Measurement and Reduction of Administrative Burdens in 13 sectors in Greece

Final Report
Fisheries

Co-financed by Greece and the European Union
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Acronyms and Abbreviations

The list below provides the abbreviations used throughout the report. All terms related to the Standard Cost Model (SCM) method are described in detail in the Greek SCM ‘Manual for the implementation of the Standard Cost Model in Greece’

AB  Administrative Burden  
AC  Administrative Cost  
AEPO  Decision of approval of environmental conditions  
BAU  Business As Usual  
CC  Consultancy Cost  
f  Frequency  
IO  Information Obligation  
NEB  Normally Efficient Business  
OOP  Out of Pocket cost  
P  Price  
PA  Priority Area (in Greek SCM also referred to as ‘Sector’)  
POAY= Areas of aquaculture managed development  
Q  Quantity  
YPEKA  Ministry of Environment, Energy and Climate Change
Executive summary

This report presents the findings from the measurement of the selected information obligations in the priority area Fisheries, together with recommendations to reduce administrative burdens.

The measurement involved interviews with businesses and experts. The information obligations selected for Fisheries form the tenth largest proportion of administrative costs and burdens in this project. They represent a total administrative cost of EUR 17.99 million. Of this, EUR 16.52 million (92%) has been classified as administrative burdens. The remainder is business-as-usual cost which businesses would be likely to continue to incur if the obligations did not exist.

The following recommendations are made as an action plan to reduce administrative costs and burdens in the selected Fisheries obligations1:

<table>
<thead>
<tr>
<th>Recommendation</th>
<th>Calculated reduction in administrative costs</th>
<th>Calculated reduction in administrative burdens</th>
</tr>
</thead>
<tbody>
<tr>
<td>Simplification of the application for an establishment licence and lease and introduction of a one-stop-shop*</td>
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<td>EUR 6 617 396</td>
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<td>EUR 3 000 673</td>
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<tr>
<td>Streamlining the modification / renewal process for aquaculture licences*</td>
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<td>EUR 3 095 904</td>
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<tr>
<td>Electronic submission of application and digitisation of the entire licensing process*</td>
<td>EUR 1 105 471</td>
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<td>Increase of the validity for the producer-seller licence*</td>
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</tr>
<tr>
<td>Reduction of documents required for a producer-seller licence*</td>
<td>EUR 1 468 350</td>
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</tr>
</tbody>
</table>

The recommendation to simplify the application for an establishment licence and lease and introduction of a one-stop-shop suggests that businesses have to deal with only one single authority during the licensing process. This authority would also gather all the information needed for the

1 In line with standard practice, the reduction calculations have been made individually for each recommendation. It is therefore not possible to add together these calculated reductions to obtain an overall total reduction because different recommendations affect the same obligations. The overall reduction obtained depends on the sequencing of recommendations. The impact of the recommendations marked * would be reduced by the other recommendations being implemented, and the impact of recommendations which are not marked would be affected similarly by prior implementation of the recommendations marked *.
licence that is already available to the public administration. This would significantly reduce the time spent on gathering documents in support of each application and dealing with multiple authorities which would also decrease irritation.

The recommendation to integrate the licence to use water resources into the environment permit would merge two licensing processes where almost identical sets of documents are requested. This would reduce the costs stemming from duplicated requirements for documentation.

The recommendation to clarify legislation in scope and development of guidelines for aquaculture businesses would lead to a thorough review of legislation in this area, its codification, standardisation of documents and administrative procedures and a development of guidelines for aquaculture businesses on the respective regulation in this sector. It would reduce the time needed to familiarise with the existing legislation and resources spent on external experts.

The recommendation to streamline the modification/renewal process for aquaculture licences would lead to a development of criteria based on which a business will need to modify its licence in case of a change of the project. It would reduce the number of cases where modification is necessary and the number of documents requested in case of the modification.

The recommendation to enable electronic submission of application and to digitalise the entire licensing process suggests developing an electronic platform for the licensing process. Documents would be submitted in the electronic form which would reduce the number of copies needed for the application.

The recommendation to increase the validity for the producer-seller licence would extend the validity period of this licence to two years and therefore reduce time fishermen and fish-farmers need to spend on renewing the licence twice a year.

The recommendation to reduce the number documents required for a producer-seller licence would abolish the requirement for applicants to submit documents that are already available to public authorities and can be obtained through internal communication. This would reduce time spent on gathering these documents and other related costs.

The implementation of recommendations in the Fisheries area should be given medium priority despite a relatively small number of concerned businesses because fisheries is a very important sector in Greece and some significant savings may be achieved for businesses (including individual entrepreneurs) and potential investors.

Different and additional options and suggestions were made by stakeholders about obligations in the priority area Fisheries. These are included to provide additional material for the Greek government to consider further measures to simplify and reduce administrative burdens and irritation.

The measurement covered the following selected obligations in the priority area Fisheries:

- Obligation to apply for an establishment licence and lease (aquaculture businesses)
- Obligation to apply for a licence to use water resources (aquaculture businesses)
- Obligation to apply for and renew a producer-seller licence (fishermen, fish farmers)
- Obligation to obtain and renew commercial fishing vessel licence
1. Introduction

1.1. Background

The Ministry of Administrative Reform and e-Government of the Hellenic Republic (“the Ministry”) and the Organisation for Economic Co-operation and Development (“the OECD”) signed a Contribution Agreement in the last quarter of 2012 for OECD to carry out this project to measure and reduce administrative burdens in 13 key sectors of the Greek economy.

The project is expected to provide independent assessment, using the Greek modification of the internationally-recognised Standard Cost Model (“SCM”), to help to identify shortcomings and unnecessary administrative burdens for business in the regulatory environment that hinder the functioning of markets, damaging long-term growth and limiting benefits to corporate and household consumers. The SCM is a method for determining the administrative costs for business imposed by regulation. The SCM breaks down regulation into a range of manageable components that can be measured. The SCM neither addresses nor questions the policy objectives of each piece of regulation. As such, the measurement and analysis focus only on the administrative activities that must be undertaken in order to comply with regulation, not on the benefits that accrue from the legislation.

Economic recovery in any country is partly hampered by the quality of the regulatory framework. In 2006, the European Commission estimated that administrative costs amounted to approximately 6.8% of Greek GDP, and that a reduction of 25% in administrative costs in Greece might yield benefits of an increase of up to 2.4% of GDP by 2025.

This report describes the situation regarding administrative costs and administrative burdens at 1 September 2013 for the Fisheries priority area. It was prepared by the OECD Secretariat in co-operation with Capgemini Consulting Netherlands and Deloitte Business Solutions SA Greece, and, for legal analysis, in co-operation with Christos Rovlias Law Office. The report gives an overview of the measurement results of the burden in the Fisheries and makes specific recommendations to reduce administrative burdens in this priority area.

1.2. Project approach

The project covers information obligation (IOs) stemming from different laws and regulations grouped into 13 Sectors or priority areas (PAs):

1. Agriculture and agricultural subsidies
2. Annual accounts/company law
3. Energy
4. Environment
5. Fisheries
6. Food safety
7. Pharmaceutical legislation
8. Public procurement
9. Statistics
10. Tax law (VAT)
11. Telecommunications
12. Tourism
13. Working environment/employment relations

The project uses the Greek Standard Cost Model (SCM) methodology as its basis and is structured in the following five phases:

1. Screening and collection of sector relevant laws and regulations
2. Qualitative scan of mapped regulations
3. Quantitative measurement of administrative burdens selected
4. Formulation of recommendations for redesigning/abolishing (parts of) laws and regulations
5. Publication and exploitation

The first phase of the project concerned the screening and selection of relevant laws and regulations by means of desk research. The result of this step was an overview of all regulations potentially causing administrative burdens in the 13 different Priority Areas.

Based on this overview, a qualitative scan of the mapped regulations was performed in order to identify the most likely burdensome and/or irritating areas. This scan, accompanied with additional meetings with key stakeholders, resulted in a selection of obligations for in-depth assessment.

The final report covers in depth stages 3 and 4: the results from the work undertaken under the quantitative measurement of administrative burdens stemming from selected laws and regulations and the formulation of recommendations to reduce administrative burdens in the Priority Area Fisheries.

More precisely this report contains:
• A description of the IOs and respective laws and regulations in measurement scope for the priority area Fisheries
• The main findings of the measurement
• Recommendations with quantified reduction proposals

This report does not include a detailed description of the methodology followed in the different stages. An analysis of the measured IOs within this priority area is in Annex 1.

The words “businesses” and “companies” are used interchangeably throughout this report. Where necessary, the term “businesses” includes sole traders and freelancers.

1.3.Methodology

The methodology used during this project is based on the ‘Manual for the implementation of the Standard Cost Model in Greece’ A short introduction to the main characteristics of the measurement approach is presented below.

The Standard Cost Model Manual (SCM) is a widely recognised method to calculate administrative burdens, which has been applied in many international projects from 2002 onwards. The model breaks down administrative costs imposed by legal acts into components that can be assessed with reasonable accuracy. The tool is characterised by the economic approach to law-making and regulation. Its aim is to identify all obligations arising from specific legislation, which render the law and procedures particularly aggravating to the functioning of the market and the economy.

The methodology neither addresses nor questions the fundamental objectives of legislation. Instead, the measurement focuses only on the administrative activities that must be undertaken in order to comply with legislation. The scope of this measurement lies within measuring the administrative costs for business to be compliant.
The SCM method during this project focuses solely on the administrative costs for businesses. Thus, administrative costs are defined as the costs incurred by businesses in meeting IOs. An IO is defined as: obligations contained in legal, regulatory or other explanatory text of the public administration and which require from the company to provide data to public authorities or third parties, or to maintain data which can be made available to public authorities or others if requested. Moreover, obligation which imposes the above but has been adopted by the daily administrative practice in public services.”

Every IO has attributes that describe:

- Content of the data required or “data requirement” (what must be provided)
- Target group (the population that must provide it)
- The frequency of the obligation (when it must be provided)

IOs can stem from either EU legislation or from nationally implemented laws and regulations. This project focuses on both IOs stemming directly from EU legislation and on those stemming from the national implementation of EU legislation.

During stage two of the project particular attention has been paid to screening and identifying of “over-implementation” (or “gold-plating”) of an EU legal act at national level, in terms of additional IOs or procedural requirements, amended frequency, or population (i.e. coverage) as this could lead to an increase in administrative costs linked to the provisions of EU legislation, as well as national measures.

The SCM method distinguishes between information that would be collected and processed by business even in the absence of the legislation and information that is solely gathered for the purpose of the legal obligation. The former are called “business-as usual” (BAU) costs, the latter administrative burdens. Together, the administrative burdens and business-as-usual costs constitute the administrative costs on businesses.

Altogether, the total administrative costs for business are assessed on the basis of the average cost of the required administrative activity (Price) multiplied by the total number of occurrences of the obligation performed per year (Quantity). The cost is estimated by multiplying a standard tariff attributed to a specific employee type (base on average labour cost per hour including pro rata overheads) by the time per action (the internal costs). Where appropriate, other types of cost such as outsourcing/consulting costs, equipment or costs of supplies that can reasonably be attributed to an information obligation are taken into account (the external costs). Furthermore, for this measurement, “additional costs” (costs posted on businesses which do not stem from laws and regulations but which are faced as part of a specific IO) are separately taken into account. The quantity is calculated as the frequency of the required activities multiplied by the number of entities concerned. This results in the following core equation of the SCM method:

\[ \sum P \times Q \]

Where

- \( P \) (Price) = Tariff \times Time
- \( Q \) (Quantity) = number of entities \times frequency.

In stage 3 of the project, interviews and expert assessments were conducted to estimate the time and other costs for businesses to comply with IOs. All results were standardised with the objective of
providing a single estimate of what would be required for a normally efficient business to complete each of the administrative activities in order to comply with the IO. Information on the quantity was gathered by public servants from government sources and desk research. If no Q was available or further work seemed necessary, an informed estimate was made by Capgemini Consulting Netherlands and Deloitte Business Solutions SA Greece.

It should be emphasised that the goal of the standardisation is not to average the cost data obtained through the interviews and/or expert assessments but to derive a plausible result for a normally efficient business for each IO. The SCM method defines a normally efficient business as a business within the target group that performs administrative activities required by the IO neither better nor worse than may be reasonably expected.
2. Introduction to priority area and overview of measurement results

2.1. Selection of IOs and respective laws and regulations

The table below provides the selection of IOs and the respective national laws and regulations and the relevant EU legislation which were identified and examined during the previous stages of the project and in which the selected IOs within the priority area Public Procurement are contained and/or in which they have a legal base.

Table 2.1: Regulatory framework

<table>
<thead>
<tr>
<th>Information Obligation</th>
<th>Legislation in scope</th>
</tr>
</thead>
<tbody>
<tr>
<td>IO 25: Obligation to apply for an establishment licence and lease (aquaculture businesses)</td>
<td>Primary national legislation:</td>
</tr>
<tr>
<td></td>
<td>Law 3199/2003 Protection &amp; Management of Water Resources</td>
</tr>
<tr>
<td></td>
<td>Law 3208/2003 Protection of forest ecosystems, compilation of forestry and their amendments</td>
</tr>
<tr>
<td></td>
<td>Law 1845/1989 Development of Agricultural Research and other provisions (Article 32)</td>
</tr>
<tr>
<td></td>
<td>Law 4014/2011 Environmental permits for projects and activities, regulation of illegitimate construction for the creation of environmental balance and other provisions of YPEKA competence, as amended by Laws 4042/2012, 4262/2012 and 4156/2013</td>
</tr>
<tr>
<td></td>
<td>See also:</td>
</tr>
<tr>
<td></td>
<td>Draft Law on the development of aquaculture published for public consultation on 14 February 2014</td>
</tr>
<tr>
<td></td>
<td>Draft framework law on simplification of business licensing published for consultation on 18 February 2014</td>
</tr>
<tr>
<td></td>
<td>Secondary national legislation:</td>
</tr>
<tr>
<td></td>
<td>Royal Decree 142/1971 Fishing in aquatic zones in lakes and rivers and protection of the same</td>
</tr>
<tr>
<td></td>
<td>Joint Ministerial Decision 31722/4-11-2011 – Approval of Special Framework on Planning and Sustainable Development on aquaculture and of its Strategic Environmental Impact Study</td>
</tr>
<tr>
<td>Information Obligation</td>
<td>Legislation in scope</td>
</tr>
<tr>
<td>------------------------</td>
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<tr>
<td>Ministerial Decision No. 9232.1/1-11-11 Clarifying the implementation of the Law 3208/2003, Article 19 paragraph 11, issue hiring decisions marine areas to the installation of aquaculture</td>
<td></td>
</tr>
<tr>
<td>Joint Ministerial Decision 50129/1392/10-09-2013 – Standard Environmental Commitments for Projects and Activities of Category B of Group 8 “Aquaculture” of Annex VIII of the Ministerial Decision 1958/2012 (B 21) as in force and particularly for the projects and activities under Nos. 1, 2, 3, 4, 5 and 6.</td>
<td></td>
</tr>
</tbody>
</table>

**Circulars:**

Circular No. 9231.2/29-03-11 Process of licensing of Fish-farming units

Circular No. 9230.4/18-07-11 Process of licensing of Fish-farming units

Circular No. 9243.6/1-07-11 Renewal of lease of water surfaces for the continuance of breeding of aqua species and renewal of licensing of Fish-farming units

Circular No. 869/53171/26-04-2013 – Clarification and information on the Joint Circular on the implementation of the Special Framework on Planning and Sustainable Development

Circular No. 445/28247/5-3-2013 Process of licensing of Fish-farming units

Joint Circular No. 822/50278/22-04-2013 - Implementation of the Special Framework on Planning and Sustainable Development

