Greece 2026

Information from: Greek National Commission for Human Rights

Executive summary

The Greek National Commission for Human Rights (GNCHR) was reaccredited with A-status in 2024 and continues to implement its mandate across an expanding set of functions, while supporting evidence-based mechanisms on racist violence and informal forced returns. In 2025, the GNCHR identified persistent rule of law challenges: a narrowing civic space, particularly for organisations and defenders working on migration; fragmented and burdensome NGO registration regimes; and legislative initiatives risking criminalisation of humanitarian action. Structural deficits also persist in law-making (limited early consultation, late amendments, weak Human Rights Impact Assessments (HRIAs)), in judicial protection (delays and gaps in legal aid), and in the effective execution of judgments, including in areas of border governance, detention conditions, and law enforcement accountability. The GNCHR responded to these challenges through opinions on draft laws, public statements, including joint interventions with UNHCR, hearings, monitoring, and sustained engagement in European rule of law reporting.

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NHRIs' establishment, independence, effectiveness and resilience

International accreditation status and SCA recommendations

The 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 the nominating authorities instructing adherence to the UN 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 NHRI's 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 UN 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 recommendations on NHRIs and relevant developments

National and NHRI's follow-up to findings from European actors

According to the GNCHR, there were no findings directly concerning its institutional status or positioning. However, several findings related to its work, interventions, and policy influence were reflected in the 2025 European Commission Rule of Law Report (Country Chapter on Greece). Explicit reference was made to consultations held in March 2025 between European Union officials and the GNCHR on rule of law matters, within the framework of the Commission's engagement with national institutional bodies (2025 EC Rule of Law Report, p.6). The Report also drew on the GNCHR's own Rule of Law submission, highlighting its contribution to the timely transposition of EU legislation aimed at strengthening gender-balanced representation on the boards of listed companies as a positive example of institutional engagement (2025 EC Rule of Law Report, p. 16) In addition, the European Commission referred to the GNCHR's Statement emphasising the need to safeguard the constitutionally guaranteed supervisory role of Independent National Authorities.

Regulatory frameworks and mandates

NHRI mandates

The regulatory framework applicable to the GNCHR has remained unchanged in 2025. The GNCHR carries out several mandates, including the ones of NHRI and of EU Artificial Intelligence Act – Article 77 Body, and acts as the Monitoring Body on EU funds compliance with fundamental rights.

The GNCHR participates as a member of the **National Accessibility Authority (EAP)**, established by Law 4780/2021 as an advisory body under the Prime Minister. Through this mandate, the GNCHR integrates human rights principles of equality, non-discrimination, accessibility, and participation into national accessibility policy, legislative processes, regulatory standards, and institutional coordination, thereby embedding CRPD compliance across the built, digital, and service environments.

In the domain of emerging technologies and digital governance, the GNCHR has been designated as a **national supervisory authority under Article 77 of Regulation (EU) 2024/1689 (Artificial Intelligence Act)**. This mandate incorporates the GNCHR into the EU enforcement framework for high-risk AI systems, entrusting it with the oversight of fundamental rights impacts arising from automated decision-making and technological regulation, alongside other national regulatory bodies. The designation formally recognises the GNCHR's role in safeguarding human rights within the evolving landscape of algorithmic governance.

The GNCHR within its special competence on monitoring and expressing recommendations to the State for the operation of a reliable and effective system for recording incidents of discrimination, racism and intolerance operates the **Racist Violence Recording Network**, established jointly with UNHCR. This mechanism functions as a structural human rights oversight framework addressing discrimination, intolerance, and hate crime, providing systematic documentation, policy guidance, and institutional accountability at national level.

With regard to migration and border governance, the GNCHR operates since 2021 the **Recording Mechanism of Incidents of Informal Forced Returns**. This mechanism responds to the absence of official data collection on pushbacks and the fragmentation of civil society reporting. Its core function is to safeguard the principle of non-refoulement and access to asylum under international and EU law, while strengthening accountability for human rights violations occurring in border control practices. The Mechanism operates through a transparent and scientifically grounded methodology, providing systematic human rights oversight in a traditionally opaque policy field. Its institutional relevance has been acknowledged at EU level and has informed judicial scrutiny, notably through GNCHR third party interventions before the European Court of Human Rights in cases concerning alleged systematic

refoulement.

Within the rule of law and democratic governance framework, the GNCHR exercises a broad mandate also related to the protection of freedom of expression and civic space, including action against strategic lawsuits against public participation (SLAPPs). Through cooperation with other relevant stakeholders such as the Council of Europe, the GNCHR promotes legislative safeguards and alignment with European human rights standards on press freedom, journalist safety, disinformation in the context of artificial intelligence, and the protection of human rights defenders.

In its capacity as Greece's National Human Rights Institution, the GNCHR also monitors the State's compliance with judgments and interim measures (Rule 39) issued by the European Court of Human Rights. Within this mandate, it intervenes before competent national authorities in support of the execution of Court orders, particularly in cases involving asylum seekers and third-country nationals, thereby reinforcing domestic implementation of international human rights obligations.

Beyond sector-specific frameworks, the GNCHR holds a horizontal advisory and coordination mandate as the State's independent human rights authority. This broad function enables systematic participation in public authorities, inter-ministerial councils, committees, and working groups, ensuring the mainstreaming of human rights standards across public administration and policy-making processes. Within this institutional architecture, the GNCHR is also a statutory member of the **National Council against Racism and Intolerance**, contributing to national coordination on anti-discrimination policy and hate crime prevention, a member of the Administrative Board of the National Accessibility Authority and it participates in the **Advisory Committee of the National Roma Social Inclusion Strategy 2021–2030**.

In the area of public investment governance, the GNCHR has been formally designated as the competent national body responsible for **ensuring the effective application of the EU Charter of Fundamental Rights across all stages of EU-funded development programs** under the ESPA 2021–2027 framework. This mandate, established through a Memorandum of Cooperation with the National Coordination Authority in April 2022, embeds fundamental rights conditionality into program design, implementation, monitoring, and evaluation. Through participation in regional and sectoral monitoring committees and inter-institutional coordination mechanisms, the GNCHR institutionalises rights-based oversight across EU structural and investment funds. Complementing this function, the GNCHR exercises a formal monitoring role within the national implementation structures of the Asylum, Migration and Integration Fund (AMIF) and the Internal Security Fund (ISF) for the 2021–2025 programming period. Through its participation in the respective Monitoring Committees with voting rights, the GNCHR integrates continuous

fundamental rights scrutiny into EU-funded policies governing asylum systems, migration management, border control, and internal security.

Potential changes in the regulatory framework

As noted above, in response to previous SCA recommendations, the GNCHR has continued to advocate for adequate and sustainable funding to ensure the effective and progressive fulfilment of its mandate, including the capacity to recruit and retain qualified staff under conditions comparable to those of civil servants performing similar functions. The GNCHR has already undertaken concrete preparatory actions to ensure the effective exercise of the mandate conferred upon it by the EU Artificial Intelligence Act, in its capacity as a designated national protective body. In parallel, the GNCHR has formally submitted a legislative proposal to the Government aimed at strengthening its institutional capacity, including the allocation of additional staff and the provision of enhanced operational tools, in order to ensure the effectiveness of its work and full compliance with SCA's recommendations. These initiatives have been pursued proactively, reflecting the GNCHR's sustained efforts to anticipate forthcoming obligations and to reinforce its independence, effectiveness, and alignment with international standards.

Challenges in implementing multiple mandates and NHRI's relevant needs

The GNCHR has increasingly assumed a wide range of complex and specialised mandates across disability rights, digital governance, migration and border monitoring, EU funds oversight, anti-discrimination policy, and rule of law safeguards. While this expansion reflects growing institutional trust in the GNCHR's expertise and independence, it has also generated significant structural challenges.

A central and recurring difficulty concerns institutional coordination with public authorities, particularly the lack of systematic and timely transmission of draft legislation by competent ministries to the GNCHR. This undermines the GNCHR's ability to provide informed, preventive, and rights-based input at early stages of law-making across the various fields of its mandate. The absence of structured consultation procedures weakens the preventive function of the GNCHR and limits the impact of its advisory role.

In 2025, 97 legislative initiatives were submitted to Parliament for discussion, not all of which had a direct or indirect impact on human rights. The GNCHR participated in seven parliamentary committee sessions in 2025 concerning draft laws relevant to its mandate (with one additional participation in January 2026). Out of these seven cases in 2025, only two involved prior consultation or the provision of adequate time to present the GNCHR's views, while in five cases the GNCHR had not been consulted at any stage of the legislative preparation process and intervened only after the draft laws had been

submitted to Parliament or published for public consultation. Beyond parliamentary participation, the GNCHR issued several additional statements, observations, and institutional interventions during 2025–early 2026 in response to legislative developments affecting fundamental rights, including in the areas of asylum, labour rights, equality, and the role of independent authorities, often without having been formally consulted in advance.

Further challenges also arise in the **functioning of national coordination and monitoring bodies** in which the GNCHR participates by mandate, such as the National Council against Racism and Intolerance and the Advisory Committee of the National Roma Social Inclusion Strategy 2021–2030. In practice, these bodies have faced systemic problems related to weak institutional follow-up, insufficient technical support, and limited scientific coordination. At the same time, the collaborative framework fostered by initiatives such as the ECOSYSTEM project demonstrates that multi-stakeholder engagement, bringing together public authorities, the GNCHR, and CSOs, can serve as an example of best practice in strengthening governance and monitoring mechanisms. The ECOSYSTEM project supports the work of the National Council against Racism and Intolerance in the drafting of the 2nd National Action Plan against Racism and Intolerance and in its implementation through capacity-building activities.

The expanding scope and growing technical sophistication of the GNCHR's mandates have increasingly exposed **capacity constraints**. The assumption of specialised responsibilities in areas such as digital governance, EU regulatory oversight, and complex monitoring frameworks places sustained pressure on existing staffing levels and financial resources. To safeguard the quality, independence, and institutional effectiveness of its human rights monitoring functions, the GNCHR has consistently advocated for a strategic expansion of specialised personnel and for stable, long-term budgetary reinforcement commensurate with its evolving mandate.

In parallel, **broader developments affecting Greek civil society have placed additional pressure on GNCHR-supported monitoring mechanisms**. Recent reductions in funding streams to Greek civil society organisations, including cuts linked to UNHCR-supported programmes, have significantly affected the operational sustainability of both the Racist Violence Recording Network and the Recording Mechanism of Informal Forced Returns. As civil society resources contract, the GNCHR is increasingly compelled to seek direct institutional or EU project-based funding of these mechanisms in order to preserve their continuity, credibility, and independence.

