



HELLENIC REPUBLIC

MINISTRY OF MARITIME AFFAIRS AND INSULAR POLICY

**Rights of passengers travelling
by sea and inland waterway
Regulation (EU) 1177/2010**

THE HELLENIC NATIONAL ENFORCEMENT BODY
ACTIVITY REPORT 2023-2024

Piraeus, May 2025

CONTENTS

1. Introduction.....	3
2. The Hellenic National Enforcement Body.....	3
3. The Maritime Transportation Market in Greece.....	4
4. The Cruise Ship Sector in Greece.....	5
5. Implementation of Regulation.....	5
6. Complaint Handling System.....	7
7. Statistics on Complaint Handling.....	7
8. Statistics on Penalties.....	9
9. Guidance and Dissemination.....	10

Rights of passengers travelling by sea and inland waterway Regulation (EU) 1177/2010

The Greek National Enforcement Body **Activity Report 2025**

1. INTRODUCTION

According to the provisions of Article 26 of Regulation (EU) 1177/2010, the National Enforcement Bodies (NEBs) of each Member State of the European Union are obliged to publish a report on their activities regarding the implementation of this Regulation during the previous two (02) calendar years.

Law 3709/2008 (A'213) "Rights-Obligations of passengers and carriers in maritime transport and other provisions", established for the first time the legislative framework regarding the rights of passengers in maritime transport, while designating the Ministry of Maritime Affairs and Insular Policy as the National Implementing Body (NEB) of this legislation. With the introduction and implementation of Regulation (EU) 1177/2010, the Greek NEB was already fully operational, taking all the necessary steps to harmonize the existing national legislation with the relevant requirements of EU Law.

In 2022, in the framework of the codification of the national legislation on maritime cabotage and passenger rights legislation, the provisions of Law 3709/2008 (A'213), as fully harmonized with Regulation (EU) 1177/2010, were incorporated into a consolidated text with subsequent amendments and Law 4948/2022 (A'125) " Code of maritime cabotage legislation and passenger rights", was published in the Government Gazette.

The codification achieves the systematization of the entire regulatory framework concerning the provisions of Law 3709/2008 (A'213), which introduced regulations on the rights and obligations of passengers and carriers in regular passenger sea transport.

2. THE HELLENIC NATIONAL ENFORCEMENT BODY

The main objectives of the Ministry of Maritime Affairs and Insular Policy (MMAIP) are, among others, the promotion of maritime development, ensuring safety at sea and protection of the marine environment. The principal activities of the MMAIP are:

- The promotion and development of the Greek merchant shipping,
- Maritime employment, education and training,
- The efficient operation of maritime transportation,
- Maritime safety and Port State Control,
- Maritime security including prevention and suppression of trafficking and smuggling,
- Border control and maritime surveillance,
- The protection of marine environmental,
- Search and rescue in maritime accident including investigation at sea,
- Fisheries control,
- Supervision of port management organizations,
- Development of maritime tourism and cruise,
- Strategic planning and implementation of port policy.

The Ministry of Maritime Affairs and Insular Policy (MMAIP) is also the supervising governmental organization of the Hellenic Coast Guard (HCG), which is responsible for the enforcement of law at sea, on board ships, in ports and coastal areas as well as for the surveillance of country's maritime borders.

3. THE MARITIME TRANSPORTATION MARKET IN GREECE

The maritime transport market in Greece is fully liberalized and harmonised with the provisions of Regulation (EEC) 3577/1992. It is divided into two sub-sectors, the market for maritime cabotage and the international shipping market.

3.1 MARKET FOR MARITIME CABOTAGE

The market for maritime cabotage comprises the connections between Greek ports (mainland Greece to the Greek islands as well as between the Greek islands). There are two types of maritime cabotage services:

- Private commercial ferry services where no subsidy is provided. These services are usually operate on an annual basis.
- Coastal services are subsidized by the government budget, through the conclusion of Public Service Contracts (PSCs).

All the above ferry services are mainly provided by Greek flagged vessels less by other EU flagged vessels.

Information about the market for maritime cabotage services during the period 2023-2024 is set out in the table below.

Table 1. Data of domestic ferry transportation (2023 – 2024)

Year	Number of passengers transported
2023	60.080.558
2024	59.790.926

3.2 INTERNATIONAL FERRY MARKET

The international ferry market mainly comprises the ferry connections between Greece and Italy. The international ferry services connecting the ports of Igoumenitsa and Patra with the Italian ports of Brindisi, Bari, Ancona and Venice operate throughout the year and carry thousands of passengers, private cars and cargo vehicles.

The following table provides data on the volume of international ferry traffic, focusing on the above-mentioned Greek ports during the years 2023 and 2024.

