LAMNIDIS LAW

Draft Law on National Measures Implementing Regulation (EU) 2024/1689 on Artificial Intelligence — What It Provides

The Ministry of Digital Governance has opened for public consultation a draft law titled "**Measures implementing Regulation (EU) 2024/1689 (the Artificial Intelligence Act) – Amendment of Law 4961/2022 and other provisions**." This is a draft law that has not been enacted or entered into force; what follows reflects the proposed framework as it stands in consultation, should it be passed in that form.

The public consultation closes on 6 July 2026.

Note that Regulation (EU) 2024/1689 has direct effect as an EU Regulation and is not "transposed" into national law: the draft law establishes purely national implementing and adaptation measures (designation of competent authorities, a sanctions framework, a regulatory sandbox, a register), not substantive rules, which already flow directly from the Regulation. This update covers only Part A (Articles 1–25) of the draft law.

The HDPA as central supervisory authority — convergence of AI and data-protection supervision

The most significant choice in the draft law is the designation of the Hellenic Data Protection Authority (HDPA) as the national market-surveillance authority under Article 70(1) of the Regulation. Its competence extends to AI systems falling within the prohibited practices of Article 5, to high-risk systems listed in Annex III, and to AI systems subject to the transparency obligations of Article 50.

Through this choice, should it be enacted, the supervision of AI and the supervision of data protection converge, to a significant degree, under a single regulator. The HDPA is also designated as the single point of contact (Article 70(2) of the Regulation) and is to act as a notified body for the conformity assessment of certain high-risk systems intended for use by authorities competent for law enforcement, migration and asylum.

This convergence is not absolute: the draft law retains a distributed model, designating the existing sectoral authorities (those designated under the EU harmonisation legislation listed in Section A of Annex I to the Regulation) as market-surveillance authorities for high-risk AI systems connected to the products they already regulate.

In parallel, a single complaints-submission system is to be established within the HDPA, to which complaints concerning infringements of the Regulation are forwarded and coordinated.

The EETT as notifying authority and innovation hub.

The Hellenic Telecommunications and Post Commission (EETT) is designated as the notifying authority (Article 28 of the Regulation). A Coordination and Expertise Centre for AI is to be established within the EETT, tasked with supporting the competent authorities, training, facilitating

codes of conduct and supporting innovation — particularly for small and medium-sized and start-up enterprises.

Sanctions framework (Article 16)

In addition to the supervisory powers under the Regulation, the draft law provides that the HDPA and the competent market-surveillance authorities may, by specially reasoned decision and after a prior hearing, issue warnings and reprimands to operators, impose the administrative fines of Article 99 of the Regulation, and threaten or impose periodic penalty payments not exceeding, for an undertaking, 2% of the average daily total worldwide annual turnover (or income) of the preceding financial year. These measures are also to apply to public-sector bodies, and sanctions must be effective, proportionate and dissuasive.

Two features of the regime warrant particular attention from businesses. First, under the publication provision (Article 17), decisions imposing sanctions are published on the authority's website, stating, as a minimum, the sanctions imposed, the nature of the infringements and the identity of the infringer. Second, the draft law allows for recovery of supervision costs (Article 18): where a sanction is imposed, the authority may require the operator to bear the full costs of investigating and establishing the non-compliance — such as testing, measures and storage — that is, costs over and above the fine itself.

Two further features bear on how sanctions are calibrated. First, when setting sanctions the authorities may take into account (beyond the criteria of Article 99 of the Regulation) whether the operator has taken adequate measures to ensure a sufficient level of AI literacy within the meaning of Article 4 of the Regulation (Article 16); staff-training and literacy efforts therefore carry concrete mitigating weight. Second, the draft law contemplates a settlement track: within a dispute-settlement procedure to be established by decision of the HDPA, the authorities may take into account whether the operator admits the infringement attributed to it (Articles 16 and 23).

Judicial protection (Article 19)

An application for annulment before the Council of State is provided against decisions imposing sanctions, as well as against the other individual administrative acts and the regulatory acts issued under the law.

Whistleblower protection (Article 20)

The draft law brings infringements of the AI Regulation within the scope of Law 4990/2022, the law on the protection of persons who report breaches of Union law, transposing Directive (EU) 2019/1937 (the Whistleblower Directive). It does so by adding the Regulation to the product-safety-and-compliance chapter of that law's Annex (Article 20).

Two practical consequences follow. First, persons who report a breach of the AI Regulation, in most cases employees, fall within the regime of protection against retaliation. Second, organisations already obliged to operate internal reporting channels under Law 4990/2022 will need those channels to accommodate AI Act matters. For businesses, this adds an internal-compliance

dimension alongside the external supervisory regime: AI Act non-compliance becomes a matter that can be reported through protected channels.

Support for innovation: regulatory sandbox and real-world testing

A regulatory AI sandbox is to be established within the EETT (under Articles 57–59 of the Regulation), with the EETT and the HDPA as the competent authorities for its operation. The EETT issues a call to providers, setting deadlines, criteria, a maximum number of applications and participation fees.

As regards testing of high-risk systems in real-world conditions outside the sandbox (Article 60 of the Regulation), the draft law clarifies that the required approval is granted only following an express written authorisation from the competent authority, and that the lapse of the thirty (30)-day period is NOT deemed to constitute approval. Providers therefore cannot rely on administrative silence as tacit approval.

Public-sector AI register (Articles 21 & 24)

A single register of AI systems used by public-sector bodies is to be established within the Special Secretariat for Artificial Intelligence and Data Governance of the Ministry. Each body intending to use an AI system is required to submit a registration declaration before the system becomes operational, with mandatory minimum content (purpose, categories of data, risk classification, impact assessments, etc.).

For systems already in use, a transitional deadline is provided: bodies are required to submit a registration declaration without delay and in any event no later than 31.10.2026.

Practical relevance for businesses

Should the draft law be enacted in this form, businesses that develop, place on the market or use AI systems in Greece should expect that the principal regulator for prohibited practices, Annex III high-risk systems and transparency obligations will be the HDPA — while, for high-risk systems embedded in regulated products, the competence of the sectoral authorities remains critical. Exposure to administrative fines (Article 99 of the Regulation), to periodic penalty payments, to publication of the infringer's identity and to recovery of supervision costs makes it advisable, already now and as a precaution, to begin preparing compliance documentation: risk classification of systems, technical file and documentation records, transparency measures, impact assessments (on fundamental rights and, where required, under the GDPR) and human-oversight procedures, as well as, for organisations within the scope of Law 4990/2022, internal whistleblowing channels capable of handling AI Act reports. Public-sector bodies should additionally prepare for the register-declaration obligation within the transitional deadline.