

To:
Council of Europe
Secretariat General
CONVENTION ON THE CONSERVATION OF
EUROPEAN WILDLIFE AND NATURAL HABITATS
Attn: Mrs Iva Obretenova

Mytilene, 21 July 2017

Subject: Response to the letter of 11-04-2017 of the Bern Convention Secretariat in relation to the Complaint n° 2014/6 on large-scale exploitation and marketing of protected marine shelled molluscs in Greece

Dear Mrs Obretenova,

In response to your letter of 11-04-2017 and taking into account the response of the Greek Ministry of Rural Development and Food, Directorate for Fisheries Control, signed by Mrs Marina Petrou – Director General – I would like to provide some updated information on the large-scale exploitation and marketing of the protected species *Lithophaga lithophaga* (date mussels) in Greece, and to react to the claims of the Greek Ministries so far.

It is evident from the three responses of the Greek Ministries (Ministry of Environment & Energy, Ministry of Rural Development and Food) that the documented large-scale exploitation and marketing of date mussels (and other “protected” shelled molluscs) has not been adequately confronted by the Greek government:

- In the first governmental response to the Complaint (21 July 2015), the existing legislative provisions in Greece for the protection of the specific species were listed as a proof of the “pioneering” actions of Greece to stop the illegal exploitation of the species. This official response precisely highlighted the problem. Greek administration considers that by passing legislation, illegal exploitation is automatically eliminated. However, **the problem is the lack of adequate enforcement and control mechanisms**. In the same response, it was stated that the Ministry “firmly disagrees” with the conclusion of widespread exploitation and

marketing of date mussels in Greece but they provided no data and evidence to support such a disagreement.

- In the second governmental response to the Complaint (15 March 2016), it was only stated that the trade of date mussels requires a CITES permit and that “based on the information available to our office and screening through the archives of the past decade, neither import or export permits for specimens of the species have ever been issued by any of the Greek CITES Management Authorities, nor has corresponding request been submitted” [!!!]. This response was totally incomprehensible and out of focus. Obviously, **the illegal exploitation, trading and serving in restaurants will not be visible in any official archive and those involved in the illegal trade of date mussels will not ask for a CITES permit!** Furthermore, most of the date mussels served in the Greek restaurants have been exploited locally.
- In the third governmental response to the Complaint (7 March 2017), the Ministry provided an account of all administrative penalties issued by local Port Authorities for the years 2014, 2015, 2016. **This account is the strongest possible evidence of the insufficiency of control and enforcement regarding the illegal exploitation and marketing of date mussels in Greece.** Within three years, penalties have been issued in only seven localities (Chalkida, Mytilene, Aidipsos, Preveza, Kavala, Piraeus, Mesologgi) despite evidence of large-scale illegal exploitation and marketing all over Greece. Furthermore, the Ministry’s list included **only two (!) cases of penalties in restaurants in three years** despite the fact that: (i) in the initial complaint and the relevant publication (Katsanevakis et al. 2011), date mussels were found to be served in 50 restaurants (systematically in 25 of them) all over Greece; (ii) in our response letter of 25 February 2016 to the Council of Europe we provided a list of tenths of restaurants **in 33 localities** in Greece, advertising their dishes with date mussels or fan mussels (*Pinna nobilis*) through the internet (see updated list in the current report). **The Ministry ignored our list and issued no penalties in any of the restaurants that advertise their illegal goods through the internet.** In July 2016, we (S. Katsanevakis, M. Sini) visited Chalkida for field work in the framework of a research project. During a half hour walk along the coastal street of Chalkida we spotted six restaurants that served date mussels. According to the official list provided by the Ministry, it took three years to the port authority of Chalkida to put fines in two restaurants!

