

## Greece 2025

### Information from: Greek National Commission for Human Rights

### Independence, effectiveness and establishment of NHRIs

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#### International accreditation status and SCA recommendations

The Greek National Commission for Human Rights (GNCHR) was last [re-accredited with A-status in October 2024](#).

In relation to the selection and appointment process for members of the GNCHR, the SCA noted the current practice of sending a letter to all nominating authorities instructing adherence to the Paris Principles in the selection process. However, it recommended that the GNHCR advocate for the formalisation of a clear, transparent and participatory selection and appointment process of the NHRIs decision-making body in relevant legislation, regulations or binding administrative guidelines, as appropriate. The SCA also encouraged the GNCHR to consider policy and/or administrative options which would allow it to provide guidance to nominating entities about their selection processes and the requirements of the Paris Principles.

Additionally, acknowledging that the Director is an ex officio member of the Board and participates in Board meetings, the SCA encouraged the GNCHR to advocate for an amendment in the enabling law to ensure that its Board includes full-time members with voting rights.

Further, the SCA recommended that the GNCHR advocates for amendments to its enabling legislation to provide a limit to the reappointment of members of the Commission to one additional mandate.

Finally, the SCA welcomed the increase in the annual budget, which reflected the expansion and adjustment of the institutions' operations and encouraged the GNCHR to continue to advocate for an adequate level of funding to effectively and progressively carry out its mandate and to enable the recruitment and retention of staff with salaries and benefits comparable to civil servants discharging similar functions.

#### Follow-up to international and European actors' recommendations on NHRIs and relevant

## developments

The Greek NHRI reformed its founding legislation (Law 2667/1998 as amended by Law 4780/2021), its Organisation (Presidential Decree 74/2023) and Rules of Procedure (2024), among others, to meet with the SCA's previous recommendations (2017). In 2024 the GNCHR was re-accredited with an A status in full compliance with the Paris Principles. In recognition of its work, the SCA in the preamble of its report stated that "the SCA welcomes the work carried out by the GNCHR to follow up on the SCA's previous recommendation and with regards to the rights of migrant workers, refugees, LGBTIQ+ persons, and monitoring places of detention". In fact, the SCA was satisfied with the progress made to comply with its previous recommendations on selection and appointment and adequate funding and recommended that the Greek NHRI be re-accredited with A status (see [SCA report](#) October 2024, p. 32).

The European Commission in its [2024 EU Rule of Law Report - Country Chapter on Greece](#) refers to the Greek NHRI as an independent authority, part of checks and balances with a mandate to protect and safeguard human rights (p. 24) and uses its findings for the reporting on the situation of rule of law in Greece (explicit reference to GNCHR Statements and positions in footnotes).

Furthermore, Greece is receiving technical assistance by the OECD (2024-2026) on reforming the law governing all independent authorities in Greece with a view to improve their standing and operation. In this framework, the GNCHR was consulted at an early stage by the OECD project team. The Greek National Commission is indeed an independent administrative authority under national law. However, there are some particularities regarding its composition, mandate and status. First, the Greek NHRI is a commission-type NHRI with members being nominated, among other, by other independent authorities under the Greek law. The GNCHR itself has a broad mandate that encompasses all human rights (in comparison with other administrative authorities with specific human rights mandates). Finally, the GNCHR has been established and operates under the Paris Principles which form a set of international law rules directly applicable to its status and operation. What is more, the GNCHR is regularly being reviewed by the competent peer organ on its compliance with the UN Paris Principles (GANHRI Sub-Committee on Accreditation). Since 2000, the GNCHR holds an 'A' status.

## Regulatory framework

The Greek NHRI, within its mission, is monitoring the technological evolution, the artificial intelligence evolution and the digital transformation, and draws the attention of the competent State authorities by highlighting the new challenges, their impact on human rights and the possible risks. In 2024, the GNCHR was designated by the Ministry of Digital Governance as one of the national authorities and bodies that enforce or supervise compliance with EU

obligations to protect citizens' fundamental rights within the framework of the [Regulation \(EU\) 2024/1689](#) of the European Parliament and of the Council of 13 June 2024 laying down harmonised rules on artificial intelligence and amending Regulations (EC) No 300/2008, (EU) No 167/2013, (EU) No 168/2013, (EU) 2018/858, (EU) 2018/1139 and (EU) 2019/2144 and Directives 2014/90/EU, (EU) 2016/797 and (EU) 2020/1828 (Artificial Intelligence Act). More specifically, according to the [announcement of the Greek Ministry of Digital Governance](#) (12.11.2024), the Ministry of Digital Governance, within the framework of the Regulation on Artificial Intelligence (AI Act), published the list of national authorities and bodies that enforce or supervise compliance with EU obligations to protect citizens' fundamental rights. The GNCHR was included in this list along with the Hellenic Data Protection Authority, the Greek Ombudsman and the Hellenic Authority for Communication Security and Privacy. According to the announcement, the aforementioned Authorities will acquire additional powers, such as access to any documentation created or maintained by an organization for its compliance with the AI Regulation, when this is necessary for the effective fulfilment of the mission of these Authorities and within the limits of their jurisdiction. The additional powers will apply from 2 August 2026. The list has been notified to the European Commission and will be updated based on future needs and circumstances.

With regards to the possibility to contribute to access to justice for individuals, the Greek NHRI has no mandate on complaints handling or providing of legal services to individuals. However, it holds the power to intervene as *amicus curiae* before courts. It has exercised this power twice in 2024:

1. The GNCHR [received a request](#) for the first time by the European Court of Human Rights (ECtHR) to submit a written intervention as regards the case of G.R.J. v. Greece (15067/21) and A.R.E. v. Greece (15783/21). The cases were heard by a Chamber of seven judges on 4 June 2024 and were related to reported incidents of informal forced returns of people seeking international protection in 2019 and 2020. The ECtHR specifically asked the Commission whether "there has been a systematic practice of refoulement of foreign nationals by the Greek authorities to Türkiye at land and sea borders". The [GNCHR reply](#) was based on the findings of the Recording Mechanism of Informal Forced Returns operated by the Greek NHRI with the participation of non-governmental organisations and the technical assistance of the UNHCR Office in Greece. On 07.01.2025, the ECtHR published its judgments on A.R.E. v. Greece and G.R.J. v. Greece relying greatly, *inter alia*, to the intervention made by the Greek NHRI, proving that the Commission's repeated recommendations to the competent bodies of the Greek state on informal forced returns remain highly topical.
2. In November 2024, the GNCHR [submitted a third party intervention](#) before the Greek Council of State in favour of the retaining in force of a Ministerial Decision (nr.15786/20.2.2024) on the reform of the way the

information of parents and spouses are being mentioned on birth certificates, in line with new Law 5089/2024 on Civil Marriage Equality.

On another note, the GNCHR through the operation of the Racist Violence Recording Network and the Recording Mechanism of Informal Forced Returns by identifying the alleged victims and ensuring the safety of the recording, encourage and facilitate the access of the alleged victims to justice (see Recording Mechanism of Informal Forced Returns, [Annual Report 2023](#), p. 46). Delivery of justice plays a crucial role in healing the trauma of citizens who endure unprovoked violence fuelled by prejudice, as well as in restoring their trust in the rule of law (see Racist Violence Recording Mechanism, [Annual Report 2023](#), p. 6).

When it comes to strengthening the regulatory framework, the Greek NHRI informs that it has already submitted to the authorities a proposal for reform of its founding legislation in order to codify recent additional mandates given to the Institution, such as the compliance of EU funds with fundamental rights and protection of human rights under the EU AI Act. The explicit provision of these additional mandates in the NHRI law serves the purpose of security of law, good governance and better GNCHR planning. At the same time, the GNCHR requested additional human resources (number of employees and profiles) in order to adequately perform its new roles. For the time being, no additional resources were provided for the fulfilment of the additional mandates.

## **NHRI enabling and safe space**

In relation to the State authorities' good awareness of the NHRI, since 2022 the same challenges persist on the awareness of the Greek NHRI's mandate by the relevant executive, parliamentarian, judicial and local authorities. There is partial compliance with their obligation to consult the NHRI prior to human rights law and policy drafting, which constituted also a specific recommendation by the EU Commission to Greece (see 2024 EU Rule of Law Report - Country Chapter Greece, p. 2). In particular, it is recommended to Greece to "Step up the efforts to ensure the effective and timely consultation in practice of stakeholders on draft legislation, including by observing the statutory timeframe for public consultation". In 2023, the GNCHR was consulted twice prior to the passing of a new law, at the invitation of the Parliament. At its own initiative, the GNCHR submitted its written views on the following bills with an impact on human rights: (1) anti-bullying law (5029/2023), (2) new Migration Code (5038/2023), (3) amendment of labour law (5053/2023). In 2024, similarly to 2023, none of the drafts laws introduced for voting in the Parliament were previously communicated to the Greek NHRI by the executive authorities for its expert opinion. The Parliament invited the GNCHR to present its views during the elaboration of two bills (e.g. on same sex marriage and minor rights). Both of these bills were discussed at the Standing Committee on Public Administration, Public Order and Justice in which

a GNCHR expert participated and briefed the Members of the Parliament (MPs). Furthermore, the Commission submitted an expert opinion on a labour rights bill (transposition of EU Directive 2022/2041 on minimum wages) discussed in Parliament in November 2024 without being invited to the discussions.