To address these structural challenges, the GNCHR's primary support **needs** relate to targeted institutional strengthening rather than *ad hoc* project funding. Key forms of support that would substantially enhance its effectiveness include:

- Advocacy at national and regional levels for legally embedded consultation procedures ensuring timely access to draft legislation and systematic involvement of the GNCHR in law- and policy-making processes.
- Sustainable funding mechanisms for civil society-linked monitoring structures coordinated by the GNCHR, ensuring their independence and long-term viability.
- Strategic engagement and advocacy support from regional networks such as ENNHRI to leverage European-level dialogue with national authorities.

NHRI structural challenges, threats and resilience

Structural challenges

Over the past year, the GNCHR has encountered structural challenges, particularly in relation to (i) **limited access to information and effective engagement with national authorities**, and (ii) **insufficient follow-up to its recommendations**.

As noted above, a central and recurring difficulty concerns **institutional coordination with public authorities**, most notably the **absence of a systematic and timely transmission of draft legislation by competent ministries to the GNCHR**, which would enable the Commission to submit its observations in due course on matters falling within its mandate. This practice significantly undermines the GNCHR's capacity to provide informed, preventive, and rights-based input at the early stages of the legislative process across the various fields of its competence. As emphasised by FRA and the Human Rights Council in the context of better legislation and human rights impact assessments, transparency and consultation with relevant stakeholders must be ensured. The meaningful participation of NHRIs and civil society is of paramount importance, and groups at risk of discrimination should be adequately represented in these processes. Furthermore, effective follow-up mechanisms should be established to allow adopted measures to be reviewed and, where necessary, reconsidered if they generate adverse human rights impacts.

Cases of **not adequate follow** up are also persistent. A salient example concerns the protection of HRDs and the operating environment for CSOs, especially those active in the fields of migration and asylum. In 2024, the GNCHR formally called on the competent authorities to ensure an enabling environment for civil society, to remove disproportionate legal obstacles linked to the NGO registry of the Ministry of Migration and Asylum, and to refrain from the targeting or criminalisation of humanitarian action (GNCHR Statement, 22 April 2024, on *Human Rights Defenders Active in the Field of Refugee and Migration Issues*).The GNCHR explicitly warned against the misuse of criminal

proceedings as a means of deterring legitimate civil society activity, in violation of fundamental freedoms and rule of law principles. These concerns were reiterated in August 2025 in a joint intervention with the UN High Commissioner for Refugees, highlighting the escalation of stigmatising rhetoric and initiatives against refugees, migrants, and supporting organisations.

Despite this sustained advocacy, the Ministry of Migration and Asylum introduced draft legislation in December 2025, subsequently submitted to Parliament in January 2026, containing provisions that significantly restrict the functioning of CSOs and facilitate the criminalisation of humanitarian assistance. The GNCHR submitted detailed written observations to the Ministry **,** particularly criticising provisions imposing severe criminal sanctions solely on the basis of NGO membership and enabling deregistration of organisations upon the mere initiation of criminal proceedings, without judicial conviction. It followed up with a public *Statement on the provisions of the draft law targeting civil society organisations* which was widely circulated in the media. The Greek NHRI was also invited to participate in the parliamentary debate where it raised its serious concerns together with other stakeholders, such as the UNHCR. Contrary to the GNCHR's opinion, the Parliament passed the law without the changes requested. To the GNCHR's view, this is a matter related to the core principles of the rule of law in Greece given its serious nature that affects a number of constitutional rights such as equality before the law, protection of the life, honour and liberty of every person living within Greek territory, the right of everyone to participate in the social and political life of the country, freedom of association and the presumption of innocence.

In addition, a structural challenge persists in relation to the **GNCHR's participation in the Special Committee on Fundamental Rights established under the Ministry of Migration and Asylum**. Since its establishment, the GNCHR has formally requested to participate in the Committee as *a non-voting member*, on the grounds that full voting membership in an executive body risks compromising the institutional independence of the GNCHR. However, successive Ministers have not responded positively to this request. In the GNCHR's view, participation with voting rights in a body situated within the executive branch may blur the necessary institutional boundaries between independent oversight and governmental decision-making, thereby raising concerns regarding compliance with the UN Paris Principles.

Measures to respond to threats

The GNCHR has put in place a combination of internal safeguards and external support mechanisms aimed at protecting its independence and institutional effectiveness. At the legislative level, the **reform** introduced through Law 4780/2021 **strengthened the institutional framework governing the GNCHR**, reinforcing guarantees of functional autonomy, pluralism, and

operational independence in line with the UN Paris Principles. In addition, the GNCHR has progressively **diversified its sources of funding** by securing support from EU programs and partnerships with international actors, including ENNHRI and the Danish Institute for Human Rights. This diversification contributes to mitigating the potential impact of reductions in state funding, which could otherwise operate as a structural threat to the sustainability of the GNCHR's mandate. Past experience has also demonstrated the importance of regional solidarity mechanisms. When the GNCHR faced risks to its independence through a unilateral governmental attempt to alter its composition, ENNHRI provided timely institutional support, including a formal communication addressed to the Prime Minister. Continued vigilance and coordinated action, however, remain necessary. Greek national authorities are expected to fully respect the legal and institutional safeguards enshrined in the GNCHR's founding legal framework and to refrain from measures that could undermine its autonomy.

Approaches to strengthen the NHRI's resilience

The GNCHR has actively reflected on and begun to develop structured approaches aimed at strengthening its institutional resilience in light of increasingly complex and, at times, adverse national dynamics affecting independent institutions and civic space.

First, **capacity-building has been prioritised**. Members of the leadership and senior staff have participated in specialised trainings on NHRI resilience and protection frameworks, including programs delivered by ODIHR. These trainings have focused on identifying early warning signs of institutional pressure, safeguarding functional independence, and strengthening strategic communication and stakeholder engagement. Building on this expertise, the GNCHR has initiated internal staff training processes to disseminate resilience-oriented methodologies across its Secretariat.

Second, the GNCHR is currently in the process of developing an **internal resilience strategy**. This strategy aims to systematise risk assessment procedures, clarify institutional response protocols in situations of institutional pressure, and strengthen coordination between the Plenary, the Bureau, and the Secretariat. As part of this process, an internal task force has been established, composed of members of the Bureau and the Secretariat, tasked with monitoring emerging risks and proposing preventive and corrective measures where necessary. This mechanism enhances preparedness and ensures that potential threats to its independence or effectiveness are addressed in a timely and efficient manner.

Third, the GNCHR considers **diversification of partnerships and funding sources**, as well as **enhanced transparency and communication with stakeholders**, as integral components of institutional resilience.

Strengthening external alliances with regional and international actors contributes to both preventive protection and rapid response capacity in case of threats. At the regional level, ENNHRI and other peer networks can play a critical role through continued peer-learning opportunities, targeted resilience trainings, early warning coordination, and, where necessary, public or diplomatic support in situations of institutional pressure.

NHRI's recommendations to national authorities and regional authorities

The GNCHR's key recommendations are:

1. **Institutionalise mandatory and timely consultation of the GNCHR in legislative and policy-making processes:** The GNCHR recommends the establishment of legally embedded procedures requiring the systematic and timely transmission of draft legislation and policy initiatives by all competent ministries to the GNCHR for prior human rights assessment. Such a framework should ideally include minimum consultation timelines, reasoned responses to GNCHR observations, and formal integration of substantial HRIAs.
2. **Ensure sustainable resourcing commensurate with the GNCHR's expanded and increasingly technical mandates:** National authorities should secure sufficient budgetary allocations and authorise the recruitment of specialised staff reflecting the GNCHR's evolving responsibilities. Adequate and predictable resourcing is essential to preserve institutional independence, expertise, and the effective implementation of GNCHR's mandates.
3. **Strengthen the functioning and accountability of national coordination bodies involving the GNCHR:** The GNCHR recommends structural reforms to national councils, monitoring committees, and action plan bodies in which it participates, including the establishment of permanent secretariats, clear working methodologies, regular convening, and effective follow-up mechanisms.

At regional level, ENNHRI and European actors could support the above recommendations through targeted advocacy, peer exchange on good governance practices, and the promotion of standards and best practices.

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Human rights defenders and civil society space

Challenges for human rights defenders and restrictions to civil society space

As reported by the GNCHR, Greece currently exhibits the characteristics of a **narrowing civic space** with elements of increasing restriction, particularly in sensitive policy areas related to migration rights. The progressive use of regulatory barriers, criminal law, stigmatising rhetoric, and punitive legislative proposals constitutes a pattern of early warning signs of further civic space contraction.

International and national monitoring has consistently identified early warning signs of a shrinking civic space. Following her country visit in June 2022, the UN Special Rapporteur on the situation of human rights defenders concluded that while HRDs are generally able to operate freely in many sectors, those working on refugee and migration issues face systematic smear campaigns, harassment, threats, and the misuse of criminal law. The Rapporteur underlined that the securitisation of migration policy has fostered an atmosphere of fear and criminalisation, in which acts of solidarity and humanitarian assistance are increasingly reinterpreted as criminal conduct, particularly under people-smuggling provisions. This chilling effect has been amplified by hostile public rhetoric targeting CSOs. The restrictive regulatory environment has further entrenched these pressures. Laws 4636/2019 and 4686/2020 introduced burdensome and discriminatory NGO registration requirements for organisations active in migration and asylum, significantly constraining their operational capacity and exposing them to administrative vulnerability. These regulatory frameworks have also functioned as indirect mechanisms of control over civic activity.

Over the past year, the GNCHR has assessed a clear deterioration in the enabling environment. This trend has recently intensified through proposed legislative measures. In January 2026, the GNCHR issued a formal statement condemning provisions in a draft law of the Ministry of Migration and Asylum that directly target CSOs. The draft introduces felony-level criminal sanctions based solely on an individual's membership in a registered NGO and allows for the deregistration of organisations upon the mere initiation of criminal proceedings against a member, without any judicial determination of guilt. The GNCHR has stressed that these measures violate the principles of proportionality, equality before the law, freedom of association, and the presumption of innocence, and create a real and immediate risk of criminalising lawful humanitarian and human rights activity. Such legislative developments constitute an escalation in the restriction of civic space.