Joint Circular No. 121570/1866/12-06-2009 Regulation of issues on aquaculture units
<table>
<thead>
<tr>
<th>Information Obligation</th>
<th>Legislation in scope</th>
</tr>
</thead>
</table>
| **IO 26: Obligation to apply for a licence to use water resources (aquaculture businesses)** | **EU legislation:**  
Communication from the Commission to the Council, the European Parliament, the European Economic and Social Committee and the Committee of the Regions - Strategic Guidelines for the sustainable development of EU aquaculture COM/2013/0229 final  
**EU Guidelines**  
COM(2013) 229 final “Strategic Guidelines for the sustainable development of EU aquaculture” |
| **Primary national legislation:** |  
Law 3199/2003 Protection & Management of Water Resources  
Law 4014/2011 Environmental permits for projects and activities, regulation of illegitimate construction for the creation of environmental balance and other provisions of YPEKA competence, as amended by Laws 4042/2012, 4262/2012 and 4156/2013 |
### Information Obligation

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</tr>
<tr>
<td><strong>Secondary national legislation:</strong></td>
</tr>
<tr>
<td>Joint Ministerial Decision 43504/2005 Category of licences for the water use and fulfilment works for their exploitation</td>
</tr>
<tr>
<td>Joint Ministerial Decision 150559/10-06-2011 Procedures, terms and conditions for the authorisation of existing rights to use water resources, as amended by JMD 110424/11-04-2012</td>
</tr>
<tr>
<td>Ministerial Decision 1958/2012 – Allocation of public and private projects and activities in categories and sub-categories pursuant to Article 1 paragraph 4 of Law 4014/2011.</td>
</tr>
<tr>
<td>Joint Ministerial Decision 50129/1392/10-09-2013 – Standard Environmental Commitments for Projects and Activities of Category B of Group 8 “Aquaculture” of Annex VIII of the Ministerial Decision 1958/2012 (B 21) as in force and particularly for the projects and activities under Nos. 1, 2, 3, 4, 5 and 6.</td>
</tr>
<tr>
<td><strong>EU legislation:</strong></td>
</tr>
<tr>
<td>Information Obligation</td>
</tr>
<tr>
<td>------------------------</td>
</tr>
<tr>
<td>EU Guidelines</td>
</tr>
<tr>
<td>COM(2013) 229 final “Strategic Guidelines for the sustainable development of EU aquaculture”</td>
</tr>
</tbody>
</table>

**IO 27: Obligations to apply for a producer-seller licence (fishermen/fish-farmers)/renewals**

**Primary national legislation:**

- Law 2323/1995 Open commerce and other provisions, as amended by Law 3377/2005

- Draft Law submitted to Parliament in February 2014 on Administrative Simplifications and other provisions

**Secondary national legislation:**


- Presidential Decree 51/2006 Terms and Conditions Regarding the Operation of Public Markets

- Presidential Decree 254/2005 Regulation of open commerce (wandering and stagnant)

**Circulars:**

- Circular No 480/30129/15-4-2013 Certificate for
<table>
<thead>
<tr>
<th>Information Obligation</th>
<th>Legislation in scope</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>producer-seller licence to natural persons (fishermen/fish-farmers)</td>
</tr>
<tr>
<td></td>
<td>Circular No 269/28399/6-3-2013 Certificate for producer-seller licence to fishermen</td>
</tr>
<tr>
<td><strong>IO 28: Obligation to obtain and renew commercial fishing vessel licence</strong></td>
<td><strong>Secondary national legislation:</strong></td>
</tr>
<tr>
<td></td>
<td>Presidential Decree 261/1991 Conditions for granting commercial fishing vessel licenses</td>
</tr>
<tr>
<td></td>
<td>Royal Decree 666/1966 Fishing vessels licences</td>
</tr>
<tr>
<td></td>
<td>Code of Public Maritime Law (ML 187/73 article 76)</td>
</tr>
<tr>
<td></td>
<td>Ministerial Decision 2240/31541/13.03.2013 – Granting new commercial fishing vessel licence</td>
</tr>
<tr>
<td></td>
<td><strong>Circulars:</strong></td>
</tr>
<tr>
<td></td>
<td>Circular M-2131.5.1/01/2010 of the competent Hellenic Coast Guard authority</td>
</tr>
<tr>
<td></td>
<td>Circular No. 179284/7.1.2010 on the requisite certificates from the fishing unions</td>
</tr>
<tr>
<td></td>
<td>Circular No. 260115/7-12-1999 Fishing vessel licenses in lakes and rivers</td>
</tr>
<tr>
<td></td>
<td><strong>EU legislation:</strong></td>
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<td></td>
<td>Communication from the Commission to the Council, the European Parliament, the European Economic and Social Committee and the Committee of the Regions - Guidelines for an integrated approach to maritime policy: towards best practice in integrated maritime governance and stakeholder consultation COM/2008/0395 final</td>
</tr>
</tbody>
</table>
2.2. High level measurement results

The total administrative cost for Priority Area Fisheries is **EUR 17.99 million**. The total administrative burdens measured in this priority area are **EUR 16.52 million**, which is 92% of the administrative cost.

The pie chart below provides the high-level findings of the measurement. It contains the administrative cost per information obligation within this priority area.

**Figure 2.1: Total identified Administrative Cost for the priority area**

The most burdensome IOs within this Priority Area are the IOs 25 and 26, related to aquaculture businesses. They account together for 76.5% of the total administrative costs for the PA Fisheries, due to particularly burdensome activities that are related to aquaculture establishments.

The remaining two IOs are less burdensome, accounting respectively for 19.59% and 3.92% of the measured administrative costs.

The Information Obligations, as well as the laws and regulations in concern are diversified enough to cover a variety of costs within this Priority Area. They do differ in terms of benefit for society, governance structure and/or target group. Comparing several IOs in terms of administrative cost therefore creates a picture that must be interpreted with considerable caution. The figure above presents the share of administrative cost per IO as part of the total administrative cost in the Priority Area Fisheries. The unit of comparison in the figure is total administrative cost.

Furthermore, this measurement covers only a selection of all legislation relevant to the Priority Area. Therefore, additional administrative cost and burden exist that has not been covered by the measurement. A detailed description of the origin, process and measurement results of the IOs is presented in the Annex 1.
3. **Action Plan and Recommendations for Priority Area Fisheries**

This chapter describes the consideration of alternatives to the current situation for the IOs measured. It makes and quantifies recommendations to simplify the current situation and reduce administrative burdens. It also describes the suggested sequencing and prioritisation of the reduction proposals and suggested ways to facilitate their implementation. The recommendations are explained in detail and quantified on the basis of previous experiences and expert assessments.

The recommendations to reduce administrative burdens and costs in the priority area Fisheries are calculated to reduce administrative costs and burdens by the following amounts:

<table>
<thead>
<tr>
<th>Recommendation</th>
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<td>Reduction of documents required for a producer-seller licence*</td>
<td>EUR 1 468 350</td>
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</table>

Note that adding together the individual reduction calculations for each recommendation gives an understanding of the magnitude of the potential reduction, rather than an exact figure. In line with standard practice, the reductions are calculated separately for each recommendation based on the costs as measured for this project. The impact of the recommendations marked * would be reduced by the other recommendations being implemented in advance, and the impact recommendations which are not marked would be affected similarly by prior implementation of the unmarked recommendations.

3.1. **Identification of potential simplification and reduction options**
During stage 4 of the project, potential simplification and reduction options were identified as appropriate from the views of businesses expressed during the measurement stage, stakeholder views, experience of other administrative burden reduction exercises, and the views of the teams of Greek public servants involved in the project.

Potential simplification and reduction options were developed by Greek public servants on the basis of a structured questionnaire developed by the OECD using the “IO Burden Reduction Pyramid” which was developed by the Capgemini, Deloitte and Ramboll consortium as part of the EU project on baseline measurement and reduction of administrative costs in 2009-10. The questionnaire asked public servants to respond to the following prompts, in order, about each IO measured:

1. What is the policy goal of the IO?

2. Option A: Remove completely this IO in order to reduce administrative burdens (arguments in favour, arguments against, conclusion)

3. Option B: Redesign public administration processes in this IO to reduce administrative burdens (identify opportunities for public administration to act in a less burdensome way, and conclude which appear most suitable)

4. Option C: Target the IO more precisely to the policy goal (identify less burdensome ways to meet the policy goal identified, and conclude which appear most suitable)

5. Option D: Make the IO as flexible as possible for business (identify ways to make complying with the IO more flexible for business, and conclude which appear most suitable)

6. Option E: Reduce the variables in the SCM equation: Population, frequency, time and tariff (identify possible changes to each of the four variables, and conclude which appear most suitable)

This provided a structured way to consider larger reforms ahead of smaller reforms, and ensured that attention was not only on small changes to the variables of the SCM equation.

3.2. Recommendations for the priority area Fisheries

Certain measures from the potential simplification and reduction measures were examined further in order to develop a compatible set of recommendations for the project which could form a coherent action plan for administrative burden reduction for the project. The potential measures which have been developed into recommendations are those which appear to have the potential to make meaningful reductions to administrative burdens or irritation factors, and which appear to be compatible with the overall policy goals of the obligations.

The recommendations are presented individually in the remainder of this section. The background to each recommendation is described, as well as the current situation as presented to the project and the desired future situation which would happen if the recommendation was implemented. A list of the relevant parts of legislation and regulation which would need to be considered for amendment is also provided. This is based on the project team’s assessment of the original legal mapping done by the Greek public servants in Stage 1 of the project, and also on additional legal analysis in order to identify relevant provisions and compatibility with EU law. Finally, an assessment is made of the likely reduction in administrative burdens which would result from the implementation of each recommendation.
As is common practice in administrative burdens exercises, the reduction in administrative burdens for each recommendation is provided independently, i.e. the reduction is calculated on the basis of the implementation of each recommendation from the current situation, and no account is taken of the combined effect of recommendations. This means that the total reduction in administrative burdens which would be achieved by implementing all recommendations cannot be calculated by simply adding together the reductions for each recommendation; further analysis would be required once it was clear which recommendations would be implemented.

3.2.1. Simplification of the application for an establishment licence and lease and introduction of a one-stop-shop

Summary of recommendation

The implementation of this recommendation is calculated to reduce both administrative burdens and costs by EUR 577 971 on a stand-alone basis.

The recommendation involves setting up of one-stop-shops in every decentralized local administration, which will be confined to the coordinating role among different authorities involved in the licensing process and gathering already available information from different administrative authorities (e.g. YPEKA), effectively and efficiently facilitating the decision process as a whole.

The introduction of the above one-stop-shop eliminates the need to submit certain documents as part of the application, such as the list of previous permits and the history of the establishment and its status, as this information is already available to public authorities.

IOs affected

This recommendation reduces administrative costs primarily for the following Information Obligations:

IO 25: Obligation to apply for an establishment licence and lease (aquaculture businesses)

Background and rationale

Obtaining the establishment licence and lease is a crucial process for an aquaculture business to actually start up its activities; from the initial lease to the licensing of the establishment, it sets the general grounds and conditions for building and operating an aquaculture unit at sea and on land.

There are numerous authorities involved in the process of obtaining an establishment licence and lease for aquaculture businesses. Actually, fish farmers need to apply for a licence several times (for a concession, environmental licence, approval application to the prefecture, etc.).

The technical file as such is submitted to 10 to 14 different Administrations. Among the main ones, are:

- The Ministry of Maritime Affairs
- The Ministry of Agricultural Development (forestry, fisheries, and veterinary departments)
- Ministry of Development
- Ministry of Culture (Tourism and archaeological departments)
- Ministry of Environment
- Local authorities: Municipalities (only consultative)
Although an internal coordination procedure is foreseen and conducted, each decision is taken separately, and each administration has to give a positive opinion for obtaining an approval.

This creates significant burdens for businesses applying for such licence as they need to provide necessary documents to several institutions, mostly in hard copies. There is a lack of internal communication inside the administration caused partially by the fragmented legislation, partially by the lack of IT equipment that would make this communication more efficient.

A great majority of fish farmers that were interviewed had to bear additional costs for travelling, usually far away from their areas so as to meet with the experts and with officers at the Prefecture for the signing of the leasing agreements, but also with the various public authorities in order to accelerate the decision process.

Having just a single window where an applicant would provide all the necessary documents and apply for the establishment licence and lease would reduce the need to follow up with various authorities to speed up the process.

The recommendation involves setting up of a one-stop-shop in every decentralized local administration, which will assume the coordinating role among different authorities involved in the decision-making process and gather already available information from different administrative authorities (e.g. YPEKA), effectively and efficiently facilitating the decision process end to end.

The introduction of the above one-stop-shop eliminates the need for certain parts of the application, such as the list of previous permits and the history of the establishment and its statuses, as this information is already available among authorities.

The recommendation also includes the reduction of the number of copies to be submitted from 10-14 paper copies (and CD) to one and internal distribution by electronic means (CD only) to the remaining recipients.

The digitisation of the licensing process would further speed it up and also introduce incentives for public authorities to respect the timelines set for decisions defined by the law and therefore reduce the irritation costs that are not measured as part of this project. Implementation of a single information system would also improve communication among public administration authorities.

**Description of current situation**

Currently, aquaculture businesses need to submit in 10 to 14 copies of the application for pre-approval on the establishment licence and lease.

The technical file associated to it contains documents related the entire history and permits that the establishment had been given.

**Description of desired situation**

Aquaculture businesses submit a single copy (and a CD) of the application and internal distribution is made by electronic means.

The information needed on entire history and permits that the establishment had been given is gathered by the one-stop-shop through paper or electronic means.

**Legislation to be examined**
On the basis of an assessment of the current situation and the legislation in scope identified in the previous stages of the project, in order for the recommendation to be implemented there needs to be a review and/or amendment of the following national legislation and circulars taking into account the existing obligations of EU law in this priority area:

National legislation

- Law 3199/2003, Article 11 par. 2 (on licensing of use of water)
- Law 3208/2003, Article 19 par. 11 (on the lease of water surfaces for aquaculture purposes)
- Law 1845/1989, Article 32 par. 7.c and 7.d (on amendments to provisions on the development of livestock, fishery etc.)
- Law 4014/2011, Articles 2, 3, 4, 8 (on environmental licensing)
- Presidential Decree 28/2009, Article 4 (on licensing of Fish-farming businesses)
- Ministerial decision 43504/2005 ‘Category of licences for the water use and fulfilment works for their exploitation’, Articles 1, 2, 3
- Joint Ministerial Decision 50129/1392/10-09-2013, Articles 4 and 5 on Environmental Commitments for Projects and Activities of Category B of Group 8 “Aquaculture”
- Ministerial Decision No. 9232.1/1-11-11 Clarifying the implementation of the Law 3208/2003, Article 19 paragraph 11 (on issuance of rental decisions of marine areas for installation of aquaculture)
- Circular No. 9231.2/29-03-11 Process of licensing of Fish-farming units
- Circular No. 9230.4/18-07-11 Process of licensing of Fish-farming units
- Joint Circular No. 121570/1866/12-06-2009 Regulation of issues on aquaculture units, Annex A

See also: Draft Law on Aquaculture Development published for public consultations on 14 February 2014, Article 2 (‘National Programme for the Development of Aquaculture’) par. 3(d), Article 4 (‘Concession of public water surfaces for aquaculture purposes’), Article 22 (‘Grant of licenses for the establishment and operation of fish-farming units’), Article 25 (‘Process for the issue of licenses to floating fish-farming units’), Article 26 (‘Process for the issue of licenses to land fish-farming units’)

EU legislation which sets relevant obligations in this area (references are to consolidated versions)

- Council Directive 2006/88/EC of 24 October 2006 on animal health requirements for aquaculture animals and products thereof, and on the prevention and control of certain diseases in aquatic animals, Article 4
- Directive 2000/60/EC of the European Parliament and of the Council of 23 October 2000 establishing a framework for Community action in the field of water policy, as in force, Article 8, Article 11 par. 3(e) and (i) and par. 5

See also, COM(2013) 229 final “Strategic Guidelines for the sustainable development of EU aquaculture”

Assessment of impact on administrative costs and burdens

This measure will allow a significant reduction of the time spent on gathering the documents in support of each application by 480 minutes, on meeting with the expert by 240 minutes, as well as on consultancy costs by 10%, representing the additional administrative costs incurred for the creation and photocopies of the application file usually made by their expert.
On this basis, the reductions in both administrative burdens and costs for this recommendation have been calculated as a reduction of EUR 577 971.