An exception to the above challenge has been the cooperation of the Commission with the newly established Ministry for Social Cohesion and Family regarding the transposition of EU Directive 2022/2381 on improving gender balance among directors of listed companies and related measures. The GNCHR convened [an oral hearing](#) with all stakeholders (public and private) to discuss the draft law prior to its finalization. The feedback received from the invited participants improved the draft text, which was subsequently put out for public consultation. Upon invitation by the Standing Parliamentary Committee on Social Affairs, the GNCHR participated in parliamentary discussions during the enactment of Law 5178/2025 in February 2025.

Drawing on the Commission's 25 years of experience, the GNCHR asserts that the NHRI's involvement in the legislative process should not be left to the discretion of governmental or parliamentary authorities. For the sake of better democratic lawmaking, the NHRI offers its expert opinion and advice to the authorities aiming to align national laws with international standards and obligations of the State. GNCHR reiterates its recommendation for a standing invitation to Parliament when bills with a human rights impact are tabled for debate. The GNCHR stands ready to launch such a discussion at the Parliament expressing its reasoned views.

With regards to the introduction of legislation, state measures or practices to ensure timely and reasoned responses to NHRI recommendations, no significant changes were made since 2022. The GNCHR law provides for annual reporting of relevant Ministries (i.e. Ministries maintaining a liaison officer with the GNCHR) on the measures taken in the previous year with respect to human rights in their field of responsibility as well as a follow-up to GNCHR recommendations (ENNHR Rule of Law Report - [Greece 2023](#) p. 21). The GNCHR, in its Annual Reports, dedicates a chapter on the implementation and follow-up on its recommendations by the state authorities (impact and efficiency of the NHRI work).

Regarding immunity, the GNCHR members enjoy personal and functional independence (immunity), as per Article 14 (6) of Law 4780/2021 for actions taken in their official capacity, protecting them from prosecution for opinions expressed or votes given in the exercise of their functions.

## **NHRI's recommendations to national authorities**

Despite the GNCHR's upgrade into an independent authority, its increased budget and staffing, there is still room for improvement in relation to the

effective execution of its additional recent mandates. To this end, the GNCHR recommends the State to:

- engage in the reform of the law governing the Commission in order to strengthen its capacity (tools and resources) to adequately carry out its multiple mandates.

At the same time, the GNCHR would like to reiterate its previous recommendations (see [ENNHR Rule of Law Report](#) – Greece, p. 16) not yet addressed by the State.

To the executive authorities, the GNCHR calls for:

- timely and meaningful consultation of the Greek NHRI on draft laws in line with EU recommendations;
- its involvement in reporting procedures before the EU Commission (rule of law) and the European Committee on Social Rights (Council of Europe) that are currently out of reach
- a follow-up procedure (reasoned reply) by respective Ministries to GNCHR's recommendations in line with Council of Europe's recommendations.

To the parliamentary authorities, the GNCHR invites them to discuss the possibility of:

- a standing invitation of the GNCHR to all sessions of parliamentary committees addressing human rights issues.

## Greece 2025

### Information from: Greek National Commission for Human Rights

## Human rights defenders and civil society space

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### Laws and measures negatively impacting civil society and Human Rights Defenders

#### Freedom of association

Since 2022, the EU Commission identified that the issue of multiple registration requirements for civil society organisations in Greece may not be proportionate in view of maintaining an open framework for them to operate. Henceforth, the EU Commission closely monitors this issue and has formulated respective

recommendations to the Greek authorities in its [2022](#), [2023](#) and [2024](#) Rule of Law Reports. In 2024, the EU Commission recommended in particular to the Greek authorities to “strengthen efforts to evaluate the current legal framework for the registration system for civil society organisations and assess whether there is a need to amend it, while moving forward with a structured dialogue with CSOs.” The GNCHR regrettably informs that there has been no progress in the implementation of this last recommendation. Civil society report on the rule of law in Greece confirms such conclusion ([Struggle for Accountability - The state of the rule of law in Greece](#), January 2025, pp. 64-65). The Greek NHRI also monitors registration requirements and sanctions imposed by Law 4808/2021 related to the suspension of trade union rights in case of non-registration to the newly established Trade Unions General Registry (GEMISOE). As informed in the [ENNRI Rule of Law Report - Greece 2024](#) (p. 12), the Council of State declared them contrary to art. 8 of the EU Fundamental Rights Charter and the General Data Protection Regulation. The case was referred to the Plenary of the Council of State. The hearing took place in May 2023, and the issuance of the relevant judgment is currently pending.

The UN Human Rights Committee in its [Concluding Observations on the 3rd periodic report of Greece](#) expressed its concerns about the stringent registration and financial requirements imposed on civil society organizations, in particular those working in the areas of migration, asylum and social integration when assessing application of Article 22 of the ICCPR in Greece. To this end, the Committee recommended to Greece to “consider reviewing article 40 of Law 4825/2021 on the deportations and return procedures of third-country nationals with a view to removing unduly restrictive requirements regarding the registration and funding of such organizations”.

## **Support to women and LGBTQ+ human rights defenders**

The Greek NHRI is composed of 20 experts appointed by independent authorities, trade unions, bar associations, nongovernmental organisations, research institutions and academia. Among nominating entities are the oldest feminist organisation in Greece, i.e. the “[Greek League for Women Rights](#)” and four LGBTQ+ organisations, i.e. the “Greek Transgender Support Association”, the “Athens Pride Festival – Athens Pride”, the “Lesbian and Gay Community of Greece”, the “COLOUR YOUTH-Athens LGBTQ Youth Community (COLOUR YOUTH)” and the “Rainbow Families Greece”. These entities have appointed 4 women in the current cohort (2 main members with their alternates). 47% of the total membership are currently women. The GNCHR members are considered human rights defenders. Some of them are renowned activists in the Greek society, defending human rights.

In addition, the Racist Violence Recording Network (RVRN) operating under the auspices of the Greek NHRI and the UNHCR Office in Greece records criminal acts or violent activities or behaviours against HRDs, namely against people

who promote and protect human rights and are targeted because of that. RVRN records, almost on an annual basis, incidents against HRDs since its establishment. Based on these recordings, the incidents concerned HRDs linked to refugee/migrant population and LGBTQI+ community, while in several cases RVRN members have also been targeted. In this framework, RVRN in its last Annual Report (2023) emphasized once again the need for a framework to protect human rights defenders. Its absence exacerbates their vulnerability, often resulting in harassment and even violence, particularly in contexts where racist violence is escalating. In the past years, the RVRN had observed the extension of this targeting also through defamation campaigns or by criminalizing human rights defenders' actions—a trend also recognized by international and European bodies (Report of the UN Special Rapporteur, Mary Lawlor, on the situation of human rights defenders, [Preliminary observations and recommendations](#), Athens, 22 June 2022).

## Practices negatively impacting civil society and human rights defenders

In 2024, Greece was under review by the UN Human Rights Committee as to the progress made in the implementation of the ICCPR since 2016. The GNCHR in its [Submission to the UN Human Rights Committee](#) (2024) reported on restrictions to freedom of association linked to the registration requirements for NGOs involved in the protection of refugees and trade unions, the racist violence incidents against HRD recorded by the RVRN and practices of intimidation, harassment and SLAPPs against NGOs and journalists working in the refugee and migration context (see also [GNHCR Statement on human rights defenders working in refugee and migration field](#), 2024). In its [Concluding Observations](#) (2024), the UN Committee expressed concerns at reports of an increasingly hostile environment towards human rights defenders, particularly those working with refugees, asylum-seekers and migrants, including reports of smear campaigns, intimidation, harassment, threats, legal harassment and criminal charges (para. 32). It formulated the following recommendations to Greece:

“33. The State party should take appropriate measures to ensure a safe and enabling environment for human rights defenders, including:

- (a) Enhancing its efforts to combat and prevent all forms of violence and threats against, and the harassment and intimidation of, human rights defenders and other civil society actors, taking all measures necessary to guarantee their effective protection and ensuring that they can freely carry out their work without fear of violence or reprisals, including arbitrary detention, travel bans, asset freezing or prosecution;
- (b) Ensuring that all human rights violations, including harassment and attacks, against human rights defenders are promptly and thoroughly investigated, that

perpetrators brought to justice and, if found guilty, duly punished, and that victims receive sufficient reparations;

(c) Adopting legislation and policies to protect human rights defenders and guaranteeing their rights, in accordance with the Declaration on the Right and Responsibility of Individuals, Groups and Organs of Society to Promote and Protect Universally Recognized Human Rights and Fundamental Freedoms.”

The GNCHR is following up on the Human Rights Committee’s recommendations (work in progress).

