

Athens, 17 March 2023

To:

- **United Nations High Commissioner for Human Rights**
- **UN Special Rapporteur on the rights of migrants**
- **UN Special Rapporteur on the situation of human right defenders**
- **Council of Europe Commissioner for Human Rights**
- **European Commission – Commissioner for Home Affairs**

Subject: Joint letter by GCR & HLHR on irregular forced returns (pushbacks), criminalisation and the Rule of Law in Greece

Your excellences,

With full respect to your duties and roles, we reach out to raise the alarm over the ongoing deterioration of the Rule of Law in Greece, in this case, with regards to the targeting, intimidation and even criminal persecution of civil society organisations (CSOs) working in the field of migration and asylum, and particularly those actively challenging human right violations at the Greek borders.

1. The signatory parties to this letter are two of the oldest and most well established civil society organisations in Greece:

2. The Hellenic League for Human Rights ([HLHR](#)) is the oldest CSO in the field of human rights in the country. It was initially established in 1936, and was reinstated in 1953, after being dissolved by the 4th of August (1936) dictatorship. It was again dissolved by the 1967 dictatorship and reinstated in 1974. It has been a permanent member of the International Federation for Human Rights (FIDH), which it has represented in Greece since its establishment and, as per its mandate, is active in the field of dissemination, defense and development of principles that recognise the rights and freedoms of people in society, working on a broad field of subjects, amongst which migration and asylum in Greece and the EU, the rights of minorities, racist violence, hate speech, freedom of expressions, police arbitrariness and Justice.

3. The Greek Council for Refugees ([GCR](#)), is a non-governmental organisation, which has been active since 1989 in the field of asylum and human rights in Greece. Amongst others, GCR has Consultative Status in the Economic and Social Council (ECOSOC) of the UN since 2001; is an operative partner of the UN High Commissioner for Refugees (UNHCR); a member of the Executive Committee of the European Council on Refugees and Exiles (ECRE) since 1991; a member of the Separated Children in Europe Program (SCEP) and participates in the Greek National Committee for Human Rights (EEDA) since 1999. Since March 2022 it has represented before the European Court of Human Rights (ECtHR) close to 500 refugees, including many children, that were requesting to be granted humanitarian assistance and access to the asylum procedure in Greece, many of who have claimed being victims of even multiple incidents of irregular forced returns by the Greek authorities.

Irregular forced returns (pushbacks)

4. Practices of irregular forced returns (henceforth “pushbacks”) by the Greek authorities, particularly at the

land borders of Evros, have been documented for decades, including by the signatory CSOs.¹ Yet what we have been witnessing since March 2020, in the aftermath of the well-known (“instrumentalisation”) incident at the Evros border,² is a complete paradigm shift or, as has been noted on more than one occasion,³ a “*de facto policy*” that has been characterised by an unprecedented escalation of pushback practices throughout the country.

5. Notwithstanding the multitude of reports by CSOs and media that have since been brought to the public’s attention,⁴ systematic pushback practices by the Greek authorities have also been consistently reported – including incidentally in the context of parallel investigations at the EU level⁵– and denounced by the most authoritative international, EU and national human rights monitoring bodies, in the context of their specific mandates. These include:

- The United Nations High Commissioner for Refugees (UNHCR);⁶
- The International Organisation for Migration (IOM);⁷
- The United Nations Committee on Enforced Disappearances (CED);⁸
- The United Nations Committee on the Rights of the Child (CRC);⁹
- The United Nations Human Rights Council;¹⁰
- The United Nations Working Group on Arbitrary Detention (WGAD);¹¹

¹ For instance, see Human Rights Watch, *Stuck in a Revolving Door: Iraqis and Other Asylum Seekers and Migrants at the Greece/Turkey Entrance to the European Union*, 26 November 2008, available at: <https://bit.ly/3yw0MLH> and “Greece: Unsafe and Unwelcoming Shores”, 12 October 2009, available at: <https://bit.ly/3LdKwXp>; AIDA report on Greece: 2016 update, available at: <https://bit.ly/3L6CkIp>, p.21; HLHR, “Coordinated refoulements to Turkey?”, 29 May 2017, available at: <https://bit.ly/3ZEy1ZI> and “More refoulements of Turkish asylum seekers in Evros”, 6 June 2017, available at: <https://bit.ly/3YxsuCv>; GCR, *Reports of systematic pushbacks in the Evros region*, 20 February 2018, available at: <https://bit.ly/41WpR04> and GCR et.al. *The new normality: Continuous push-backs of third country nationals on the Evros river*, 12 December 2018, available at: <https://bit.ly/3SUMVbv>.