<table>
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<th>Total for this recommendation</th>
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of which:

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<tr>
<td><strong>Measurement results:</strong></td>
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<tr>
<td>P (sum segments) = EUR 5 662.94</td>
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<tr>
<td>f= 1</td>
</tr>
<tr>
<td>Q= 1 055</td>
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<tr>
<td>BAU= 5%</td>
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</table>
3.2.2. Integration of the licence to use water resources into the environment permit

Summary of recommendation

The implementation of this recommendation is calculated to reduce administrative burdens by EUR 6,617,396 and administrative costs by EUR 7,257,672 on a stand-alone basis.

This recommendation includes abolition of the licence to use water resources as similar documents are being requested for the environmental licence (AEPO). Any additional requirements will be included in the application for the environmental permit.

The recommendation would reduce the costs stemming from duplication of requirements for documentation without undermining the policy goal of the respective regulation.

IOs affected

This recommendation reduces administrative costs primarily for the following Information Obligations:

IO 26: Obligation to apply for a licence to use water resources (aquaculture businesses)

Background and rationale

The application for a licence to use water resources requires a series of documents and studies – such as topographic diagrams, proof of land, and the technical study - which are to a great extent similar to those required to obtain an environment permit and thus duplicate the time and costs spent to comply. Although some additional requirements exist (e.g. the conduction of hydrologic, chemical and microbiological studies of the water), most of them can be submitted as part of the application for environmental permits.

Currently, both the licence to use water resources and environmental permits (AEPO) are needed to proceed to the establishment licence for the aquaculture business. The integration of the licence into the environmental permit will reduce intermediate approval delays, while it will retain the requirements for the conduction of specialized analyses of the water (hydrologic, chemical and microbiological) at the current standardized cost of EUR 500 (within the environmental permit application).

Work has already started between the respective ministries on integration of these two licenses into the environmental licence. The introduction of the Digital Environmental Registry as foreseen by the Government in late 2014 will further speed up the environmental licensing process (see the report on the Environment priority area).

In integrating these two licences, the EU standards set by the respective EU legislation must be met.

Description of current situation

Currently, aquaculture businesses are duplicating efforts and resources to obtain an environment permit and a licence to use water resources, in order to obtain an establishment licence for conducting their operations. As a result, they gather similar information and hire an expert to conduct studies and to submit their applications.
Description of desired situation

There is no need to apply for licence to use water resources. Aquaculture businesses will be required to submit, along with and for the environment permit to be granted, hydrologic, chemical and microbiological analyses of the water.

Legislation to be examined

On the basis of an assessment of the current situation and the legislation in scope identified in the previous stages of the project, in order for the recommendation to be implemented there needs to be a review and/or amendment of the following national legislation taking into account the existing obligations of EU law in this priority area:

National legislation

- Law 3199/2003, Article 11 (on licensing of use of water)
- Ministerial decision 43504/2005 ‘Category of licences for the water use and fulfilment works for their exploitation’, Articles 1, 2, 3
- Joint Ministerial Decision 150559/10-06-2011 ‘Procedures, terms and conditions for the authorisation of existing rights to use water resources’, as in force - Article 4 par. 2

See also: Draft Law on Aquaculture Development published for public consultation on 14 February 2014, Article 22 (‘Grant of licenses for the establishment and operation of fish-farming units’) par. 2b.

EU legislation which sets relevant obligations in this area (references are to consolidated versions)

- Directive 2000/60/EC of the European Parliament and of the Council of 23 October 2000 establishing a framework for Community action in the field of water policy, as in force, Article 8, Article 11 par. 3(e) and (i) and par. 5

See also, COM(2013) 229 final “Strategic Guidelines for the sustainable development of EU aquaculture”

Assessment of impact on administrative costs and burdens

The reduction of time related to this IO is 100%, as the majority of the activities to gathering information and meeting the expert are conducted in the process of applying for the environment permit.

On this basis, the reductions in administrative burdens and costs for this recommendation have been calculated as a reduction of EUR 6 617 396 in administrative burdens and a reduction of EUR 7 257 672 in administrative costs.
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<th>Reduction potential:</th>
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<td>AC=EUR 7 785 172.05</td>
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of which:

**IO 26: Obligation to apply for a licence to use water resources (aquaculture businesses)**

<table>
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<tr>
<th>Measurement results:</th>
<th>Estimated future figures:</th>
<th>Potential reduction: Reduction of 100% (of IO 26)</th>
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</table>
3.2.3. Clarification of the legislation in scope and development of guidelines for aquaculture businesses

Summary of recommendation

The implementation of this recommendation is calculated to reduce both administrative burdens and costs by EUR 3 000 673 on a stand-alone basis.

This recommendation aims at codifying and standardising the legislation in scope for aquaculture businesses in order to effectively facilitate the development of guidelines for the aquaculture industry.

This measure would considerably reduce the time actually spent on familiarising with these information obligations and on gathering the adequate information with hired experts. It will also reduce the time spent on the application follow-up and on inspections.

IOs affected

This recommendation reduces administrative costs primarily for the following Information Obligations:

IO 25: Obligation to apply for an establishment licence and lease (aquaculture businesses)

IO 26: Obligation to apply for a licence to use water resources (aquaculture businesses)

Background and rationale

As stated during the interviews, aquaculture businesses went rapidly from the absence of a legislative framework to an unstable, constantly changing and complex one, which has created high levels of confusion among administrations and for the businesses.

The vagueness of the existing legislation with regards to the establishment licence and the licence to use water resources often leads to different interpretations from consulted authorities, requiring additional documentation from applicants (within the initial application or upon control – such as additional tests and studies on water and fishing resources, duplication of controls and inspections from different public administrations, especially from local authorities which have a consultative yet influencing role), resulting in delays for the commencement of operations. Additionally, specific requests from local authorities, which have a consultative role, often lead to back-and-forth meetings to reach a positive decision.

Furthermore, fish farmers seek additional assistance (with the according costs) from external experts in order to better understand the legislation, and even to provide it to administrations.

This recommendation aims at codifying and standardizing the legislation in scope for aquaculture businesses in order to effectively facilitate the development of guidelines for the aquaculture industry. As such, it would:

- define further the scope of control from the different authorities and remove duplication of responsibilities (e.g. between pre–approval for the establishment licensing / leasing and the environmental permitting)
- introduce binding timeframes for taking decisions.
- standardise the data requirements for the approval from each authority,

As a result, industry guidelines and specific case studies should be developed to support the changes and steer the aquaculture business through its application.
At the moment, the Government is already working on codification of legislation that concerns the aquaculture sector. In addition, guiding material has been prepared for different kinds of aquaculture companies in a form of 2–3 page flyers. However, this is provided to the companies only on their request. Further dissemination of this guidance would be advisable, for example using the website of the Ministry.

In addition, better co-ordination of inspection as recommended in the OECD Best Practice Guidance on Regulatory Enforcement and Inspections, would reduce time businesses have to spent co-operating with various inspections and considerably reduce irritation stemming from multiplicity of inspections of the same business.

Description of current situation

Currently, applications for the establishment licence and for the licence to use water resources are completed by the applicants with their experts, according to their interpretation of the legal requirements, usually leading to increased gathering to safeguard the approval process.

Additional requests are also made from the relevant authorities due to different interpretations of the legal requirements.

Duplicate inspections from authorities lead to time delays for both applicants and public administration.

Description of desired situation

Legislation provides standardised requirements for the application.

Specific guides are developed and made accessible to drive the application and approval process, effectively reducing familiarization time and delays.

Legislation to be examined

On the basis of an assessment of the current situation and the legislation in scope identified in the previous stages of the project, in order for the recommendation to be implemented there needs to be a review and/or amendment of the following national secondary legislation and circulars taking into account the existing obligations of EU law in this priority area:

National legislation

- Ministerial decision 43504/2005 ‘Category of licences for the water use and fulfilment works for their exploitation’, Articles 1, 2, 3
- Joint Ministerial Decision 150559/10-06-2011 ‘Procedures, terms and conditions for the licensing of existing rights to use water resources’, as in force, Article 4 par. 2
- Joint Ministerial Decision 50129/1392/10-09-2013 Environmental Commitments for Projects and Activities of Category B of Group 8 “Aquaculture”, Annex A
- Ministerial Decision No. 9232.1/1-11-11 Clarifying the implementation of the Law 3208/2003, Article 19 paragraph 11 (on issuance of rental decisions of marine areas for installation of aquaculture)
- Circular No. 9231.2/29-03-11 Process of licensing of Fish-farming units
- Circular No. 9230.4/18-07-11 Process of licensing of Fish-farming units
- Joint Circular No. 121570/1866/12-06-2009 Regulation of issues on aquaculture units

EU legislation which sets relevant obligations in this area
(references are to consolidated versions)

- Council Directive 2006/88/EC of 24 October 2006 on animal health requirements for aquaculture animals and products thereof, and on the prevention and control of certain diseases in aquatic animals, Article 4
- Directive 2000/60/EC of the European Parliament and of the Council of 23 October 2000 establishing a framework for Community action in the field of water policy, as in force, Article 8, Article 11 par. 3(e) and (i) and par. 5

See also COM (2013) 229 final “Strategic Guidelines for the sustainable development of EU aquaculture”

Assessment of impact on administrative costs and burdens

This measure would considerably reduce the time actually spent on familiarising with these information obligations and on gathering the adequate information with external experts, since it will allow the fish farmer to understand the different steps of the process for obtaining the licences as well as the data requirements that are related to them. It will also reduce the time spent on the application follow-up and on inspections as the decision process will be conducted in a more coordinated manner from authorities.

It is estimated that the reduction time will be of 16 hours (2 days) throughout the conducted activities, by an increase of efficiency through each step that is undertaken. More specifically, it is expected that the time for familiarization, gathering of information and facilitation of inspections will be reduced by more than 8 hours, with external meetings and submission times reduced by another 8 hours.

Consulting and out-of-pocket costs are also expected to be reduced by 20%, consequent to an increased efficiency in the application process, leading to seeking less expert guidance.

On this basis, the reductions in both administrative burdens and costs for this recommendation have been calculated as a reduction of EUR 3 000 673.

In case of abolishing the licence to use water resources as recommended as part of recommendation 3.2.2, IO26 would not exist, there would be no cost connected to complying with this IO and therefore the 10% savings stemming from this simplification of IO26 would not take effect (in fact, savings would be 100%).

<table>
<thead>
<tr>
<th>Measured relevant IOs:</th>
<th>Estimated future figures:</th>
<th>Reduction potential:</th>
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<tr>
<th>IO 25: Obligation to apply for an establishment licence and lease (aquaculture businesses)</th>
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<tr>
<td><strong>Measurement results:</strong></td>
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<td>$P$ (sum segments) = EUR 5 662.94</td>
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<td>$AB=EUR 6 617 396.24$</td>
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<td>$AC=EUR 7 785 172.05$</td>
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3.2.4. **Streamlining of the modification / renewal process for aquaculture licences**

**Summary of recommendation**

The implementation of this recommendation is calculated to reduce both administrative burdens and administrative costs by EUR 3 095 904 on a stand-alone basis.

The proposition includes the development of criteria (e.g. thresholds) that will determine whether there is a need to modify the existing licence. These criteria can be determined within the initial licence and can be related to the AEPO. These criteria should be linked with specific outputs and not create a closed list of permitted variations within the licence. Similarly, it is suggested that a simple declaration should be sufficient for a licence renewal in case of no changes.

The recommendation also includes the introduction of a clear valid period (e.g. AEPO period – 10 years) that will be applicable to all the underlying licenses.

**IOs affected**

This recommendation reduces administrative costs primarily for the following Information Obligations:

- IO 25: Obligation to apply for an establishment licence and lease (aquaculture businesses)
- IO 26: Obligation to apply for a licence to use water resources (aquaculture businesses)

**Background and rationale**

The recommendation assumes that the licence to use water resources will be abolished and merged with the environmental licence (AEPO) - see recommendation 3.2.2.

The purpose of a renewal of the AEPO licence is to ensure that during the operation of the project the environmental impact does not change. Holders of the licenses need to submit all necessary documents to the competent authorities. The folder is then submitted to the proper competent authority. The renewal process often takes significant time and effort, even if this concerns minor changes in the operations of the establishment.

If existing projects are modernised, expanded, improved or modified, the holders of environmental licenses are obliged to prepare a folder for the modification of the AEPO, submit it to the competent authority and wait for a decision whether the changes are substantive and therefore a new licence is needed. The criteria on what is a substantive change are not defined by the law.

The process and documents required for these renewals are exactly the same as in the case of new licenses, which is perceived as very burdensome.

It is suggested that a clear criteria for when a licence needs to be modified are clearly set and part of the original licence. Where there are significant changes to the project (e.g. breeding of new species, a significant increase of the capacity) which would cause a significant change of potential environmental impacts, the applicant would still need to ask for a modification of the licence. Nevertheless, the applicant would not to go again through the whole licensing process but would only provide documents concerning the change of the project.

In the case of a renewal without substantial changes of the project, a simple notification and declaration of compliance with the original terms would be sufficient. Severe penalties would be defined by the legislation in case of non-compliance.
Also, a fish farming unit requires different sets of permits as prerequisites to the establishment licence and lease (which is valid for ten years, unless the permits are due before). The time frames of these individual permits vary from one permit to another, effectively shortening the overall licensing period and creating additional costs for ensuring compliance. This happens in cases when one licence is awarded with a delay after another. This issue should be solved through merging of different licenses into one AEPO licence.

This recommendation includes the introduction of a clear valid period (e.g. AEPO period) that will be applicable to all the underlying licenses.

In case of abolishing the licence to use water resources as recommended as part of recommendation 3.2.2, IO26 would cease to exist, there would be no cost connected to complying with this IO and therefore the 10% savings stemming from simplification of IO26 would not take effect (in fact, the savings would be 100%).

**Description of current situation**

Currently, the aquaculture business that has to modify / renew its licences is required to submit an entire application and conduct all related activities, even if only minor changes have occurred throughout the licence period.

**Description of desired situation**

A fish farming unit where no major changes to its production and/or its establishment occur would not need to submit an entire application but only supporting documents for the renewal of its licences; in this case, the application would only involve a solemn declaration, verifying compliance in relation to the original terms.

**Legislation to be examined**

On the basis of an assessment of the current situation and the legislation in scope identified in the previous stages of the project, in order for the recommendation to be implemented there needs to be a review and/or amendment of the following national legislation and circulars taking into account the existing obligations of EU law in this priority area:

- Law 1845/1989, Article 32 par. 7.b (on amendments to provisions on the development of livestock, fishery etc.)
- Law 4014/2011, Article 5 (on the procedure for the renewal of AEPO)
- Ministerial decision 43504/2005 ‘Category of licences for the water use and fulfilment works for their exploitation’, Articles 1, 2, 3
- Joint Ministerial Decision 150559/10-06-2011 ‘Procedures, terms and conditions for the licensing of existing rights to use water resources’, as in force (Article 4)
- Circular No. 9243.6/1-07-11 Renewal of lease of water surfaces for the continuance of breeding of aqua species and renewal of licensing of Fish-farming units
EU legislation which sets relevant obligations in this area
(references are to consolidated versions)

- Council Directive 2006/88/EC of 24 October 2006 on animal health requirements for aquaculture animals and products thereof, and on the prevention and control of certain diseases in aquatic animals, Article 4

- Directive 2000/60/EC of the European Parliament and of the Council of 23 October 2000 establishing a framework for Community action in the field of water policy, as in force, Article 8, Article 11 par. 3(e) and (i) and par. 5


See also, COM (2013) 229 final “Strategic Guidelines for the sustainable development of EU aquaculture”

Assessment of impact on administrative costs and burdens

Taking into account the changing parameters of an establishment over an AEPO period and the fact that the majority of the current applications concern modifications or renewals of previously obtained licences, this reduction proposal targets a population of approx. 30% of the applicants. For this population, it is assumed that half of them would not need to proceed to renewal arising from modification (below threshold) and that for the remaining half it will reduce the time spent throughout the various steps of the application by 50%, as it would simplify the entire application resubmission and diminish the external costs (consultancy and out-of-pocket related to travel costs) by 50%.