The Greek NHRI systematically reported, since the first rule of law report ([ENNRI Rule of Law Report – Greece](#)), on the absence of a special protective legal framework for human rights defenders operating in Greece. The GNCHR would like to reiterate its standard recommendation (which is also a RVRN’s recommendation and the UN Special Rapporteur’s on the situation of human rights defenders) that a special national law on the recognition (definition) and protection of human rights defenders in Greece should be adopted. Even if human rights defenders are protected under constitutional or other general or per professional category provisions, a new special legal framework would add, according to the UN Special Rapporteur, “legal guarantees, visibility and recognition for individuals and groups dedicated to human rights, shielding them from attacks, including undue restrictions on their work”.

## **Activities of NHRIs to support civil society space and Human Rights Defenders**

The GNCHR as a commission-type NHRI with broad representation of civil society in its membership has a unique relationship with civil society and human rights defenders. It promotes and supports the work of human rights defenders and civil society organizations active in Greece on all occasions either directly or indirectly. It relies on their findings for its advocacy and monitoring work, it collaborates with them on capacity building activities and promotes their involvement in consultation processes throughout policy making and legislative procedures. The GNCHR has built a strong, trusted relationship with civil society, creating a mutually beneficial dynamic. For the Institution, this means access to reliable, on-the-ground information, while for the organizations, it ensures protection and amplification of their work.

The Greek NHRI, within its mandate as a bridge builder between civil society and the authorities, extended its scope of work into facilitating the dialogue not only between national authorities and civil society but also between EU authorities and civil society. A recent illustrative example is the Greek NHRI's facilitation of regular meetings between the European Commission and NGOs working in the refugee and migration sector, whenever the occasion arises—such as a country visit by the Head of DG Home (Working Meeting with

the participation of Civil Society actors and the Director General of DG HOME at the premises of the GNCHR, GNCH Press Release in [July 2024](#) and [November 2024](#)) or the Commissioner for Home Affairs (The GNCHR meets with the new EU Commissioner for Home Affairs and Migration M. Brunner, Press Release in January 2025).

In 2024 Greece was under review by the UN Human Rights Committee and the UN Committee against Racial Discrimination as to the progress made in the implementation of the ICCPR and ICERD in Greece respectively. On both occasions, the GNCHR submitted its independent reports to the UN treaty bodies. On November 2024, [the Greek NHRI engaged in an informal dialogue in Geneva with the UN CERD](#). The Racist Violence Recording Network (a network of 51 CSOs and NGOs operating under the auspices of the GNCHR and the UNHCR Office in Greece) is an important stakeholder in the fight against racial discrimination in Greece, acknowledged for its outstanding contribution by different national and international organisations and bodies. The GNCHR relies on the RVRN's findings for its advocacy and monitoring work. For the first time, the Assistant Coordinator of the RVRN participated in the delegation representing the Greek NHRI in order to present the findings and conclusions from the Network's work. The UN CERD in its [Concluding Observations to the Greek State](#) (2024) acknowledged the RVRN's role by advising the Government to "ensure effective and meaningful consultation with and the participation of civil society organizations and relevant stakeholders working on the rights of persons belonging to groups vulnerable to racial discrimination and hate crimes, in particular the National Commission for Human Rights, the Ombudsperson and the Racist Violence Recording Network, in relation to the development, monitoring and implementation of measures related access to justice for victims of racial discrimination and hate crimes" (para. 15).

Moreover, the establishment and operation of the Recording Mechanism of Informal Forced Returns which is comprised of 11 NGOs active in the field of migration and asylum provides a "protective shield" to its Members, given the general hostile environment currently in Greece (from state and non-state actors) towards civil society organisations active in the refugee and migration context. NGOs enjoying a membership status in the GNCHR's Recording Mechanism are able to carry on their relevant activities in the field (recording testimonies of informal forced returns in the name of the Greek NHRI) without any interference by the state authorities.

In January 2025 the GNCHR collaborated with the Office of the Council of Europe's Commissioner for Human Rights during their monitoring visit in Greece. [A GNCHR delegation met with the Commissioner](#) at the GNCHR premises and handed over an analytical memo on the current situation regarding the human rights of migrants/asylum seekers and Roma population in Greece. The Commissioner's country visit had a specific focus on the protection of human rights in the context of border control operations and on

the human rights of Roma. In his [preliminary remarks](#), the Commissioner noted, among others, “the worsening environment for legal professionals and civil society organisations supporting vulnerable people, as well as for investigative journalists” and recalled that “it is essential for strong rule of law-based states that the role and work of civil society and media be cherished and supported”. The GNCHR concurs with the Commissioner’s recommendations.

## **NHRI's recommendations to national and regional authorities**

The GNCHR through its multilevel and long-time cooperation with civil society monitors closely the situation of human rights defenders in Greece. It has formulated, in its Reference Reports and ad hoc interventions different kind of recommendations in relation to the protection of their work, the promotion of their role and the non-violation of their rights. Currently, the GNCHR identifies the following recommendations to the state authorities as the most urgent to be addressed:

- Refrain from hate speech, intimidation, harassment, or the criminalization of civil society organizations working in the refugee and migration field. Ensure accountability for human rights violations against human rights defenders in relation to their work.
- Take proactive measures to create an enabling environment for human rights defenders in Greece, in accordance with international standards and specific recommendations from UN and Council of Europe monitoring bodies.
- Uphold their freedom of association by removing restrictive laws, measures, and policies.
- Ensure their sustainability through adequate funding from state-owned or state-managed financial resources.

## **Greece 2025**

### **Information from: Greek National Commission for Human Rights**

## **Functioning of justice systems**

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Based on its human rights monitoring and reporting, the GNCHR identified length of court proceedings, access to justice for women and the right of access to court and fair trial standards as the main areas where significant challenges persist, affecting access to justice and effective judicial protection.

## Excessive length of court proceedings

As mentioned in the Greek NHRI previous Rule of Law Reports ([2024](#), [2023](#)) the delays and inefficiency of the justice system remain the main obstacles to the full enjoyment of the rule of law in Greece.

[The national recovery and resilience plan](#) entails a plethora of measures on the improvement of the efficiency of the justice system. In September 2024, [the European Commission's preliminary assessment](#) noted a satisfactory fulfilment of milestones and targets related to the fourth payment request submitted by Greece. The query revolves around a total of 17 milestones and 3 targets, concerning -among others- the training of judges and clerks, a set of actions so as to increase the justice system's IT capabilities with regard to the digitalisation of documents, the enhancement of the record-keeping system of the courts, the simplification, standardisation and acceleration of procedures through digitalisation, and the interoperability of IT systems of the courts with those of the Ministry of Justice, as well as other national and international authorities and databases. In December 2024, Greece submitted the fifth payment request, which entails reforms targeting to the acceleration of the administration of justice (see [Greece 2.0 Press Release](#), 6.6.2024). According to the [Digital Transformation Bible 2020-2025](#) 28 projects are designated for the development, integration and improvement of digital tools related to the access and management of legal information, the operation of court proceedings and in general the improvement of the functioning of the judicial system. 19 projects are in progress, 3 are completed, 1 is aborted (Development of an Electronic Payment System in the Mortgage Offices), while the remaining ones are scheduled.

Improving the efficiency of the justice system involves foremost the acceleration of the administration of justice, which is a major drawback for the proper functioning of the justice system in Greece. Acceleration of the administration of justice constitutes a separate measure under the national recovery and resilience plan. It is comprised by several elements, ranging from a revision of the judicial map across Greece (covering all branches of the judiciary), the introduction of an array of procedural and training measures and the introduction of digital tools and data.

In May 2024, the Greek Parliament adopted [Law 5134/2024](#), which reformed the judicial map in civil and criminal justice. The reform is included in the Recovery and Resilience Plan (measure ID 16575) and is set to be fully implemented by the end of 2025.

The new provisions redefine the courts' jurisdiction and competences and consolidate the first degree of jurisdiction with the merging of the magistrate's courts and the courts of first instance, aspiring to rationalize the number of the judicial bodies. Measures are introduced to speed-up the adjudication process

in first instance courts, whereas the use of electronic procedures for submitting applications and issuing decisions is encouraged, in order to increase the mechanism's efficiency. The procedure for filing appeals and other legal remedies is simplified, while stricter deadlines are in order, so as to avoid delays. Simultaneously, intensive focus is given on the alternative dispute resolution process and on the non-litigious cases (mortgage pre-notation, sworn statements and acts relating to inheritance), which are transferred from courts to lawyers, in order to reduce the courts' heavy workload.

The adoption and implementation of the new judicial map received severe [criticism](#) from the Plenary of the Bar Associations, highlighting the lack of staff training, the deficiencies in adaptation of technological systems to new developments, as well as the shortages as regards the preparedness of building infrastructures. No tangible progress has yet been made in relation to the changes brought about by the new judicial map and the changes in the procedures in the civil courts and the Council of State.

In July 2024, [Law 5119/2024](#) pertaining to the administrative justice was launched, entailing the reformation of the preliminary procedure before the Council of State. The Plenary of the Bar Associations delivered a [statement](#) expressing its opposition to the new provisions, claiming that it restricts the right to be heard and to effective judicial protection. They also stressed that there was no prior consultation with lawyers.

