

COMMUNICATION

of the GREEK COUNCIL FOR REFUGEES to the COMMITTEE OF MINISTERS of the COUNCIL OF EUROPE (Rule 9.2.) with regard to the execution of A.R. and Others v. Greece (Application No. 59841/19) and Muhammad v. Greece (Application No. 14606/20) GROUP of cases.

1569th meeting (September 2026) (DH)

20 July 2026

I. Introduction

1. The Greek Council for Refugees (GCR) submits this communication pursuant to Rule 9(2) of the Rules of the Committee of Ministers for the supervision of the execution of judgments.
2. This submission addresses the execution of the European Court of Human Rights (ECtHR) judgment in *A.R. and Others v. Greece* and *Muhammad v. Greece*. The Court in this group of cases found systemic violations of Article 3 of the European Convention on Human Rights (ECHR) concerning the living conditions of asylum seekers, the failure to provide adequate medical care and protection to applicants residing in reception facilities and the detention conditions prevailing.
3. The purpose of this communication is to provide the Committee of Ministers with an updated assessment of persisting structural shortcomings in 2025 and 2026 with regard to conditions of reception and detention, which have been further compounded following the entry into force of Law 5307/2026 (Gov. Gazette A' 90/11-06-2026) on June 12, 2026, intended to implement the EU Pact on Migration and Asylum.

II. General observations

4. As a preliminary remark, GCR recalls again¹ that, since December 2022, camp-based accommodation has become the only available accommodation provided under the Greek reception system for all asylum applicants, including vulnerable groups whose special needs are not met, both on the islands and the mainland. The only exceptions to this camp-based accommodation model are shelters dedicated to the accommodation of unaccompanied children (UAC). However, even in the case of UAC, prior to their placement in a shelter, they have to remain for prolonged periods in CCACs and RICs, in unsuitable conditions.
5. Specifically, the Greek Reception system comprises five (5) Closed Controlled Access Centers ([CCACs](#)) on the islands of Chios, Kos, Leros, Lesbos and Samos, three (3) mainland Reception and Identification Centers ([RICs](#)) in Diavata, Malakasa, and Filakio, and twenty-four (24) Controlled Access Facilities for Temporary Accommodation of Asylum Seekers ([CAFTAAS](#)) on the mainland.
6. A common thread underlying the operations of these facilities is their remote nature, which, as *inter alia* flagged by the Greek Ombudsman already since 2024,² “creates clear challenges in terms of access to goods and services, and fosters a strong sense of isolation of residents from local communities”.
7. This isolation has a direct impact on applicants’ mental health, serving as an added driver of acute psychological distress, which has been found to be significantly pronounced amongst asylum applicants in Greece,³ particularly those residing in camps.⁴ In this context, it is worth noting the complete lack of psychiatrists in the Greek reception system, as evidenced in the Updated Action Plan communicated by the Greek Government to the Committee on 29 June 2026,⁵ as well as the noted

¹ GCR, *Communication of the Greek Council for Refugees to the Committee of Ministers of the Council of Europe (Rule 9.2.) with regard to the execution of M.S.S. (Application No. 30696/09) and H.A. and others (Application No. 4892/18) Group of cases in view of the Committee’s 1531st meeting (June 2025) (DH)*, April 2025, available at: https://gcr.gr/wp-content/uploads/GCR-Submission_Examination_MSS-GROUP-v.-Greece_042025.pdf, para. 24.

² Greek Ombudsman, *The Challenge of Migratory Flows and Refugee Protection: Reception Conditions and Procedures*, 26 April 2024, available at: <https://www.theioi.org/ioi-news/current-news/the-greek-ombudsman-publishes-new-report-on-the-challenges-of-migratory-flows-and-refugee-protection>, p. 25.

³ Dumke, L., Maousidi-Ziganou, E., Kalpaxi, P. *et al.* Mental health and psychosocial support for asylum seekers and refugees in Greece: a narrative review of stressors, needs, services, and barriers. *Int J Equity Health* **25**, 59 (2026). <https://doi.org/10.1186/s12939-026-02786-2>.