Moreover, the GNCHR, jointly with UNHCR in August 2025, warned of an

intensifying climate of negative rhetoric and informal initiatives stigmatising organisations supporting refugees and migrants, further reinforcing the hostile operating environment. In response to these developments, the GNCHR has issued urgent recommendations calling on the State to prevent harassment and hate speech against defenders, refrain from criminalising humanitarian assistance and professional activities, reform restrictive NGO registration regimes, ensure protection against SLAPPs, and establish a comprehensive institutional framework for the recognition and protection of HRDs in line with European and international standards.

Structural challenges for civil society organisations and human rights defenders

Independent authorities in Greece responsible for oversight in sensitive fields, such as data protection and communications privacy, face structural constraints linked to workload, staffing, and institutional positioning, which impair their capacity to exercise their mandates effectively and in a timely manner. The GNCHR has consistently intervened to underline the constitutional importance of independent authorities as safeguards of the rule of law, including through its 2023 Statement emphasising the need to protect their supervisory role from erosion and political marginalisation.

Another central challenge for CSOs and HRDs in Greece is the **absence of a dedicated legal framework recognising and protecting HRDs**. Domestic law neither defines the status of human rights defenders nor provides institutional safeguards for their work, resulting in legal vulnerability and heightened institutional insecurity, particularly for those operating in politically sensitive areas such as migration, minority rights, and accountability work. The GNCHR has consistently advocated for the adoption of a specialised law on the recognition and protection of HRDs, as well as for the establishment of a dedicated focal point within the NHRI to ensure early response, monitoring, and institutional support. Despite sustained advocacy, this structural protection gap remains unaddressed.

In parallel, **significant barriers persist with regard to meaningful participation in law- and policy-making processes**. Both the GNCHR and the European Commission, within the Rule of Law framework, have repeatedly emphasised the need to strengthen transparency, consultation, and stakeholder engagement in the legislative process (see, for instance, GNCHR *Input of January 2025 to the OHCHR study on human rights monitoring in the context of migration, including at international borders*). In practice, however, CSOs and HRDs continue to face **limited access to timely information** and insufficient opportunities for substantive dialogue. The GNCHR has therefore called on competent ministries to institutionalise procedures for early and meaningful consultation with all relevant stakeholders, including public authorities, local governments, international

organisations, and civil society actors, particularly in policy areas affecting migrants, asylum seekers, and vulnerable groups. The GNCHR has also, in multiple occasions, facilitated a structured dialogue between the state and civil society through the organisation of thematic hearings at its premises with great participation and success. It stands ready to continue promoting a culture of dialogue and collaboration between the state and other stakeholders in the field such as international organisations, social partners and civil society actors.

The GNCHR through its monitoring work has identified practices of **harassment and intimidation through excessive administrative burden to CSOs working in the migration context**. European Commission's recommendation to national authorities to streamline registration requirements for CSOs to the Registry of the Ministry for Migration and Asylum is yet not implemented (2025 EC Rule of Law Report, p.2). Greece maintains a fragmented, burdensome, and inconsistently applied system of NGO registries across multiple ministries, particularly within the Ministry of Migration and Asylum.

While recent legislative initiatives, including Law 5275/2025, were presented by the authorities as aiming to simplify procedures and enhance transparency, available evidence indicates that, in practice, the regulatory framework has become more restrictive and has failed to address longstanding structural concerns previously raised by civil society actors. Mandatory registration obligations for organisations and their individual members, employees and partners remain intact and continue to operate as a general prerequisite for engagement in activities related to migration, international protection and social integration (2026 Civil Society Report on the State of the Rule of Law in Greece, p. 81). At the same time, amendments have expanded grounds for exclusion and introduced additional compliance requirements, including a broader list of criminal offences that may bar registration and increased discretion for the administration to impose further conditions through secondary legislation (2026 Civil Society Report on the State of the Rule of Law in Greece, p. 81–82). Operational examples illustrate the practical impact of these rules, such as volunteers being unable to register due to administrative obstacles, lawyers denied access to facilities because of individual registration requirements, and organisations excluded from operating in reception centers in the absence of registration or project approval (2026 Civil Society Report on the State of the Rule of Law in Greece, p. 84–85).

Finally, the operating environment of CSOs and HRDs has been further strained by increasing **financial insecurity**. Reductions in funding streams have significantly weakened organisational sustainability and operational capacity. This undermines independent human rights monitoring and advocacy, reinforcing the structural fragility of civic space.

Threats to human rights defenders and civil society organisations

The European Commission has closely assessed developments in the operating environment of civil society and the regulatory framework governing the registration of CSOs, an area in which the GNCHR has maintained sustained institutional involvement (2025 EC Rule of Law Report, p. 2). The European Commission identified limited progress in implementing the recommendation to establish a structured and meaningful dialogue with CSOs and to reform the existing registration framework, which continues to be complex, fragmented, and burdensome, particularly for organisations active in migration and asylum. The GNCHR had explicitly underlined to European stakeholders that, notwithstanding repeated governmental announcements regarding forthcoming reforms, the rules governing the registration and operation of CSOs have in practice remained unchanged, thereby continuing to restrict civic space and effective participation in public decision-making (GNCHR's 2025 Rule of Law Report, p. 6-11).

The GNCHR has also repeatedly drawn attention to the broader deterioration of the enabling environment for civil society and HRDs, highlighting in particular the imposition of disproportionate administrative requirements, the use of stigmatising public rhetoric, and the growing risk of the criminalisation of humanitarian action. Through a series of public statements and formal interventions, the GNCHR has called upon the competent authorities to remove legislative and regulatory obstacles linked to the registries of the Ministry of Migration and Asylum and to ensure full respect for freedom of association, in line with constitutional guarantees and European and international human rights standards (see, inter alia: GNCHR *Input to the OHCHR study on human rights monitoring in the context of migration, including at international borders*; GNCHR Statement, 11 July 2025, *The Suspension of Asylum Applications and the Violation of International Law*; GNCHR Explanatory Note, 30 July 2025, *The Suspension of the Submission of Asylum Applications and the Violation of International Law*; Joint Statement by UNHCR and the GNCHR, 28 August 2025, *Concern over Rhetoric Directed against Civil Society*; GNCHR Statement, 26 January 2026, *On Provisions of the Draft Law Targeting Civil Society Organizations*).

Rather than demonstrating substantive compliance with European and international recommendations, recent legislative initiatives introduced by the Ministry of Migration and Asylum appear to further intensify existing restrictions. The new framework provides for criminal penalties linked solely to an individual's membership in a registered CSO, while also establishing mechanisms that allow for the deregistration of organisations upon the mere initiation of criminal proceedings, without any prior judicial determination of liability. Such deregistration and restrictive re-registration regimes undermine the enabling environment for civic action by preventing CSOs from operating, accessing funding, or participating in activities related to migration,

international protection, and social integration. In practice, non-registered CSOs are barred from performing activities inside reception facilities and from engaging in migration- or asylum-related work, while simultaneously losing access to state and EU funding streams. Moreover, the possibility of removal from registries on the basis of allegations against individual members introduces legal uncertainty and collective sanctions that risk eroding freedom of association and legitimate advocacy. Finally, as highlighted in the January 2026 report by major Greek CSOs on the state of the rule of law in Greece, the proliferation of parallel registries and the delegation of core regulatory requirements to secondary legislation are incompatible with principles of legal certainty and freedom of association, while enhanced supervisory powers and criminalisation measures heighten the risks of intimidation, deterrence, and self-censorship within civil society (2026 Civil Society Report on the State of the Rule of Law in Greece, p. 79–85). The GNCHR has intervened promptly in view of these developments, stressing that such measures violate the principles of proportionality and the presumption of innocence, undermine core elements of the rule of law, and create a real risk of criminalising legitimate humanitarian and human rights work.

The GNCHR expresses its concern about the excessive delay in the issuance of the Council of State's decision on the application for annulment of the registration requirements for the operation of CSOs in the field of migration and refugees. This prolonged uncertainty exacerbates the actual situation on the ground, where civil society's enabling space is already hampered. As reported in the Greek NHRI's previous Rule of Law Reports (2023, 2024, 2025) the hearing took place on 2.12.2022. Pending the issuance of the decision, the GNCHR was informed that the case had been reassigned by the Court to a new rapporteur, resulting in a new hearing being scheduled for April 2026. This may also affect the decision pending before the Plenary of the Council of State since May 2023 on the similar case of registration requirements imposed on trade unions.

The GNCHR has also identified consistent evidence of threats against CSOs and HRDs, primarily in the form of verbal attacks, negative narratives promoted by public authorities, and an increasing risk of criminalisation of legitimate humanitarian and advocacy work.

First, a marked escalation in **hostile rhetoric** has been formally documented at the public and political level, particularly targeting CSOs and HRDs working in the fields of migration and refugee protection. In their joint statement of August 2025, UNHCR and the GNCHR explicitly warned of the **intensification of negative discourse and the emergence of a hostile climate** directed against refugees, migrants, and the CSOs supporting them. They highlighted with particular concern public statements, political initiatives, and informal leaks that stigmatise civil society actors or advocate punitive measures against organisations expressing dissenting views or seeking judicial remedies on

behalf of affected individuals. This rhetoric, as noted by both institutions, undermines public trust and long-standing cooperation between the State and civil society, and contributes to an environment in which human rights work is increasingly framed as suspect or threatening.

Second, this hostile narrative has been accompanied by concrete legislative and institutional developments that open the way to the **criminalisation of humanitarian action**, as expressly highlighted by the GNCHR in its January 2026 Statement on the draft law targeting CSOs. The GNCHR warned that specific provisions introduce felony-level criminal sanctions against members of registered NGOs solely on the basis of their organisational status, without any substantive justification, while simultaneously allowing for the removal of organisations from the official registry upon the mere initiation of criminal proceedings against one of their members, even in the absence of any judicial assessment or conviction. The GNCHR stressed that such measures constitute excessive and disproportionate sanctions, in flagrant breach of the principles of proportionality, presumption of innocence, and freedom of association, and risk instrumentalising criminal law as a mechanism of intimidation and deterrence against lawful human rights and humanitarian work.

More generally, the GNCHR has observed a pattern of **misuse of criminal procedures as a means of restricting civil society activity**, noting that even when prosecutions are not ultimately pursued, the initiation of proceedings itself produces a chilling effect on CSOs and HRDs, discouraging engagement in humanitarian assistance, legal representation, and public advocacy. With regard to perpetrators, the primary source of these threats stems from state actors, particularly through public rhetoric, legislative initiatives, and institutional practices. However, such narratives also risk legitimising hostility from non-state actors by fostering suspicion and social polarisation against civil society.