The major challenges that the judicial system has to face can be better understood through the [2024 EU Justice Scoreboard \[Quantitative data\]](#) and the statistics from [CEPEJ](#), which display that the estimated time needed to resolve litigious civil and commercial cases at first instance is among the highest disposition times in EU (with an average of 746 days for civil cases and 223 days for criminal cases). When it comes to the administrative cases, the Greek average reaches the number of 464 days for the courts of first instance, whereas for the Council of State the number of days needed skyrockets to 1.239.

The [Office for the Collection and Processing of Judicial Statistics](#), established in 2020, runs the project "Support for the office for the collection and processing of judicial statistics", which is part of the Recovery and Resilience Fund. The operation of the Office suffers from delays, while in October 2024, [the Ministry of National Economy and Finance](#) extended the project's end date.

## **Challenges of access to justice of women**

In January 2025, the EU Directive 2024/1385 relating to lay down a comprehensive set of rules which address the persisting problem of violence against women was incorporated into national law. The GNCHR was [invited to participate](#) in the parliamentary proceedings. The GNCHR welcomed the provisions pertaining to genital mutilation and forced marriage but remained

concerned as regards the insufficient adaptation of the article referring to the aggravating circumstances. The Greek NHRI also agreed with the article affording the prosecutor offices the discretion to reject or alter the terms of the mediation process, having as a criterion the protection of the victim. Moreover, it highlighted that mediation should only be applied to women victims of violence who are in a position to decide freely whether to accept or refuse the procedure, in line with the Council of Europe's GREVIO recommendations (see [Baseline Evaluation Report Greece](#), 2023). Additionally, awareness has been raised with respect to the lack of co-operation protocols between prosecutors' offices, victims' support organisations and state-provided social services.

With respect to the access to justice, the CEDAW, in its [Concluding Observations on the combined eighth and ninth periodic reports of Greece](#) (para. 13), raised the issue of the legal illiteracy among rural women, women with disabilities and women belonging to ethnic minorities, including Roma women and women belonging to the Muslim minority in Thrace, and their reluctance to file complaints about gender-based violence and discrimination, because of the prevalence of judicial gender bias and gender stereotypes among law enforcement personnel. It also stated that refugee, asylum-seeking and migrant women continue to face barriers to access to justice, a phenomenon that deteriorates due to their lack of trust in the judiciary and law enforcement forces, as well as to the fear of retaliation. National stakeholders raise awareness with respect to the [lengthy judicial proceedings](#) and the deeply-rooted gender stereotypes and prejudices among the branch of the judiciary. These elements in conjunction with the [low convictions' rate](#) deter the victims from finding recourse to the judicial procedure.

### **Restrictions to the right of access to a court**

In 2024, the ECtHR ruled against Greece in two cases referring to the excessive formalism by the Supreme Courts', especially at the stage of admissibility, impairing, thus, the fair trial right.

In the case of [Tsiolis v. Greece](#) concerning the Council of State's dismissal of an application for non-compliance with the admissibility requirements, the ECtHR held that an excessive formalistic approach was taken in implementation of the procedural requirements impairing with the very essence of the right of access to a court, thus Article 6 para. 1 ECHR had been violated. Relevant to the above, the [Athens Bar Association](#) underlined that the number of cases that the Council of State has launched through the years displays a substantial decrease; it released 10.250 in 2012, whereas in 2024 the number plummeted to 2.604.

The case of [Zouboulidis v. Greece](#) (no 3) concerned the formalistic interpretation by the Council of State of its scope of jurisdiction on compensation claims from the State for the alleged errors of the civil courts

until the eventual adoption of new legislation. The ECtHR held that the restriction on applicant's right for an undetermined period creating legal uncertainty to his detriment constituted a disproportionate burden that impaired the very essence of the right of access to a court (violation of Article 6 para 1 ECHR). In November 2024, a [legislative drafting committee](#) was established with the task to handle and regulate the action for damages occurred by the acts or omissions of the judicial organs, in compliance with the Zouboulidis judgement.

## **Room for improvement on fair trial standards**

In October 2024, the European Commission notified Greece that it failed to properly incorporate and transpose the [Directive 2016/343/EU](#) pertaining to the strengthening of the presumption of innocence and the right to be present at criminal trials. It is unequivocal that these elements are inextricably connected to the right to a fair trial. Thus, it released a [formal notice](#) initiating an infringement procedure.

## **Implementation of European Courts' Judgments**

### **European Court of Human Rights**

The Greek NHRI informs that Greece continues to maintain [a satisfactory track record](#) regarding the payment of just satisfaction ordered by the Court. The adoption of both individual and general measures varies, [with frequent legislative amendments enacted in response to ECtHR judgments finding violations](#). GNCHR notes that particularities of the Greek legal system substantially hinder the reopening of cases both in law and in practice, thus impeding access to restitutio in integrum. In the specific context of Greece, it is proven that the imperative of restitutio in integrum in the implementation of judgments carries significant weight. Even in cases where proceedings can be reopened, there is often little to no substantive prospect of success in rectifying the consequences of the violation and ensuring a Convention-compliant outcome for the applicant. Domestic courts demonstrate reluctance to deviate from their initial findings, as exemplified in the Bekir-Ousta group. Furthermore, normative constraints, such as the prohibition of reopening proceedings at the expense of the accused, hinder efforts to achieve restitutio in integrum, as demonstrated in cases like Sidiropoulos and Papakostas group. Similarly, the newly introduced remedy on poor detention conditions in response to the Nisiotis group, is sparingly employed and applications are rejected at an overwhelming rate.

In 2024, the Committee of Ministers received from the European Court 29 cases against Greece for supervision of their execution (compared to 35 in 2023 and 25 in 2022). Of the new violations found by the Court in 2024, some of them concerned the detention and reception conditions of asylum seekers,

and one concerned the failure of the investigative and judicial authorities to adequately respond to allegations of rape. Another concerned the authorities' failure to demonstrate that the use of force by coastguards during an operation to intercept a boat illegally transporting people to Greece had been "absolutely necessary" and the lack of an effective investigation thereof. The Committee closed 31 cases against Greece, including four leading cases under standard supervision (Council of Europe/Committee of Ministers, Supervision of the execution of judgments and decisions of the European Court of Human Rights, [Annual Report 2024](#), pp. 73-74).

There are [nine groups of leading cases](#) pending before the Committee of Ministers, most under enhanced supervision due to the important structural and/or complex problems revealed therein:

- [Sidiropoulos and Papakostas group \(33349/10+\)](#) concerns the ill-treatment by law enforcement and the lack of effective investigations into death or ill-treatment in the context of law enforcement;
- [Nisiotis group \(34704/08+\)](#) relates to inhuman and/or degrading treatment based on poor detention conditions (overcrowded prisons, no ventilation, no personal space, lack of medical care, etc);
- [M.S.S. group \(30696/09+\)](#) relates to shortcomings in the examination of asylum requests, poor detention conditions, absence of adequate support upon release and absence of an effective remedy.
- [Beka-Koulocheri group \(38878/03\)](#) relates to the non-compliance or significantly delayed compliance of the authorities with final judgments of the domestic courts;
- [Bekir-Ousta and others group \(35151/05+\)](#) relates to the refusal to register two associations and the dissolution of one association asserting that their aim was to promote the existence of an ethnic minority in Greece (as opposed to a religious one);
- [House of Macedonian Civilization and others \(1295/10\)](#) relates to the refusal to register an association due to the use of the word "Macedonian" and based on an alleged contravention of public order.

Notwithstanding the enhanced supervision by the ECtHR with respect to detention centres' or police and border guard stations' conditions (Nisiotis group and M.S.S. group), the situation cannot be deemed as improved. The Council of Europe's Committee for the Prevention of Torture and Inhuman or Degrading Treatment or Punishment (CPT), in its [2024 Report](#), observed that foreign nationals continue to be held in poor facilities and receive inhuman and degrading treatment (see also [Special Report of the Greek Ombudsman](#), 2023). The CPT criticized heavily the new EU-funded Closed Controlled Access Centres on the Aegean Islands, stating that they do not provide for decent living conditions.

Additionally, following the GNCHR's [visit to the Ritsona centre](#), it was witnessed

that the facilities do not provide for a female-friendly safe space, as they did during the previous years. Also, [deficiencies](#) as regards the employees, professional experts and interpreters create difficulties to the procedure of reporting, when it comes to violent incidents and ill-treatment. Moreover, despite the [agreement signed between the IOM and the Ministry of Migration and Asylum](#) concerning the project 'Hippocrates I', which foresees the provision of primary medical care and psychosocial support to those residing in such centres, the ratio between the staff members and the people residing is disproportional. A positive step made is the recruitment of 405 employees under the [Asylum Migration and Integration Fund](#), in order to strengthen the human resources of the Asylum Service and enhance its operational capacity. The project started in January 2024 and is expected to last until 2027.