Due to the lack of funding, it was not possible to repeat a large-scale survey to update our 2011 results. However, we managed to collect relevant updated information mainly through the web and by our own opportunistic records. Hence, we did the following:

1. We updated our previously submitted list (25 February 2016) by checking if the web pages of restaurants, trip advisors, restaurant reviews, blogs etc that advertise the marketing of date mussels and fan mussels remain valid and we also added some new records (Fig. 1; Table 1). We reached the same conclusion as before: **surveillance and enforcement is so weak that many restaurants do not hesitate to promote online a variety of dishes with date mussels.**
2. We have conducted a Facebook survey asking those that participated if they had recently encountered date mussels or fan mussels in a seafood restaurant or fish market. Despite the low participation in the survey (only 17 responses), 9 localities have been reported (Fig. 1) for date mussels (Corinth, Athens, Leros, Alexandroupolis, Chalkida, Kefalonia, Aigina, Artaki, Mytilene) and 7 localities for fan mussels (Chalkida, Kefalonia, Aigina, Artaki, Syros, Kaloni, Gera). In one case (Syros), fan mussels were openly sold in the central fish market (27 February 2017; documented by video – available upon request).
3. We have mapped our own (limited) records during underwater surveys of destroyed reefs due to date mussel fisheries (Fig. 2). These records are opportunistic and highly underestimate the actual situation in Greece as they are not based on a systematic dedicated survey. No targeted study on the level of impact of date mussel fisheries in Greece has been conducted yet.

Nothing has improved since our initial large-scale survey in 2011 (Katsanevakis et al. 2011). Protected marine shelled molluscs are still widely exploited and marketed in Greece. **The account of all administrative penalties of the last three years, provided by the Ministry, further emphasizes the non-implementation of the related legislation and the malfunction of competent structures/authorities for the fisheries control and enforcement.** The total amount of fines placed on seafood restaurants within three years was 1,300 Euros. This is comparable to the daily revenues of a single medium-sized seafood restaurant! **It is obvious that such low penalties will not contribute to adverse the bad mentality of non-compliance that is widespread in Greece.**

Stelios Katsanevakis (Associate Professor, Department of Marine Sciences, University of the Aegean)

Irene Chalداiou (NGO Archipelagos – environment and development, Strofiliou 26, GR 14562, Kifissia)

Aliki Panou (NGO Archipelagos – environment and development, Strofiliou 26, GR 14562, Kifissia)

Dimitris Poursanidis (Postdoctoral researcher, Foundation for Research and Technology – FORTH, Heraklion, Greece)

Maria Sini (Phd in Marine Ecology, Postdoctoral researcher, Department of Marine Sciences, University of the Aegean)

Yiannis Issaris (Postdoctoral researcher, Hellenic Centre for Marine Research, Anavyssos, Greece)

Maria Salomidi (Researcher, Institute of Oceanography, Hellenic Centre for Marine Research, Anavyssos, Greece)