² On relevant reactions, see GCR et.al, “Protect our laws and humanity!: Open letter by 256 Organizations”, 6 March 2020, available at: <https://bit.ly/420CIIi> and “Protect the most vulnerable to ensure protection for everyone!-Open letter of 121 organizations”, 25 March 2020, available at: <https://bit.ly/41TCokZ>.

³ Amongst others, United Nations, Report of the Special Rapporteur on the Human Rights of Migrants, Felipe González Morales, Human rights violations at international borders: trends, prevention and accountability, A/HRC/50/31, available at: <https://bit.ly/40cLRIN>, para. 32; Amnesty International, *Greece: Violence, Lies, And Pushbacks: Refugees and Migrants Still Denied Safety and Asylum at Europe's Borders*, 23 June 2021, <https://bit.ly/3ZUUely>, p.5.

⁴ For one of the latest relevant reports, see GCR, *At Europe’s Borders: Between Impunity And Criminalization*, 2 March 2023, available at: <https://bit.ly/3ZO2nrY>.

⁵ OLAF, Final Report on Frontex (CASE No OC/2021/0451/A1), available at: <https://bit.ly/3T9ocA4>.

⁶ UNHCR, *Submission by the Office of the United Nations High Commissioner for Refugees in the case of S.A.A. and Others v. Greece (No. 22146/21) before the European Court of Human Rights*, July 2022, available at: <https://bit.ly/3ZGdP9C>. UNHCR, ‘UNHCR warns of increasing violence and human rights violations at European borders’, 21 February 2022, available at: <https://bit.ly/39Md9L4>; ‘UNHCR concerned by pushback reports, calls for protection of refugees and asylum-seekers’, 21 August 2020, available at: <https://bit.ly/3xNCV90>

⁷ IOM, ‘IOM Alarmed over Reports of Pushbacks from Greece at EU Border with Turkey’, 11 June 2020, available at: <https://bit.ly/39GXQDi>

⁸ CED, Concluding observations on the report submitted by Greece, CED/C/GRC/CO/1, 12 April 2022, paras 28-31, available at: <https://bit.ly/3OwtTVh>.

⁹ CRC, ‘Experts of the Committee on the Rights of the Child Ask Greece about Roma Children and Push Backs of Refugees at the Border’, 4 May 2022, available at: <https://bit.ly/3xDCsqA>.

¹⁰ UN Human Rights Council, Report of the Working Group on the Universal Periodic Review: Greece, A/HRC/49/5, 6 January 2022, paras 130.96, 130.202, 130.204, 130.209, 130.214, 130.215, 130.216, 130.223, 130.226, available at: <https://bit.ly/3tSxghE>.

¹¹ WGAD, Report of visit to Greece, A/HRC/45/16/Add.1, 29 July 2020, paras 87-88, available at:

- The United Nations Special Rapporteur on the human rights of migrants;¹²
- The United Nations Special Rapporteur on human rights defenders;¹³
- The Council of Europe Commissioner for Human Rights;¹⁴
- The European Committee for the Prevention of Torture (CPT);¹⁵
- The Frontex Fundamental Rights Officer (FRO);¹⁶
- The Greek National Commission of Human Rights (NCHR),¹⁷ which in September 2021 established an independent Recording Mechanism of Informal Forced Returns, *inter alia* due to “*the absence of an official and effective data collection mechanism of informal forced returns*”.¹⁸

6. It is past time for it to be acknowledged that recent years have seen a wealth of authoritative and independent reports and publications that provide ample documentation on systematic pushback practices at Greece’s land and sea borders, which *inter alia* put the victims’ life, dignity, corporeal integrity and freedom in danger. It is also past time for it to be acknowledged that the Greek government’s ongoing and persistent denial of all such allegations, particularly amidst the ongoing lack of any thorough and independent official investigation and the disputed nature of the alleged independent monitoring mechanisms that have since been set up by the Greek state,¹⁹ not only fails to do justice to the victims, but also creates an insurmountable tension with fundamental principles of good governance, including transparency, accountability and the Rule of Law.