Table 2. Data of international ferry transportation by port (2023 -2024)

Ports	Year	Number of itineraries	Passengers embarked	Passengers disembarked
Igoumenitsa	2023	3.719	461.495	494.154

	2024	3.937	458.000	481.568
Patra	2023	1.706	190.355	175.147
	2024	1.633	152.945	134.314

4. THE CRUISE SECTOR IN GREECE

In the current year, the Greek cruise industry is in a period of rapid growth as a number of Greek islands are among the most popular destinations worldwide. Many Greek ports are used by the mayor cruise lines as stopovers. However, the main ports that attract the largest share of cruise ship arrivals are those of Piraeus, Santorini, Mykonos, Rhodes, Corfu and Heraklion. The port of Piraeus is also an important hub port for cruise programmes. The table below provides information on the cruise sector in Greece.

Table 3. The Greek cruise industry in 2023 and 2024 in figures

Year	Number of cruise ships visits	Number of cruise passengers
2023	5.073	6.326.135
2024	5.275	6.958.403

5. IMPLEMENTATION OF THE REGULATION (EU) 1177/2010

As the national legislative framework on the rights of passengers in maritime transport existed before Regulation (EU) 1177/2010, the harmonization of the provisions of the EU legislation was achieved by the codification of Law 3709/2008 by incorporating its subsequent amendments into a consolidated text.

Additionally, the Greek NEB issued the Ministerial Decision No. 3332.12/05/13/ 14-06-2013 (B' 1453) and the Circular No. 3332.12/10/13/27-09-2013 which set out the framework of the complaint management mechanism, the responsibilities and actions of all supervisory authorities involved.

Greece has not requested any exemption from the application of the Regulation for maritime passengers transport services which are governed by public service obligations, public service contracts or integrated services [Article 2(paragraph 4) of Regulation (EU) 1177/2010].

5.1 DELAY OR CANCELLATION OF MARITIME TRANSPORT SERVICES

On a daily basis, the Greek NEB supervises and controls, through the regional HCG authorities, the timetables of ships departures and arrivals and have all the time the possibility to enforce the relevant legislation. There are more than two hundred (200) Greek ports where local HCG authorities are located. These regional port authorities have direct

powers to supervise and investigate cases of violation of passengers' rights legislation, even when there is no passenger complaint.

5.2 ACCESSIBILITY AND ASSISTANCE FOR PASSENGERS WITH DISABILITIES OR REDUCED MOBILITY (PRMs)

The Greek NEB has issued a serie of legislative provisions which ensure that all passengers are provided with accessibility conditions without discrimination The Annual Action Plan of the Hellenic Ministry has set the goal of ensuring the accessibility of passengers with disabilities or reduced mobility PRMs in sea transport. Specifically, some of the actions are targeting to ensure accessibility in ships and ports, in order to secure the necessary financial incentives in order to carry out the required interventions and to publish the current state of accessibility of ships and ports .

5.2.1. ACCESSIBILITY AND ASSISTANCE TO PASSENGERS WITH DISABILITIES OR REDUCED MOBILITY (PRMs) ON BOARD SHIPS

With regard to the facilities for passengers with disabilities or reduced mobility (PRMs) on board ships, the implementation of the Regulation is controlled through the annual regular inspections for the issuance of Passenger Ship Safety Certificate, as well as through additional ad hoc inspections.

5.2.2. ACCESSIBILITY AND ASSISTANCE TO PASSENGERS WITH DISABILITIES OR REDUCED MOBILITY (PRMs) IN PORTS

With regard to accessibility facilities for passengers with disabilities or reduced mobility (PRMs) in port areas, there is a regular supervision of port terminals infrastructure to ensure the implementation of the Regulation. Port terminal operators are obliged to take all necessary measures to continuously improve conditions of access for passengers with disabilities to ports. In this context,, the Greek NEB has sent written requirements and instructions to all port terminal operators. These requirements and instructions have been drawn up in cooperation with the National Confederation of Persons with Disabilities.

In 2022, Secretary General of Ports, Port Policy and Maritime Investment carried out an inventory of the existing accessibility infrastructure for the passengers with disabilities and reduced mobility in the port terminals (conditions of access, possibility of providing free assistance, existence of a meeting point inside or outside the port terminals, etc.). It should be mentioned that a section entitled "Accessibility of Ports by People with Disabilities & Reduced Mobility (Disabled)" has been launched on the websites of the Ministry and the Hellenic Coast Guard (HCG) website where PRMs can find information on accessibility in Greek ports. Soon these pages will be translated in English.

In addition, in cooperation with the Association of Greek Ports (E.LIM.E.) and associations of disabled persons, several joint training programs for port employees are organized, as a further tool to improve the level of assistance for passengers with disabilities in ports.