In terms of risk profiles, HRDs working on refugee, migration, and asylum-related issues are disproportionately exposed to stigmatisation and criminalisation, given the politicisation of these fields. Legal professionals, journalists, and humanitarian workers assisting migrants and refugees have been explicitly referenced in public discourse as potential targets of punitive measures. While the GNCHR has not yet documented systematic gendered patterns of threats within this context, it notes that, within an intersectional approach, women HRDs and defenders belonging to marginalised communities may face compounded vulnerabilities due to the broader hostile climate and existing structural inequalities, warranting continued monitoring.

The GNCHR also notes with concern the **increasing use of Strategic Lawsuits Against Public Participation (SLAPPs)**. Civil society organisations and professional associations continue to report a growing number of lawsuits targeting journalists, activists, and civil society actors.

Many of these proceedings rely on allegations of defamation or claims relating to the alleged violation of personal data. As also documented in the January 2026 Civil Society Rule of Law Report (p. 52–55), SLAPPs in Greece are frequently accompanied by parallel criminal proceedings, thereby intensifying their coercive effect and exposing targeted individuals not only to excessive financial claims but also to the risk of criminal sanctions, including imprisonment (2026 Civil Society Report on the State of the Rule of Law in Greece, p. 53). Concrete examples documented in 2025 include defamation complaints filed by mayors against journalists and media professionals, lawsuits initiated by private individuals against investigative journalists, as well as high-profile litigation connected to reporting on political scandals and rule-of-law concerns. The 2026 Civil Society Rule of Law Report also identifies a growing number of so-called “eco-SLAPPs”, targeting environmental defenders and local associations, such as litigation brought by a developer against the Save Ios Association (2026 Civil Society Report on the State of the Rule of Law in Greece, p. 54).

Despite these developments, Greece has not yet adopted a comprehensive legislative framework addressing SLAPPs. The transposition of Directive (EU) 2024/1069, which establishes minimum standards to protect persons engaging in public participation from manifestly unfounded or abusive court proceedings, remains pending, with the deadline for transposition set for May 2026. The GNCHR continues to recommend the adoption of comprehensive anti-SLAPP legislation, including the establishment of effective early-dismissal mechanisms, safeguards against disproportionate cost burdens, and procedural guarantees capable of preventing the misuse of judicial proceedings to silence investigative journalism and public participation.

Certain institutional initiatives have nevertheless been introduced. The Ministry of Justice has established a SLAPP Observatory tasked with recording and monitoring relevant incidents. In addition, Law 5253/2025 on the modernisation of the legal framework governing the public broadcaster (ERT) and the implementation of elements of the European Media Freedom Act provides for the development of a National Action Plan for the Safety of Journalists. The plan is expected to include clear timelines, as well as monitoring and evaluation mechanisms, and will be prepared with the participation of the Task Force for the Safety and Empowerment of Journalists. The law also foresees the adoption of a National Strategy for Media Literacy with multi-stakeholder governance involving academia, civil society organisations, European institutions, and international organisations. Furthermore, financial support is envisaged for the POESY SLAPPs Observatory in order to ensure its long-term sustainability and its capacity to assist journalists facing abusive litigation.

In this context, the GNCHR considers that the absence of a comprehensive national anti-SLAPP framework, coupled with the increase in abusive litigation,

contributes to a climate that may deter public participation and investigative reporting. The effective transposition and implementation of the EU Anti-SLAPP Directive, together with complementary national safeguards, remain essential to ensuring that judicial mechanisms are not misused to silence critical voices or undermine legitimate human rights and accountability work.

National frameworks to support and protect human rights defenders and civil society organisations

At present, Greece lacks a dedicated national framework for the recognition, protection, and support of HRDs and CSOs. There are no specific laws defining the status of HRDs, no targeted protection mechanisms, and no national strategies or action plans addressing the risks they face. As a result, HRDs operate within a fragmented legal environment that offers no tailored safeguards and leaves them exposed to institutional vulnerability, particularly in politically sensitive fields such as migration, minority rights, anti-discrimination, and accountability work.

The GNCHR has consistently called for the adoption of a specialised legal framework explicitly recognising the role of HRDs and guaranteeing their protection in line with international standards, including the establishment of a dedicated focal point to provide early warning, monitoring, rapid response, and institutional support. Such a mechanism would facilitate access to assistance, including legal protection and engagement with public authorities in cases of threats or harassment. Despite sustained and repeated advocacy by the GNCHR, these recommendations have not yet been implemented.

Consequently, support for HRDs remains largely informal and *ad hoc*, relying primarily on civil society networks, legal solidarity initiatives, and international organisations rather than structured state-based protection mechanisms.

Activities of NHRIs to support civil society space and human rights defenders

Promotion of civil society space and HRDs

The GNCHR supports civil society space and the work of HRDs through a combination of institutional inclusion, structured dialogue, public advocacy, and the operation of dedicated monitoring mechanisms.

At an institutional level, civil society participation is embedded within the GNCHR itself. The Plenary includes a broad spectrum of major Greek human rights organisations, representing fields such as refugee protection, women's rights, Roma rights, LGBTI+ equality, environmental protection, and general human rights advocacy. This structure ensures that civil society actors are not

merely consulted but are **formally integrated** into the GNCHR's deliberative and decision-making processes, strengthening legitimacy, pluralism, and responsiveness to grassroots human rights concerns.

In its standard working methods, the GNCHR systematically organises **public hearings, joint meetings, and roundtables** with CSOs and HRDs in the preparation of major statements, thematic reports, and policy interventions. These participatory processes allow the direct incorporation of civil society expertise, lived experience, and field-based evidence into the GNCHR's official positions, while providing defenders with institutional visibility and protection through engagement with an independent national authority. Indicatively, in 2025 – and early 2026 four multi-stakeholder public hearings were organised at the initiative of the GNCHR on prison conditions, children rights, and artificial intelligence. Likewise, the GNCHR participated in more than 20 meetings, workshops or other events organised by civil society.

The GNCHR also actively promotes civic space through **public advocacy and communication**. This includes formal statements, commentaries on draft legislation and policy interventions issued in 2025 and 2026 addressing the protection of human rights defenders, the enabling environment for civil society, and legislative developments affecting NGOs, particularly in the migration and asylum context standards (see, inter alia: GNCHR *Input to the OHCHR study on human rights monitoring in the context of migration, including at international borders*; Joint Statement by UNHCR and the GNCHR, 28 August 2025, *Concern over Rhetoric Directed against Civil Society*; GNCHR Statement, 26 January 2026, *On Provisions of the Draft Law Targeting Civil Society Organisations*; GNCHR *Observations on the Draft Law of the Ministry of Migration and Asylum*).

Beyond advocacy and dialogue, the GNCHR provides concrete institutional support to civil society through the **hosting and coordination of two national human rights monitoring mechanisms**:

First, the GNCHR established the **Recording Mechanism of Incidents of Informal Forced Returns** in 2021 to address the absence of official data on pushbacks and to coordinate civil society documentation efforts. The Mechanism brings together a wide network of human rights and humanitarian organisations and applies common methodological standards through a transparent and scientifically grounded recording system. This coordinated structure enhances the quality, reliability and comparability of documented incidents, while reinforcing the security and legitimacy of participating organisations. Through its institutional backing, the GNCHR strengthens civil society capacity to collect and verify evidence and amplifies findings within national, European and international accountability processes.

Importantly, the Recording Mechanism has been explicitly reported by the

United Nations as a best practice in cooperation between National Human Rights Institutions and civil society for strengthening accountability for violations at borders. In its Study on human rights monitoring in the context of migration (Report of the Office of the United Nations High Commissioner for Human Rights, 15 July 2025), the OHCHR refers to the Greek NHRI's creation of the Recording Mechanism as a promising example of coordinated monitoring using a standardised methodology (Report, p. 6). This recognition complements earlier acknowledgements by EU bodies and the OSCE of the Mechanism's role within the national monitoring framework, further affirming both its necessity and its added value.

Second, the GNCHR jointly established and continues to coordinate the **Racist Violence Recording Network** with UNHCR. The Network brings together over fifty CSOs and service providers to systematically document incidents of racist and hate-motivated violence. It functions as a national platform for evidence-based advocacy, policy recommendations, and institutional accountability, while also reinforcing cooperation and protection among organisations working on discrimination and hate crime.

Protection of civil society space and HRDs

Over the past two years, the GNCHR has focused its protective action for civil society space and HRDs on three tracks: (a) **systematic monitoring** and evidence-based documentation of risks and violations affecting civic actors; (b) **prompt, public and formally reasoned interventions** addressed to competent authorities when legislative or policy developments threaten civic freedoms; and (c) **institutional support to civil society through structured coordination mechanisms** that strengthen credibility, visibility, and accountability, particularly in high-risk fields such as migration, asylum, and hate crime. This approach has been operationalised through the GNCHR's targeted advocacy and statements in 2025 and 2026, including interventions addressing negative rhetoric, stigmatisation, and legislative initiatives that risk criminalising lawful humanitarian and human rights work (inter alia: GNCHR *Input to the OHCHR study on human rights monitoring in the context of migration, including at international borders*; Joint Statement by UNHCR and the GNCHR, 28 August 2025, *Concern over Rhetoric Directed against Civil Society*; GNCHR Statement, 26 January 2026, *On Provisions of the Draft Law Targeting Civil Society Organizations*; GNCHR *Observations on the Draft Law of the Ministry of Migration and Asylum*).

The GNCHR protects HRDs and CSOs through structured monitoring mechanisms that apply common rules and standardised methodologies, in close cooperation with civil society actors:

- **Recording Mechanism of Incidents of Informal Forced Returns:** The GNCHR coordinates a coherent and scientifically grounded

recording methodology designed to document alleged incidents, enhance the credibility of reports, and strengthen accountability for violations affecting third-country nationals and those working to support them.

- **Racist Violence Recording Network:** Co-established with UNHCR, the Network provides a systematic framework for recording incidents of racist and hate-motivated violence through coordinated reporting by civil society members.

These mechanisms reduce the vulnerability of individual defenders and organisations by embedding cooperation within an institutional framework, strengthening reliability, and providing a structured channel through which civil society concerns can be elevated to national and international accountability fora.