As it has been reiterated in the ENNHRI 2023 Rule of Law Report, the introduction of a new remedy in the Penitentiary Code (article 6A by virtue of article 8 of Law 4985/2022) to address poor detention conditions yielded little to no practical result. Its application [remains thin on the ground and the rejection rate exceeds 99.5%](#). In [Circular 3/2023](#), the Deputy Prosecutor of the Supreme Court emphasizes the importance of applying the new Article 6A of Law 4985/2022 in line with ECtHR rulings. He revisits the issue with [Circular 05/2024](#), highlighting that by the end of 2023, Greece faced 139 convictions by the ECtHR for violating Article 3 ECHR, which prohibits torture and inhuman or degrading treatment. Additionally, 567 inmate cases were settled through friendly agreements, with Greece ranking fifth among Council of Europe countries for pending cases, mainly related to detention conditions.

The GNCHR is of the view that given the fact that only four out of 197 appeals have been accepted, combined with the absence of any appeals in nearly 44% of correctional facilities and in light of the recent findings by the [CPT](#) suggest that the implementation of the law requires significant improvement to ensure compliance with both national and international standards. The Greek NHRI, in [its Note](#) before the Greek Parliament, has already pointed out that since the conditions in Greek correctional facilities have been repeatedly deemed equivalent to inhuman and degrading treatment by the ECtHR, as confirmed by CPT and CAT, there are serious reservations regarding the effectiveness of the relevant legislative provision. Penitentiary facilities - despite the recent reforms in the Penal Code to facilitate the exit from the system (see ENNHRI Rule of Law Report - Greece 2023 p. 31) still remain overcrowded and prison conditions are below international human rights standards. The Greek National Commission recommends the removal of obstacles faced by inmates wishing to complain about their detention conditions and the strengthening of their procedural rights, particularly their rights to access information, to legal representation, and to free legal aid. This is crucial given the unknown (not officially published) proportion of inmates with mental health disorders and the significant number of foreign inmates who are often unable to effectively utilize the available legal remedies. The Greek NHRI has prioritized this issue and is

using all available tools to monitor the situation in Greece. Soon, a comprehensive report on the human rights situation in correctional facilities will be published.

In brief, the GNCHR recommends the following to the authorities:

- Hearing of detainees' appeals shall be encouraged, and the evidence regarding detention conditions shall be thoroughly investigated, extending beyond the claims of the prison administration.
- Protection measures shall be implemented to ensure that detainees who submit appeals do not face retaliation.
- Regular, detailed statistics on detention condition appeals (e.g., number of appeals, number accepted, reasons for refusal) shall be published.
- Free legal aid shall be encouraged and facilitated, particularly for vulnerable groups (e.g., foreign nationals and individuals with mental health disorders).
- Clear and comprehensible information (including in multiple languages) concerning the process for filing an appeal and the necessary supporting evidence shall be made readily available.

The Greek Ombudsman in its [reports](#) highlights systemic faults and shortcomings recorded in the internal process of investigating disciplinary offenses and, therefore, their durability over time, despite the recommendations and repeated interventions of the Ombudsman.

A large group of cases pending for examination before the Court is related to alleged informal forced returns from Greece to Türkiye. Rule 39 provisional measures have been issued by the Court in a number of these cases. According to the official [ECtHR statistics](#), 61 out of 69 interim orders in 2024 are related to border issues. In 2024, the GNCHR continued its practice (ENNHR Rule of Law Report - Greece, p. 33) to intervene for every case communicated by civil society to the competent Greek authorities recommending them to comply with the Court's respective interim orders (relevant information are included in the Annual Report for 2024 of the Recording Mechanism for Informal Forced Returns, to be published). On 07/01/2025, the ECtHR published two judgments against Greece on complaints by third-country nationals that they had suffered violations of ECHR rights as a result of informal forced returns (IFR) from Greece to Türkiye ([Decision G.R.J. v. Greece - Alleged “pushback” of an Afghan from Greece to Türkiye; A.R.E. c. GRÈCE](#)). The Court of Strasbourg, based on official reports of international organisations and national human rights structures, like the GNCHR, describing a rather stable and uniform modus operandi, held that at the time of the events relied on by the applicant, there was a systematic practice of pushbacks by the Greek authorities. In A.R.E. v. Greece, the Court acknowledged that the applicant suffered an IFR incident, found an infringement of Article 3 of the ECHR and pointed out that the

applicant had been irregularly deported to Turkey, without any assessment of the risk she was running in Turkey, in breach of the principle of non-refoulement. Moreover, the Court found an infringement of Article 5 of the ECHR, with regard to the right to liberty and security, as the applicant was subjected to arbitrary detention without legal justification or access to remedies to challenge its lawfulness. In addition, the Court found infringements of Article 13 of the ECHR, as the applicant had no access to an effective remedy to protect her rights. In the same case, the Court, taking into account the cases of IRF incidents already investigated by the competent authorities and the fact that the proceedings regarding the applicant's complaint were closed without an effective investigation, found that the domestic remedies alleged by the Greek Government to be available to the applicant, were not effective in complaints concerning "pushbacks" or other violations that occur during "pushbacks".

It is recalled that the GNCHR has repeatedly issued relevant [recommendations](#), calling, *inter alia*, on the competent authorities to ensure that all the institutions of the Greek State strictly observe the principle of non-refoulement and the Greek judiciary to effectively investigate the relevant complaints. Taking into account the recent judgments of the ECtHR, the Greek NHRI underlines that its repeated recommendations to the competent bodies of the Greek state are currently highly topical. The consolidation of the IFR operations characteristics and their repeated methodology (*modus operandi*) have already been recorded and highlighted in the [2022](#) and [2023](#) Annual Reports of the [Recording Mechanism of Informal Forced Returns](#) which operates under the auspices of the GNCHR since January 2022.

Finally, with respect to freedom of association group of cases that are pending for 16 years before the Committee of Ministers for execution, some progress was made following the deadlock created by the Court of Cassation's negative decisions in 2021 and 2022. More particularly, based on bilateral discussions between the Greek authorities and the Committee of Ministers, [a Committee of Experts was established in 2024](#), comprised of Greek legal experts that would study the matter of general measures and advise the authorities on the next steps. The Committee of Experts intends to finalise its work and deliver its proposal to the authorities by June 2025.

## **Court of Justice of the European Union**

Following a [preliminary reference](#) submitted by the Council of State, the CJEU, in October 2024, delivered its ruling stating that the Member States cannot launch a decision rejecting an asylum application as inadmissible on the basis of the concept of a "safe third country" in cases where they have established that the asylum seeker will not be able to enter the territory of a state described as safe. The ruling is deemed of great significance, since it contradicts the long-standing pattern of the Greek forces, that is, to

horizontally dismiss asylum applications as inadmissible under the safe third country principle. Thus, the rejection should be considered as prohibited when it is not plausible for the applicants to re-enter to Türkiye, while the precondition should be examined not at the time of the decision's execution, but during the launching of the latter ([GCR, 'safe third country'; CJEU, Request for a preliminary ruling under Article 267 TFEU from the Council of State \(Council of State, Greece\)](#)). By a subsequent [decision](#) of the Plenary of the Council of State on 27 March 2025, the Joint Ministerial Decision designating Turkey as a safe third country for asylum seekers originating from Syria, Afghanistan, Somalia, Pakistan, and Bangladesh has been annulled.

### **Greek NHRI's activities to support the implementation of the European Courts' judgments**

With regards to the actions taken by the NHRI to support implementation of European Courts' judgments, the GNCHR maintains a long standing, multi-level cooperation with the European Court of Human Rights, promoting the work of the Court and contributing to the effective implementation of its judgments in Greece. In 2024, the GNCHR translated into Greek two of the Court's [thematic factsheets](#) on interim measures and the protection of minors, aiming to facilitate the dissemination of ECtHR case-law in Greece.

The GNCHR is also active on engaging the Greek Parliamentarians in discussions about substantial implementation of the ECtHR's jurisprudence in cases against Greece as well as GNCHR's recommendations on specific cases under enhanced supervision by the Committee of Ministers. In 2024, the GNCHR was invited to offer relevant insight before the Special Permanent Committee on monitoring the decisions of the European Court of Human Rights in the Hellenic Parliament. The Greek NHRI continues to promote the engagement of the Parliamentarians in the implementation of European Courts' judgments.

The GNCHR uses the Court's jurisprudence to help the authorities align their national practice with international standards. In its advisory opinions to draft laws or policies, the GNCHR always makes reference to relevant ECtHR caselaw. In 2024, the Greek National Commission participated in different national inter-ministerial or administrative policy-making or monitoring bodies on Roma rights, migrant rights, children rights and other.