On this basis, the reductions in both administrative burdens and costs for this recommendation have been calculated as a reduction of EUR 3 095 904.

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<tr>
<td>Measured relevant IOs: AB=EUR 12 293 077.86 AC=EUR 13 759 573.75</td>
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of which:
**IO 25: Obligation to apply for an establishment licence and lease (aquaculture businesses)**

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<th>Measurement results:</th>
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<tr>
<td><strong>f= 1</strong></td>
<td><strong>f= 1</strong></td>
<td></td>
</tr>
<tr>
<td><strong>Q= 1 055</strong></td>
<td><strong>Q= 897</strong></td>
<td></td>
</tr>
<tr>
<td><strong>BAU= 5%</strong></td>
<td><strong>BAU= 6.45%</strong></td>
<td></td>
</tr>
<tr>
<td><strong>AB=EUR 5 675 681.62</strong></td>
<td><strong>AB=EUR 4 331 441.23</strong></td>
<td></td>
</tr>
<tr>
<td><strong>AC=EUR 5 974 401.70</strong></td>
<td><strong>AC=EUR 4 630 161.32</strong></td>
<td></td>
</tr>
</tbody>
</table>

**Estimated future figures:**

- **P = EUR 5 163.27**
- **f= 1**
- **Q= 897**
- **BAU= 6.45%**
- **AB=EUR 4 331 441.23**
- **AC=EUR 4 630 161.32**

**Potential reduction:**

- Reduction of EUR 1 344 240.38 AB
- EUR 1 344 240.38 AC

**IO 26: Obligation to apply for a licence to use water resources (aquaculture businesses)**

<table>
<thead>
<tr>
<th>Measurement results:</th>
<th>Estimated future figures:</th>
<th>Potential reduction:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>P (sum segments)</strong> = EUR 7 379.31</td>
<td><strong>P = EUR 6 728.19</strong></td>
<td>Reduction of 24% (of IO 25)</td>
</tr>
<tr>
<td><strong>f= 1</strong></td>
<td><strong>f= 1</strong></td>
<td></td>
</tr>
<tr>
<td><strong>Q= 1 055</strong></td>
<td><strong>Q= 897</strong></td>
<td></td>
</tr>
<tr>
<td><strong>BAU= 15%</strong></td>
<td><strong>BAU= 19.35 %</strong></td>
<td></td>
</tr>
<tr>
<td><strong>AB=EUR 6 617 396.24</strong></td>
<td><strong>AB=EUR 4 865 732.53</strong></td>
<td></td>
</tr>
<tr>
<td><strong>AC=EUR 7 785 172.05</strong></td>
<td><strong>AC=EUR 6 033 508.34</strong></td>
<td></td>
</tr>
</tbody>
</table>

**Estimated future figures:**

- **P = EUR 6 728.19**
- **f= 1**
- **Q= 897**
- **BAU= 19.35 %**
- **AB=EUR 4 865 732.53**
- **AC=EUR 6 033 508.34**

**Potential reduction:**

- Reduction of EUR 1 751 663.71 AB
- EUR 1 751 663.71 AC
3.2.5. Electronic submission of application and digitisation of the entire licensing process

Summary of recommendation

The implementation of this recommendation is calculated to reduce both administrative burdens and administrative costs by EUR 1 105 471 on a stand-alone basis.

This recommendation suggests creating an on-line platform for on-line submission of all documents necessary for the application. The documents would be submitted only electronically and the whole dossier would also circulate inside the administration in electronic form.

Such an electronic system would enable the applicant to check the status of the licensing process at any stage. It would also reduce the out-of-pocket costs connected with preparation of hard copies of all documents.

IOs affected

This recommendation reduces administrative costs primarily for the following Information Obligations:

IO 25: Obligation to apply for an establishment licence and lease (aquaculture businesses)

IO 26: Obligation to apply for a licence to use water resources (aquaculture businesses)

Background and rationale

Currently, the application file for an establishment licence and lease needs to be submitted in 10-14 paper copies and on one CD. Similarly, the application for the licence to use water resources is submitted in two paper copies. The entire applications could be made virtual by allowing the communication of electronic content only to a single on-line platform. The file / content could then be dispatched to the different authorities, utilizing a process workflow associated with it. This would define the submission and the requests for opinions / approvals / notices from the various authorities involved. As soon as all independent approvals are granted, the responsible authority will grant the licence or provide a certificate of completeness if the predetermined period for the administration to object has expired.

Such an electronic system would enable the applicant to check the status of the licensing process at any stage. It would also reduce the out-of-pocket costs connected with preparation of hard copies of all documents.

Ex-post audits can be performed by the relevant authorities to verify compliance.

For the development of such information system, however, significant financial investments will be needed both for software as well as for hardware equipment in all competent authorities.
Description of current situation

Currently, aquaculture businesses need to submit in 10 to 14 copies and a CD an application for establishment licence and lease. Similarly, they are required to submit in 2 paper copies their application for obtaining the licence to use water resources.

The application is then dispatched by paper means to different authorities for their approval.

Description of desired situation

The applications for the establishment licences or for the licence to use water resources are sent electronically.

The data / application is then communicated to the authorities that are required to submit an approval or an opinion on decision within a specified period, otherwise the responsible authority issues the certificate of completeness that serves as an approval to commence operations.

Legislation to be examined

On the basis of an assessment of the current situation and the legislation in scope identified in the previous stages of the project, in order for the recommendation to be implemented there needs to be a review and/or amendment of the following national legislation and circulars taking into account the existing obligations of EU law in this priority area.

National legislation

- Law 3199/2003, Article 11 par. 2 (on licensing of use of water)
- Law 3208/2003, Article 19 par. 11 (on the lease of water surfaces for aquaculture purposes)
- Law 1845/1989, Article 32 par. 7.c and 7.d (on amendments to provisions on the development of livestock, fishery etc.)
- Law 4014/2011, Articles 2, 3, 4, 8 (on environmental licensing)
- Ministerial Decision No. 9232.1/1-11-11, Clarifying the implementation of the Law 3208/2003, Article 19 paragraph 11(on issuance of rental decisions of marine areas for installation of aquaculture)
- Presidential Decree 28/2009, Article 4 (on licensing of Fish-farming businesses)
- Ministerial decision 43504/2005 ‘Category of licences for the water use and fulfilment works for their exploitation’ (Articles 1, 2, 3)
- Joint Ministerial Decision 150559/10-06-2011 Environmental Commitments for Projects and Activities of Category B of Group 8 “Aquaculture”, as in force (Article 4)
- Circular No. 9231.2/29-03-11 Process of licensing of Fish-farming units
- Circular No. 9230.4/18-07-11 Process of licensing of Fish-farming units
- Joint Circular No. 121570/1866/12-06-2009 Regulation of issues on aquaculture units

EU legislation which sets relevant obligations in this area
(references are to consolidated versions)
Council Directive 2006/88/EC of 24 October 2006 on animal health requirements for aquaculture animals and products thereof, and on the prevention and control of certain diseases in aquatic animals, Article 4

Directive 2000/60/EC of the European Parliament and of the Council of 23 October 2000 establishing a framework for Community action in the field of water policy, as in force, Article 8, Article 11 par. 3(e) and (i) and par. 5


See also, COM (2013) 229 final “Strategic Guidelines for the sustainable development of EU aquaculture”

Assessment of impact on administrative costs and burdens

This recommendation will allow a reduction of the time spent on creating paper copies of the application by 240 minutes, on following up the application by 120 minutes, as well as on external costs (consultancy and out-of-pocket) by 10%, representing the additional administrative costs incurred for the creation and photocopies of the application file by their expert.

In case of abolishing the licence to use water resources as recommended as part of recommendation 3.4.2, the IO26 would cease to exist, there would be no cost of complying with this IO and therefore the 10% savings stemming from simplification of IO26 would not take effect (in fact, the reduction would be 100%).

On this basis, the reductions in both administrative burdens and costs for this recommendation have been calculated as a reduction of EUR 1 105 471.

<table>
<thead>
<tr>
<th>Total for this recommendation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Measured relevant IOs:</td>
</tr>
<tr>
<td>AB=EUR 12 293 077.86</td>
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<tr>
<td>AC=EUR 13 759 573.75</td>
</tr>
<tr>
<td>Estimated future figures:</td>
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<td>AB=EUR 11 187 606.66</td>
</tr>
<tr>
<td>AC=EUR 17 120 392.30</td>
</tr>
<tr>
<td>Reduction potential:</td>
</tr>
<tr>
<td>Reduction of</td>
</tr>
<tr>
<td>EUR 1 105 471.20</td>
</tr>
<tr>
<td>AB</td>
</tr>
<tr>
<td>EUR 1 105 471.20</td>
</tr>
<tr>
<td>AC</td>
</tr>
</tbody>
</table>
of which:

| IO 25: Obligation to apply for an establishment licence and lease (aquaculture businesses) |
|---------------------------------|---------------------------------|---------------------------------|
| **Measurement results:**       | **Estimated future figures:**   | **Potential reduction:**         |
| P (sum segments) = EUR 5 662.94 | P = EUR 5 264.02                | Reduction of 7% (of IO 25)       |
| f= 1                           | f= 1                            |                                 |
| Q= 1 055                       | Q= 1 055                        |                                 |
| BAU= 5%                        | BAU= 5.38%                      |                                 |
| AB=EUR 5 675 681.62            | AB=EUR 5 254 821.02             | Reduction of EUR 420 860.60 AB  |
| AC=EUR 5 974 401.70            | AC=EUR 5 553 541.10             | Reduction of EUR 420 860.60 AC  |

| IO 26: Obligation to apply for a licence to use water resources (aquaculture businesses) |
|---------------------------------|---------------------------------|---------------------------------|
| **Measurement results:**       | **Estimated future figures:**   | **Potential reduction:**         |
| P (sum segments) = EUR 7 379.31 | P = EUR 6 730.39                | Reduction of 10% (of IO 26)     |
| f= 1                           | f= 1                            |                                 |
| Q= 1 055                       | Q= 1 055                        |                                 |
| BAU= 15%                       | BAU= 16.45%                     |                                 |
| AB=EUR 6 617 396.24            | AB=EUR 5 932 785.64             | Reduction of EUR 684 610.60 AB  |
| AC=EUR 7 785 172.05            | AC=EUR 7 100 561.45             | Reduction of EUR 684 610.60 AC  |
3.2.6. Increase of the validity for the producer-seller licence

Summary of recommendation

The implementation of this recommendation is calculated to reduce both administrative burdens and administrative costs by EUR 2,554,038 on a stand-alone basis.

This recommendation concerns an extension of validity of the producer-seller licence for fishermen and fish-farmers who sell at a public marketplace from 6 months to two years. At the same time, an obligation of the producer-seller to notify on any substantial change in his activity is suggested.

IOs affected

This recommendation reduces administrative costs primarily for the following Information Obligations:

IO27: Obligation to apply for a producer-seller licence (fishermen, fish farmers)/renewals

Background and rationale

The producer-seller licence is valid for six months, which forces the producer to renew his permit twice a year.

The validity of such licences can be extended to a longer time period, such as to two years. This IO is important to fishermen and fish-farmers who choose to sell their production in public marketplaces. Such a recommendation should be coupled with an obligation of the producer-seller to notify on any substantial change in his activity, based on specific criteria (as a result of modification of the fishing licence or of the fishing vessel licence, modification of the fishing gear for fishermen, or of the operating licence for fish-farmers).

Currently, the Ministry of Development is drafting a new legislation to extend this licence to one year. However, we suggest considering further extension accompanied with the notification obligation. Also, it is suggested to extend the validity of the producer-seller licence horizontally for all agricultural products.

It is necessary to note that, according to the data of the Ministry of Agriculture, currently there is only a small number of requests for a renewal of this licence. The reason for this might be non-compliance with the obligation.

Description of current situation

The producer-seller licence, for fishermen and fish-farmers who sell at a public marketplace, needs to be renewed every 6 months, by resubmitting part or all of the documents initially provided.

Description of desired situation

Fishermen and fish-farmers who sell at a public marketplace, obtain their producer-seller licence for 2 years and they are required to notify any substantial change in the fishing activity they conduct.

Legislation to be examined
On the basis of an assessment of the current situation and the legislation in scope identified in the previous stages of the project, in order for the recommendation to be implemented there needs to be a review and/or amendment of the following national secondary legislation:

- Presidential Decree 51/2006, as in force, Article 3 (‘Producer-seller licenses in public markets’) par. 1
- Draft Law on Administrative Simplifications (submitted to Parliament in February 2014), Article 4 (‘Simplification of producer licenses’)

Assessment of impact on administrative costs and burdens

It is assumed that this recommendation will allow a reduction in frequency for 90% concerned fishermen and fish-farmers, whereas the remaining 10% are expected to proceed to notification of changes every 6 months, with a reduction of time and costs in relation to the licence of 50%, in relation to travel costs for gathering documentation from different administrations.

On this basis, the reductions in both administrative burdens and costs for this recommendation have been calculated as a reduction of EUR 2,554,038.

<table>
<thead>
<tr>
<th>Measured relevant IOs:</th>
<th>Estimated future figures:</th>
<th>Reduction potential:</th>
</tr>
</thead>
<tbody>
<tr>
<td>AB=EUR 3,522,810.94</td>
<td>AB=EUR 968,773.01</td>
<td>Reduction of EUR 2,554,037.93 AB</td>
</tr>
<tr>
<td>AC=EUR 3,522,810.94</td>
<td>AC=EUR 968,773.01</td>
<td>EUR 2,554,037.93 AC</td>
</tr>
</tbody>
</table>

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of which:

| IO27: Obligation to apply for a producer-seller licence (fishermen, fish farmers)/renewals |
|----------------------------------|----------------------------------|----------------------------------|
| **Measurement results:**         | **Estimated future figures:**    | **Potential reduction:**         |
| \( P \) (sum segments) = EUR 246.73 | \( P = EUR 234.39 \)            | Reduction of 72\% (of IO 27)     |
| \( f = 2 \)                      | \( f = 0.65 \)                   | Reduction of EUR 2 554 037.93 AB  |
| \( Q = 7 139 \)                  | \( Q = 7 139 \)                  | Reduction of EUR 2 554 037.93 AC  |
| \( BAU = 0\% \)                  | \( BAU = 0\% \)                  |                                  |
| \( AB = EUR 3 522 810.94 \)      | \( AB = EUR 968 773.01 \)        |                                  |
| \( AC = EUR 3 522 810.94 \)      | \( AC = EUR 968 773.01 \)        |                                  |
3.2.7. Reduction of documents required for a producer-seller licence

Summary of recommendation

The implementation of this recommendation is calculated to reduce administrative burdens and administrative costs by EUR 1 468 350 on a stand-alone basis.

This recommendation aims at reducing the number of documents needed to the ones that are actually needed to assess the applicant's ability to sell at a public market. Those data requirements that can be obtained by the public administration will not need to be submitted (ex officio). A solemn statement of compliance at the moment of application can be used instead.

The related information may be subject to ex post controls/inspections with a strict penalising system in case of false declarations.

IOs affected

This recommendation reduces administrative costs primarily for the following Information Obligations:

IO27: Obligation to apply for a producer-seller licence (fishermen, fish farmers)/renewals

Background and rationale

For the application for a producer-seller licence, the applicant needs to provide documents from different administrations, such as fixed assets (E9), proof of insurance (OGA) and ELGA (merchandising of products), fiscal declaration (E1), etc.

Only those documents that are needed to assess the applicant's ability to sell at a public market should be required by the administration. The documents and information that are already available to the administration should be obtained through internal information sharing mechanisms, if needed. The applicant could declare compliance with other requirements than those that must be documented. The competent authorities could conduct only random checks, and in case of non-compliance revoke the licence and impose penalties.

A specific template for such an application should be developed that includes the checklist of information to be collected, as well as the solemn statement of compliance.

The Ministry of Agriculture is currently developing an Integrated Information System for Monitoring and Recording of Fishing Activities (OSPA) which should be deployed in early 2015. This system should enable standardisation of documents and significant simplification of the whole licensing process. If compatible with other similar electronic platforms, it should also make internal communication easier.