The GNCHR's protective role is also expressed through formal recommendations and public positions aimed at preventing civic space deterioration and responding to early warning signs. In August 2025, the GNCHR, jointly with UNHCR, publicly warned of the escalation of negative rhetoric and a hostile climate directed against refugees, migrants, and the CSOs supporting them. The intervention highlighted particular concern regarding public statements, initiatives, and informal leaks that stigmatise civil society actors or advocate punitive measures against organisations that express dissenting views or seek judicial remedies on behalf of persons they support. On 26 January 2026, the GNCHR adopted a formal statement on draft legislative provisions that, in its assessment, would obstruct the functioning of CSOs and open the way to the criminalisation of humanitarian action. The GNCHR specifically criticised provisions introducing felony-level sanctions linked solely to NGO membership and enabling deregistration of organisations upon the mere initiation of criminal proceedings against a member, without any judicial determination of liability. The GNCHR called for the immediate withdrawal of these provisions, stressing incompatibility with core rule of law principles and rights guarantees, including proportionality, equality before the law, freedom of association, and the presumption of innocence.

The GNCHR, acting as a bridge between the State and CSOs and HRDs, protects civic space through institutional convening and formalised participation pathways, including hearings and structured consultations with CSOs and HRDs in the preparation of statements and thematic interventions (see, for instance, GNCHR Hearing of Stakeholders on Artificial Intelligence and Human Rights, January 2026; GNCHR Stakeholder Hearing at the NCHR Premises on the Human Rights Situation in Greek Prisons, September 2025). The GNCHR's cooperation with international and regional actors (notably UNHCR and the Council of Europe) further supports protection by anchoring national advocacy in established European and international standards.

The GNCHR has not yet established a dedicated, standalone gender-responsive protection mechanism specifically for women HRDs or LGBTQ+ defenders. Nonetheless, the GNCHR encompasses an intersectional component throughout its work, addresses gendered and identity-based vulnerabilities through its anti-discrimination work and through engagement with CSOs representing women's rights and LGBTQ+ communities, including within its institutional composition and its broader advocacy on hate speech, stigmatisation, and civic space.

NHRI's needs to advance protection of HRDs nationally

The GNCHR considers that advancing the protection of HRDs nationally requires a combination of structural guarantees, institutional capacity, and preventive safeguards within ordinary governance processes.

A first and central need is **sustainable resourcing** that matches the GNCHR's protective function. The expansion and increasing technical complexity of the GNCHR's mandates, together with the deterioration of the enabling environment for civil society, have made clear that *ad hoc* or project-based support is insufficient. Stable and adequate funding is necessary not only to preserve the independence and effectiveness of the GNCHR as such, but also to ensure the continuity of the two monitoring mechanisms coordinated by the GNCHR that directly support and protect defenders and civil society actors operating in high-risk fields. The Racist Violence Recording Network and the Recording Mechanism of Incidents of Informal Forced Returns require predictable financing to maintain methodological integrity, operational continuity, and independence, especially as external funding streams for civil society have contracted. At the same time, the GNCHR must retain the budgetary capacity to organise the hearings, stakeholder consultations, and field engagement that are indispensable for early warning, credible documentation, and the institutional visibility of defenders.

A second essential need concerns **the institutionalisation of preventive engagement in law and policy-making**. The recurrent lack of timely access to draft laws undermines the GNCHR's capacity to intervene at the stage where risks to civic space can still be prevented. The GNCHR therefore considers it necessary that Greece legally embed binding procedures requiring the systematic and timely transmission of draft legislation and key policy initiatives to the GNCHR, together with minimum consultation timelines that allow substantive review. This should be coupled with an institutionalised HRIA process in which the GNCHR's input is formally integrated and to which competent ministries provide reasoned responses. Such reforms would strengthen the rule of law function of preventive oversight and ensure that measures affecting human rights are effectively assessed *ex ante* for compatibility with constitutional, EU, and international human rights standards.

A further priority is addressing the persisting gap created by the absence of a **dedicated national framework recognising and protecting HRDs**. The lack of a clear legal definition of HRDs and the absence of tailored safeguards leave defenders operating in politically sensitive fields exposed to institutional vulnerability and legal insecurity. The GNCHR has therefore maintained that effective protection requires the adoption of a law recognising and protecting HRDs in line with international standards, alongside the establishment of a focal point or structured coordination arrangement that can support early warning, liaison with competent authorities, and follow-up when defenders face targeting, harassment, or risks of criminalisation. The Greek NHRI stands ready to assume this role.

Finally, the GNCHR considers that protection cannot be advanced without stronger **follow-up and accountability** for measures affecting civic space. The effectiveness of GNCHR's recommendations depends on institutional mechanisms that ensure substantive engagement by public authorities, including review and revision of measures that generate adverse impacts on HRDs and CSOs.

National authorities can support these needs most effectively by ensuring stable resourcing commensurate with the GNCHR's mandates and monitoring responsibilities, by embedding consultation and HRIA procedures into ordinary legislative practice, and by adopting a national framework recognising and protecting HRDs. Regional actors, including ENNHRI, can reinforce this agenda through targeted advocacy and sustained engagement with national authorities, through peer exchange on effective consultation and HRIA models, and through the promotion of European standards and HRD protection. Regional networks can also strengthen the GNCHR's institutional leverage by elevating its concerns in the present Rule of Law Report at the European level.

NHRI's recommendations to national and regional authorities

The GNCHR recommends to national authorities to:

1. **Restore and protect the enabling environment for civil society, human rights defenders, and independent oversight bodies:** National authorities should urgently reform the fragmented and disproportionate NGO registration frameworks, particularly in the field of migration and asylum, by establishing transparent, uniform, and proportionate criteria that safeguard freedom of association and legal certainty. Legislative initiatives that risk criminalising humanitarian and human rights activities should be withdrawn. Meaningful, timely, and institutionalised consultation with independent authorities, the GNCHR, and CSOs should be ensured throughout the law-making process. European actors should continue close scrutiny of developments

affecting civic space in Greece within the framework of rule of law monitoring, link relevant funding instruments to compliance with fundamental rights obligations, and discourage regulatory practices that operate as indirect restrictions on civil society participation.

2. **Establish a clear and protective legal and institutional framework for HRDs and CSOs**, including explicit recognition of the legitimacy of human rights work and safeguards against targeting, harassment, and criminalisation. This should include the adoption of a dedicated law defining and protecting HRDs in line with international standards, accompanied by an operational mechanism capable of early warning, rapid liaison with competent authorities, and follow-up when HRDs are at risk. The Greek State should also ensure that any regulatory framework governing civil society, including registration regimes for organisations active in sensitive fields such as migration and asylum, complies with constitutional and European guarantees of freedom of association and does not operate as an indirect instrument of control. Legislative or policy initiatives that introduce punitive measures against CSOs, including sanctions linked solely to organisational status or provisions enabling deregistration on the basis of unadjudicated allegations, should be withdrawn or amended, as they undermine proportionality, equality before the law, and the presumption of innocence while producing a chilling effect on legitimate humanitarian and human rights activity.
3. **Institutionalise meaningful participation and preventive human rights oversight in the ordinary legislative and policy-making process**. The GNCHR considers that effective protection of civic space requires structurally embedded consultation procedures that guarantee timely access to draft laws and policy initiatives for all relevant stakeholders, including CSOs and the GNCHR itself. This should be coupled with systematic HRIAs for legislation affecting civic freedoms, migration governance, non-discrimination, and accountability, with clear minimum timelines and an obligation for competent ministries to provide reasoned responses to human rights concerns raised during consultation. Such reforms would reduce the risk that restrictive measures are adopted without scrutiny, and would strengthen the capacity of the State to prevent adverse human rights impacts.

The GNCHR recommends to both national authorities and European actors to:

1. **Provide sustainable support for independent monitoring and the resilience of civil society**. National authorities should provide predictable and adequate resourcing for the GNCHR and for independent, civil society-linked monitoring structures coordinated by it, including the Racist Violence Recording Network and the Recording Mechanism of Incidents of Informal Forced Returns, whose continuity and methodological integrity are essential to transparency and

accountability in high-risk areas. European actors, for their part, should reinforce this enabling environment through consistent standards-based engagement with Member States, including the systematic follow-up of rule of law findings related to civic space and the use of political and funding conditionality to discourage restrictive regulatory frameworks and punitive legislative approaches. European actors, including ENNHRI, can also provide targeted advocacy support, peer exchange on good practices in consultation and HRIAs, and sustained visibility and protection for HRDs at risk, particularly in politicised sectors such as migration and minority rights.

Greece 2026

Information from: Greek National Commission for Human Rights

Democracy - checks and balances, disinformation, and law-making processes

Disinformation

The GNCHR's monitoring and reporting indicate that the spread of disinformation and hostile public narratives in Greece during the last year has had a significant impact on several core democratic rights and processes, in particular the right to freedom of expression, the right to participation in public life, and trust in democratic institutions.

First, disinformation and inflammatory rhetoric surrounding migration and asylum have increasingly distorted public debate, undermining the conditions for informed and pluralistic democratic discourse. A joint statement by the GNCHR and UNHCR in 2025 warned of the escalation of negative narratives portraying refugees, migrants, and CSOs supporting them as threats to social order or national security. Such narratives stigmatise human rights actors, discourage public engagement, and contribute to self-censorship among journalists, CSOs, and advocates, thereby directly affecting **freedom of expression**.

Second, the GNCHR and the Racist Violence Recording Network have documented the normalisation of xenophobic and misleading portrayals of migrants and refugees, including the use of dehumanising language, exaggerated claims of "invasions," and false narratives regarding alleged privileges or benefits. These forms of disinformation fuel social polarisation, legitimise hostility, and weaken social cohesion, creating **barriers to**

meaningful participation in public life for affected communities.

Third, the proliferation of disinformation has contributed to an **erosion of trust in democratic institutions**. The GNCHR has underlined that sustained negative rhetoric against civil society and journalists, combined with misleading public narratives, undermines long-standing cooperation between the State and civil society and weakens public confidence in institutional accountability mechanisms. This environment risks delegitimising independent oversight, human rights advocacy, and fact-based journalism, which are essential pillars of democratic governance.

Groups mostly affected by disinformation include refugees and migrants, particularly those arriving through politically sensitive routes, as well as civil society actors, journalists, and HRDs working in these areas. These groups are disproportionately exposed to stigmatisation, public hostility, and institutional pressure generated by misleading narratives and politicised information flows.

