

MEDITERRANEAN ALLIANCE FOR WETLANDS

The Right Honourable Kyriakos Mitsotakis
Prime Minister of the Hellenic Republic 8,
Efroniou street
10634 Athens
Greece



Subject: Letter from the Mediterranean Alliance for Wetlands – urgent action needed to protect the wetlands of the Erimitis peninsula

Your Excellency, Mr. Prime Minister,

We are writing as a group of international environmental organizations and members of the Mediterranean Alliance for Wetlands to urge you to prevent the destruction of the wetlands of the Erimitis peninsula.

In October 2020, you received a previous letter from the Mediterranean Alliance for Wetlands, signed by 16 organizations working across the Mediterranean region, where we expressed our serious concern about the proposed construction of a tourist resort in the Erimitis peninsula (the “Kassiopi Project”).

In that letter we highlighted how the Erimitis wetlands are not only a site of natural beauty, which attracts locals and tourists alike, but also represent a significant natural asset for Greece, providing ecological services such as erosion protection and water quality regulation. The Erimitis peninsula is one of the few remaining unspoiled parts of north-east Corfu and contains a great diversity of habitats, including three important coastal wetlands in Corfu (Vromolimni, Akoli Pond and Savoura), which are protected by the Greek Presidential Decree 229/AAP/2012. Erimitis’ three wetlands are an important ‘stopover point’ for migratory birds crossing the north of Greece, a number of which are classified as threatened and officially protected under the Birds Directive of the European Union. Additionally, numerous species protected by the EU Habitats Directive also depend on the existence of these wetlands, such as the European pond terrapin and the dice snake (see Appendix).

As outlined in that letter, the proposed Kassiopi Project could have serious implications for the habitats and species of two of Erimitis’ important coastal wetlands, Vromolimni and Akoli. The threats associated with the project include increased noise pollution, water pollution, light pollution, alteration of the catchment area and water regime, loss of vegetation and ecosystem fragmentation.

MEDITERRANEAN ALLIANCE FOR WETLANDS

Not having received a response to our previous letter, we are writing to you again as it has subsequently come to our attention that preliminary construction works associated with the Kassiope Project have now begun, including the deforestation and clearing of the plot. We were shocked to learn that heavy machinery passed on Friday February 19th through the boundaries of the protected wetland Vromolimni, constructing a road on the seaside shore of the wetland despite being outlawed according to the ministerial decree for small wetlands (Code Y22KER030, ΦΕΚ ΑΑΠ 229/19.06.2012).

We therefore urge you to reconsider the development of this project and implement appropriate conservation measures in order to comply with the obligations to which Greece has committed itself at the national and international level, including:

- Permission of only minor activities that would not alter the ecological properties of the wetlands within this area, such as hiking and running through the existing paths, and nature observation and research.
- The designation of this area as a protected area in line with Directives 92/43/EEC and 2009/147/EC, and national law 1650/1986 (as amended), instead of promoting unsustainable and environmentally-damaging development projects such as the Kassiope Project.
- The adoption of conservation measures for the protection of the specific habitats and species in line with the Bonn and Bern Conventions and the EU nature Directives.
- The effective implementation of the presidential decree 229/AAP/2012 on small island wetlands and appropriate measures for the protection of these wetlands.

As the global tourism industry reopens following the devastation of the Covid-19 pandemic, the eyes of the world will certainly be on Greece. We consider that you and your government have a unique opportunity to demonstrate to the world your leadership in addressing the environmental crisis and promoting sustainable development, which considers local needs and wishes and adheres to international and EU law.

Instead of allowing damaging development, we ask that Erimitis be used as a flagship for ecologically compatible tourism and the conservation of nature and natural beauty across the Greek islands.

We the undersigned organizations remain at your disposal to provide any further information required and to contribute our expertise to support the protection and preservation of the valuable coastal wetlands of the Erimitis peninsula.

Yours sincerely,

The organizations of the Mediterranean Alliance for Wetlands whose logos are on the top of the letter.

CC.

M. ATTIA Khalil, Director at UNEP/MAP-SPA/RAC

M. DERELIEV Sergey, Head of Science, Implementation and Compliance at UNEP/AEWA Secretariat

M. GUERQUIN Francois, Director at Plan Bleu

M. LEINER Stefan, Head of the Biodiversity Unit at the European Commission

M. SATTA Alessio, Coordinator of the MedWet Initiative

Ms. STICKER Ursula, Secretary of the Bern Convention

Ms. URREGO ROJAS Martha, General Secretary at RAMSAR

MEDITERRANEAN ALLIANCE FOR WETLANDS

APPENDIX

The following documents have been prepared by Elena Papadopoulou (MSc Landscape Ecology) based on data collected by the biologist Xavier Gremillet, the zoologists Marie Stille and Bo Stille, the ornithologist Giannis Gasteratos and the Flora Ionica working group of the University of Vienna.