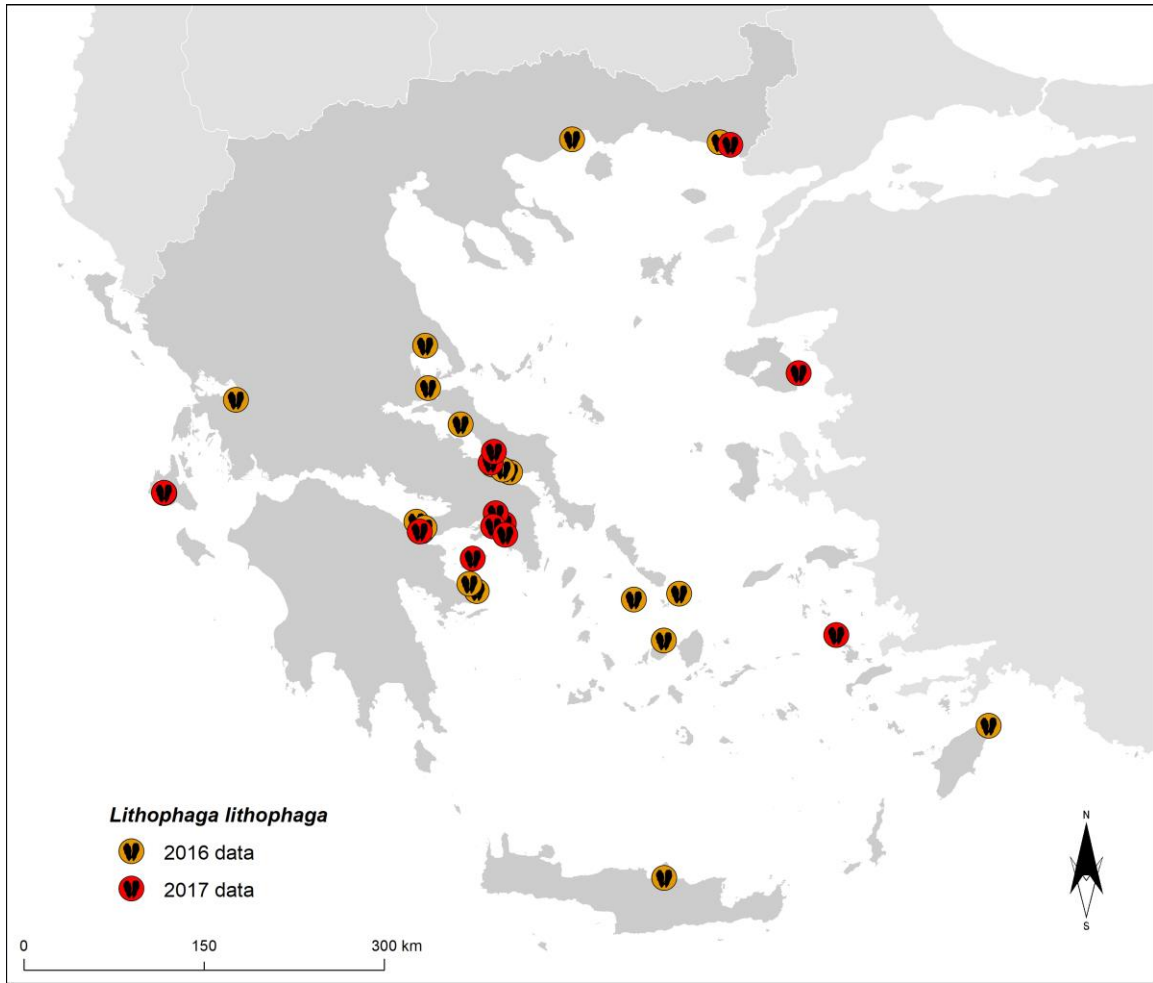


Figure 1: Localities in Greece, where there are recent records of seafood restaurants serving date mussels (data retrieved from the internet and personal communications). Note that this map is not based on an exhaustive search, and thus it underestimates the geographical range of illegal marketing and serving of date mussels in restaurants.