Description of current situation

For the submission of an application for the producer-seller licence, a fisherman or a fish-farmer needs to attach to his application various documents from different administrations such as E9 (fixed assets), proof of insurance (OGA) and ELGA (merchandising of products), Fiscal declaration (E1), etc.

Description of desired situation
The fisherman or the fish-farmer submits his application for the producer-seller licence by declaring his fishing activity with a solemn statement of compliance.

The administration activates data sharing, effectively supporting the cross-check of provided information.

Ex-post controls take place and false declarations are penalized.

**Legislation to be examined**

On the basis of an assessment of the current situation and the legislation in scope identified in the previous stages of the project, in order for the recommendation to be implemented there needs to be a review and/or amendment of the following national secondary legislation and circulars:

- Presidential Decree 51/2006, as in force, Article 3 (‘Producer-seller licenses in public markets’) par. 3.
- Presidential Decree 254/2005, Article 7 (General provisions on open commerce)
- Circular No 480/30129/15-4-2013 Certificate for producer-seller licence to natural persons (fishermen/fish-farmers)

**Assessment of impact on administrative costs and burdens**

This recommendation will allow a significant reduction of the time spent on gathering the documents in support of the application, as well as out-of pocket costs related to travel costs to the different administrations. This would represent a reduction of 4 hours (240 minutes) and out-of-pocket costs will also be reduced by EUR 50 per application limiting the need to visit various authorities or experts to collect these documents or to certify them.

On this basis, the reductions in both administrative burdens and costs for this recommendation have been calculated as a reduction of EUR 1 468 350.

<table>
<thead>
<tr>
<th>Total for this recommendation</th>
<th>Measured relevant IOs:</th>
<th>Estimated future figures:</th>
<th>Reduction potential:</th>
</tr>
</thead>
<tbody>
<tr>
<td>AB=EUR 3 522 810.94</td>
<td>AB=EUR 2 054 461.42</td>
<td>Reduction of EUR 1 468 349.52 AB</td>
<td></td>
</tr>
<tr>
<td>AC=EUR 3 522 810.94</td>
<td>AC=EUR 2 054 461.42</td>
<td>EUR 1 468 349.52 AC</td>
<td></td>
</tr>
</tbody>
</table>
of which:

<table>
<thead>
<tr>
<th>IO27: Obligation to apply for a producer-seller licence (fishermen, fish farmers)/renewals</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Measurement results:</strong></td>
</tr>
<tr>
<td>P (sum segments) = EUR 246.73</td>
</tr>
<tr>
<td>f= 2</td>
</tr>
<tr>
<td>Q= 7 139</td>
</tr>
<tr>
<td>BAU= 0%</td>
</tr>
<tr>
<td>AB=EUR 3 522 810.94</td>
</tr>
<tr>
<td>AC=EUR 3 522 810.94</td>
</tr>
<tr>
<td><strong>Estimated future figures:</strong></td>
</tr>
<tr>
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<tr>
<td>f= 2</td>
</tr>
<tr>
<td>Q= 7 139</td>
</tr>
<tr>
<td>BAU= 0%</td>
</tr>
<tr>
<td>AB=EUR 2 054 461.42</td>
</tr>
<tr>
<td>AC=EUR 2 054 461.42</td>
</tr>
<tr>
<td><strong>Potential reduction:</strong></td>
</tr>
<tr>
<td>Reduction of 42%</td>
</tr>
<tr>
<td>(of IO 27)</td>
</tr>
<tr>
<td>Reduction of</td>
</tr>
<tr>
<td>EUR 1 468 349.52 AB</td>
</tr>
<tr>
<td>EUR 1 468 349.52 AC</td>
</tr>
</tbody>
</table>
3.3. **Suggested sequencing and prioritisation**

The sequencing and prioritisation of these recommendations should depend on both their relative impact and difficulty. The difficulty is best appreciated by the relevant Ministries of the administration, which also have competing priorities.

The Fisheries priority area is the tenth largest priority area covered by this project in terms of the size of its administrative burdens and it affects a relatively limited number of businesses (including sole traders/freelancers) in the economy. Given the importance of the fisheries sector for the Greek economy, in relative terms within the administrative burden reduction project, the implementation of recommendations in this area should be accorded **medium** priority.

Comparative analysis of the recommendations shows that:

- Integration of the licence to use water resources into the environment permit will have the highest impact in reducing administrative burdens. It involves abolishing one of the licenses (the one on the use of water resources) and integration of two administrative procedures into one. The respective ministries have already started to discuss this option. It should be implemented later in 2014. Businesses will save time and resources spent on applying for two licences with a similar set of documents to be submitted.

- Streamlining the modification / renewal process for aquaculture licences will have the second highest impact in reducing administrative burdens. It involves development of criteria (e.g. thresholds) that will determine whether there is a need to modify the existing licence. Businesses would not have to go again through the lengthy licensing process in case of minor changes in their project. A simple declaration should be sufficient for a licence renewal in case of no changes.

- Clarification of the legislation in scope and development of guidelines for aquaculture businesses will have the third highest impact in reducing administrative burdens. It involves codifying and standardising the legislation in scope for aquaculture businesses and development of guidelines for the aquaculture industry. This measure would reduce the time spent on familiarising with legislation.

Works on integration of the licence to use water resources into the environment permit as well as on the extension of producer/seller licence validity are already under way. It is suggested to proceed with high priority.

A review of legislation with the aim to simplify licensing procedures (recommendations 3, 4, 7 and partially 1) will need more time for analysis and discussion among ministries. It is recommended to start preparatory works without further delay.

Finally, implementing ICTs and developing electronic tools for submission of documents, their sharing inside administration and publishing some information will need relatively a longer time period and more resources. The Government should decide on the priorities and secure funding to finance these projects.

Government and businesses should co-operate and act jointly in order to successfully reduce administrative burdens. The government should take the lead in abolishing and/or simplifying regulations or practices and involve and consult sector organisations and businesses throughout the implementation process.

3.4. **Other issues**
The following relevant issues were raised by stakeholders during the project. They are not administrative burden reduction recommendations within the scope of this priority area, but they are irritations to business which the government could consider addressing:

- Further development and detailing of the P.O.A.Y. scheme (Specific Areas of aquaculture managed development)

Within the framework of the Special Framework for Spatial Planning for Sustainable Development of Aquaculture, Specific Areas of aquaculture managed development have been promoted as to organise spatial and zoning development for aquaculture on a regional and local level, as well as to organise designated land use for aquaculture businesses (existing and potential).

Although the development of such a scheme has been set up, it is not yet mature: Ambiguities in the legal framework, in the establishment and in the scope of action has led to a modest development of existing aquaculture units. This recommendation aims at further developing and enhancing their structures, as to contribute to consolidated and organised aquaculture activities in specific areas, ensuring efficiency and monitoring of conducted activities – savings could arise from economies of scale arising from the constitution of common applications – guided through the POAY’s, leveraging aquaculture businesses in Greece.

- Creation of a national digital registry of fishermen

In order to establish a national overview on fishing activity, this recommendation aims at creating a national digital registry of fishermen under the public authorities’ supervision. Such a registry would allow controls and inspections to be conducted in a most efficient way. Additionally, such a registry could be updated from the vessels’ owners when it is required (for example upon notification of changes) as to have the most accurate and updated information on the vessel and on the fishermen when required.

The Ministry of Agriculture is currently developing the Integrated Information System for Monitoring and Recording of Fishing Activities (OSPA). The system should serve the above mentioned purpose and should be finalised by the end of 2014.
4. Conclusion

This report identifies the priority area Fisheries as the tenth largest of the 13 priority areas covered by the project in terms of the total administrative costs and administrative burdens measured. On the basis of the fieldwork, the total administrative costs were measured at EUR 17.99 million and the total administrative burdens at EUR 16.52 million.

This is explained in part by the fact that most of the information obligations selected for measurement concern the aquaculture sector with a relatively limited number of businesses. However, it is an important sector for the Greek economy with a big potential for development. Somewhat complicated licensing procedure might impede investments in this sector and have a negative impact on its competitiveness.

Due to its size, the Fisheries priority area offers opportunities for administrative burden reduction within the project which may be significant for businesses in the fisheries sector, especially in aquaculture.

This report makes seven recommendations for administrative burden reduction measures on Fisheries:

<table>
<thead>
<tr>
<th>Recommendation</th>
<th>Calculated reduction in administrative costs</th>
<th>Calculated reduction in administrative burdens</th>
</tr>
</thead>
<tbody>
<tr>
<td>Simplification of the application for an establishment licence and lease and introduction of a one-stop-shop*</td>
<td>EUR 577 971</td>
<td>EUR 577 971</td>
</tr>
<tr>
<td>Integration of the licence to use water resources into the environment permit*</td>
<td>EUR 7 257 672</td>
<td>EUR 6 617 396</td>
</tr>
<tr>
<td>Clarification of the legislation in scope and development of guidelines for aquaculture businesses*</td>
<td>EUR 3 000 673</td>
<td>EUR 3 000 673</td>
</tr>
<tr>
<td>Streamlining the modification / renewal process for aquaculture licences*</td>
<td>EUR 3 095 904</td>
<td>EUR 3 095 904</td>
</tr>
<tr>
<td>Electronic submission of application and digitisation of the entire licensing process*</td>
<td>EUR 1 105 471</td>
<td>EUR 1 105 471</td>
</tr>
<tr>
<td>Increase of the validity for the producer-seller licence*</td>
<td>EUR 2 554 038</td>
<td>EUR 2 554 038</td>
</tr>
</tbody>
</table>

In line with standard practice, the reduction calculations have been made individually for each recommendation. It is therefore not possible to add together these calculated reductions to obtain an overall total reduction because different recommendations affect the same obligations. The overall reduction obtained depends on the sequencing of recommendations. The impact of the recommendations marked * would be reduced by the other recommendations being implemented, and the impact of recommendations which are not marked would be affected similarly by prior implementation of the recommendations marked *.
The IOs with the most reduction potential in this Priority Area are Integration of the licence to use water resources into the environment permit; Streamlining the modification / renewal process for aquaculture licences and Clarification of the legislation in scope and development of guidelines for aquaculture businesses. The recommendations will result in a reduction of time needed to deal with administrative procedures concerning licensing, reduction of the out-of-pocket costs spend on consultations with external experts and also on gathering and copying documents. In addition, the changes should lead to lower irritation and higher compliance with regulation in the Fisheries sector.

The involvement of businesses is key to achieving the burden reduction through implementation. The government should take the lead and also ensure that businesses and their representatives are consulted and engaged during implementation to assure that solutions are well-designed.
Annex 1: Analysis of information obligations and quantification of administrative costs

This Annex provides the measurement results of the study per IO within this Priority Area. For every IO the origins and process description are presented and the detailed measurement results are described and analysed.

1.1. Obligation to apply for an establishment licence and lease (aquaculture businesses) – IO25

1.1.1. Origins and process of the information obligation (brief assessment of purposes of IO)

Figure 1.1 Process for complying with the requirement “Obligation to apply for an establishment licence and lease (aquaculture businesses)”

The application for an establishment licence and lease is based on Laws 3199/2003, 3208/2003 and their amendments 9231/29-03-11, 9232/1-11-11, which set the licensing and leasing procedures of aquaculture units.

The lease is awarded by the Secretary General of the Prefecture either by direct contract (through the means of public procurement) or by auction.

In case of a public procurement award, the initial lease may last up to five years and then ten years if/when it is renewed. Auction award may last from the initial award up to ten years.
Initially, the aquaculture companies must submit an application to the Prefecture’s Directorate of Agricultural Development in order to obtain a pre-approval decision prior to the establishment licence and lease. This initial step sets the completeness of the initial application folder and the eligibility of the company to obtain an establishment licence and lease, along with approvals from various authorities such as the Hellenic Navy, the Ministry of Mercantile Marine, the Hellenic Ministry of Culture and Sports or the Prefecture’s Directorate of Fisheries. This initial application consists in their corporate statutes as well as a series of other documents listed below:

- A feasibility study with information regarding the species to be cultivated (information about the fish, the construction of the facility as well as financial information).
- A map of the broader area, where the water area that will be leased is clearly marked and highlighted. (Scale 1:5 000).
- A topographic diagram of the plot under scope with its coordinates (Scale 1:500 or 1:1 000).
- A floor plan of the cages or other facilities along with data regarding the depth of the sea plot.

Once the pre-approval decision is obtained, fish farmers are granted an approval decision for the establishment licence and lease, provided that they will obtain certain permits for the conduction of their activities. To do so and as such to proceed with the licence, they must provide in their application a proof of their compliance to the environmental commitments that are set (standard environmental terms or environmental permit) and the licence to use water resources (as described in the IO26).

The application (with these documents) is then submitted to the Secretary General of the prefecture who evaluates the application and authorizes the leasing and licensing activities of the aquaculture business. According to the law in scope, within three months of the decision, a contract between the two parties is drawn up and signed.

To reduce waiting time and costs, the decision to lease and the establishment licence are issued simultaneously with the same decision.

1.1.2. Results from measurement and quantification

Table 1.1 Composition of Administrative Cost and Administrative Burden (IO 25)

<table>
<thead>
<tr>
<th>PA: Fisheries</th>
<th>Price (P)</th>
<th>Nr of entities / occurrences (Q)</th>
<th>frequency (f)</th>
<th>BAU (%)</th>
<th>Total AB (in EUR million)</th>
<th>Total AC (in EUR million)</th>
</tr>
</thead>
<tbody>
<tr>
<td>IO 25: Obligation to apply for an establishment licence and lease (aquaculture businesses)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Non-segmented</td>
<td>4 020</td>
<td>2 500</td>
<td>1 500</td>
<td>5 663</td>
<td>1 055</td>
<td>5%</td>
</tr>
</tbody>
</table>

For the purpose of this measurement, the number of occurrences for this IO relate to the average annual number of applications for an establishment licence and lease for the past three years (2010-2012), which are performed by professionals.
Standardised description of the activities related to the IO 25

The establishment licence and lease is as such the main process for an aquaculture unit to actually conduct its activities; from the initial lease to the licensing of the establishment, it sets the general grounds and conditions for building and operating an aquaculture unit at sea and on land. Generally, the process of obtaining an establishment licence and lease can be split into the following activities:

1. **Initial lease to the fish-farming unit:**

   At first, the initial lease (prior to this licence) is in most cases granted to aquaculture businesses by direct designation from local authorities. Throughout the interviews, there was only a minor case of auction and none of public procurement. Before actually starting the application activity, aquaculture companies spend some time (one hour) on familiarising themselves with the application process in relation to their own project (the application as such being known, this time is associated to the learning curve effect from similar experiences).

2. **Initial application and obtainment of pre-approval:**

   Once the initial lease is attributed, aquaculture companies are required to submit a pre-approval application folder, which is designated by a great majority of the interviewees as a mini environmental permit, since it requires the approval from different authorities on the completeness of the application folder and the environmental eligibility of the company to obtain an establishment licence and lease.

   Concretely, this initial application is a preliminary Environmental Impact Study, which consists of:

   - a feasibility study with information regarding the species to be cultivated (information about the fish, the construction of the facility as well as financial information),
   - a map of the broader area, where the water area that will be leased is clearly marked and highlighted (Scale 1:5 000),
   - a topographic diagram of the plot under scope with its coordinates (Scale 1:500 or 1:1 000) and
   - a floor plan of the cages or other facilities along with data regarding the depth of the sea plot.

   To do so, aquaculture companies usually require the services of external experts (specialised consultancies) which undertake the obligation to submit the folder to the Prefecture’s Directorate of Agricultural Development. In most cases, these experts undertake all the activities required from the preparation of the folder to its submission, with a standardised cost of approximately EUR 2 500 (which actually can vary from EUR 1 500 to EUR 3 250, depending on the unit). These plans and study are therefore usually entirely outsourced to the experts who manage the conduction of tests and the study on their behalf.

   A total of 14 hours (720 minutes in gathering and 120 minutes in assessing results from conducted studies) is dedicated by a normally efficient business to gather and provide information to the expert, and additionally 12 hours are spent on meetings with him.