⁴ Knappe F, Filippou K, Hatzigeorgiadis A, Morres ID, Tzormpatzakis E, Havas E, Seelig H, Colledge F, Ludyga S, Meier M, de Quervain D, Theodorakis Y, von Känel R, Pühse U, Gerber M. Psychological well-being, mental distress, metabolic syndrome, and associated factors among people living in a refugee camp in Greece: a cross-sectional study. *Front Public Health*. 2023 Jun 16;11:1179756. doi: [10.3389/fpubh.2023.1179756](https://doi.org/10.3389/fpubh.2023.1179756). PMID: 37397726; PMCID: PMC10311549; Médecins Sans Frontières (MsF), *Migration Projects - Greek Islands 2024: Operations and Context Update*, 18 June 2024, available at: <https://tinyurl.com/3mhvwnwm>

⁵ Council of Europe, Committee of Ministers, *Communication from Greece concerning the case of A.R. and Others v. Greece (Application No. 59841/19), and the groups of cases Muhammad v. Greece (Application No. 14606/20) and H.A. and Others v. Greece (Application No. 4892/18)*, DH-DD(2026)812E (2026), available at: [https://hudoc.exec.coe.int/eng?i=DH-DD\(2026\)812E](https://hudoc.exec.coe.int/eng?i=DH-DD(2026)812E), p.5.

“lack of available public mental health services, especially in remote areas where accommodation facilities are located”.⁶

8. In a similar vein, the securitised characteristics of camps, which consist of high concrete fences in the CAFTAAS, double fencing with barbed wire in the CCACs and RICs, and security and surveillance systems that have been questioned as to their proportionality by the Greek Ombudsman⁷, act as a further stressor for residents, and in any case, as has been noted by both the Greek and European Ombudsman, are of a carceral nature⁸ that is inconsistent with the status of residents, who belong to *“a particularly underprivileged and vulnerable population group in need of special protection”*⁹.

III. Living conditions in reception facilities

9. This situation is further compounded by the interruption, since May 2024 and for a period of ten (10) months,¹⁰ and the subsequent complete cessation, since March 2025¹¹, of the EU-funded (under [AMIF](#)), monthly financial allowance provided to applicants as part of material reception conditions. This cessation amounts to a blanket, *de facto* reduction of material reception conditions, in breach of Article 23 [Directive \(EU\) 2024/1346](#) (Article 20 of the previous [Directive 2013/33/EU](#)), and has had cascading effects on applicants’ ability to enjoy other rights guaranteed under this Directive, such as healthcare and education, insofar as it negatively impacts their ability (lack of resources) to cover basic living expenses, including medicine and transportation.¹²
10. Regarding other dimensions of prevailing conditions in the camps, these need to be checked for each specific facility, as the notable lack of overcrowding in past months is not a guarantee of compliance with the standards set by the Reception Conditions Directive and *inter alia* guaranteed by the European Convention on Human Rights. For instance, in its 2025 report¹³, the Fundamental Rights Office of

⁶ Dumke, L., Maousidi-Ziganou, E., Kalpaxi, P. *et al.*, *op.cit.*, p.4.

⁷ Greek Ombudsman, *op.cit.*, p.41.

⁸ EU Ombudsman, *Decision in strategic inquiry OI/3/2022/MHZ on how the European Commission ensures respect for fundamental rights in EU-funded migration management facilities in Greece*, 7 June 2023, available at: <https://www.ombudsman.europa.eu/en/decision/en/170792>.

⁹ ECtHR, *M.S.S. v. BELGIUM AND GREECE* (Application no. [30696/09](#)), para. 251.

¹⁰ AIDA, Country Report on Greece: 2024 update, September 2025, available at: <https://asylumineurope.org/reports/country/greece/>, p.182.

¹¹ See Joint Statement: Provision of cash assistance to asylum seekers in Greece must resume immediately, 4 March 2026, available at: <https://gcr.gr/en/news/item/koini-dilosi-amesi-apokatastasi-toy-programmatos-katavolis-oikonomikoy-voithimatos-stoys-aitoyntes-asylo/>

¹² As per information *inter alia* received during the 9 July 2025 National Protection Working Group, which is held under UNHCR in Greece. Also RSA, *Statistics on Reception & Refugee Camps in Greece 2025*, 26 March 2026, available at: <https://tinyurl.com/5y9xhe8z>, p.4 and *Reception & refugee camps in Greece in the first half of 2025*, 11 September 2025, available at: <https://tinyurl.com/yp6ar5fu>.