7. We stress that, despite the overwhelming number of documented incidents and practices, to this day there has also been no judicial response at national level. The sole exceptions concern few sporadic investigations, initiated after complaints filed by CSOs, including complaints filed by the signatory parties before Greece’s Supreme Court Prosecutor, since 2017 and 2019, respectively.²⁰ Yet these have remained for years stuck at a preliminary stage.

8. On this point, we wish to recall that just a few months ago (July 2022), Greece was condemned in the case

<https://bit.ly/3HINxuZ>.

¹² UN Special Rapporteur on the human rights of migrants, available at: <https://bit.ly/3QxvbBn>.

¹³ UN Special Rapporteur on human rights defenders, ‘Statement on preliminary observations and recommendations following official visit to Greece’, 22 June 2022, available at: <https://bit.ly/3tSwZLB>.

¹⁴ Council of Europe Commissioner for Human Rights, ‘Greek authorities should investigate allegations of pushbacks and ill-treatment of migrants, ensure an enabling environment for NGOs and improve reception conditions’, 12 May 2021, available at: <https://bit.ly/3OclKpt>.

¹⁵ CPT, ‘Council of Europe’s anti-torture Committee calls on Greece to reform its immigration detention system and stop pushbacks’, 19 November 2020, available at: <https://bit.ly/39FChmQ>.

¹⁶ Frontex, Fundamental Rights Officer Annual Report 2021, June 2022, 7, 14, 39, available at: <https://bit.ly/3A1XP7J>.

¹⁷ NCHR, *Recording Mechanism of Incidents of Informal Forced Returns: Interim Report*, January 2023, available at: <https://bit.ly/3myWEYJ>.

¹⁸ NCHR, *Recording Mechanism of Informal Forced Returns*, <https://bit.ly/3ZReBQO>.

¹⁹ Amongst others, see PRAB, *Beaten, punished and pushed back*, January 2023, available at: <https://bit.ly/3ywnL9N>, pp. 8-9; GCR *et al.*, “National Transparency Authority should publish the full investigation regarding pushbacks in accordance with the principle of transparency”, 7 April 2022, available at: <https://bit.ly/3JChorS>. On the lack of comprehensive investigation by the Greek authorities on complaints regarding pushbacks, see Greek Ombudsman, *Alleged pushbacks to Turkey of foreign nationals who had arrived in Greece seeking international protection: Interim Report*, 31 December 2020, available at: <https://bit.ly/3ZLaITa>.

²⁰ HLHR, “Complaint regarding pushbacks in the region of Evros”, 6 February 2018, available (Greek) at: <https://bit.ly/3mILz7m>; GCR, “GCR files lawsuits and complaint after refugees complain of pushbacks in Evros”, 19 June 2019, available (Greek) at: <https://bit.ly/2FgQqnS>;

of [Safi and Others vs. Greece](#) (Farmakonisi shipwreck case), amongst others, on account of the failure to effectively investigate the circumstances of the shipwreck. This included failing to account for the survivors' testimonies, all of whom had claimed the shipwreck had been provoked in the context of a maritime operation carried by the Greek Coast Guard, with the aim of pushing them back to Türkiye.²¹

9. In stark contrast to the Greek judiciary's inaction, the European Court of Human Rights (ECtHR) has to date prioritised the examination of no less than 32 cases alleging pushbacks and ill-treatment of refugees and migrants by the Greek authorities.

Criminalisation

10. In tandem with the aforementioned paradigm shift, and in intrinsic connection to it, during the same period we have also been witnessing an escalating rhetoric against CSOs, coupled with legislative initiatives that have curtailed CSOs' ability to independently monitor and bring to light fundamental rights violations, particularly at the borders.