   Once the study is prepared, the whole application folder is then checked (internally, which takes 4 hours and one additional hour on internal meetings). On internal approval, the application is submitted by the expert in several copies to the Prefecture’s Directorate of Agricultural Development, which dispatches the application to several authorities for their approval. The recipients of these folders are:
• The Hellenic Navy and the Ministry of Mercantile Marine (through the port authorities)

• The Hellenic Ministry of Culture and Sports (through the Directorate of Antiquities and the Greek National Tourism Organization)

• The Prefecture’s Directorate of Fisheries

Also the local municipal authorities are asked to provide their opinion which is consultative and not binding.

The submission of the pre-approval application folder, depending on the case, may result to inspections from public authorities such as the Directorate of Antiquities, which require the use of external divers for the purposes of the inspection, and for which fish farmers are required to cover for their costs. As an example, for the examination of the seabed, fish farmers may bear the cost of the divers which amount to EUR 1 500, and last for 25 hours over a period of three or four days in presence of the head of the unit. Additional tests from certified organisations may also be required, upon demand, and covered by the applicants as well.

Once all inspections are conducted and the public authorities involved have expressed their opinion, a pre-approval concession can be provided by the prefecture. This usually takes from 3 to more than 12 months, for which a normal efficient business spends 5 hours in external meetings, as to contact authorities and to push the application along with the expert.

3. Reception of pre-approval, obtainment of permits and final application

When obtained, this concession enables the aquaculture companies to submit an application for an environmental permit or standard environmental terms (which are covered within IOs 18 and 19 of the present study) and for a licence to use water resources (which is covered by IO 26 of the study).

Once these permits are obtained, along with other eventual permits, fish farmers are required to submit a second application – an approval application - to the prefecture. This application generally consists in relatively easy steps, consolidating all of the above-mentioned data. It takes a normal efficient business 3 hours to collect the required information (60 minutes on gathering information and 120 on verifying the application) for submission to the authorities, which takes usually 2 hours.

The latter evaluates the application (including based on its permits) and authorises the leasing and licensing activities of the aquaculture business. Within three months of the decision, a contract between the two parties is usually drawn up and signed, as stated by the law (and which takes an additional 2 hours on final submission).
1.1.3. Analysis of measurement results

The measurement results show that if these IOs (apply, reporting, inspections) are completely removed, the administrative burden for the Greek economy would be reduced by EUR 5.68 million. The administrative cost reduction if this IO is abolished completely would amount to EUR 5 974 402.

The information obligation in scope requires some time and costs for aquaculture businesses, as it is perceived as of high importance along with IO26 for commencing operations. Alone, it accounts for 33% of the total administrative cost of the PA.

Throughout the process of obtaining the establishment licence and lease, the most burdensome activities in the process relies in the retrieval and gathering of data for the expert such as compiling information about the pre-approval, and on internal and external meetings. It takes up to 840 minutes (14 hours) for a NEB to gather all the data required, whereas the information about the pre-approval may take up to 300 minutes (5 hours) to be completed or to be internally checked. In addition to these, a total of 15 hours are required for a normal efficient business as to have external meetings, with his expert who takes in charge the application, as well as with authorities in order to follow-up the application, and eventually push it for its authorisation.

The conduction and the assistance during the several inspections that may be conducted are also among the most burdensome in the process, as they require the full presence of the head of unit throughout their conduction, as well as additional out-of-pocket and consultancy costs, which amount to a total of EUR 1 500.

Together, the above-mentioned activities represent more than 80% of the total time, including a considerable amount of time spent in order to push the application among different authorities.

Among the interviewees, only a 5% of the conducted activities (in terms of time and costs), are considered to be “business as usual”, as most time is spent on gathering data, external and internal meetings and receiving inspections from various public authorities. In most cases, these activities do not represent an aquaculture’s unit normal activity for such an application, with the exception of conducting a few initial measurements for the sake of the aquaculture project.

The total external costs beard by the aquaculture businesses amount to EUR 4000 in general, which is broke down in consultancy costs (EUR 2 500 on an expert – consultant that handles the whole application) and other out-of-pocket costs (EUR 1 500) which mainly consist in the costs of inspectors on site and for several days.

Furthermore, for the licence to be efficiently obtained, a great majority of fish farmers that were interviewed had to bear additional costs for travelling, usually far away from their areas so as to meet with the experts and with officers at the Prefecture for the signing of the leasing agreements, but also with the various public authorities in order to accelerate the decision process.

These costs however may depend on certain variables as identified through the interviews:

- The level of outsourcing for the services of external experts in order to prepare the preliminary Environmental Impact Study: many fish farmers rely entirely on their services. However, in the case of a larger company, a mix of in-house and external experts that have been used for the preparation of this study was set-up, and thus generating higher internal costs (in terms of time) and less external costs.

- Travelling costs may vary from one company to another, and from one project to another; depending on the unit being away from the prefecture or other stakeholder (such as for example on an island as opposed to a project in continental Greece, thus increasing both additional time required and the subsequent costs.
The use of an internal or an external topographer in order to prepare the topographic diagrams needed.

**Main irritation points**

The suggestions presented below represent the views of businesses collected through the interviews conducted. They do not take into account the views of the OECD, the Greek authorities or the consultants’ assessment.

- **The heavy requirements due to a complex and vague legislation:**
  As stated by the interviewees, aquaculture businesses went rapidly from the absence of legislation to an unstable, constantly changing and complex one, which has created high levels of confusion among administrations and for the businesses. It appears that the different authorities that are implicated are on each occasion requiring new additional documents and proofs, obliging the fish farmers to undergo different procedures and bear additional costs as to accelerate their request. Furthermore, fish farmers seek additional assistance (with the according costs) from their external experts in order to better understand the legislation, and even to provide it to administrations.

- **The lack of simplicity in the renewal of existing licences:**
  It is worth to be noted that, according to the interviewees, the last few years no new establishment licenses and lease have been awarded. There are only renewals of these licenses but the process and documents required for these renewals is exactly the same as in the case of new licenses, which is perceived as very burdensome.

- **The delays in the approval decision:**
  The interviewees have stated delays as the most irritating factor of the procedure, beyond any other administrative burden. According to their statements, there are huge delays in all stages of the process, from the pre-approval decision (which has a minimum time of three months, but usually is much higher) to the obtainment of the permits and at last of the final approval (which may take several years). The law defines decision delays, yet no one is respecting these leading to a continuous follow-up from the fish-farmer or his expert on every level and office of the administration. These delays do not only create a major irritation, as they create an important barrier to their projects, but also may require many back and forth negotiation and consultation activities so as to push the application wherever it is held. It may also create cases of non-compliance if the project to be approved is deemed necessary to conducting operations.

- **The lack of penalising and fining directions through the legislation:**
  In cases of non-compliance (stated as necessary as to conduct its business through the decision process), many aquaculture businesses are subject to legal procedures and to fining procedures that are not clearly defined in the law. The vagueness of the law and of the legal procedures would often lead to big and arbitrary sums to pay – often without taking a decision on the application itself.
The number and heterogeneity of deciding authorities:
For the entire application process, environment permit and licence for water resources included, there is a large amount of Administrations that are required to give their approval: The technical file as such is submitted to 10 to 14 different Administrations. Among the main ones, can be quoted:

- The Ministry of Economic affairs
- The Ministry of Maritime affairs
- The Ministry of agricultural development (forestry, fisheries, and veterinary departments)
- Ministry of development
- Ministry of Culture (Tourism and archaeological departments)
- Ministry of Environment
- Local authorities: Municipalities (only consultative)

Although an internal coordination procedure is foreseen and conducted, each decision is taken separately, and each administration has to give a positive opinion for obtaining an approval.

The implication of local authorities beyond their consultative role:
Local authorities have a consultative role toward the periphery, who is the official decision-maker for such an application, but who seemingly relies entirely on the local authorities. As stated by the interviewees, there seems to be high waiting delays for no specific reason provided. In order to avoid local conflicts with different opposing stakeholders to any fish farming activity (for which there may be some lack of information or knowledge), most of the applications would be held back on purpose, without any communication or willingness to reach for a compromise as it could be done in a normal consultation process.

Unsupported number and volume of documents and data
Through the interviews, fish farmers have stated that they need to submit more than ten copies of the different applications, including documents that be easily retrieved, such as the entire history of the establishment (within the technical file on pre-approval). Furthermore the same documents often need to be submitted twice as they are no longer valid due to the delays of the decisional process, which creates additional irritation to the applicants.

The absence of spatial planning
On a more practical level, the absence of spatial planning (including for land use as studied in the Environment PA) has created additional irritations to the applicants as there a certain lack of coordination and decision among administrations in the decision or in the consultation process. It has been mentioned on several occasion that spatial planning would be able to resolve many pending issues for the aquaculture businesses.
1.2. Obligation to apply for a licence to use water resources (aquaculture businesses) – IO26

1.2.1. Origins and process of the information obligation (brief assessment of purposes of IO)

Figure 1.2 Process for complying with the requirement “Obligation to apply for a licence to use water resources (aquaculture businesses)”

The application for a licence to use water resources for aquaculture businesses is based on the Ministerial decision 43504/2005 (Government Gazette B 1784), which sets the grounds for obtaining a licence prior to using water resources (for aquaculture businesses), and allowing therefore aquaculture farms to use water.

This IO actually takes place from the moment a water domain has been awarded to the applicant (through the means of public procurement or public auction). Prior to commencing his activities, the fish farmer needs to comply with this additional obligation.

The submission of such an application requires the gathering of all the necessary documents. Specifically, units must present:

- Topographic diagram
- Legal entitlement (proof)
- Procuration (eventually)
- Report on hydrologic and hydro-geologic conditions
- Chemical and microbiologic analysis of water and other data related to water quality

Once completed, the application is submitted for approval to the Special Secretariat of Water of the Region. After submitting the application, the competent authority may conduct inspections and administrative controls on an ad-hoc level.

Decision is then taken, within the time limit of 45 days after submission of the application or 20 days after the approval of environmental conditions (AEPO). It is then communicated to the applicant, who archives it and is now able to proceed for the lease and establishment licence.
1.2.2. Results from measurement and quantification

Table 1.2 Composition of Administrative Cost and Administrative Burden (IO 26)

<table>
<thead>
<tr>
<th>PA: Fisheries</th>
<th>Price (P)</th>
<th>Nr of entities / occurrences</th>
<th>frequency</th>
<th>BAU</th>
<th>Total AB</th>
<th>Total AC</th>
</tr>
</thead>
<tbody>
<tr>
<td>Non-segmented</td>
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<td>5 000</td>
<td>1 250</td>
<td>7 379</td>
<td>1 055</td>
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</tbody>
</table>

For the purpose of this measurement, the number of occurrences for this IO relate to the average annual number of applications for licence to use water resources for the past three years (2010-2012), which are performed by the employee type ‘professionals’.

Standardised description of the activities related to the IO 26

The licence to use water resources is one of the requirements for an aquaculture firm to obtain its establishment licence and lease. As such, it aims at ensuring a minimum acceptance level of quality in the water used in fish farming. The licence to use water resources occurs after the reception of the pre-approval decision (described in IO25).

The licence to use water resources concerns two main activities, the use of water on sea and the water-drilling activity on land (in hatcheries). Generally, the process of obtaining a licence to use water resources can be split into the following activities:

1. Preparation of Application and data Gathering:

The application for licence to use water resources consists in a technical study which is assigned to external experts. Before actually outsourcing this activity, aquaculture companies spend a relatively small amount of time (one hour) on familiarising themselves with the application process in relation to their own project (the application as such being known, this time is associated to the learning curve effect from similar experiences).

Usually, and depending on the size of the aquaculture project, the expert-consultancy costs for the entire submission is approximately EUR 5 000 for a normal efficient business (which in reality may range from EUR 3 000 to EUR 8 000 depending on the project).

In order for an aquaculture company to obtain this licence, it must conduct an important series of works (counted as out-of-pocket costs) and gather accordingly a series of documents such as:

a. Topographic diagrams - 3 diagrams of different scale (1:1 000, 1:5 000 and 1:10 000) developed by external topographers, with out-of-pocket cost of EUR 750.

b. Authenticated copy of legal entitlement (proof of land) as well as eventually a procuration allowing the applicant to act at the interest of its legal entity.

c. Report on hydrologic and hydro-geologic conditions, chemical and microbiologic analysis of water and other data related to water quality – these analyses gather data regarding the quality
of the water to be used in the cultivation. For this reason they conduct chemical and microbiologic analysis, using the services of specialised microbiologists. The cost for this service is approximately EUR 500.

It is important to mention at this point that similar analyses and diagrams with a separate and different cost are developed for the application for the environment permit, which is as well a requirement for the obtainment of the lease and establishment licence. It takes a normal efficient business a total of 2 man-days to gather all above mentioned required information (960 minutes).

2. Submission for Approval:

Once all the aforementioned documents are gathered, the aquaculture company delivers them to the external expert, and meets with him on several occasions as to develop the technical study and the entire application folder. A normal efficient business requires approximately 15 hours of meetings with the expert and 4 additional hours internally, as to check the application file. Usually, the external expert submits the application at the prefecture’s Directorate of Environment and Hydro-Economy, on behalf of his / her client, under procuration.

The application folder is submitted in two copies (including topographic diagrams and analyses) and is reviewed for final approval. At this stage, apart from the Directorate, the local municipal authorities are invited to express their opinion on granting this licence. Their opinion is however consultative and not binding for the prefecture. This reviewing step has been describing as time consuming, particularly on decision making when local authorities have expressed a negative opinion – which often requires the company or its expert to multiply meetings with them as to influence (reassure) and push the acceptance – such external meetings require a total of 8 hours for the aquaculture business on each application submission.

3. Information about decision and reception of decision

After the prefecture issues a positive opinion on granting this licence, the fish farmer is informed accordingly and receives the licence to use water resources. It takes a normal efficient business 90 minutes as to copying, communicating and archiving the decision. When he receives this licence (along with other licences or permits) he may further proceed with obtaining the establishment licence and lease as described in IO25.

1.2.3. Analysis of measurement results

The measurement results show that if these IOs (apply, reporting, inspections) are completely removed, the administrative burden for the Greek economy would be reduced by EUR 6 617 396. The administrative cost reduction if this IO is abolished completely would amount to EUR 7 785 172.

Even though the process of obtaining this licence seems to be rather simple and straightforward, it still contains some activities that are quite burdensome. As stated previously, it is perceived as highly important along with IO25 for aquaculture businesses to be able to commence their operations on a particular unit. As such, it is the most burdensome IO of this PA, accounting for 43% of the total administrative cost.

More specifically, the activities of data gathering and preparing the application folder with the expert are by far the most burdensome ones; together, they account for 82% or 37 hours of the total time required for the whole process.

This is due to the time needed to obtain all abovementioned documents and due to the high number of meetings with external experts and topographers or eventually with public authority officers. The latter becomes more apparent in cases the applicant has to travel far away from his area in order to meet with either experts or with public authorities.
Furthermore, the activity of getting the approval seems to be a bit burdensome due to the high time often needed for the authorities to express their opinion. This often results in the applicant having to spend extra time (8 hours) for travelling and meetings with the public authority officers so as to accelerate the process or to consult with the external expert on what needs to be done in order to receive the licence.

Although these activities bear significant administrative burdens, 15% of the conducted activities (in terms of time and costs), are considered to be “business as usual”, as some of these tests and analyses would have been conducted anyway as to ensure that water resources are indeed appropriate for their fish-farming activity.

These burdens and costs however may vary upon other factors as identified through the interviews:

- The level and kind of outsourcing for the services of external experts; most of the interviewees relied on external topographers for producing topographic diagrams. In other cases, these have been handled and integrated by the external expert handling the entire application, or they have been realized by a topographer internally, thus minimizing the subsequent OOP cost, but increasing either the internal time spent on it or the consultancy costs of the company.

- Travelling costs may vary among companies and projects; depending on the location of the unit as opposed with the location of the prefecture (e.g. a unit on an island as opposed with one in continental Greece).

