

(English version)

**Question for written answer E-001288/26
to the Commission
Maria Zacharia (NI)
(26 March 2026)**

Subject: Implementation of Seveso III Directive, Industrial Emissions Directive and Environmental Liability Directive in Lavrio given a new corporate structure and the risk of a major accident — ASAP projects

In its reply to Question P-000475/2026, the Commission states that military establishments are exempt from the Seveso III Directive and that the Environmental Liability Directive does not apply to national defence activities. At the same time, it also claims that it does not have the necessary details to assess whether EU law applies to the Lavrio site.

However, an official registration in the General Commercial Register (GEMI) shows that a new company, 'Hellenic Ammunition SA', has been established, with its own management and full representation, which raises serious questions as to the real operator and, therefore, as to the applicable EU environmental law.

In view of the above, can the Commission answer the following:

1. How does it justify invoking exemptions for military establishments when it claims not to have the necessary data to identify the real operator in Lavrio?
2. Will it immediately request comprehensive information from the Greek authorities and ASAP beneficiaries in order to determine whether the activity falls within the scope of the Seveso III Directive, the Industrial Emissions Directive and the Environmental Liability Directive?
3. If it emerges that the activities are being carried out by a civilian corporate entity, what specific measures will it take to ensure the full application of EU law on the prevention of major accidents and to put a stop to activities in breach of that law?

Submitted: 26.3.2026

**Answer given by Ms Roswall on behalf of the European Commission
(6 July 2026)**

Based on additional information provided by the Honourable Member, the Commission may have identified a corresponding upper-tier establishment ⁽¹⁾ in the eSPIRS database ⁽²⁾. Based on the information reported to the Industrial Emissions Portal ⁽³⁾, it is not clear if it is also covered by the Industrial Emissions Directive (IED) ⁽⁴⁾.

While Member States' authorities are primarily responsible to ensure compliance with EU legislations mentioned above, the Commission will contact the Greek competent authorities to ascertain the regulatory status of the establishment.

If the establishment in question is covered by the Seveso III Directive ⁽⁵⁾, the operator has to take all necessary measures to prevent major accidents and limit their consequences for human health and the environment ⁽⁶⁾ while the Greek competent authorities have to organise a system of regular ⁽⁷⁾ and non-routine ⁽⁸⁾ inspections.

If it is covered by the IED, the operators have to take the necessary measures to prevent accidents and limit their consequences. The Greek competent authorities have to ensure that the installation is covered by environmental inspection plans.

⁽¹⁾ The classification as Lower-tier Establishment (LTE) or Upper-Tier Establishment (UTE) under the Seveso Directive relies on 'the maximum quantities [of hazardous substances] which are present or are likely to be present at any one time' (Note 3 to Annex I).

⁽²⁾ EU database on Seveso establishments.

⁽³⁾ <https://industry.eea.europa.eu/>. When an installation is covered by the IED, the competent authorities have to report installation's administrative and environmental information to the Industrial Emissions Portal on an annual basis, once the installation is operational.

⁽⁴⁾ Directive 2010/75/EU of the European Parliament and of the Council of 24 November 2010 on industrial and livestock rearing emissions (integrated pollution prevention and control) (Recast), OJ L 334, 17.12.2010, p. 17-119, as amended by Directive (EU) 2024/1785 of the European Parliament and of the Council of 24 April 2024 OJ L, 15.7.2024.

⁽⁵⁾ Directive 2012/18/EU of the European Parliament and of the Council of 4 July 2012 on the control of major-accident hazards involving dangerous substances, amending and subsequently repealing Council Directive 96/82/EC, OJ L 197, 24.7.2012, p. 1-37.

⁽⁶⁾ Article 5 of the Seveso III Directive.

⁽⁷⁾ Article 20(4) of the Seveso III Directive: for upper-tier establishments, the period between two consecutive site visits should not exceed one year, unless the inspection programme covering the site is based on a systematic appraisal of major-accident hazards.

⁽⁸⁾ Article 20(6) of the Seveso III Directive: non-routine inspections should be carried out to investigate serious complaints, serious accidents and 'near misses', incidents and occurrences of non-compliance as soon as possible.

If the operation of the establishment in question is not excluded from the scope of the Environmental Liability Directive ⁽⁹⁾, the Greek competent authorities have to investigate cases of significant environmental damage and imminent threat while interested parties ⁽¹⁰⁾ can require the competent national authorities to act ⁽¹¹⁾.

National courts are best placed for applying EU law effectively in cases of an individual nature, as well as for taking provisional measures if necessary.

⁽⁹⁾ Directive 2004/35/CE of the European Parliament and of the Council of 21 April 2004 on environmental liability with regard to the prevention and remedying of environmental damage, OJ L 143, 30.4.2004, p. 56-75.

⁽¹⁰⁾ Or (likely to be) affected parties.

⁽¹¹⁾ To this end, they should submit their observations to the authorities with supporting evidence.