¹³ FRONTEX, *2025 Annual Report of the Frontex Fundamental Rights Officer: Protecting, promoting and monitoring fundamental rights in the European Border and Coast Guard community*, 15 July 2026, available at: <https://www.frontex.europa.eu/media-centre/news/news-release/frontex-fundamental-rights-office-releases-its-2025-annual-report-3wb244>, p.27.

the European Border and Coast Guard Agency (FRONTEX), while acknowledging improvements, “observed the need to improve the general conditions of reception centres” in the Aegean islands.

11. In line with the above, GCR further wishes to highlight the following chronic material and operational deficiencies that continue to obstruct the effective execution of the *A.R. and Others v. Greece* group of cases:
12. *Food Insecurity and Malnutrition*: Despite the total cessation of the financial allowance, the in-kind catering provided within facilities remains insufficient, culturally inappropriate, and fails to meet specific dietary requirements, including for children, pregnant or lactating women and people living with diabetes, with reports from April 2025 documenting cases of malnutrition amongst children.¹⁴ Furthermore, essential personal hygiene items—such as soap, diapers, and sanitary pads—are consistently not provided by the authorities.¹⁵
13. *Severe infrastructure deficiencies*: Residents in multiple facilities continue to endure substandard living conditions, including broken sanitation systems, a lack of regular hot water, and severe pest infestations. Protests on account of such conditions were held by residents of Malakasa and Oinofyta camps in January 2025 and February 2026 respectively, with parents flagging that unhygienic conditions pose a serious and immediate risk to the health of their children.¹⁶ In February 2026, amidst winter conditions, residents of the Chios CCAC, including 150 children, remained without stable access to heating, on account of electricity shortages for at least 12 days.¹⁷
14. *Deplorable Conditions and de facto detention of unaccompanied children (UAC)*: Regarding unaccompanied children (UAC), progress made in previous years is currently undergoing severe regression. This is primarily driven by recent legislative changes that foresee the use of “safe zones” within mainland camps and island CCACs as a permanent form of accommodation, rather than a temporary emergency measure. Specifically, this applies to children aged 16 and above, which can also exceptionally be accommodated alongside unknown adults, as well as children of any age depending on their nationality or asylum recognition rates. This establishes a discriminatory, two-tier child protection system where care decisions

¹⁴ MsF, ‘Children diagnosed with malnutrition on Greece’s Samos island’, 7 April 2025, available at: <https://www.msf.org/children-diagnosed-malnutrition-samos-island-greece>.

¹⁵ Aegean NGO Network, *Monitoring closed controlled facilities on the Greek islands (March 2026)*, 17 March 2026, available at: <https://reliefweb.int/report/greece/aegean-ngo-network-monitoring-closed-controlled-facilities-greek-islands-march-2026>, pp. 3-4. Also see Joint Statement: Provision of cash assistance to asylum seekers in Greece must resume immediately, 4 March 2026, available at: <https://gcr.gr/en/news/item/koini-dilosi-amesi-apokatastasi-toy-programmatos-katavolis-oikonomikoy-voithimatos-stoys-aitoyntes-asylo/>.

¹⁶ MIT & RLS, *Follow Up Report: People continue to suffer in Greece’s mainland refugee camps*, 3 April 2025, available at: <https://tinyurl.com/5f9rmcyx>, p.9 and News24/7, “We Need Help”: Refugees Denounce Appalling Conditions In The Oinofyta Facility”, 21 February 2026, available in Greek at: <https://tinyurl.com/4mz4xvww>.