### **Follow-up to the recommendations concerning justice systems, issued by European actors**

**European Commission (European Union)**

Following the recommendations of the European Commission in previous years' Rule of Law Reports ([2022](#), [2023](#), [2024](#)) pertaining to the involvement of the

judiciary in the appointment of the highest positions of the Council of State, the Supreme Court and the Court of Audit, the Greek Parliament moved on to the adoption of [art. 27 Law 5123/2024](#). The latter engages the administrative Plenaries of the three highest courts in the procedure leading to the appointment of their Presidents and Vice-Presidents. More particularly, the plenary of the aforementioned courts delivers its opinion (vote by secret ballot), after the formation of a query by the Minister of Justice. It has to be noted, though, that the opinion is not binding. After consulting the Conference of Presidents of Parliament and upon a proposal from the Minister for Justice, the Council of Ministers has to choose the candidates. The appointments are made by Presidential Decree, following the recommendation by the Council of Ministers.

The new provision is in alignment with the Greek Constitution ([art. 90 para. 5](#)), as well as with the European standards, which stipulate that the head of state, the government or the legislative power take decisions concerning the selection and career of judges, an independent and competent authority drawn in substantial part from the judiciary should be authorized to make recommendations or express opinions which the relevant appointing authority follows in practice (see Council of Europe, [Recommendation CM/Rec\(2010\)12](#) of the Committee of Ministers to member states on judges: independence, efficiency and responsibilities, paras 46-48).

As the [explanatory memorandum](#) of Law 5123/2024 sets out, the amendment in question consolidates judicial independence and boosts the foundations of the rule of law. In its [2024 Rule of Law Report](#), the EU Commission acknowledged that its previous standing recommendation on the need for involvement of the judiciary in the appointment of the above positions has been fully implemented.

The Greek judicial system is facing several systematic issues in the provision of legal aid and interpretation in the last years (especially after the economic crisis of the 2010s). The Legal Aid [Law 3226/2004](#) has been found insufficient in practice, with limited resources allocated to providing quality legal representation. Based on research by the Hellenic League for Human Rights, the majority of beneficiaries of legal aid are foreigners. In half of the cases, there is no timely appointment of an interpreter by the Court. In two-thirds of cases studied, an interpreter was not available for the preparatory meeting between the defendant and their lawyer.

In 2023 the European Commission, in the context of infringement proceedings under Article 258 TFEU, [sent a letter of formal notice](#) to Greece due to late payments to lawyers under the legal aid scheme and the consequent incorrect application of the rules laid down in the Late Payments Directive (2011/7/EU). In March 2024 [Article 25 Law 5095/2024](#) was passed to settle the payments due to lawyers from 2018 under the legal aid scheme (from 2018 to 2022

42.000 applications for payment of legal fees were pending). The [European Commission](#), in light of the new law provisions, decided to close the infringement case in July 2024. However, in September 2024, no payment had yet been made; therefore, the Bar Associations decided to abstain from their duties.

### **European Committee for the Prevention of Torture (Council of Europe) and Human Rights Committee (UN)**

The GNCHR had multiple times recommended to the State to ensure the necessary adequate interpretation for any administrative or judicial proceedings involving third-country nationals; the exercise of the right to interpretation constitutes a basic prerequisite and guarantee for the enjoyment of foreigners' fundamental rights. The Greek NHRI published [a comprehensive report](#) on "the right to interpretation and translation in the criminal proceedings and the right to information in the context of criminal procedures" with concrete substantiated detailed recommendations on how to establish an interpretation system in line with international and regional standards. In 2024, the European Committee for the Prevention of Torture documented cases where foreign nationals deprived of their liberty under the migration legislation were not informed of their rights and for the reasons of their detention in a language that they can understand and signed several official documents in Greek without the assistance of an official interpreter (see [CPT Report](#)). Moreover, the UN Human Rights Committee in its [Concluding Observations on the 3rd periodic report of Greece](#) recommended Greece to ensure effective access to legal aid to victims of discrimination based on sexual orientation and gender identity and asylum seekers and migrants.

## **Greece 2025**

### **Information from: Greek National Commission for Human Rights**

## **Media freedom, pluralism and safety of journalists**

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[Greece's press freedom index](#) improved, rising 19 places in 2024, but remains last among EU countries. The country has risen to the 88th place from 107th last year out of 180 countries, in [Reporters Without Borders' \(RSF\) 2024 World Press Freedom](#), Index. Greece's overall score increased at 57.15 out of 100, from 55.2 in 2023.

In its [2024 Rule of Law Report](#), the European Commission recommended to

Greece to “further advance with the process of adopting legislative and non-legislative safeguards to improve the protection of journalists, in particular as regards abusive lawsuits against journalists and their safety, in line with the adopted Memorandum of Understanding and taking into account European standards on the protection of journalists”.

## **SLAPPs cases**

According to the [MRFF's latest report](#), the Strategic Lawsuits against Public Participation (SLAPPs) remain one of the most challenging threats in respect of the media freedom in Greece. Notwithstanding the establishment of the Task Force, the [Observatory](#), as well as the support and training provided by the [International Training Centre for the Safety of Journalists and other ME Professionals](#), the issues have not been resolved.

In 2024, the Greek government introduced the amendment of Criminal Code under [Law 5090/2024](#), setting as the main target the protection of freedom of expression and the protection of journalists from abusive lawsuits. The reform brought about the facilitation of the dismissal of manifestly unfounded claims (paragraph 3 of article 43 of the CCP). Also, the new law decriminalized the offence of simple defamation (Article 362 of the Criminal Code), while it retained the slanderous defamation, increasing the minimum sentence and making even more difficult to achieve the suspension of sentences stemming from a court of first instance, when they are appealed. The new provisions foresee the repeal of article 367 of the Code, which amounted to a justifying basis for removing the offence in favour of journalists, while they exercise their duties, on the ground of the justified interest in covering issues of public interest. [Associations and scholars](#) have raised their objection as to the effectiveness of these amendments, supporting that from now on the interested parties could only invoke the articles of the Constitution and ECHR. The GNCHR is of the view that an Anti-SLAPP legislation, which would entail the dismissal of SLAPPs at an early stage of the procedure and the simultaneous transfer of the burden of proof to the applicants, would be a positive measure, assisting in the preservation of time and resources.

At a European level, the [7.2.2024 Resolution of the European Parliament](#) on the state of Rule of Law in Greece encapsulates the concerns of the body, as regards the status of journalists in Greece and their ineffective protection against systematic lawsuits. The Greek Government in its extensive [response to the Resolution of the Parliament](#) supported, among others, that ‘the Greek State is already considering transposing the content of the anti-SLAPP Directive to regulate all, without exception, abusive actions to silence journalists, and not only those actions of a cross-border nature’. On 27/02/2024, the Parliament voted in favour of a new [Directive](#) (EU) 2024/1069, which aims to protect persons who engage in public participation from manifestly unfounded claims or abusive court proceedings in cross-border disputes. The European body

highlights that it is of significant importance for journalists to exercise their duties effectively and without the fear of punishment for their research. Therefore, it provides safeguards for the alleged defendants, including early dismissal of unfounded claims, remedies against abusive lawsuits and security for costs. The member states have to incorporate the Directive by May 2026. To fully implement the act, Greece has to move on to some legal reforms in order to deter comprehensively the phenomenon designated above.

Additionally, the UN Human Rights Committee in its [Concluding Observations on the 3rd periodic report of Greece](#) (2024) stated that 'it remains concerned about reports that local officials file strategic lawsuits against public participation (SLAPPs) to suppress critical news reporting and put financial and psychological pressure on journalists'. The Greek NHRI in its [Submission to the UN Human Rights Committee](#) (September 2024, p. 23) reiterated its recommendation on ensuring the unhindered exercise of the journalistic function, urging the Greek State to take measures to protect and compensate victims of "strategic lawsuits against public participation (SLAPPs)".

The GNCHR, based on information from publicly available sources, recorded the following SLAPP cases in the past year:

- According to the [European Centre for Press and Media Freedom](#), in 2025, there is one lawsuit against two journalists, Konstantinos Poulis and Anna Nini, submitted by the convicted for the fatal bodily harm of activist Zak Kostopoulos. The applicant accused the respondents of defamation and misuse of sensitive personal data, mainly concerning the footage and reports from the court sessions.
- After being acquitted, [the businessman Aristidis Floros, demanded the deletion of 182 posts related to his cases](#), including a cartoon, from the news outlet Tvxs. The [Journalists' Union of Athens Daily Newspapers](#) (ESIEA) expressed its concern for these practices, highlighting that 'they directly threaten the principles of freedom of the press and urged the government 'to take a stand, institutionally shielding the media from similar threats and SLAPP practices in cases of public interest'.
- On 25 January 2024, a case against two journalists of Reporters United was heard in Athens Court of First Instance. This case was initiated in 2022 by Grigoris Dimitriadis, who was allegedly involved in the illegal surveillance scandal against newspaper EFSYN and online investigative portal Reporters United and their reporters Nikolas Leontopoulos and Thodoris Chondrogiannos, plus freelance journalist Thanasis Koukakis for compensation. In 2023 Dimitriadis filed a [second lawsuit](#) against many of the same plaintiffs for the same reasons. Journalists' associations denounce the above lawsuits as SLAPPs (e.g. Media Freedom Rapid Response, [Mission Report Greece 2024](#), pp. 18-19). [Many press organizations and groups](#) came to the support of the journalists, requesting the implementation of effective anti-SLAPP

legislation. The Athens Court of First Instance held [its ruling](#) on 10/10/2024, dismissing Dimitriadis allegations regarding the first of the lawsuits. As the judges concluded, the reports were not false, abusive or libelous, while they recognized the public interest element of the reporting. The decision was welcomed by the [relevant associations](#), which highlighted the vindication of the investigative journalism against the increasing trend of SLAPPs and the meaning behind the reference of the court to the Constitution and ECHR (Human Rights Watch, [Victory for Greek journalists in Surveillance case](#), 16/10/2024).