11. At the narrative level, these have included attempts by even high level representatives of the Greek Government to discredit and distort the work of CSOs documenting, publicising and ultimately legally challenging pushback practices, by linking it with the agendas of third countries, opposition parties and/or smuggling rings. Even *interim measures* (Rule 39) granted by the ECtHR, in cases concerning groups of mainly Syrian and Turkish nationals wishing to apply for asylum while on Greek territory,²² have been employed by representatives of the Greek state to cast doubt, smear and ultimately criminalise the work of CSOs, even by claiming that said measures constitute part of an orchestrated set of actions, aimed at facilitating the entry of third country nationals, through the use of legal actions.²³ By deduction, this also casts doubt to the role and work carried out by the Court itself.²⁴

12. In parallel, undue obstacles and regulatory burdens that have been rightfully characterised as a form of "*bureaucratic harassment*" by the UN Special Rapporteur on Human Rights Defenders,²⁵ were introduced

²¹ ECtHR, *Affaire Safi et Autres c. Grèce* (Requête no 5418/15), available at: <https://bit.ly/3mQKCdC>, para. 9.

²² Some of who claimed they had been pushed back even on multiple occasions and/or while *interim measures* were pending or had already been granted. GCR, *Information Note on interventions and on interim measures granted by the ECtHR in cases regarding pushbacks*, 6 March 2023 (last update), available at: <https://bit.ly/3YIA25z>.

²³ For instance, as noted by the Greek Minister of Migration and Asylum in June 2022, while speaking before the European Parliament's Committee on Civil Liberties, Justice and Home Affairs (LIBE): "*smuggling networks have devised a new method of circumventing border controls and manipulating the European asylum and justice system. Smugglers abandon groups of migrants on islets created by the seasonal low flow of the Evros river. Then they notify specific NGOs, which specialise in border crossing facilitation and these NGOs in turn notify the Greek authorities and at the same time file with the European Court of Human Rights with a letter reacting by indicating interim measures, which of course do not prejudice the merits of any case*". See Ministry of Migration & Asylum, "N. Mitarachi: Greece would expect an even more active role of EU institutions", 27 June 2022, available at: <https://www.youtube.com/watch?v=hBDGfunbPIU>, minutes 3:17-3:50. More recently, during a BBC interview, while asked to comment on GCR's latest [report](#) on pushbacks and criminalisation in Greece (March 2023), the Greek Minister of Migration & Asylum once more did not hesitate to employ this approach, this time by claiming on air that GCR had "mislead justice" and specifically the ECtHR, as part of legal actions undertaken in one of the more than 20 cases concerning groups of refugees wishing to apply for asylum while on Greek territory. The aforementioned video is available on the Ministry's website at: <https://migration.gov.gr/mitarakis-sto-hardtalk-toy-bbc-den-tha-epitrepsomye-se-lathrodiakinites-na-apofasizoyn-poiOI-tha-erchontai-stin-eyropi/>. The specific section is between minutes 14:56-15:56.

²⁴ RSA *et al.*, *Joint CSO Briefing: Systemic breaches of the rule of law and of the EU asylum acquis at Greece's land and sea borders*, June 2022, available at: <https://bit.ly/3JbXUc6>.

²⁵ UN Special Rapporteur on Human Rights Defenders, "Hearing with migrants' rights defenders in Greece", 5 October 2021, available at: <https://bit.ly/3FISQAO>.

through the Registry of NGOs working in the field of international protection, migration and social inclusion.²⁶ As also and *inter alia* noted by the [Expert Council on NGO Law](#),²⁷ “instead of fostering greater transparency” –which is ultimately something CSOs themselves seek and desire– these initiatives have “raise[d] both procedural and substantive difficulties with respect to freedom of association and the protection of civil society space”, while introducing “significant potential for arbitrary decision-making” –namely making it possible for the Greek Ministry of Migration and Asylum to deny registration “on grounds which are vague, arbitrary and with the potential to be abused”– at a time when particularly CSOs working in the field of refugee protection face “continued violence and judicial harassment [...], including criminalisation of aspects of their work”.

13. The result has been a chilling effect, which coupled with the imposition of disproportionate confidentiality measures for those working in facilities of the Greek reception system,²⁸ also hinders CSO’s ability to perform vital watchdog functions,²⁹ at a time when the Registry’s operationalization has also given rise to dubious decisions, with some CSOs being denied registration for carrying work compliant with the EU acquis,³⁰ and others being expeditiously approved and called to manage significant operations and EU funds, despite not meeting criteria of registration at the time their registration was approved.³¹