¹⁷ Sto Nisi, ‘Refugees and migrants without electricity in Chios for 12 days’, 2 February 2026, available in Greek at: <https://www.stonisi.gr/post/104635/xwris-reyma-prosfyges-kai-metanastes-sth-xio-epi-12-hmeres-pics-video>.

are increasingly based on asylum assumptions rather than an individualised assessment of the child’s best interests, contrary to Article 2(1) of the Convention on the Rights of the Child.¹⁸

15. To be noted, the challenges faced by UAC in such arrangements have been also corroborated by consecutive Interim Measures granted by the European Court of Human Rights (ECtHR) in numerous cases concerning unaccompanied minors remaining in “safe zones”.¹⁹
16. *Severely substandard reception conditions in Crete*: The systemic failure to provide dignified reception conditions is acutely illustrated on the island of Crete, which has rapidly emerged as the primary entry point for persons fleeing war and persecution, accounting for approximately 70% of all maritime entries to Greece as of mid-June 2026. This sustained geographic shift involves highly vulnerable demographics, including Sudanese and Afghan nationals (who together represent 36.3% of sea arrivals in 2026)²⁰, alongside a significant proportion of families and UACs. It has also continued to place pressure on reception and registration capacity, particularly given the limited reception infrastructure available on the island, which results in newcomers remaining in deplorable conditions pending their transfer to a camp²¹.
17. In particular, as noted by the Fundamental Rights Office of Frontex in its 2025 report²², *“conditions upon disembarkation [to Crete] often failed to comply with fundamental rights standards”, with “[s]hortcomings includ[ing] no distribution of water and food supplies, no availability of toilets, delays of buses and ambulances under harsh weather conditions, and excessive security measures”*.
18. *Ongoing barriers to asylum resulting in deprivation of reception conditions*: As an initial remark, GCR stresses that following entry into force of Law 5307/2026 incorporating the provisions of the EU Migration and Asylum Pact into Greek legislation on 12 June 2026, the structural shortcomings of the reception system are

¹⁸ For more on the setbacks in the field of UAM protection, see Save the Children & GCR, Joint brief: Children on the move in Greece (April-June 2026), available at: https://gcr.gr/wp-content/uploads/Save-GCR-Joint-Briefing_Q2_final-sign-off-SCI.pdf.

¹⁹ For a brief, see AIRE Centre/Greek Council for Refugees, Communication in accordance with Rule 9.2 of the Rules of the Committee of Ministers regarding the supervision of the execution of judgments and of terms of friendly settlements – O.R. v. Greece (App No 24650/19) group of cases, 21 November 2025, available at: <https://gcr.gr/wp-content/uploads/O.R.-v.-Greece-Rule-9.2-submission-AIRE-Centre-GCR-.pdf>.

²⁰ See UNHCR’s Operational Data Portal for Greece, under “Most Common Nationalities of Sea Arrivals”, available at: <https://data.unhcr.org/en/situations/europe-sea-arrivals/location/24489> [last accessed 14 July].

²¹ *Inter alia* see Kathimerini, ‘Migration: The situation at the port of Heraklion is dire’, 10 June 2026, available in Greek at: <https://www.kathimerini.gr/society/564276454/metanasteytiko-asfyktiki-i-katastasi-sto-limani-toy-irakleioy/>; Cretalive news, Migrants: The appalling detention conditions in Heraklion and Chania are a public health “time bomb”, 13 September 2026, available in Greek at: <https://www.cretalive.gr/kriti/metanastes-ygeionomiki-bomba-oi-athlies-synthikes-kratisis-se-irakleio-kai-hania>; neakriti, PAME: Denounces the appalling living conditions of refugees and migrants in Crete, 11 July 2025, available in Greek at: https://www.neakriti.gr/kriti/2127606_pame-kataggellei-athlies-synthikes-paramonis-ton-prosfygon-kai-metanaston-stin-kriti.

²² FRONTEX, *op.cit.*, p.20.

currently being drastically exacerbated by a complete administrative paralysis regarding access to the asylum procedure, which has resulted in newcomers subject to screening procedures remaining in conditions of *de facto* detention for more than a month.

19. That being said, such shortcomings further compound chronic deficiencies in accessing asylum –and as a result any type of reception conditions– on the Greek mainland,²³ and continue to result in asylum seekers remaining stuck in a protracted legal limbo, in conditions of severe material deprivation. The latest such case notified to GCR (13 July 2026) concerns a single-parent family headed by a woman with six (6) minor children (five girls and one boy) from Afghanistan, one of whom has recently undergone surgery on account of a medical condition. The family lacked access to any form of reception and remained homeless in a public park in central Athens (*Pedion tou Areos*) for more than a week.