- On 19 September 2024, the Appeal Court heard the appeal of the journalist Stavroula Poulimeni and media outlet Alterthess against their partial conviction by the First Instance Court for violating the right to privacy by publicizing the names of two Hellas Gold executives, who were involved in a water pollution case. The partner organisations of the [Media Freedom Rapid Response](#) (MFRR) and the [Panhellenic Federation of Editors' Unions](#) expressed their support to Poulimeni condemning and reporting the weaponization of GDPR against press freedom in Greece.
- The [judgment nr. 123/2024](#) of the Court of First Instance in Larissa was [positively received by the Panhellenic Federation of Editors' Unions](#). The Court dismissed a lawsuit filed by Giorgos Mihalopoulos against five journalists, with which the former demanded an excessively high amount of compensation.
- With the [judgement nr. 3487/2024](#) held by the Athens Court of First Instance, a lawsuit filed against NAFTEMPORIKI was rejected. The applicant had requested compensation for alleged abuse of his personality (POESI, SLAPPs [Observatory](#)).

[POESY has created a form](#) on its website where SLAPPs can be recorded. Journalists, victims of SLAPPs can submit in full confidentiality information on their cases. However, the cases will be processed only for information purposes. In addition to the form, POESY also provides information on SLAPP cases and other SLAPP-related news, and it collects relevant information on legislative developments related to SLAPPs. While this initiative is a welcome tool to gather information and at the same time to raise awareness on SLAPPs, at the moment it appears to be the only one aimed at countering SLAPPs. It is also significant that many journalists didn't seem to be aware of it as they also seemed to be unaware of the government's Task Force. More initiatives will have to be developed to provide support for journalists and tackle the problems of SLAPPs.

## **Journalists' safety**

In 2024, the [Mapping Media Freedom](#) platform recorded 19 alerts pertaining to the safety of journalists (physical assaults, fines blocked access, obstruction, surveillance etc.), while, from the beginning of the year up until today, the

incidents enumerated are 6. Accordingly, the [Council of Europe's Platform](#) displays 3 active alerts in 2024 and 1 in 2025, whereas, in general, there are two cases of impunity and one active systemic alert. Some illustrative cases of these reports concern physical assaults resulting in journalists' injury by riot police, when the former were covering demonstrations and protests. For instance, on 26 January 2025, Marios Lolos, a photojournalist, reported his attack by the riot police, during a protest that took place in Athens commemorating the Tempi train collision (Council of Europe, Safety of Journalists' Platform, Greece, [Alert No. 28/2025](#)). Another case involving the photojournalist Orestis Panagiotou, who was injured while covering a strike by water shooting by the police forces was heard before the [First Instance Administrative Court of Athens](#), which ruled in favour of the victim in October 2024. The Court made an explicit reference to the Greek Constitution, as well as to article 10 of the ECHR, which establishes the freedom of the press.

As it has been highlighted by the partner organisations of the Media Freedom Rapid Response (MFRR), along with Reporters Without Borders and the Committee to Protect Journalists, in their latest [report](#), the [bill](#) on suspending the confidentiality of communications, cybersecurity and the protection of citizens' personal data continues to fall short of what is foreseen by the European standards. Consequently, the journalists [remain unprotected](#) when it comes to the right to protect the confidentiality of their sources.

Additionally, [the OECD](#) does not oversee state's efforts to establish a safe environment for investigative journalism, but it highlights that some concerns are still present.

## Cases of impunity

[With respect to the case of Giorgos Karaivaz](#) that is monitored by the EU Commission and [European Parliament](#) within the rule of law cycle, the Greek NHRI informs that the crime and police reporter who was shot and killed by two men outside his home, the Athens mixed jury court, on 31 July 2024, did not manage to find beyond reasonable doubt that the suspects were guilty. Therefore, although the Prosecutor had requested their conviction, the two hitmen were acquitted.

In respect of the murder of the reporter and broadcaster Sokratis Giolias that took place in 2010, the [Ministry of Citizen Protection released its response](#) stating that the investigation remains at the Athens Public Prosecutor's Office, since there was no sufficient evidence and, thus, no active lines of inquiry.

## Transparency and media ownership

During 2024, the registration of websites on [the Registry for Electronic Press \(MHT\) was completed](#) securing, thus, more information as regards the media owners. The National Council for Radio and Television (NCRTV) and its

Transparency Department do not provide updated data, mainly due to limited financial and human resources. Consequently, changes in media concentrations or ownership cannot be monitored on time. The [Euromedia Ownership Monitor](#) has pointed out the problem set out above, highlighting the lack of transparency in the broadcasting sector. [The Media Capture Monitoring Report](#) stipulates that many points of articles 6 and 22 of EMFA are encapsulated in the Greek law, but their compliance remains contested.

According to [2024 MPM](#), the indicator of Transparency of Media Ownership witnessed a significant reduction reaching the percentage of 25%, mainly due to the adoption of Law 5005/2022. The Plurality of Media Providers area adheres to a medium risk, whereas the score of Plurality in Digital Markets remains high, at 86% (it might have its cause to the delays emerged in the registration of websites). With respect to the state funding, the UNHRC in [the 2024 assessment](#) underscored that 'remains concerned that the law (L 5005/2022) may be misused to exclude media that are critical of the government from receiving state advertising revenue'. Moreover, [Media Capture Monitoring Report](#) underpins that a high percentage of state funding is allocated via several subsidies, whose distribution requirements remain obscure. The upgrade of [the e-Pasithea information system](#) and the implementation of the [EC Directive 2022-2523](#) (concerning a global minimum level of taxation for multinational enterprise groups and large-scale domestic groups in the Union) are noted as positive steps for the enhancement of the media sector. The [UN Human Rights Committee](#) took note of the adoption of Law No. 5005/2022 on strengthening the publicity and transparency of print and electronic media, which provided for the establishment of an independent committee in charge of overseeing the compliance of print and online media with journalistic ethics. Nevertheless, the HRC is concerned that the law may be misused to exclude media that are critical of the Government from receiving State advertising revenue.

## National Council for Radio and Television

In May 2024, [the Athens Bar Association filed an application](#) to the Council of State requesting the annulment of the ministerial decision with which members of the NCRTV had been appointed. The Court [dismissed the case](#) claiming that the Association lacked the legal interest required. Additionally, the NCRTV faces challenges as regards the financial and human resources. [In its annual report for 2023](#) the latter highlights the reduction that it has undergone in respect of the budget required since 2010 (i.e. salaries, personnel, equipment, information systems), which creates impediments to the exercise of its task. The NCRTV's activity is supervised by the Special Permanent Committee on Institutions and Transparency of the Greek Parliament. According to the [Media Pluralism Monitor \(MPM\)](#) indicators, the independence and effectiveness of the media authority shows a significantly high risk, reaching the percentage of 83%. The number [might have its roots](#) in the opaque and highly contested

procedures that took place during the appointment of the new board, culminating in the application for annulment before the Council of State.

## Access to documents

Journalists covering migration and refugee issues have [shared information with the GNCHR](#), reporting increasing difficulties in accessing information and sources in recent years. They attribute these challenges to ministries' refusals to provide information, often citing privacy or confidentiality concerns as justification. Similarly, they report that they do not have free access to the refugee population hosted in reception and accommodation facilities. The GNCHR recalls that in Szurovecz v. Hungary, the ECtHR found that denial of access to a journalist on privacy and security grounds was not a sufficient basis for this restriction and found a violation of Article 10 of the ECHR, again underlining the 'watchdog' role of the media and the fact that their presence is a guarantee to ensure the accountability of the authorities.

As the [Greco's 2024 fifth evaluation report](#) states, 'GRECO recommended undertaking an independent assessment on access to information requirements in order to adopt regulation, and the necessary implementation measures, that fully meet the standards of the Council of Europe Convention on Access to Official Documents'. Notwithstanding the initiation of a reformation of the Administrative Procedure Code conducted by the Greek government, Greco insists that, still, there is no dedicated freedom of information act, since the scope of the recommendation is much broader than a mere code amendment. As a result, the latter does not consider the recommendation as implemented, since the state did not take into account the challenges emerged from the current legislation.

Under [Law 5143/2024 \(article 57\)](#), article 5 of the Code of Administrative Procedure was amended. In alignment with the reform, the current title makes a reference to public documents, while the private ones held by public authorities fall –officially- within this category. Additionally, the special legitimate interest is not, principally, a prerequisite for having access to private documents, facilitating in that way the process. As it was supported during the public consultation 'the proposed regulation incorporates the implementation of the [Council of Europe's Tromsø Convention on Access to Public Document](#)'. The results of the amendment remain to be seen.