5.3 PENALTY SYSTEM

The Ministry of Maritime Affairs and Insular Policy (MMAIP) investigates and handles every complaint submitted by maritime passengers. In cases of violations of the provisions of the Regulation and its related legislative framework, an integrated system of penalty rules is applied. The penalty rules may be in the form of simple recommendations, in cases of low significance, up to the imposition of administrative fines. Administrative range from fifty euros (50,00€) up to fifty thousand euros (60.000,00€). These fines imposed are

independent of any other criminal or administrative sanctions that may be imposed by provisions of other relevant legislation.

The Greek NEB has a continuous and close working cooperation with the associations and organizations representing carriers, ship-owners, consumers and persons with disabilities. Representatives of all the above stakeholders participate in the Council of Maritime Shipping Transport (CMST), a consultative body, under the auspices of the MMAIP, which examines issues concerning the operations and the level of maritime transport services.

6. COMPLAINT MANAGEMENT SYSTEM

The Greek NEB acts as a body for the examination of appeals. Passengers should first contact the carrier or the port operator. If they do not receive a reply or if the reply is not satisfactory, they submit their complaint to the Greek NEB. The Greek NEB decides whether the complaint is justified under the provisions of the Regulation and in this case, conducts a full investigation. Passengers can submit their complaints either in written form, by e-mail or by filling in the Passenger's Complaint Form, a one-page form with details and instructions in both Greek and English, which has been designed by the MMAIP for convenience. Passenger's Complaint Forms must be available on all ships, as well as at travel agencies and port authorities.

According to Article 27 of the Regulation, the Greek NEB is in constant contact and cooperation with the other EU Member States NEBs.

7. DATA ON THE MANAGEMENT OF COMPLAINTS

During the period 2023-2024, the Greek NEB received a total of four hundred and thirty-five (435) passenger complaints. The following table contains details of the complaints received for the above years (number, type and reason of complaint, outcome of the case).

Table 4. Statistical data of complaints submitted at NEB

Year	Number of complaints received by the Greek NEB	Reason for complaint	Remarks
2023	234 passenger complaints in total 128 complaints forwarded to the carrier at the first level of management 106 complaints forwarded to relevant port authorities	72 (delay), 21 (no information for delay), 33 (cancellation of itinerary), 06 (no information for cancellation), 01 (carrier did not provide food or accommodation), 12 (loss of response) 02 (failure to transfer passenger to destination) 09 (non-refundable fare), 02 (non-compensation or incorrect compensation), 07 (no access & free assistance to passengers with mobility problems), 08 (no response from the carrier or ticket issuer or terminal operator within the time allowed) 01 (discrimination of passengers) 01 (compensation of passenger by carrier for loss/damage of luggage) 59 (for reasons of accommodation, hygiene, safety)	65 complaints resolved, 169 complaints not compensated by the carrier,

2024	201 passenger complaints in total 125 complaints forwarded to the carrier at the first level of management 76 complaints forwarded to relevant port authorities	74 (delay), 05 (no information for delay), 38 (cancellation of itinerary), 05 (no information for cancellation), 02 (carrier did not provide food or accommodation), 02 (loss of response) 04 (failure to transfer passenger to destination) 06 (non-refundable fare), 05 (non-compensation or incorrect compensation), 02 (no access & free assistance to passengers with mobility problems), 05 (no response from the carrier or ticket issuer or terminal operator within the time allowed) 03 (compensation of passenger by carrier for loss/damage of luggage) 50 (for reasons of accommodation, hygiene, safety)	67 complaints resolved, 134 complaints not compensated by carrier,
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With regard to the above data, it should be noted that a complaint case often involves more than one reason. In relation to the complaint cases submitted at the MMAIP, the following conclusions can be drawn:

- a) All the submitted complaints were related with transportation services and there was no complaint about cruise service.
 - b) In the complaints related to claims of compensation, the carriers often offered compensation or other benefits of a higher value than it was required by law.
- For the period 2023-2024, nine (09) complaints were submitted regarding lack of accessibility or assistance to passengers with disabilities or reduced mobility on board.

Table 5. Statistical data of complaints submitted at port terminal operators (2023-2024)

Year	Number of complaints received by port terminal operators	Reason for complaint	Comments
2023	0	----	---
2024	0	---	---

8. STATISTICS ON PENALTIES

During the period 2023-2024, the MMAIP and the relevant port authorities imposed two hundred and sixty (260) sanctions for 2023 for a total value of thirty-one thousand one hundred euros (31,100.00€) and two hundred and twenty (220) sanctions for the year 2024 for a total value of one hundred and twenty-five thousand three hundred euros (125,300.00€). The table below provides data on the number of penalties imposed, as well as the reason for the penalty violated.