- Levels of decision pressure; as a consultative opinion is given by local authorities, their aversion or reaction to the aquaculture may need considerable time resources as to develop further consultations and negotiations with the prefecture for the licensing decision.

**Main irritation points**

The suggestions presented below represent the views of businesses collected through the interviews conducted. They do not take into account the views of the OECD, the Greek authorities or the consultants’ assessment.

- The similarity of the requirements in relation to the environment permit:
  In order to obtain an environment permit, the same documents and analyses as the ones described here above are required with slightly different, yet seemingly non substantial, conditions. For reminder, the environment permit is also a requirement for proceeding with the establishment and lease licence. This creates a double requirement, which multiplies considerably the efforts in time and the outsourcing costs for an aquaculture unit, creating an important irritation factor. Precisely, several of the interviewees stated that they cannot see the point in having this procedure, especially since these authorities are already consulted for the establishment licence as well as for the environment permit.

- The delays in the approval decision:
  The interviewees have stated delays as the most irritating factor of the procedure, beyond any other administrative burden. According to their statements, there are huge delays in the approval decision (which on average takes from one to two years). These delays not only create a major irritation, as they create an important barrier to their projects, but also may require many back and forth negotiation and consultation activities so as to push the application wherever it is held.

- The implication of local authorities beyond their consultative role:
Local authorities have a consultative role toward the periphery, who is the official decision-maker for such an application, but who seemingly relies entirely on the local authorities. As stated by the interviewees, there seems to be high waiting delays for no specific reason provided. In order to avoid local conflicts with different opposing stakeholders to any fish farming activity (for which there may be some lack of information or knowledge), most of the applications would be held back on purpose, without any communication or willingness to reach for a compromise as it could be done in a normal consultation process. It has as well been mentioned that prior to the increased implication of local authorities, such a procedure would take on average 30 days for its approval.

- **Unsupported number and volume of documents and data**

  In order to be able to produce at efficient levels (quality of treatment and water usage), fish farmers have stated that they already conduct by themselves a long series of analyses and by such ensuring the good levels of water quality. The level of detail of what would be seen as an aquaculture’s normal measurement would not be accepted by the authorities, which always ask for new ones, more complex and detailed, to a level that is not understood or shared by the businesses.
1.3. **Obligations to apply for and renew a producer-seller licence (fishermen/fishfarmers) – IO27**

1.3.1. **Origins and process of the information obligation (brief assessment of purposes of IO)**

**Figure 1.3** Process for complying with the requirement “Obligation to apply for and renew a producer-seller licence (fishermen, fish farmers)”

According to the Presidential Decree 116/2008 and 51/2006, all the categories of professionals (as described in the aforementioned laws) who wish to trade in Local Markets, are required to get either a professional seller licence or a producer – seller licence. Fishermen and fish farmers must possess a producer – seller licence in order to be able to trade in such markets.

In order to obtain such a licence, fishermen and fish-farmers must gather, fill and submit at the Organisation of Public Markets or to their regional authorities:

- an application for the licence to trade
- an acknowledgement of ownership or co-ownership for their boat (fishermen)
- a certificate from the Ministry of Maritime Affairs, Islands and Fisheries and the Ministry of Rural Development and Food (fishermen)
- the licence of operating their business (fish farmers)
- a certificate from their regional authority that their businesses are fully operational (fish farmers)

The producer – seller licence must be renewed every 6 months and this requires the professionals to resubmit part or all of the aforementioned documents. More specifically, fishermen are required by law to submit an acknowledgement of ownership or co-ownership for their boat, whereas fish farmers are required resubmit all the documents initially submitted in order to obtain the licence.
1.3.2. Results from measurement and quantification

Table 1.3 Composition of Administrative Cost and Administrative Burden (IO 27)

<table>
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<td>0%</td>
<td>3.52</td>
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For the purpose of this measurement, the number of occurrences (Q) for this IO relate to the number of producer-seller, for which the application is performed by manual workers (fisheries).

Standardised description of the activities related to the IO 27

There are three different ways for fishermen and fish farmers to sell their production:

- Selling at an auction fishing market;
- Selling as an itinerant merchant;
- Selling at a public market.

This information obligation refers to the third category, where in order to able to sell their own production at a public market, fish producers - whether they are fishermen or fish farmers - need to have a producer-seller licence.

This licence is actually common to all sellers at public markets (incl. farmers and other producers). The requirements for having it however may differ from one category to another. For that, fishing professionals have to be individual persons in order to have the right to sell at public markets and can sell only their own production, and not products that have not been produced by them.

The licence itself is valid for a period of 6 months, and thus has to be renewed twice a year. As a reminder, the law theoretically allows fishermen to submit only the acknowledgement of their vessel in order to renew such licence, but is does not appear to be applied: Whether it is an initial application or the renewal of the licence, the steps that producers-sellers (fishermen and fish-farmers) are required to follow are identical, and can be summarised by the following activities:

1. Gathering of documents for the application:

Fishermen and fish-farmers that want to apply for a producer-seller licence (or for its renewal), are required to collect documents that are related to the economic activity as well as to their fishing activity:

- A copy of their agricultural social insurance booklet (or certification) in order to prove their profession (as fishing activities belong to agricultural social insurance).
- A proof of payment of special contributions of ELGA (central body for agricultural insurance in Greece).
- A certificate that states their production and fishing gear/method. It is acquired and validated at the Directorate of Fisheries of the Prefecture. This certificate takes usually two to three days to be prepared.

- A legal proof of tax payment (on public markets), which testifies that the producer-seller is in compliance with VAT and tax requirements for his selling activity. In most cases it is a receipt of the cashier machine (which is counted as an OOP cost with a five year amortization).

- For fishermen, a copy of their fishing licence and their fishing vessel licence.

- For fish-farmers, the operating licence of their aquaculture business.

For gathering these documents across the different above-mentioned administrations, future or existing producers-sellers approximately spend 570 minutes (9.5 hours), including going to the local administration and to the prefectural offices.

2. Submission of application and reception of licence:

The application for the licence or the renewal of the licence is then realised at the municipality together with the submission of the previously collected documents.

The application form consists in a request for the renewal or the obtainment of the licence, where fishermen and fish-farmers declare their production capability, as well as they sign a declaration on the honour, stating that they commit to terms in relation to their production and to Public Market selling activity. When the application is submitted, the licence is usually approved within 1 or 2 days, for which fishermen or fish-farmers visit again the municipality.

In total a normal efficient fisherman or fish-farmer spends to this purpose 3.5 hours (210 minutes).

1.3.3. Analysis of measurement results

The measurement results show that if this IO is completely removed, both the administrative burden and the administrative cost for the Greek economy would be reduced by EUR 3,522,811.

From the abovementioned activities and from all interviewees, this information obligation is not perceived as burdensome, although it represents 20% of the total administrative costs of this PA. The most important burden lays essentially in the gathering of documents which for the majority of the fishermen and fish farmers already have (they need to provide this for their fishing activity licence). Fishermen and Fish-farmers need indeed mostly to make copies (OGA insurance booklet and of their fishing licence). In any case, none of the interviewees needed to provide other documents required by law (such as E3 and E9 certificates, stating previous years’ operations and immovable properties).

The most burdensome activity is actually related going to the prefecture as to validate and obtain their certifications (including returning to retrieve them). Such an activity, according to the interviewees, takes 9.5 hours in total. For the submission and the reception of the licence, fishermen require to go twice at the Municipalities office and spend 3.5 hours.

In terms of costs, a necessary requirement, and the only part of “business as usual” activity as well, for a producer-seller is the possession of a cashier machine. The cashier machine usually costs 250 EUR for a lifetime of approximately 5 years. In addition, the travelling costs of approximately 25 EUR to and from the prefecture and the municipality are out of pocket cost related to this IO.

Main irritation points
The suggestions presented below represent the views of businesses collected through the interviews conducted. They do not take into account the views of the OECD, the Greek authorities or the consultants’ assessment.

- **The frequency of the licence’s renewal:**
  As stated by the interviewees, the producer’s-seller’s licence is valid only for six months. It was mentioned from their side, that they have to renew their licence twice a year. In such a short time period, no significant change in their production or their activity had occurred, as to justify such a renewal. Producers-sellers consider the fact of renewing their licence every six months fairly irritating.

- **The variety of documents to collect from different authorities:**
  The producers-sellers that were interviewed stated as irritating the fact of having numerous authorities to respond to, mostly the prefecture, the municipality and the local port authority. Particularly, the documents to obtain from the prefecture have been described as quite burdensome, due to the time spent as to get there, and to the lack of flexibility (in terms of understanding) of the authorities. This is valid for numerous documents beyond this IO, certifications such as production certification.

- **The restriction of the licence to a very local range:**
  During the interviews, one additional irritation was pointed out, in relation to the fact that a licence may be obtained for one and only local public market. Indeed, the producer-seller licence allows fishermen and fish-farmers to sell their products only in their local prefecture, without having the opportunity to extend their business in other regions, “obliging” them to sell remaining fishing products on black market. The fact of being able to sell in municipalities or cities nearby could help significantly their activity, and could restrain them from illegal activity.

- **The selling area in public markets:**
  It is worth to be mentioned, that many interviewees had expressed their irritation about the area that they are given from authorities at the public markets. Usually there is lack of a central distribution system and producers-sellers have to arrange the selling area on their initiative and upon discussions with the key players within the market. This irritation exceeds the scope of the current IO, scoping the organisation in public markets in most Greek cities, nevertheless characterises the barriers that exist for a producer-seller, once they have obtained their licence.
1.4. Obligation to obtain and renew commercial fishing vessel licence – IO28

1.4.1. Origins and process of the information obligation (brief assessment of purposes of IO)

Figure 1.4 Process for complying with the requirement “Obligation to obtain and renew commercial fishing vessel licence”

Existing mapping has identified as core legislation for this IO only the Royal Decree 666/1966, which however does not give an up-to-date comprehension of the process. Based on additional desk research, the above-mentioned process gives a general overview, which however does not arise entirely or directly from official legislative sources:

- The Code of Public Maritime Law (ML 187/73 article 76) states that fishermen wishing to obtain a commercial fishing vessel licence must satisfy a series of criteria:
  
  - They must be between 20 – 65 years old
  - They must be living in Greece and having either Greek or EU citizenship
  - They must be professional fishermen (owners of the respective licence)
  - They must be registered with their local fishing club
  - They must be registered with the Agricultural insurance Organization (ΟΓΑ)
  - They must have declared their new profession at the Tax authorities

- The Directorate of Fisheries in a regional authority has set that those who satisfy the aforementioned criteria and wish to obtain a commercial fishing vessel licence must gather a series of documents such as:
  
  - Identity Card
  - Professional Fishing Licence
  - Certificate from their fishing club
  - Certificate from the Agricultural insurance Organisation
  - Income Clearance Certificate
  - Certificate from the Tax authorities that they have declared their new profession
  - Documents regarding their boat (fishing licence, measurement certificate, proof of the nationality of the boat)
According to the above-mentioned, fishing vessel owners must submit all these documents along with their application either at their local port authority or at the Directorate of Fisheries of their Prefecture who will decide on their application.

The commercial fishing vessel licence must be renewed every 2 years and for this purpose it is required that the interested parties must gather and submit at their port authority the following documents (which are similar to the initial application) along with their application for renewal:

- Documents regarding their boat (fishing licence, measurement certificate, proof of the nationality of the boat)
- Other licences and certificates
- Proof of payment of a total fee of EUR 8 at the Navy’s Pension Fund (MTN)
- Identity Card of the owner or the owners of the boat
- Tax Identity Number

1.4.2. Results from measurement and quantification

Table 1.4 Composition of Administrative Cost and Administrative Burden (IO 28)

<table>
<thead>
<tr>
<th>PA: Fisheries</th>
<th>Price (P)</th>
<th>Nr of entities / occurrences</th>
<th>frequency</th>
<th>BAU</th>
<th>Total AB</th>
<th>Total AC</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Time</td>
<td>Consulting costs</td>
<td>Out of pocket / Equipment Costs</td>
<td>P (in EUR )</td>
<td>(Q)</td>
<td>(f)</td>
</tr>
<tr>
<td>IO 28: Obligation to obtain and renew commercial fishing vessel</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Non-segmented</td>
<td>255</td>
<td>0</td>
<td>30</td>
<td>86</td>
<td>16 350</td>
<td>0.5</td>
</tr>
</tbody>
</table>

For the purpose of this measurement, the number of occurrences for this IO relate to the number of fishing vessel licences, for which the application is performed by manual workers (fisheries). This licence must be renewed every two year which makes the frequency 0.5.

Standardised description of the activities related to the IO 28

Fishermen who own a professional fishing vessel, or are acquiring one, need to have a fishing vessel licence as to be able to operate on their vessel. It complements the professional fishing licence which enables the fishermen to sail at sea (or lake) and to proceed to their professional activity. The fishing vessel licence authorises the vessel itself, along with its owner. It is renewed every two years.

From the interviews it arises that the issuance of a new fishing vessel licence is very rare nowadays and that most of the activity in the area is restricted on the renewal and / or sale of already existing licenses. Therefore, the process described below focuses on the renewal of the licenses, as this is the most common case. The last section however focuses on the process of transferring a licence, as to illustrate a specific additional step, which entails additional costs for fishermen, beyond the process measured here.

1. Data and Document Gathering:

For renewing their licence, fishermen are required to gather and submit a series of documents proving the Fishing activity, but the economic (at a broad sense) and financial situation of the
fisherman-owner. These documents according to the responses received from the interviews are as follows:

- A copy of the Identity Card
- An income Clearance Certificate
- A Professional Fishing Licence
- The former fishing vessel licence
- A proof of payment of a fee of EUR 24 in the local tax authority
- A certificate from their fishing union
- A certificate from the Agricultural insurance Organisation
- A domicile Certificate

For gathering these documents, fishermen require obtaining them at the municipality they reside, the Agricultural Insurance Organisation of their area, the fishing club they belong to, the local tax authority and in case they do not have their income clearance certificate, they must (re)visit their accountant. The time spent for this activity is approximately 2.5 hours (150 minutes), with an additional 15 minutes for the payment of the fee at the local tax authority. None of these have however been perceived as time-costly.

2. Submission of documents and reception of the commercial fishing vessel licence:

When all these documents are gathered, fishermen visit their local port authorities in order to apply for the commercial fishing vessel licence and submit the supporting documents, which takes normally 90 minutes.

In most cases, the applicant receives the new / renewed licence within the same day he submits the documents at the port authorities. In extreme situations, where the port authority office has a heavier workload, the licence may be obtained within 3 to 5 days.

3. Acquisition of an existing commercial fishing vessel licence:

For the acquisition of an existing fishing vessel licence, the process is at first assimilated to the commercial transaction between a buyer and a seller, but which has the particularity of needing to transfer the ownership of the licence along with the vessel. For that, the buyer is required to visit the Directorate of Fisheries in a regional authority (where the seller belongs to) and provide them with the following documents:

- A Professional Fishing Licence
- The former fishing vessel licence and the certification of its equipment
- An income Clearance Certificate (E1 or similar) – proving of his –at least at 50%-fishing activity
- A certificate from their fishing union
- A certificate from the Unemployment (if applicable)
- A proof of payment of a fee of 60EUR to the municipality

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3 Such procedure is not included in the present measurement as it is not arising from the legislation in scope as such, and refers to a very particular case.
Within a period of 5 days and in case of approval, the regional authority issues a certificate authorizing the transfer. It is usually sent from the regional authority to the local port authorities.

Once the certificate has arrived at the local port authority, the buyer and the seller are required to go there along with the proof of transfer (commercial transaction) and their identity cards for obtainment of the transfer. The issuance of the licence may take up to one day.

1.4.3. Analysis of measurement results

The measurement results show that if this IO is completely removed, both the administrative burden and the administrative cost for the Greek economy would be reduced by EUR 704,215.

The process of getting a new / renew and old licence is quite simple and rather straightforward, accounting for 4% of the total administrative costs measured for this PA. Among the activities described here above, the most burdensome rely in the gathering of data needed for the application, which requires almost 60% of the total time or 2,5 hours. This is due to the fact that fishermen need to visit several public authorities (yet on a rather local perimeter) in order to obtain the respective documents.