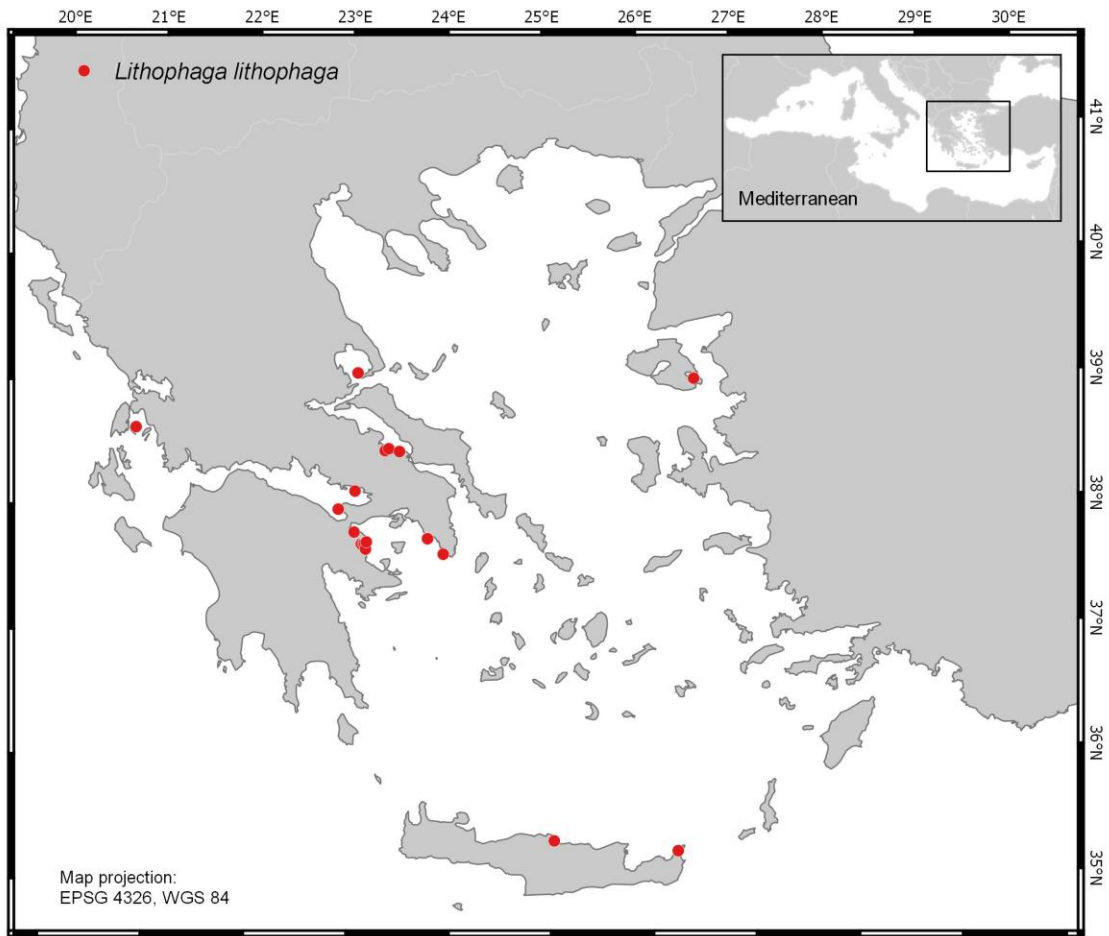


Figure 2: Sites where extensive destruction of rocky reefs due to date mussel fisheries has been observed by the authors of this document and by members of the NGO 'Archipelagos – environment and development'. These records are opportunistic and highly underestimate the actual situation in Greece as they are not based on a systematic survey.

Table 1: Information retrieved from the web and from personal communications on the serving of date mussels and fan mussels in Greek restaurants (updated: July 2017)

Location/Name of restaurants serving date mussels or fan mussels	Comments	Source	source (2017)
restaurant "Kritamo", Volos	date mussels are served	https://www.e-table.gr/restaurant/kritamo	
restaurant "Paramalo", Nea Kifisia (Athens)	date mussels are served	http://www.lifo.gr/team/taste/50717	https://www.ask4food.gr/estiatoria/15564-paramalo
restaurant "Strofi", Perama	date mussels are served	http://www.lifo.gr/team/taste/50717	
restaurant "Strofi", Perama	date mussels are served	http://www.culinarybackstreets.com/athens/2013/strofi/	
restaurant "Psariston", Neo Irakleio	date mussels are served	http://www.lifo.gr/team/taste/50717	http://www.psariston.gr/index.php?option=com_content&view=article&id=24&Itemid=175&lang=el

restaurant "Psariston", Neo Irakleio	date mussels are served	http://foodforthoughtathens.blogspot.gr/2010/07/blog-post_19.html	
Nea Artaki	date mussels are served	http://www.culinarybackstreets.com/athens/2015/cb-on-the-road-6/	
Barbarossa restaurant in Paros	date mussels are served	http://www.greeka.com/cyclades/paros/island/paros-restaurants/naoussa-restaurants/barbarossa.htm	http://paros.barbarossagr.com/en/restaurant-catering/menu/pasta-risoto
In Rhodes Town Alexis taverna	date mussels are served	http://www.europeandestinations.com/cms/4052/Web_Content.aspx?CMS&wh=0&wf=0	
Nea Artaki	date mussels are served	https://www.instagram.com/p/9yGqFHRfij/	
Kyani Akti, Argostoli, Kefalonia	date mussels are served	https://foursquare.com/v/%CE%BA%CF%85%CE%B1%CE%BD%CE%AE-%CE%B1%CE%BA%CF%84%CE%AE/4be55b252457a593fe5aab15	
restaurant "Varkoules", Metamorfofi	date mussels are served	https://foursquare.com/v/barkoules/4b094520f964a520191523e3	
restaurant "Batis", Nea Lampsakos		http://pieria-gr.blogspot.gr/2011/08/blog-post_4973.html	
Lampsakos	date mussels are served in	Nikos Katsiaras, personal communication	