Finally, **access to information remains problematic**. Although certain legislative reforms have been adopted in recent years, the broader systemic issues affecting transparency and accountability persist. Continuing obstacles remain in place with regard to effective access to documents (2026 Civil Society Report on the State of the Rule of Law in Greece, p. 54), which directly impact the ability of journalists and civil society to counter disinformation through evidence-based reporting. Persistent failures in the investigation of high-profile cases (Predator, Tempi, pushbacks, police violence) and recurrent findings of ineffective investigations by the ECtHR such as in the *F.M. v. Greece* (2025) are highly relevant to disinformation dynamics in Greece.

Initiatives taken by the NHRI to address disinformation

The GNCHR has addressed disinformation through a combination of **public interventions**, **institutional fact-finding**, and **targeted recommendations** aimed at safeguarding democratic debate and the rule of law. During 2023 and 2024, the GNCHR focused on documenting the effects of stigmatisation and narrative attacks against HRDs, CSOs, and journalists working on migration and asylum issues (*see* 2025 GNCHR Rule of Law Report, p. 6-11 and 23). Building on its previous positions, the GNCHR significantly intensified its public and institutional engagement in 2025 and 2026. In 2025, together with UNHCR, it issued high-profile statements explicitly condemning the escalation of negative rhetoric and misleading narratives targeting refugees, migrants, and the CSOs supporting them, highlighting how stigmatisation erodes public trust, fuels social polarisation, and distorts democratic debate. These interventions directly linked disinformation to threats against civic space and democratic participation (*see* Joint Statement by UNHCR and the GNCHR, August 2025, *Concern over Rhetoric Directed against Civil Society*; GNCHR Statement, January 2026, *On Provisions of the*

Draft Law Targeting Civil Society Organizations;).

In early 2026, the GNCHR further confronted the institutional consequences of disinformation by publicly challenging legislative initiatives that risk translating hostile narratives into criminalisation of humanitarian and human rights work. In its Statement on draft legislation targeting civil society organisations, the Commission warned that exaggerated and misleading portrayals of NGO activity were being used to justify disproportionate criminal sanctions and deregistration measures, transforming narrative delegitimisation into legal repression. It emphasised that such developments undermine the presumption of innocence, freedom of association, and the conditions for pluralistic public discourse. Alongside these actions, the GNCHR has continued to counter disinformation structurally through evidence-based monitoring mechanisms, notably the Racist Violence Recording Network and the Recording Mechanism of Incidents of Informal Forced Returns. By **producing verified, systematic data** in areas heavily affected by politicised narratives, these mechanisms contribute substantially to an accurate public record and thus strengthen democratic accountability.

The GNCHR also engages in **institutional cooperation** to address disinformation in a coordinated manner. It maintains working contacts with the General Secretariat for Communication and Information in matters relating to public discourse and information integrity. Furthermore, on 8 October 2025, the GNCHR hosted a delegation from the Division for Cooperation on Freedom of Expression of the Council of Europe to exchange views on freedom of expression, press freedom, disinformation in the context of artificial intelligence, hate speech, the safety of journalists, the protection of human rights defenders, and the phenomenon of SLAPPs, as well as broader rule of law challenges. This meeting formed part of ongoing monitoring and cooperation efforts and laid the groundwork for further collaboration in strengthening protections for freedom of expression and democratic resilience in Greece.

National follow-up to European actors' recommendation on countering disinformation

As reported by the GNCHR, Greece has adopted a series of legislative and regulatory measures that formally respond to concerns raised by European Union and Council of Europe monitoring frameworks, particularly as reflected in the European Commission's annual Rule of Law reporting, where countering disinformation is increasingly linked to strengthening media freedom, transparency, and access to reliable public information. In June 2025, new legislation was adopted with the stated objective of reinforcing transparency and publicity in the printed and electronic press, strengthening editorial independence, and introducing safeguards against financial pressures on media outlets, notably in relation to state advertising. The reform was explicitly

presented as aligning domestic law with the standards of the European Media Freedom Act and was framed as a structural response to risks affecting pluralism and the integrity of the information environment.

However, substantive structural concerns persist, particularly in relation to media independence, journalist safety, and the broader environment in which disinformation circulates.

The European Media Freedom Act entered into force in August 2025. While Greece conducted a public consultation and adopted Law 5253/2025 in November 2025, introducing provisions related to state advertising expenditure and a national plan for the safety of journalists, reforms remain limited. Substantive safeguards to ensure regulatory independence, transparent and equitable allocation of state funding, and effective guarantees of pluralism have yet to be introduced (see also 2026 Civil Society Report on the State of the Rule of Law in Greece, p. 46–49).

Moreover, press freedom indicators continue to show a marked decline. Greece ranked last among EU Member States for the fourth consecutive year in the RSF Press Freedom Index and fell further in the global ranking. There are persistent and structural shortcomings, including deficiencies in safeguards and transparency of media ownership, lack of fair and transparent allocation of state advertising, inadequate protection of journalists, particularly in relation to SLAPPs and a broader climate of intimidation and hostile public narratives directed against journalists. There is currently no effective domestic anti-SLAPP framework, despite growing European standards and legislative developments at EU level.

The GNCHR has not been formally integrated into the drafting of the above-mentioned legislative initiatives. Nevertheless, it has played an active role through continuous monitoring, documentation, and institutional advocacy within European rule of law reporting processes. Through its own submissions and public positions, as well as through ENNHRI reporting channels, the GNCHR has consistently highlighted issues concerning access to information, media freedom, the protection of journalists, risks linked to abusive litigation (SLAPPs), and the wider conditions necessary for a pluralistic and trustworthy public sphere. In parallel, the GNCHR contributed to a mapping exercise led by the General Secretariat for Communication and Information on Strengthening Social Resilience against Misinformation / Disinformation. The Greek NHRI proposed the establishment of a targeted interdisciplinary working group to serve as a platform for dialogue, documentation, and dissemination of good practices, while respecting the institutional role and independence of each body. This working group may include, besides governmental authorities, independent authorities such as the Ombudsman, the Personal Data Protection Authority, and the National Broadcasting Council (ESR), members of the academic community, with emphasis on the Law and Communication/Media

Departments of the country's universities, Journalists' associations such as ESIEA and civil society organisations.

Counter-disinformation measures raising human rights concerns

At this stage, the GNCHR has not identified the adoption of specific counter-disinformation measures that in themselves actively constitute direct restrictions on rights such as freedom of expression or access to information. However, the GNCHR is closely monitoring the implementation and practical effects of the recently adopted legislative and regulatory reforms presented by the authorities as responses to European standards on media freedom, transparency, and the information environment. In particular, the GNCHR is following the application of the 2025 reforms concerning transparency in the press, editorial independence, state advertising safeguards, and access to administrative documents, with a view to assessing whether these frameworks are implemented in a manner that genuinely strengthens pluralism and access to verified information. GNCHR is building cooperation networks with the General Secretariat for Communication and Information under the Presidency of the Government, the Hellenic Telecommunications and Post Commission (EETT), and the National Council for Radio and Television (NCRTV). Disinformation was one of the issues discussed during the hearing of stakeholders on AI and Human Rights, which was organised by the GNCHR. The Greek NHRI addresses issues of disinformation related to AI in its Report on AI and Human Rights to be published in the upcoming months.

Law-making processes

The GNCHR has identified persistent structural weaknesses in the law-making process that undermine transparency, participation, and rights-based governance:

- Public consultations are frequently conducted within **very limited timeframes** and often do not reflect the final legislative text submitted to Parliament. Substantial provisions are regularly introduced through **last-minute ministerial amendments that are not subject to prior consultation**. This practice severely restricts meaningful public participation and prevents civil society, independent bodies and affected groups from providing informed input.
- There is **no systematic process** ensuring the early involvement of independent bodies such as the GNCHR, **nor tailored and timely engagement with groups disproportionately affected by legislation**, including migrants, women, LGBTQI+ persons, and other vulnerable communities. Draft legislation is not consistently transmitted to the GNCHR in a timely manner, limiting its ability to provide preventive rights-based assessments before laws are adopted.
- Although better regulation principles formally exist, **legislative**

initiatives are generally adopted without systematic evaluation of their potential human rights effects. The **absence of structured and efficient HRIAs** contributes to frequent post-adoption amendments.

- Legislative quality is undermined by **fragmented and omnibus law-making**. Civil society monitoring has documented the widespread use of laws regulating multiple unrelated topics, extensive reliance on **last-minute amendments**, and frequent **short-term revisions of newly adopted legislation** (*see* 2026 Civil Society Report on the State of the Rule of Law in Greece, p.63-64). These practices point to a hasty and reactive legislative process that weakens legal certainty, democratic scrutiny, and accountability. European monitoring bodies, including the Group of States against Corruption (GRECO) of the Council of Europe, have similarly raised concerns regarding the lack of transparency, the marginalisation of consultation processes, and the excessive use of late amendments in parliamentary procedure.

Actions taken by the NHRI to address the challenges in law-making processes

The GNCHR has undertaken sustained institutional action to address structural deficiencies in the quality, transparency, and rights-compliance of the law-making process. The GNCHR has consistently issued **formal opinions on draft legislation** with significant human rights implications, even in the absence of timely institutional consultation by the competent ministries. In recent years, this has included detailed submissions on major reforms such as the Migration Code, labour law amendments, and social protection legislation, systematically identifying shortcomings in consultation, proportionality, coherence, and human rights safeguards.

The GNCHR has also engaged in continuous **public advocacy on good law-making standards**, notably through its contributions to successive Rule of Law Reports. It has repeatedly highlighted the routine use of expedited consultations, the absence of prior involvement of independent bodies, the lack of meaningful stakeholder participation, the marginalisation of social dialogue in labour reforms, and the persistent use of last-minute amendments and omnibus legislation. These positions are regularly reiterated in public hearings, institutional meetings with ministries, and parliamentary discussions, where the GNCHR consistently presses for early-stage consultation, legislative quality and coherence, and democratic lawmaking in accordance with the OSCE definitions and standards.

The GNCHR has explicitly **promoted the systematic use of HRIAs** as a preventive governance tool, in line with European and international standards. It has relied on international and European standards, good practices and analytical frameworks emphasising early-stage rights assessment, meaningful

consultation, and follow-up mechanisms to mitigate adverse impacts, as set out in the European Union Agency for Fundamental Rights' report on better legislation and HRIAs.