The second most burdensome activity is the submission of the documents to the port authorities which may require from one to two hours and a half, with a standardised time of 1,5 hours, representing 35% of the total time.

As regards the differences identified among interviewees, these are limited to the time required to gather the documents and submit them to the port authorities, closely related to the distances covered by the fishermen each time. It is not however perceived as burdensome, nor does it create particular irritation issues as such, even if they would not do it if the legislation did not impose it.

The main difference that was pointed out from the different conducted interviews resides in the services delivered in local port authorities, where in smaller ports, the authorities themselves would contact the fishermen as to renew their fishing vessel licences, guiding them entirely and in a proactive way through the process.

Main irritation points

The suggestions presented below represent the views of businesses collected through the interviews conducted. They do not take into account the views of the OECD, the Greek authorities or the consultants’ assessment.

- The numerous, yet similar permits for fishermen:
  According to the interviewees, the most irritating factor is the issuance of permits and licenses with identical characteristics. Fishermen have to visit 3 different authorities in order to submit almost the same documents in order to receive similar certifications. They claimed that the sailing licence, the fishing vessel’s licence and the fisherman permit required almost the same documents and have slightly (yet seemingly non substantial) differences with each other. This creates a double or triple requirement, which multiplies considerably the efforts in time for fishermen, creating an important irritation factor.

- The limitation of local authorities to a controlling and inspecting role:
  In order to operate their fishing vessel, fishermen have different inspection with authorities. In many cases it has been stated that the role of the authorities (and mainly of the port authority) have a strictly controlling role, aiming at finding a mistake. Such an inspection is perceived as inquiring to a certain level of exaggeration, exceeding the normal conduction of activities. As
a result, it requires time for fishermen to comply, often creating conflicts and communication issues with authorities.

- The absence of data sharing between authorities:

  As mostly stated in the case of a transfer of licence, interviewers have indicated as irritating the absence of communication of fishermen or vessel information among different authorities. As a reminder, in case of transfer, the prospective beneficiaries need to go to different prefectures as to get certifications that they need to provide to municipalities and to port authorities. The transfer of the licence has to be validated both at the authorities of the seller and the buyer, which creates a double requirement. It was also pointed out that data sharing among administrations was absent, gathering at a more central level in a more general way (as for instance among veterinary offices, the municipality, the prefecture and the port authorities). Fishermen were highly irritated when they had to travel from one authority to another in order to handle documents that already been submitted, and having the role of intermediaries among them.
Annex 2: Forms: Obligation to apply for a licence to use water resources (aquaculture businesses) – IO 26

ΠΑΡΑΡΤΗΜΑ ΙΙ
ΑΙΤΗΣΗ-ΔΗΛΩΣΗ

Κωδικός Αδειας

(συμπληρώνεται απο τη Διεύθυνση Υδάτων της Αποκεντρωμένης Διοίκησης)

1. ΑΙΤΗΣΗ

1. ΓΙΑ ΤΗ ΧΩΡΗΓΗΣΗ: Αδειας χρήσης νερού

2. ΠΡΟΣΣ:

Περιφέρεια: .................................................................

Τμήμα Υδροοικονομίας: .................................................................

ή

Περιφερειακή Ενότητα: .................................................................

Τμήμα Περιβάλλοντος & Υδροοικονομίας: .................................................................

3. ΣΤΟΙΧΕΙΑ ΑΙΤΟΥΝΤΟΣ:

3.1 Για φυσικό πρόσωπο:

Επώνυμο: ............................................................................................

Όνομα: ............................................................................................

Όνομα πατρός ή συζύγου: ............................................................................................

Διεύθυνση κατοικίας: Οδός ............................................................................................ Αριθμ.

Πόλη: ............................................................................................ Τ. Κ.

Τηλ.: ............................................................................................. e-mail: .................................................................

A.Τ. ............................................................................................. Ημερ. ημερ. Επιδότηση αρχή.

3.2 Για Ν.Π.Ι.Α. & Ν.Π.Α.Δ.:

Επώνυμο: ............................................................................................

Οδός ............................................................................................ Αριθμ. Τ. Κ.

Τηλ.: ............................................................................................. e-mail: .................................................................

3.3 Παρατηρήσεις/νομιμοποίηση εκπροσώπων

.................................................................................................
### A. ΣΤΟΙΧΕΙΑ ΠΟΥ ΣΥΜΠΛΗΡΩΝΟΝΤΑΙ ΓΙΑ ΟΛΟΥΣ ΤΟΥΣ ΤΥΠΟΥΣ ΑΔΕΙΩΝ

<table>
<thead>
<tr>
<th>1. ΣΤΟΙΧΕΙΑ ΧΩΡΟΥ (δραστηριότητα ή εκτέλεσης έργου):</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.1 Περιγραφή Στοιχείων</td>
</tr>
<tr>
<td>Νόμος ..........................................................</td>
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<td>Δήμος ..........................................................</td>
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<tr>
<td>Δημοτική Ενότητα .................................................</td>
</tr>
<tr>
<td>Τοπωνυμία χρήσης νερού .........................................</td>
</tr>
<tr>
<td>1.2 Ιδιωτικού καθεστώς θέσεις υδρηλητρίες ή και έκτασης έργου</td>
</tr>
<tr>
<td>Ιδιωτική ..........................................................</td>
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<td>Δημοτική ..........................................................</td>
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<td>Δικαιώματα ..........................................................</td>
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<tr>
<td>1.3 Σε περίπτωση χρήσης έργου σε μη ειδικευμένη έκταση</td>
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<tr>
<td>Μοναδική ..........................................................</td>
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<td>Επιπλέον ..........................................................</td>
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<tr>
<td>Χρηματοδότηση ....................................................</td>
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<thead>
<tr>
<th>2. ΣΤΟΙΧΕΙΑ ΧΡΗΣΗΣ ΝΕΡΟΥ</th>
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<tbody>
<tr>
<td>2.1 Βασικές κατηγορίες χρήσης</td>
</tr>
<tr>
<td>ΥΔΡΕΥΣΗ ..........................................................</td>
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<tr>
<td>ΑΓΡΟΤΙΚΗ ..........................................................</td>
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<tr>
<td>Πόση-διατροφή-καθαριότητα-πράσινο ........................................</td>
</tr>
<tr>
<td>Αρδευση ..........................................................</td>
</tr>
<tr>
<td>Υδρ. κανόνωσιν χώρων &amp; δημόσιων ........................................</td>
</tr>
<tr>
<td>Κινηματογραφία ....................................................</td>
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<tr>
<td>Κλιματισμός-θερμομετρία ........................................</td>
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<tr>
<td>Υδατοκαλλιέργειες ...................................................</td>
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<tr>
<td>Παροχή υδραυλικών .....................................................</td>
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<tr>
<td>Ανακύκλωση-κατασκευές ..............................................</td>
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<tr>
<td>ΑΝΑΝΑΨΗ ..........................................................</td>
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<td>ΑΝΑΛΥΣΗ ..........................................................</td>
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<td>ΠΟΛΛΑΠΛΑ ΧΡΗΣΗ .......................................................</td>
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<td>Καλλιεργήσεις .......................................................</td>
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<td>Εγκαταστάσεις καθ. τουρ. Υποδ. ........................................</td>
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<tr>
<td>ΑΘΛ. &amp; ΨΥΧ. δραστηριότητες .........................................</td>
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<tr>
<td>ΛΟΙΠΕΣ ΧΡΗΣΕΙΣ .......................................................</td>
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</table>

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2.2 Είδος και μέγεθος μονάδας εκμετάλλευσης

α. Σε περίπτωση ύδρευσης
   - Αριθμός ύδρευμενών σταθμών
   - Έκταση περιοχής (στρ.)

β. Σε περίπτωση άρδευσης

<table>
<thead>
<tr>
<th>Είδος καλλιέργειας</th>
<th>Αρδεύσιμη εκτάση (στρ.)</th>
<th>Σύστημα άρδευσης</th>
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γ. Σε περίπτωση κηποτορικής μονάδας

<table>
<thead>
<tr>
<th>Είδος ζώων</th>
<th>Αριθμός ζώων</th>
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δ. Σε περίπτωση υδατοκαλλιέργειας, διαβίωσης φυτών, αγροτοβιομηχανικής ή βιομηχανικής χρήσης νερού
   - Είδος παραγωγών προϊόντων
   - Διαμορφώσεις του έργου (παραγωγή)
   - Χαρακτηριστικά υδατοδίαλυμα (m³)

ε. Σε περίπτωση επεξεργασίας νερού (για πόση)
   - Τρόπος επεξεργασίας
   - Μέση επίσημη απόδοση νερού (m³/η)

στ. Σε περίπτωση ενεργειακής χρήσης
   - Παραγόμενη ενέργεια μονάδας

ζ. Σε περίπτωση χρήσης νερού για αναψυχή
   - Συνολική χρησιμοποιημένη υδατοδίαλυμα (m³):
   - Υδάτινη επιφάνεια ποταμού ή λίμνης που ασκείται η χρήση

η. Σε περίπτωση χρήσης για προστασία από τη ρύπανση
   - Σύνηθεις περιογραφή

β. Λοιπές περιπτώσεις χρήσης νερού που δεν περιγράφονται παραπάνω
   - Σύνηθεις περιογραφή μονάδας
### 3. ΣΤΟΙΧΕΙΑ ΝΕΡΟΥ:

#### 3.1 Προέλευση (απόληψη από)

<table>
<thead>
<tr>
<th>Επιφανειακό</th>
<th>Ποτάμια</th>
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</thead>
<tbody>
<tr>
<td>α) Λύκνιο</td>
<td></td>
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<tr>
<td>β) Μεταβατικά ύδατα</td>
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<tr>
<td>γ) Παράκτια ύδατα</td>
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<tr>
<td>δ) Άλλο</td>
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</tbody>
</table>

#### 3.2 Πορώτα που απατείται με βάση τα στοιχεία της απόληψης (από m²/ήτος)

<table>
<thead>
<tr>
<th>Ετήσια απολήψεις ύδατος</th>
<th>Περίοδος χρήσης (μήνες) από</th>
<th>έως</th>
</tr>
</thead>
</table>

#### 3.3 Πορώτα που απατείται για υδατοκαλλιέργειες (από m²/ήτος)

<table>
<thead>
<tr>
<th>Ετήσια απολήψεις υγρού</th>
<th>Περίοδος χρήσης (μήνες) από</th>
<th>έως</th>
</tr>
</thead>
</table>

#### 3.4 Πορώτα υγρών που απατείται για τη δηλωμένη χρήση, σύμφωνα με τη κύρια χρήση

### 4. ΓΕΝΙΚΕΣ ΠΑΡΑΤΗΡΗΣΕΙΣ / ΕΠΙΣΗΜΑΝΣΕΙΣ

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OIH AIT .......

(συνοψίσθη)
Β. ΔΗΛΩΣΗ

Ο/Η (επώνυμο) .................................................................
(όνομα) ..............................................................................
(όνομα πατρός) ......................................................................
κάτοικος του υπ'αρχήν ..........................................................
με ημερ. εκδ. ...........................................................................
δελτίου ασυνομικής ταυτότητας ..............................................

Δηλώνω υπεύθυνα και γνωρίζοντας τις συνέπειες του Ν.1599/1986 για υπεύθυνη δήλωση, ότι ολα τα στοιχεία της οπήρα εκ των δικαιολογητικών, πέραν αυτών που υπογράφουν οι κατά νόμο υπεύθυνοι, είναι αληθινά και ότι αποδέχομαι τελείως ολόκληρο στοιχεία περί ραφιδάμος, προσωπικές και ελέγχους που προβλέπονται από την ισχύουσα νομοθεσία για τη χορήγησή της αυτόματης δέσιμου.

Ο/Η ΔΗΛΑ...................

(υπογραφή) [4]

ΗΜΕΡΟΜΗΝΙΑ ΥΠΟΒΟΛΗΣ ΑΙΤΗΣΗ-ΔΗΛΩΣΗΣ .................................................................


[2] Ο υπολογισμός αναγκάζεται σε κεφάλαια σύμφωνα με:
- Την ΚΥΑ 616-6531/1985 προκειμένου για αρδευτική χρήση
- Την ΚΥΑ Δ1/625/1991 προκειμένου για υδραυλική χρήση για ανθρώπινη κατανάλωση
- Το ΠΔ 43/2092 για τομεακές εγκαταστάσεις
- Επικαιρίες της θηκής προκειμένου για υδραυλική χώρα

[3] Επισημάνεται η χρήση και/ή χαρτοπαιδιογραφική ενδείξη σύμφωνα με την κύρια νομοθεσία

Annex 3: Forms: Obligations to apply for and renew a producer-seller licence (fishermen/fish-farmers) - IO 27

ΑΔΑ: ΒΕΔΦΒ-ΓΓ2

ΑΙΤΗΣΗ-ΥΠΕΥΓ.ΔΗΛΩΣΗ
Η συμφωνία των αποτελεσμάτων που υποβάλλονται με σκοπό τη διαμόρφωση μιας ελαφράτης με ελεγχόμενη μη βάση τα αρχεία άλλων υπηρεσιών (μέρος 8 τμ. 4 Ν. 1599/1996)
Περίγραψη αιτήματος: «Χορήγηση βεβαίωσης για έκδοση άδειας Παραγωγού Λαϊκών Αγορών σε επαγγελματίες αλιείας»

ΣΤΟΙΧΕΙΑ ΑΙΤΟΥΝΤΟΥ ΑΛΙΕΩΝ (αριθμητικά επαγγελματικοί αλιευτικοί σκάφη)

Ο – Η Όνομα: Επώνυμο:
Όνομα Πατέρα: Επώνυμο Πατέρα:
Όνομα Μητέρας: Επώνυμο Μητέρας:
Αδέτι Αδετίς:
Ημερομηνία γέννησης:
Τύπος (Γένος):
Τύπος Καταχώρησης: ΟΜΕ:
Τηλ: Φαξ:
Δήλη πληρωμής παραδοτού (Επαε):

ΟΡΙΣΜΕΙΣ / ΣΤΟΙΧΕΙΑ ΕΝΗΜΕΡΩΣΗΣ (ελληνική), δηλ. ονοματεπώνυμο, αδέτι)

ΟΝΟΜΑ:
ΟΝΟΜΑ ΠΑΤΕΡΑ:
ΟΝΟΜΑ ΜΗΤΕΡΑΣ:
ΤΗΛ:
ΦΑΞ:

18. στοιχείο χρονικής άρσης και γραφής της κατανομής υπό το άρθρο 22 του Ν. 1599/1996, δηλαδή τον Απρίλιο του προηγούμενου χρόνου.
### Annex 4: Hourly rate per employee type

<table>
<thead>
<tr>
<th>Employee Type</th>
<th>Hourly Rates (per employee type)</th>
</tr>
</thead>
<tbody>
<tr>
<td>1: Legislators, senior officials and managers</td>
<td>EUR 34.62</td>
</tr>
<tr>
<td>2: Professionals</td>
<td>EUR 24.82</td>
</tr>
<tr>
<td>3: Technicians and associate professionals</td>
<td>EUR 19.06</td>
</tr>
<tr>
<td>4: Clerks</td>
<td>EUR 16.73</td>
</tr>
<tr>
<td>5: Service workers and shop and market sales workers</td>
<td>EUR 13.46</td>
</tr>
<tr>
<td>6: Craft and related trades workers</td>
<td>EUR 18.03</td>
</tr>
<tr>
<td>7: Plant and machine operators and assemblers</td>
<td>EUR 17.19</td>
</tr>
<tr>
<td>8: Manual workers (agricultural and fisheries)</td>
<td>EUR 13.21</td>
</tr>
<tr>
<td>9: Elementary occupations</td>
<td>EUR 12.92</td>
</tr>
</tbody>
</table>

To calculate the total AC and AB, employee types are used. For every employee type a standardised hourly wage rate is used. The hourly rates presented above are based on employer costs and include a 25% overhead. They are used to calculate the administrative cost and burden for the different IOs in scope of this measurement.