14. Other legislative initiatives (art 8 [L.4825/2021](#)) that have virtually criminalised independent search and rescue (SAR) operations in Greek waters, have also had a chilling effect, leading to the termination of the sole independent SAR operation in Greece (Mare Liberum, in Lesvos), in parallel and to no small degree due to introducing insurmountable obstacles to the ability to perform independent monitoring (watchdog) activities in the area of maritime pushbacks. As reported by Mare Liberum, after four years of operations, during which the crew and association *inter alia* experienced intimidation and harassment by the Greek Coast Guard and even “criminal investigations on flimsy grounds by the Greek authorities”, this law ultimately forced the ship to cease its operation in Greece, as it was *inter alia* considered that the new obligation to at all times follow

²⁶ Article 191 L 4662/2020, Gov. Gazette A’ 27/07.02.2020; Joint Ministerial Decision (JMD) 3063/2020, Gov. Gazette B’ 1382/14.04.2020; Article 58 L 4686/2020, Gov. Gazette A’ 96/12.05.2020; JMD 10616/2020, Gov. Gazette B’ 3820/09.09.2020.

²⁷ Council of Europe Expert Council on NGO law, *Opinion on the compatibility with European standards of recent and planned amendments to the Greek legislation on NGO registration*, July 2020, available at: <https://bit.ly/3mlW5vo>, para. 22, 103 & 108, and *Addendum to the Opinion on the compatibility with European standards of recent and planned amendments to the Greek legislation on NGO registration*, November 2020, available at: <https://bit.ly/3l0hdNi>, para. 21

²⁸ Article 8 (1) of Ministerial Decision setting the general rules governing the operation of temporary reception facilities and accommodation facilities (i.e. mainland camps), foresees that everyone working in these facilities is bound by confidentiality, not only with respect to personal data, but also with respect to “information and any other material which is to be disclosed or which comes to their knowledge in any way in the course of or in connection with the performance of their duties”. Article 8(2) also foresees, “indicatively”, that “any information, data and personal data concerning or relating to a resident in the Facility, regardless of how it is characterised” is to be considered confidential and that, “in case of doubt over the characterization of an information, it is to be considered confidential”. [MD 23/13532](#) on the “General Regulation on the Operation of Temporary Reception Facilities and Temporary Accommodation Facilities for third country nationals or stateless persons, operated by the Reception and Identification Service”, Gov. Gazette 5272/B/30-11-2020.

²⁹ Joint CSO briefing, *Walling Off Welcome: New reception facilities in Greece reinforce a policy of refugee containment and exclusion*, September 2021, available at: <https://bit.ly/3Fj3jwL>, p.5.

³⁰ Joint statement by 19 organisations active on refugee issues in Greece, December 2021, available at: <https://bit.ly/3Fj0qvL>.

³¹ Solomon, “Millions in funding at stake for refugee housing”, 22 January 2021, available at: <https://bit.ly/3YACxqC>; Inside Story, “NGOs that come out of nowhere and ghost organizations in the Mitarakis register”, 20 April 2021, available at: <https://bit.ly/3mDhhTI>; RSA, “Registry of NGOs working with refugees and migrants in Greece under scrutiny”, 26 May 2021, available at: <https://bit.ly/3T77UYx>.

the instructions of the Coast Guard would be in conflict with the monitoring work carried out by Mare Liberum, ultimately making this work void of substance and of meaning.³²

15. On this point, we wish to recall the narrative of complete success vis-à-vis the management of mixed migration flows that has been consistently promoted by the Greek Government in past years, which has been exclusively based on the exponential decrease in the number of irregular arrivals to Greece, without addressing the similarly consistently reported pushbacks at Greece's land and sea borders. The Greek Government's vehement denial of all pushback allegations to this day, begs the question of the necessity of rules and measures that either directly or indirectly impact on the ability to perform independent monitoring activities.

16. To be noted, even before the aforementioned legislative amendment, SAR operations in Greece had been under pressure and in some cases criminalised. The ERCI trial case, where even volunteers, such as Sara Mardini, Sean Binder, Nasos Karakitsos, Paul Wittenberg and others were accused as members of a criminal smuggling network, is the most emblematic. It is also important to recall that the specific case is still pending before judicial authorities in Lesbos, since investigation of the main felonies for which all those involved were charged back in 2018, is ongoing.