Importantly, the FRA report explicitly refers to the GNCHR's substantive engagement in the draft law on school bullying as a promising practice of NHRI involvement in the legislative process (p. 23). The GNCHR's contribution in that context demonstrated how structured, evidence-based intervention at the pre-legislative stage can strengthen compliance with fundamental rights standards and improve legislative quality.

Building on this approach, the GNCHR has progressively systematised comprehensive thematic reference reports which function as baseline studies capable of informing future legislative initiatives and supporting structured HRIAs. Four such reference reports have already been completed, covering migration and asylum, COVID-19 emergency measures, business and human rights, and women's rights. Additional reports are under preparation on artificial intelligence and human rights, Roma rights, the rights of persons deprived of liberty, and children's rights.

In addition, the GNCHR has promoted structured pre-legislative dialogue as a positive institutional practice. A notable example was the participation of the Minister of Migration and Asylum in a Plenary session of the GNCHR in December 2025, prior to the submission of the draft law on legal migration to Parliament. This exchange enabled substantive discussion of the draft at an early stage and reflects a constructive model of NHRI engagement.

National follow-up on findings or recommendations from European actors regarding strengthening law-making processes

Although formal procedural adjustments reflect partial follow-up to European recommendations, structural shortcomings persist regarding early consultation, substantive participation, HRIAs, and legislative coherence.

The GNCHR observes that certain measures adopted in the previous year indeed formally respond to recommendations issued by European actors concerning legislative quality, transparency, and participation, in particular those reflected in the rule of law monitoring of the European Commission and standards promoted within the Council of Europe and the OSCE. A positive trend mentioned in the 2025 EC Rule of Law Report is the gradual avoidance of expedited legislative procedures and the more consistent formal observance of the statutory two-week public consultation period (p.6). The practice of submitting draft bills to Parliament immediately after the end of consultations has significantly decreased, reflecting partial alignment with European recommendations on procedural transparency and participation.

However, these improvements remain largely procedural rather than

substantive. Additional provisions continue to be introduced through last-minute amendments, often unrelated to the subject matter of the bill, which bypass consultation and parliamentary scrutiny (*see* 2026 Civil Society Report on the State of the Rule of Law in Greece, p. 61). Moreover, while consultation periods are now more frequently respected in form, stakeholder input is rarely meaningfully integrated into the final legislative text. European monitoring actors have repeatedly highlighted the need for early and structured engagement of independent authorities, justice stakeholders, civil society, and professional associations prior to the launch of public consultations. In this context, the GNCHR has not been systematically involved in reforms aimed at strengthening and democratising the law-making process, despite explicit European standards emphasising the role of independent human rights expertise in legislative preparation. While good cooperation exists with certain ministries, such as the Ministry of Foreign Affairs, most ministries do not transmit draft legislation to the GNCHR in a timely manner, preventing early-stage HRIAs. The two-week consultation period remains insufficient for comprehensive rights-based analysis, particularly for complex or far-reaching reforms.

NHRI's recommendations to national and regional authorities

The GNCHR's priority recommendations to national authorities and relevant regional actors **concerning disinformation** are the following:

1. **Institutionalise transparency as a counter-disinformation tool:** Authorities should ensure the effective, uniform, and enforceable application of access-to-information rules across all administrative bodies. This includes binding deadlines for responses, sanctions for unjustified refusals, proactive publication of high-interest public data in areas such as migration, public funding of media, and public procurement, and the establishment of independent oversight mechanisms to monitor compliance.
2. **Actively protect democratic discourse and prevent false narratives:** Public authorities should adopt clear institutional standards prohibiting stigmatising or delegitimising rhetoric against journalists, CSOs and HRDs, particularly in politically sensitive policy areas. This should be complemented by legal safeguards against abusive litigation (SLAPPs), guarantees of access to information for the media, and rapid response mechanisms to address threats and harassment.
3. **Anchor counter-disinformation policy in a HRIA framework:** All legislative and regulatory initiatives presented as responses to disinformation should undergo systematic and efficient HRIAs with the participation of independent bodies such as the GNCHR and civil

society.

The GNCHR considers that strengthening the quality, transparency, and democratic legitimacy of the **law-making process** in Greece requires a shift from formal procedural compliance to genuinely participatory and rights-based governance. It therefore recommends the following:

1. National authorities should institutionalise **early-stage and mandatory consultation** mechanisms with independent bodies and affected stakeholders, including the GNCHR, CSOs, professional associations, and groups disproportionately impacted by legislation such as migrants, women, LGBTQI+ persons, and other vulnerable communities. Draft legislation should be systematically transmitted at a preparatory stage, well before public consultation, with minimum timelines that allow substantive analysis and reasoned responses to inputs received, in line with European rule of law and democratic standards. There should also be a standing invitation to the GNCHR to all sessions of parliamentary committees addressing human rights issues.
2. Greece should embed **systematic and meaningful HRIAs** within the ordinary legislative process. Every bill with potential effects on fundamental rights should be accompanied by a structured HRIA that evaluates proportionality, necessity, and differential impacts on vulnerable groups, and that is publicly accessible. The GNCHR's expertise should be formally integrated into this process.
3. Both national authorities and European institutions should **address practices that undermine legislative quality and accountability**, notably the routine use of last-minute amendments and omnibus bills. Clear procedural safeguards should limit the introduction of unrelated amendments, require justification for any expedited procedure, and guarantee parliamentary scrutiny and public transparency. European monitoring frameworks should actively follow up where these standards are systematically weakened.

Greece 2026

Information from: Greek National Commission for Human Rights

Other challenges to the rule of law and human rights

Structural human rights issues which reflect persistent challenges for the rule of law

A central structural issue concerns the protection of fundamental rights in the context of migration governance and border control. The publication in January 2025 of the European Court of Human Rights judgments in *A.R.E. v. Greece* and *G.R.J. v. Greece* confirmed the existence of serious indications of a systematic practice of informal forced returns at both land and sea borders. The Court found that the Greek authorities had failed to rebut this presumption and, in *A.R.E. v. Greece*, identified a manifest breach of domestic and international law, amounting to violations of Articles 3, 5, and 13 of the European Convention on Human Rights. Of particular structural significance is the Court's conclusion that, in the current state of national practice, domestic remedies are not effective for complaints arising from refoulement and related violations. This finding aligns with long-standing concerns documented by the GNCHR regarding the absence of effective accountability mechanisms, the lack of access to remedies for victims, and the failure of the criminal justice system to respond meaningfully to allegations of arbitrariness by law enforcement bodies. Official statistics corroborate this assessment. No pushback case has progressed beyond the preliminary examination stage, with Public Prosecutors routinely archiving complaints for lack of "sufficient indications" of wrongdoing (2026 Civil Society Report on the State of the Rule of Law in Greece, p. 19–21).

This pattern is also reflected in the information submitted by the Greek Government to the Committee of Ministers of the Council of Europe in the context of the execution of (15783/21) *A.R.E. v. Greece* case. According to the Action Plan, the Prosecutor of the Court of Cassation invited the Prosecutor at the Court of Appeal of Thrace to examine the possibility of retrieving the relevant criminal case file from the archives; however, the latter concluded that there were no grounds to reopen the case in the absence of new evidence. It is noteworthy that, unlike other cases concerning border incidents, this position does not appear to have been linked to procedural obstacles such as statutory limitation issues or the existence of final acquittals, as was the case in (5418/15) *Safi and Others v. Greece*. In this respect, the case raises questions regarding the willingness of the authorities to reopen and effectively investigate allegations of human rights violations at the borders following findings of violations by the European Court of Human Rights, thereby calling into question the degree of practical compliance with the Court's judgments in this field. By contrast, in other contexts, the judicial authorities have demonstrated a greater willingness to reopen archived investigations or undertake complex procedural steps following findings of inadequate investigations by the Court, as illustrated by the reopening of the investigation in the case (73974/14) *Tsalikidis & Others v Greece* after the Court's findings regarding investigative deficiencies, as well as by the exercise of cassation in the interest of the law by the Prosecutor of the Court of Cassation in relation to the judicial interpretation of trafficking offences in the (21884/15) *Chowdury*

and Others v. Greece context.

Official figures reveal that none of the sworn administrative inquiries conducted into allegations of fundamental rights violations by Coast Guard officials between 2019 and 2025 resulted in disciplinary action, and no disciplinary sanctions were imposed on police officers in pushback-related cases during the same period (2026 Civil Society Report on the State of the Rule of Law in Greece, p. 19). Additional ECtHR judgments in 2024 and 2025, including *F.M. v. Greece*, confirm persistent investigative deficiencies and ineffective criminal accountability mechanisms. These findings corroborate long-standing concerns regarding the ineffectiveness of criminal investigations into alleged misconduct by state officials, the absence of meaningful disciplinary consequences, and the broader failure to secure access to remedies for victims of refoulement and ill-treatment. The GNCHR has addressed these developments through monitoring, public statements, and formal interventions, including submissions to European and international monitoring processes and institutional engagement aimed at reinforcing the execution of ECtHR judgments and safeguarding the principle of non-refoulement.

Other persisting challenges or key developments for the rule of law in 2025

The GNCHR has identified several persistent challenges for the rule of law in Greece in 2025.

Persistent structural deficiencies in the justice system and access to effective remedies

Excessive length of judicial proceedings remains a core rule of law challenge, despite reforms under the national recovery and resilience plan, including judicial map reorganisation, telematic hearings, and the establishment of a judicial police. While these measures reflect institutional investment, systemic delays continue across civil, criminal, and administrative jurisdictions, undermining the right to a fair trial within a reasonable time. In addition, long-standing shortcomings in legal aid provision, particularly for persons in immigration detention, persist despite ongoing European supervision and infringement proceedings. The GNCHR has consistently highlighted that procedural reforms without guaranteed access to legal assistance and effective interim remedies fail to ensure meaningful judicial protection.

Chronic weaknesses in the execution of judicial decisions, particularly in cases involving fundamental rights violations

Greece continues to face enhanced supervision concerning the implementation of judgments of the European Court of Human Rights, notably in areas of police accountability, detention conditions, asylum procedures, freedom of

association, and non-compliance with domestic court rulings. Numerous case groups remain under enhanced supervision, revealing systemic deficiencies in investigations into ill-treatment by law enforcement, overcrowding and poor prison conditions, ineffective asylum remedies, and restrictions on association rights. While Greece generally complies with the payment of just satisfaction, the adoption of general measures often remains slow, partial, or ineffective in practice.