	many restaurants		
Nea Artaki	date mussels are served in many restaurants	Nikos Katsiaras, personal communication	
restaurant Dourabeis Microlimano (Piraeus)	date mussels are served	https://panathinaeos.wordpress.com/2009/06/28/dourambeis-fish-restaurant/	
restaurant Dourabeis Microlimano (Piraeus)	date and fan mussels are served	https://www.facebook.com/pages/Dourabeis-Estiatorio/409519999143637	fb page
restaurant Dourabeis (Neo Psychiko)	date and fan mussels are served	http://www.clickatlife.gr/geusi/story/30166	fb page
restaurant Dourabeis (Neo Psychiko)	date and fan mussels are served	http://www.arttable.gr/estiatoria_ellada_athhna/article/8057/athhna-pou-tha-fate-to-kalutero-psari	fb page
restaurant Argoura - Tzitzifis	date mussels are served	http://www.arttable.gr/estiatoria_ellada_athhna/article/8057/athhna-pou-tha-fate-to-kalutero-psari	http://www.arttable.gr/estiatoria_ellada_athhna/article/8057/athhna-pou-tha-fate-to-kalutero-psari

restaurant Argoura - Tzitzifies	date mussels are served - the chef mentions in this interview that date mussels are fished by Kalymnian fishermen	http://popaganda.gr/argoura/	
restaurant Argoura - Tzitzifies		http://www.greecessence.com/wp-content/uploads/2014/11/2012_02_17_AN-Simply-divine-treasures-of-the-sea.pdf	
restaurant Argoura - Tzitzifies	date mussels are served	http://www.clickatlife.gr/geusi/story/26350	
restaurant "Teskos" - Nea Artaki	date mussels are served		https://foursquare.com/v/%CF%84%CE%AD%CF%83%CE%BA%CE%BF%CF%82/4c83fc3d51ada1cd4eea2a10
restaurant "Teskos" - Nea Artaki	date mussels are served	http://www.culinarybackstreets.com/athens/2015/cb-on-the-road-6/	
Kavos, Isthmia, Loutraki 20100, Greece		https://www.tripadvisor.co.uk/LocationPhotoDirectLink-g1188932-d3583339-i159093958-Kavos_Fish_Tavern-Isthmia_Loutraki_Corinthia_Region_Peloponnese.html	

Mykonos	date mussels are served	K. Demiropoulos, personal communication	
restaurant "Alokoto" - Vrilissia	date mussels are served	http://www.regroup.gr/default/388/city/1/deals/381/to-allokoto-tsipouradiko/	https://www.facebook.com/allokototsipouradiko/photos/a.461325500680554.1073741828.460312034115234/754595608020207/?type=3&theater
restaurant "Fishalida" - Athens center	date mussels are served	http://www.athensmagazine.gr/restaurants/articles/1613	CLOSED permanently
restaurant "Mpalkoni stis Kyklades", Vyronas (Athens)	date mussels are served	http://www.athensmagazine.gr/restaurants/articles/1613	
restaurant "Mikres Kyklades", Ilioupoli (Athens)	date mussels are served	http://www.athensmagazine.gr/restaurants/articles/1613	
restaurant "Aigaio", Ano Vrilissia (Athens)	date mussels are served	http://www.athensmagazine.gr/restaurants/articles/1613	
restaurant "Monemvasia" Nea Kifisia (Athens)	date mussels are served	http://www.athensmagazine.gr/restaurants/articles/1613	