## Restrictions on trial coverage

Article 8(1) L 3090/2002, as replaced by [Article 31 L 5119/2024](#), prohibits full or partial broadcast of trials. The restriction of the coverage received severe criticism by [journalists' organisations](#) and [scholars](#), as to its compatibility with the Greek Constitution.

## European Court of Human Rights

In 2024 three cases that were brought before the ECtHR against Greece are of particular interest to journalistic freedom:

1. [Ilias Kanellis and Andreas Pappas v. Greece & Maria Vasilaki and Emmanouil Vasilakis v. Greece](#) (2024): The case concerned civil defamation proceedings against the applicants, in their capacities as co-directors, journalist and editor of the magazine “The Athens Review of Books”. The ECtHR confirmed the domestic courts’ assessment, holding that the boundaries of responsible journalism had been overstepped.
2. [Thomaidis v. Greece](#) (2024): The case concerned civil liability damages imposed on the applicant, a journalist and main presenter of a television programme for revelation of witness statements in a match fixing case pending before justice. The ECHR ruled that ‘it is legitimate for special protection to be afforded to the secrecy of judicial investigation in criminal proceedings in view of what is at stake, both for the administration of justice and for the right of persons under investigation to be presumed innocent’ and that ‘the punishment of a journalist for assisting in the dissemination of statements made by another person in an interview would seriously hamper the contribution of the press to discussion of matters of public interest and should not be envisaged unless there are particularly strong reasons for doing so’. In the particular case, the Court found that the domestic courts adduced standards which were in conformity with the principles embodied in Article 10 of the ECHR.
3. [Vouliwatch v. Greece](#) (communicated in August 2024): The case involves a request by the applicant association for access to documents pertaining to the contract signed between the General Secretariat of Information and Communication of the Greek Government and a private company on creating information material for the public on combatting Covid-19. National instances (the National Transparency Authority and Administrative Courts) have dismissed its request due to lack of special interest according to the national law. The applicant invokes Article 10 of the ECHR complaining that the denial of access to the requested information is in breach of its right to receive and impart information, underscoring its role as its role as ‘public watchdog’.

### **Follow-up to the 2024 European Commission’s recommendation to Greece**

In order to fully implement the [recommendation](#) issued by the European Commission, Greece adopted some legislative and non-legislative safeguards, so as to afford a better environment to journalists and investigative journalism, especially as regards the threats stemming from SLAPPs.

In February 2024, the amended [Criminal Code](#) abolished the criminal offence of simple defamation, while the slanderous defamation was retained. As it was

underscored previously, the amendment of Criminal Code under [Law 5090/2024](#) aimed to the protection of freedom of expression and the protection of journalists from abusive lawsuits. Nonetheless, the Greek NHRI informs that many associations and scholars do not concur and have raised reservations as to the effectiveness of the new provisions and relevant reforms.

In May 2024, [a collective labour agreement](#) was established between the state and the unions, pertaining to the public sector journalists. This movement was welcomed by the trade unions (practical improvements for better working conditions, protection in war zones and areas of natural disasters, financial-social protection). It entails [provisions which solidify gender equality](#) and secure the protection for women journalists against harassment (inclusion, equal opportunities, and harassment policies, financial and social support to new spouses and mothers, creation of a Committee with the task to monitor the effective implementation of the gender equality provisions, phenomena of harassment and violence).

[Law 5085/2024](#) on "Urgent Measures for the Prevention of Violence at Sporting Events". Following an initiative of Task Force, these provisions were welcomed by journalists' unions as [reinforcing their protection](#) while covering sport events.

The [European Media Freedom Act](#) (EMFA, May 2024), obliges member states to amend domestic media bills, so as to tackle the issue of media capture. The reforms in question entail securing media regulator independence, transparency in media ownership, safeguarding media pluralism, and delimiting state influence on editorial policies. The level of Greece's compliance with the provisions of the act is deemed partial.

## Greece 2025

### Information from: Greek National Commission for Human Rights

### Other challenges to the rule of law and human rights

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#### Effective and timely investigations of incidents of alleged misconduct involving state official

The GNCHR received a request for the first time by the European Court of Human Rights to submit a written intervention as regards the cases of G.R.J. v. Greece (15067/21) and A.E. v. Greece (15783/21). These cases were related to

two applications against the Greek Authorities, lodged with the ECtHR by persons requesting international protection, on reported incidents of informal forced returns for the period 2019 – 2020 both at land and at sea. The Strasbourg Court requested from the GNCHR an answer to the general question whether there is a systematic practice of pushbacks of third-country nationals from Greece to Türkiye at the land and sea borders. GNCHR's intervention was based on the findings of the Recording Mechanism of Incidents of Informal Forced Returns. On 07.01.2025, the ECtHR published its judgments on [A.R.E. v. Greece](#) and [G.R.J. v. Greece](#) acknowledging that at the time of the events and based on the reports of international organizations and national institutions, there was a systematic practice of pushbacks by the Greek authorities. The Recording Mechanism of Informal Forced Returns, operated under the GNCHR recommended in its [Annual Report 2023](#) to the Greek Authorities to "investigate in an independent and efficient manner, all complaints lodged by persons alleging to have been subjected to IFR incidents and other incidents of serious human rights violations at the borders, by applying, mutatis mutandis, the provisions laid down in the Circulars of the Prosecutor of the Supreme Court No 1/2023 and No 18/2023,<sup>56</sup> underlining that any failure to act in this regard is not only contrary to the obligations of the Greek Authorities pursuant to international human rights law and the ECHR, but risks to put the country on an embarrassing spot and ends up to new convictions by the ECtHR [see for example ECtHR (5418/15) *Safi & Others v. Greece*]".

On 21.01.2025 the ECtHR published its judgement on [Panayotopoulos and others v. Greece](#) which acknowledged a violation of Article 3 of the ECHR (ill-treatment by the police). The case concerned a police violence incident that occurred in October 2016, involving three Roma people. While in custody, they were allegedly subjected to racist abuse and violence, including being beaten, in an attempt to extract information and confessions. One of the applicants ended up in hospital two days later complaining of chest pains, with wounds to his genitals. The Strasbourg Court found the violation of Article 3 in conjunction with Article 14 based on racial motivation. Based on the findings of the Racist Violence Recording Network, in the last six years 40-60% of the racial incidents involve targeting by officers in uniform. The Racist Violence Recording Network for 2023 recorded incidents against Greek Roma citizens who were targeted by other citizens and Police representatives because of their different ethnic origin, including a pregnant woman and minors. At the same time, the Network is closely following the developments on the murders of young Roma involving officers in uniform, highlighting the importance and need for the investigation of the incidents in light of the existence of a racist motive. The Network notes that the context of targeting experienced by the Roma community is broader and permeates all its aspects racism, highlighting their treatment as "less" Greeks ([RVN Annual Report 2023](#), p. 17). In 2025, a bill was passed by the Parliament on the reform of the Police Corps ([Law 5187/2025](#)). Among other provisions, a Directorate for Social Policing is established to cover domestic

violence, racist violence and gender violence. The [Greek NHRI supported](#) the reform given that there are many common elements in both investigation and victim support in these fields.

### **Checks and balances (independence of independent authorities)**

In the [GNCHR Rule of Law Report for 2024](#) (p. 16), the Greek National Commission denounced the unconstitutional selection and appointment of new members of the National Council for Radio and Television (NCRT) and the ADAE and the serious impediments that ADAE faced in the execution of its mission. The Greek Council of State [dismissed the appeal of the Bar Association of Athens](#) on the unconstitutionality of the election of NCRT and ADAE members due to a lack of sufficient interest of the applicant. Article 90(g) of the Lawyers Code (L 4194/2023) which explicitly foresees that bar associations may intervene before the courts and any authority “on any matter of national, social, cultural, economic nature or content that is of interest to their members or to the legal profession in general, as well as on any matter of national, social, cultural or economic interest.” The ECtHR has already convicted Greece for its Supreme Courts’ excessive formalism, especially at the stage of admissibility, impairing, thus, the fair trial right (see ECtHR, [Tsiolis v. Greece](#), Judgment, 19.11.2024, and [Zouboulidis v. Greece \(No 3\)](#), Judgment, 4.6.2024).

The Greek NHRI depicts that there is still a worrying trend for governmental authority to interfere in the exercise of the independent authorities’ oversight and investigatory powers as enshrined in the Constitution and its executive laws. On 19 February 2025, the GNCHR published a [Statement](#) on the need to respect the constitutionally enshrined supervisory role of the Independent Authorities on the occasion of the issuance of a Press Release by the Ministry of Maritime Affairs and Insular Policy. The latter responded to the publication of the findings of the Greek Ombudsman on the Pylos shipwreck by claiming that the investigation was politically motivated, questioning also the Greek Ombudsman’s competence to investigate these incidents since his term has already expired (contrary to the provisions of Article 101 of the Greek Constitution).