Persisting challenges relating to corruption, prosecutions and high-level accountability

While legislative and institutional reforms have been introduced in recent years, a consistent track record of final judgments in complex or high-level corruption cases is still lacking. This absence continues to undermine public confidence in institutional integrity. At the same time, the excessive length of judicial proceedings—still among the highest in the European Union—weakens the effectiveness of accountability mechanisms, particularly in cases requiring complex financial investigations and close coordination between prosecutorial authorities. Several high-profile cases have also raised concerns regarding prosecutorial independence and institutional accountability. In the so-called “Predator” surveillance scandal, despite the existence of extensive evidence and significant public scrutiny, proceedings have thus far resulted only in misdemeanour charges against private individuals, without indictments of public officials connected to the National Intelligence Service (see also *2026 Civil Society Report on the State of the Rule of Law in Greece*, pp. 5–6 and 16–17). Similarly, in the OPEKEPE agricultural funds scandal currently under investigation by the European Public Prosecutor’s Office (EPPO), allegations of interference and attempts to remove the competent EPPO prosecutor have raised concerns regarding prosecutorial independence and the adequacy of safeguards against undue influence.

Transparency and accountability mechanisms in the area of corruption prevention also remain limited in practice. According to the 2025 Recommendations of the European Commission, Greece should “improve the lobbying framework, including by reviewing the definition of a lobbyist and ensuring effective implementation”, and ”continue efforts to establish a robust track record of prosecutions and final judgments in corruption cases, including high-level corruption” (p. 2). Nevertheless, the relevant legislative framework governing lobbying activities (Law 4829/2021) has not been amended to date. In particular, the restrictive definition of the term “lobbyist”, which excludes in-house lobbying activities, and the limited scope of disclosure obligations concerning lobbying contacts reduce the effectiveness of the framework. Moreover, the number of registered lobbyists and the number of meetings declared in the Transparency Register remain comparatively low, raising questions regarding both the implementation and monitoring of the system. Concerns also persist regarding integrity and transparency rules applicable to

public officials.

With respect to gifts to Members of Parliament, the amendment of the Code of Conduct for Members of Parliament has not yet commenced, according to the Implementation Report of the National Anti-Corruption Action Plan. At the same time, the National Transparency Authority is preparing the new National Anti-Corruption Action Plan for the period 2026–2030, which is expected to be launched in the near future. Regarding asset declarations, the deadline for the submission of annual declarations was once again extended (Law 5243/2025, art. 116), with the declarations for the years 2023 and 2024 published only at the end of September 2025 (2026 Civil Society Report on the State of the Rule of Law in Greece, p. 41). At the same time, complaints regarding the functioning of the Committee for the Investigation of Declarations of Assets have re-emerged, particularly concerning the fulfilment of its oversight obligations. Although certain provisions of Law 5026/2023 were amended (notably articles 16 and 21(7)), these amendments mainly introduced procedural adjustments and have not substantially strengthened transparency.

Further concerns have been raised regarding the constitutional framework governing ministerial criminal liability. In a recent press conference, the European Chief Prosecutor reiterated that the special regime established by Article 86 of the Greek Constitution creates significant obstacles to the effective functioning of the EPPO in Greece. At the beginning of 2026, the Greek Prime Minister announced the initiation of the constitutional revision process, with Article 86 among the provisions expected to be examined. Finally, public perception data indicate that corruption continues to be widely perceived as a significant problem. According to a public opinion survey conducted by the National Transparency Authority, 56% of respondents consider corruption in Greece to be prevalent “to a very large extent”, while a further 27% consider it prevalent “to a fairly large extent”. In light of the above, the GNCHR considers that the implementation of the European Commission’s recommendation remains incomplete. What is required is not only the adoption of formal legislative reforms, but also measurable outcomes demonstrating effective investigation, prosecution, and adjudication of corruption cases, including those involving high-level officials.

Persisting challenges relating to media freedom and safety of journalists, including SLAPPs

In its most recent recommendations, the European Commission called on Greece to continue its efforts to strengthen both legislative and non-legislative safeguards aimed at enhancing the safety and protection of journalists, particularly with regard to abusive litigation, in line with the adopted Memorandum of Understanding and relevant European standards (2025 EC Rule of Law Report). Although the Commission acknowledged some further

progress regarding stakeholder consultation in legislative processes, the structural deficiencies identified in previous GNCHR Rule of Law reports remain largely unresolved.

The overall environment for media freedom continues to raise serious concerns. For the fourth consecutive year, Greece ranked last among EU Member States in the Reporters Without Borders Press Freedom Index and has further declined in the global ranking. At the same time, monitoring platforms continue to record numerous incidents affecting journalists. The Mapping Media Freedom platform, managed by the European Centre for Press and Media Freedom as part of the Media Freedom Rapid Response mechanism, recorded 19 alerts concerning Greece in 2025 and two additional alerts during the first months of 2026. These alerts include cases of harassment, physical and verbal assaults, obstruction or restriction of access to information, and discrediting campaigns against journalists. In parallel, the Council of Europe Platform for the Protection of Journalism and Safety of Journalists lists four active alerts relating to Greece in 2025, including two cases of impunity for the murder of journalists and one systemic alert.

A number of structural concerns persist regarding media independence and pluralism. Questions continue to be raised regarding the political independence and operational capacity of the National Council for Radio and Television (NCRTV), particularly in relation to the procedure for the appointment of its members and the reduction of its financial and human resources. According to the Media Pluralism Monitor, the independence and effectiveness of the media regulatory authority fall within the high-risk category, approaching 80%, while the Media Capture Monitoring Report similarly finds that the existing safeguards do not ensure effective independence.

Concerns also extend to the governance of public service media. Although Law 5253/2025 aimed to modernise the legal framework of ERT and align national legislation with Directive (EU) 2024/1083, the Scientific Service of the Hellenic Parliament noted that the new legislation did not fully transpose the European Media Freedom Act, focusing instead on selected provisions. Moreover, the monitoring body responsible for ERT and the Athens-Macedonian News Agency remains the Secretariat-General of Communication and Information, which operates under the supervision of the Prime Minister’s Office. According to the Media Pluralism Monitor, the indicator concerning the independence of public service media therefore remains within the high-risk category. In this context, the International Press Institute has called on the Greek Government to remove the public broadcaster and the Athens-Macedonian News Agency from the direct oversight of the Prime Minister’s Office.

Additional concerns relate to **media ownership transparency and concentration**. According to the Media Pluralism Monitor, risks associated with media ownership transparency and concentration have increased and are now

assessed as high. Although the existing legislative framework formally addresses several aspects of ownership disclosure and safeguards against excessive concentration, its implementation remains limited. The dominance of specific actors in the audiovisual market, non-transparent patterns of cross-media ownership, gaps concerning digital media ownership, and weak enforcement by regulatory authorities contribute to a deteriorating assessment of media pluralism (IPI-MJRC Report I Media Capture Monitoring Report: Greece I November 2025, p. 27). Editorial independence from owners and commercial influence is also assessed as very high risk, partly due to insufficient safeguards ensuring editorial continuity during changes in media ownership.

At the same time, certain reforms aimed at improving **transparency in state advertising** have been introduced. Law 5253/2025 requires public authorities to publish in advance information regarding the allocation of public funds for state advertising and obliges media service providers to disclose the total amount of public funds received for such purposes. The media regulatory authority is also tasked with monitoring and reporting annually on the distribution of state advertising expenditure. In addition, the electronic platform for the management of state advertising (e-pasithea) has recently been upgraded and will become publicly accessible without the need for prior registration. Nevertheless, persistent concerns regarding the transparency of state advertising allocation and media ownership continue to raise questions about indirect forms of influence that may undermine media pluralism and editorial independence.

In light of the above, the GNCHR considers that the implementation of the 2025 recommendation of the European Commission's Rule of Law report remains partial. Effective protection of journalists requires a coherent and comprehensive framework combining robust anti-SLAPP safeguards, effective monitoring mechanisms, and institutional guarantees capable of ensuring the independence and pluralism of the media landscape.

NHRI's recommendations to national and regional authorities

Concerning structural human rights issues which reflect persistent challenges for the rule of law

The GNCHR recommends that the national and regional authorities ensure **effective accountability against refoulement and remedies in migration governance and border control.** National authorities should establish an effective, independent, and rights-compliant accountability framework for border management, ensuring prompt, impartial, and thorough investigations into allegations of informal forced returns and related abuses, with access to effective remedies for victims. This requires operational

safeguards (registration, identification, access to asylum, non-refoulement guarantees) and credible prosecutorial follow-up. European actors should link rule of law monitoring and relevant EU funding instruments to measurable safeguards on fundamental rights compliance at borders, and support rights-based monitoring mechanisms.

Concerning other persisting challenges or key developments for the rule of law in 2025

In light of the above, the GNCHR's priority recommendations are as follow:

1. **Address structural deficiencies in the justice system and strengthen accountability mechanisms:** National authorities should treat excessive judicial delays, persistent shortcomings in legal aid provision, and weaknesses in the execution of judicial decisions as systemic rule of law challenges requiring comprehensive structural responses. Priority measures should include effective backlog-reduction strategies, strengthened interim protection mechanisms, and guaranteed access to legal assistance, particularly for persons in situations of vulnerability such as immigration detention. At the same time, accountability mechanisms should be reinforced through measures aimed at ensuring the effective investigation and prosecution of corruption, including high-level corruption cases, strengthening prosecutorial independence, and addressing structural obstacles such as those related to the constitutional framework governing ministerial criminal responsibility. European actors should continue providing targeted technical assistance and maintain close supervision of the execution of judgments of the European Court of Human Rights, ensuring that reforms lead to measurable improvements in the effectiveness of judicial protection.
2. **Safeguard media freedom, transparency, and democratic oversight:** National authorities should adopt a comprehensive legal framework to protect journalists and other actors engaged in public participation from abusive litigation, including the timely transposition and effective implementation of Directive (EU) 2024/1069 on SLAPPs. This framework should include early-dismissal mechanisms, safeguards against disproportionate cost burdens, and procedural guarantees preventing the misuse of judicial proceedings to silence investigative journalism. At the same time, measures should be taken to strengthen the independence and effectiveness of media regulatory authorities, enhance transparency in media ownership and state advertising allocation, and ensure institutional safeguards for the independence of public service media. European actors should continue monitoring media pluralism and journalist safety in Greece through the rule of law framework and provide support for initiatives that enhance media independence, transparency, and resilience against political or

economic pressure.

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