restaurant "Paramalo", Nea Kifisia (Athens)	date mussels are served	http://www.pirouni.gr/2014/03/%CF%80%CE%B1%CF%81%CE%AC%CE%BC%CE%B1%CE%BB%CE%BF/	
Syros	date mussels are served	Yiannis Issaris, personal communication	
restaurant "Asterias", Nea Makri	date mussels are served	http://www.in2life.gr/delight/eat/article/281999/10-tavernes-kai-mezedopoleia-dipla-sth-thalassa.html	
restaurant "Koursaros", Drosia (Athens)	date mussels are served	http://www.estiatoria.gr/estiatorio/83/%CE%BA%CE%BF%CF%85%CF%81%CF%83%CE%B1%CF%81%CE%BF%CF%82	
restaurant "Mouria", Nea Artaki	date mussels are served	http://www.clickatlife.gr/geusi/story/26350	
restaurant "Edodi", Koukaki	date mussels are served	http://www.athinorama.gr/restaurants/article/xrusoi_skoufoi_2011-10245.html	
Kapetanios, Chalkida	e-food, delivery of seafood - two dishes of date mussels (8.50 Euros) are included	https://www.e-food.gr/delivery/chalkida/kapetanios	

	in the catalogue		
restaurant "Agkistri", Glyfada	date mussels are mentioned in the catalogue but it could be a different bivalve species	http://toagistri.gr/?p=61	
restaurant "Trata", Athens	date mussels are served	https://www.tripadvisor.com.gr/ShowUserReviews-g189400-d2580508-r247008163-Trata_Fish_Tavern-Athens_Attica.html	
restaurant "Ladokola", Irakleio, Crete	date mussels are served	https://www.facebook.com/102833059754151/photos/pb.102833059754151.-2207520000.1454671111./902249433145839/?type=3&theater	
restaurant "Ladokola", Irakleio, Crete	date mussels are served	https://www.facebook.com/102833059754151/photos/pb.102833059754151.-2207520000.1454671150./752798861424231/?type=3&theater	
restaurant "Manolas", Trikeri	date mussels are served	https://www.e-table.gr/restaurant/manolas-o	

restaurant "Maistrali", Loutraki	date mussels are served	http://maistraliloutraki.gr/downloads/menu_gr.pdf	
restaurant "Palaiokastro" , Methana	date mussels are served	http://www.saronicmagazine.com/?page_id=608	
restaurant "Takis", Lechaio (Korinthia)	date mussels are served	http://www.tovima.gr/vimagourmet/restaurants/article/?aid=461016	
restaurant "Kakias", Salamina, Athens	date mussels and fan mussels are served	https://www.e-table.gr/restaurant/kakias-o	
Kavala, Nea Peramos	seafood restaurant serving fan mussels	http://newharpas.blogspot.gr/2013/08/blog-post_29.html	
Volos	seafood restaurant serving fan mussels	http://www.tsipouradikavolou.gr/?project=%CF%84%CE%BF-%CF%80%CE%B1%CE%BB%CE%B9%CE%BF-%CE%BB%CE%B9%CE%BC%CE%B1%CE%BD%CE%B9	
restaurant "The Sea Star", Rhodes	seafood restaurant serving fan mussels	Dimitra Petza, personal communication	

restaurant "Manolas", Agia Kyriaki Pelion	date mussels are served		https://www.e-table.gr/restaurant/manolas-o
Recipes/images/other	Comments	Source	
recipes	online recipes for date mussels	http://www.letscook.gr/recipes/psarika/ostrakoeidh/petrosolhnes/spaggeti-me-petrosolines.htm	
recipes	online recipes for date mussels	http://www.mytaste.gr/a/%CF%80%CE%B5%CF%84%CF%81%CE%BF%CF%83%CF%89%CE%BB%CE%AE%CE%BD%CE%B5%CF%82.html	
recipes	online recipes for date mussels	http://www.athinorama.gr/umami/food/articles/?id=2005070	
recipes	online recipes for date mussels	http://www.tastefull.gr/freska-ostrakaneraki-loutropyrgos	
recipes	online recipes for date mussels	http://syntageskardias.blogspot.gr/2011/07/blog-post_06.html	
Social media images		https://www.instagram.com/p/BBM-z3ERfgd/	

used as bait		http://www.otithess.gr/katastimata1-b.php?big=1&katigoria=467&fotomeg=9&katastima=3283	
--------------	--	---	--