Misuse of Criminal law against human rights defenders

17. In parallel to the above, and in further stark contrast to the ongoing inaction of the Greek judiciary vis-à-vis cases regarding fundamental rights violations at the country's borders, more recently we have been witnessing provisions of the penal law being misused to prosecute human rights defenders that have been at the forefront of highlighting and challenging these fundamental rights violations. To be noted, specific action was preceded by targeted smear against some of the CSOs most active in bringing forth complaints concerning rights violations at the borders, with public statements by responsible ministers or even (reportedly) police authorities going at least as far back as 2020,³³ claiming in an abstract manner that the activities of such CSOs were under investigation for the crimes (degree of felony) of managing and/or participating in a criminal smuggling network.

18. The most recent case is the one concerning Panayote Dimitras, spokesperson of the Greek Helsinki Monitor, as part of which pending investigations against Tommy Olsen, founder of the Aegean Boat Report, Ruhi Ahtar, founder of Briyani and Bananas, and Madi Williamson, Director of In-Sight Collaborative – that is to say, some of the most active professionals in this field– were also revealed.

19. In the case of Mr. Dimitras, which was brought before the investigating judge in Kos, severe restrictive measures, such as the prohibition of leaving the country, the obligation of appearing at a police station twice a month, and a guarantee of € 10,000, were imposed. Yet in parallel with these measures, the judge also prohibited Panayote Dimitras from engaging with the activities of the Greek Helsinki Monitor. This prohibition further endangers the right to freedom of association and even the right to freedom of expression for a representative of an organisation that has for decades been working closely with UN and Council of Europe (CoE) human rights bodies, even by submitting cases to ECHR, or by intervening *ex parte* in other cases, such

³² Mare Liberum, “New Assignment for Ship Mare Liberum”, January 2023, available at: <https://bit.ly/3ZJuaKv>.

³³ Amongst others: The Press Project, “Mitarakis invokes evidence of smuggling rings with false leaks to the press”, 9 December 2020, available (Greek) at: <https://bit.ly/3leEAmj> and Kathimerini, “From Somalia to the Eastern Aegean”, 14 December 2020, available (Greek) at: <https://bit.ly/3Tdgl4P>; dikaiologitika.gr, “Evros: Four NGOs “Locked” by the authorities for dubious tricks with migrants in the river”, 29 May 2022, available (Greek) at: <https://bit.ly/429PiuY>;

as in the abovementioned 32 cases regarding pushbacks.³⁴

20. On this point, we wish to recall and acknowledge that the CoE Commissioner for Human Rights,³⁵ as well as the UN Special Rapporteur's on Human Rights Defenders and on the Human Rights of Migrants,³⁶ have already denounced this pattern of undermining the work of human rights defenders, by also referring to the aforementioned cases.

21. Your excellences, even though Greece has already been brought under the enhanced supervision of Council of Europe monitoring bodies for the execution of ECHR judgements, allegations and concerns over the ill-treatment of refugees and migrants by law enforcement agents that can even exceed the threshold of torture or inhumane and degrading treatment, and over the state of play that of freedom of association in the country, continue mounting. This creates a legitimate concern on whether the Rule of Law can even be safeguarded at all in specific fields in Greece, and reasonable questions on the wider impact that ongoing impunity may have for the respect of fundamental rights and democratic values in the broader European and international field.

22. We therefore urge and depend on you, as the competent international instruments safeguarding human rights, to appeal to the Greek authorities to comply with their obligations, as enshrined in the UN Covenants on Human Rights, the European Convention on Human Rights, as well as the EU Charter of Fundamental Rights and the EU acquis in general.

Athens, 17 March 2023

Greek Council of Refugees

Hellenic League for Human Rights

Vasilis Papadopoulos, President of the Board

Andreas Takis, President of the Board



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³⁴ [Greek Helsinki Monitor's main activities in 2022 \[from INACH Annual Report 2022\]](https://greekhelsinki.wordpress.com/2022/12/16/1-622/)
<https://greekhelsinki.wordpress.com/2022/12/16/1-622/>

³⁵ CoE Commissioner for Human Rights, "Greek authorities should reverse the trend undermining the work of human rights defenders and journalists", 12 January 2023, available at: <https://bit.ly/3LeNwTz>.

³⁶ Communication to the Greek government under the Mandates of the Special Rapporteur on the situation of human rights defenders and the Special Rapporteur on the human rights of migrants (Ref.: AL GRC 3/2022), 28 December 2022, available at: <https://bit.ly/3yykmXT>.