Table 6. Statistical data on penalties

Year	Number and type of penalties imposed	In case of fines, amount of money imposed	Reason for imposing the penalty
2023	260 fines		A) FAILURE TO INFORM THE PASSENGER OF A

		Thirty one thousand one hundred euros (31.100,00€)	<p>CANCELLATION OF AN ITINERARY.</p> <p>B) FAILURE TO COMPLY WITH THE PASSENGER COMPLAINT PROCEDURE ON THE PART OF THE CARRIER</p> <p>C) BAD STOWAGE</p> <p>D) FAILURE TO DISPLAY A SIGNBOARD WITH THE RIGHTS OF PASSENGERS AT A PROMINENT PLACE ON THE SHIPPING AGENCY</p> <p>(E) FAILURE OF THE COMPANY TO RESPOND TO A PASSENGER COMPLAINT WITHIN A SPECIFIED TIME LIMIT</p> <p>(F) FAILURE TO COMPLY WITH THE MAXIMUM PERMISSIBLE FARE ACCORDING TO THE STATE FARE SCHEDULE</p> <p>(G) FAILURE TO COMPLY WITH THE CARRIER'S OBLIGATION TO INFORM PASSENGERS OF A DELAY IN A SCHEDULED SERVICE</p>
2024	220 fines	One hundred and twenty-five thousand three hundred euros (EUR 125 300,00)	<p>(A) FAILURE BY THE CARRIER TO COMPLY WITH THE OBLIGATION TO INFORM PASSENGERS OF A DELAY IN A SCHEDULED SERVICE</p> <p>(B) FAILURE TO INFORM THE PASSENGER OF THE CANCELLATION OF A SERVICE.</p> <p>(C) FAILURE TO RETURN THE ENTIRE FARE</p> <p>(D) FAILURE OF THE COMPANY TO RESPOND TO A PASSENGER COMPLAINT WITHIN A SPECIFIED TIME LIMIT</p> <p>(E) REFUSAL OF THE SHIPPING AGENT</p> <p>(F) FAILURE TO PROVIDE PROOF OF LUGGAGE STORAGE</p> <p>G) FAILURE TO INFORM THE PORT AUTHORITY OF THE RATES APPLIED BY THE CARRIER</p> <p>(H) NON-PERFORMANCE OF A SERVICE</p> <p>(I) BAD STOWAGE</p>

9. GUIDANCE AND DISSEMINATION

The official website of the Greek NEB (www.ynanp.gr) provides all the necessary information and guidelines to passengers (legislation, info brochure, Passenger's Complaint Form). The same informative material is also available on the official website of the Hellenic Coast Guard official (www.hcg.gr).

The legislation in force sets standards of good conduct for carriers, ticket issuers and terminal operators. These standards are related to the mandatory display of summarized information boards on passengers' rights both on board ships, and in travel agencies and port terminal areas. In addition, these information boards must be available in the reception areas of ships in Braille, at the request of the passenger, for blind or visually impaired persons.

The MMAIP, in cooperation with the Consumers' Union of Greece, has designed a smart guidance brochure. Through twenty one (21) simple questions and answers, passengers can be informed about their rights in maritime transport. Printed brochures are distributed by the HCG authorities on a regular basis during periods of high passenger traffic (Christmas and Easter holidays, weekends, summer season, etc.).

The Greek NEB cooperates closely with the independent authority of the Consumer's Ombudsman, member of the European Consumer Centre (ECC), both in the resolution of complaints and in the organization of information campaigns.

INFORMATION LINKS:

- <https://www.ynanp.gr/el/gia-ton-polith/nomo8esia/nomothesia-dieuthynse-thalassion-synkointhalassion-synkoinonion/dths-nomoi-pd/nomoi-pd-dikaiomata-epibatwn-stis-thalasthalassies-metaphores/>
- <https://www.hcg.gr/el/gia-ton-polith/nomo8esia/nomothesia-dieuthynse-thalassion-synkointhalassion-synkoinonion-222/dths-nomoi-pd-223/nomoi-pd-dikaiomata-epibatwn-stis-thalasthalassies-metaphores-225/>
- <https://www.hcg.gr/el/gia-ton-polith/sas-endiaferei/enhmerwtika-entypa-epibatwn/xarta-dikaiwmatwn-epibatwn/>
- <https://www.ynanp.gr/el/gia-ton-polith/xrhsimes-plhrofories/>) και του Αρχηγείου Λιμενικού Σώματος – Ελληνικής Ακτοφυλακής
- <https://www.hcg.gr/el/gia-ton-polith/koinwniko-ergo-draseis/prosbasimothta-limenwn-apo-atoma-me-anaphria-meiwmenh-kinhtikothta-amea/>
- <https://www.synigoroskatanaloti.gr/en/submit-complaint>