Appendix A: Habitat types in Erimitis (Habitats Directive 92/43/EEC Annex I)

- 1120* Posidonia beds (*Posidonium oceanicae*)
- 1150* Coastal lagoons
- 1170 Reefs
- 1210 Annual vegetation of drift lines
- 1310 Salicornia and other annuals colonizing mud and sand
- 1240 Vegetated sea cliffs of the Mediterranean coasts with endemic *Limonium* spp.
- 1410 Mediterranean salt meadows (*Juncetalia maritimi*)
- 1420 Mediterranean and thermo-Atlantic halophilous scrubs (*Sarcocornetea fruticosi*)
- 5230* Arborescent matorral with *Laurus nobilis*
- 5320 Low formations of *Euphorbia* close to cliffs
- 5330 Thermo-Mediterranean and pre-desert scrub
- 9310 Aegean *Quercus brachyphylla* woods - 9340 *Quercus ilex* and *Quercus rotundifolia* forests

Appendix B: Connectivity of Erimitis to protected areas

Connectivity of Erimitis to protected areas



MEDITERRANEAN ALLIANCE FOR WETLANDS

Appendix C: List of strictly protected wetland bird species in Erimitis

Scientific Name	English Name	Directive		Bern	Bonn
		2009/147/EC	Annex I	Convention Annex II	Convention Annex II
<i>Aythya nyroca</i>	Ferruginous duck		+		+
<i>Podiceps nigricollis</i>	Black-necked grebe			+	
<i>Phalacrocorax aristotelis</i>	European shag		+	+	
<i>Ixobrychus minutus</i>	Little bittern		+	+	+
<i>Ardeola ralloides</i>	Squacco heron		+	+	
<i>Egretta garzetta</i>	Little egret		+	+	
<i>Ardea alba</i>	Great egret		+	+	+
<i>Ardea purpurea</i>	Purple heron		+	+	+
<i>Plegadis falcinellus</i>	Glossy ibis		+	+	+
<i>Tringa glareola</i>	Wood sandpiper		+	+	+
<i>Sterna sandvicensis</i>	Sandwich tern		+	+	+
<i>Alcedo atthis</i>	Common kingfisher		+	+	
<i>Motacilla flava</i>	Yellow wagtail			+	+
<i>Motacilla cinerea</i>	Grey wagtail			+	+
<i>Motacilla alba</i>	White wagtail			+	+
<i>Cettia cetti</i>	Cetti's warbler			+	+
<i>Acrocephalus scirpaceus</i>	European reed warbler			+	+
<i>Acrocephalus arundinaceus</i>	Great reed warbler			+	+
<i>Hippolais pallida</i>	Eastern olivaceous warbler			+	+

Appendix D: List of strictly protected Erimitis wetland species (except for birds)

Scientific Name	English Name	Directive		Bern	Greek
		92/43/EEC Annex II	Annex IV	Convention Annex II	Presidential Decree 67/81
<i>Lutra lutra</i>	Eurasian otter	+	+	+	+
<i>Hyla arborea</i>	Common tree frog		+	+	+
<i>Bufo bufo</i>	Common toad				+
<i>Lissotriton vulgaris graecus</i>	Greek smooth newt				+
<i>Emys orbicularis</i>	European pond terrapin	+	+	+	+
<i>Mauremys rivulata</i>	Balkan terrapin	+	+	+	+
<i>Natrix tessellata</i>	Dice snake		+	+	+
<i>Natrix natrix</i>	Grass snake				+

MEDITERRANEAN ALLIANCE FOR WETLANDS

List of references

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- Gremillet X. (1998): Otter (*Lutra lutra*) Surveys on Corfu island and at lakes Prespa (Greece), Proc. VIIIth International Otter Colloquium.
- Gremillet X. (1993): Field survey of *Lutra lutra* on Corfu island (Greece). IUCN Otter Spec. Group Bull. 8: 39-42.
- Stille Bo & Marie Stille (2017): The Herpetofauna of Corfu and Adjacent Islands. Edition Chimaira, Frankfurt am Main.

Legislation

- Bern Convention: “*Convention on the Conservation of European Wildlife and Natural Habitats*”, adopted on 19 September 1979 in Bern, Council of Europe, Official Journal L 38 of 10.02.1982.
Amended by the Standing Committee on 8th March 2018.
- Bonn Convention: “*Convention on the conservation of migratory species of wild animals*”, signed in 1979 in Bonn, Official Journal L 210 of 19.07.1982. Amended by the Conference of the Parties in 22 May 2020.
- EU Birds Directive: “*Directive 2009/147/EC of the European Parliament and of the Council of 30 November 2009 on the conservation of wild birds*”, European Parliament and European Council, Official Journal L 20 of 26.01.2010. Codified version of Directive 79/409/EEC. Transposed into Greek legislation through the Joint Ministerial Decision 414985/29-11-85(G.G. B’757), the Joint Ministerial Decision 37338/1807/E.103/1-9-10 (G.G. 1495/B/6-9-10) and the Joint Ministerial Decision 8353/276/E103/17-2-2012 (G.G. 415/B/23-2-2012).
- EU Habitats Directive: “*Council Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora*”, European Council, Official Journal L 206 of 22.07.1992. Transposed into Greek legislation through the Joint Ministerial Decision 33318/3028/11-12-1998 (G.G. 1289/B/28-12-98) and the Joint Ministerial Decision 14849/853/E103/4-4-2008 (G.G. 645/B/11-4-08).
- Presidential Decree for the protection of small island wetlands: “*Approval of a list of small island wetlands, and provision of terms and conditions for the protection and conservation of small coastal wetlands included therein*” (G.G. AAP 229/19-06-2012).
- Presidential Decree No 67/81: “*Greek presidential decree on the protection of native flora and wild fauna and the determination of the coordination and control procedure of related research*” (G.G. 23/A/30-01-1981).