IV. Health services in the camps

20. Regarding the availability of health professionals in the camps, GCR takes note of the Government's communication of 29 June 2026, and welcomes the reported increase in the number of such professionals under the Ippocrates II program.
21. Nevertheless, GCR wishes to highlight that per official data²⁴, on the specific date, a total of 1,064 persons were residing in the CCAC of Leros, 1,220 in the CCAC of Samos, and 862 in the CCAC of Kos. Based on the data provided by the government regarding the number of deployed healthcare professionals²⁵, this means that in Leros, there was only one (1) general practitioner (GP) per more than a thousand residents and two (2) psychologists per more than 500, while no pediatrician was available. In Samos, there was only one (1) GP per more than 600 residents, one (1) psychologist per more than a thousand residents, and no pediatrician. Lastly, in Kos, there was only one (1) GP and one (1) psychologist per more than 800 residents, and no pediatrician. In GCR's view, and taking into consideration the vulnerability characteristics of the population concerned, this number is insufficient, particularly if the number of arrivals increases again.

²³ For more, see the recurrent challenges arising in the context of the online registration platform established by the Ministry of Migration and Asylum in AIDA, Country Report on Greece: 2024, September 2025, pp.72-73, 139-140, 152, 170-171, 178, 215, 221, as well as in the previous AIDA reports on Greece, all of which are available at: <https://asylumineurope.org/reports/country/greece/>.

²⁴ National Coordination Center for Border Control, Immigration and Asylum (N.C.C.B.C.I.A.), *National Situational Picture Regarding the Islands at Eastern Aegean Sea (29/06/2026)*, 30 June 2026, available at: <https://migration.gov.gr/en/statistika/> and <https://www.scribd.com/document/1056658887/NSP-Eastern-Aegean-29-06>.

²⁵ Council of Europe, Committee of Ministers, *Communication from Greece concerning the case of A.R. and Others v. Greece (Application No. 59841/19), and the groups of cases Muhammad v. Greece (Application No. 14606/20) and H.A. and Others v. Greece (Application No. 4892/18)*, DH-DD(2026)812E (2026), available at: [https://hudoc.exec.coe.int/eng?i=DH-DD\(2026\)812E](https://hudoc.exec.coe.int/eng?i=DH-DD(2026)812E), p.5.

V. Conditions of administrative detention

22. With regard to conditions of administrative detention, GCR wishes to highlight the following in the context of the execution of the *Muhammad v. Greece* case:
23. Conditions of administrative detention across Greece remain structurally incompatible with human rights standards, amongst others, on account of the carceral design of Pre-Removal Detention Centers (PRDCs).
24. As has been noted by the European Committee for the Prevention of Torture (CPT),²⁶ PRDCs, such as in Kos²⁷, Fylakio, Paranesti, Corinth, and Xanthi, employ fenced perimeters with multiple layers of barbed wire and rely on fundamentally inappropriate prefabricated containers, leading the CPT to maintain that these facilities, alongside other detention facilities operating under the competence of the police, such as Tavros (Petrou Ralli), fail to provide an appropriate environment for prolonged immigration detention due to their prison-like environment, poor material conditions, insufficient healthcare services, and a lack of suitably qualified personnel.
25. With regard, in particular, to healthcare services, as in the case of camps, no psychiatrists are available in any of Greece's PRDCs, while regarding other medical professions, the number of deployed staff in 2025 per PRDC, in relation to the number of detainees, can be seen in the following table:

PRDC	Doctors	Nurses	Psychologists	Health visitors	Detainees throughout 2025	Detainees at the end of 2025
Amygdaleza	2	4	2	2	4,074	634
Corinth	1	2	0	1	936	323
Fylakio	1	2	1	0	6,209	312
Kos	0	0	0	0	168	33
Paranesti	2	2	1	1	940	242
Tavros	1	2	1	1	2,214	129
Xanthi	1	2	1	1	642	151

Source: Information provided by the Directorate of the Hellenic Police, 6 March 2026.

26. These systemic design flaws are compounded by severe, ongoing material deprivation inside the PRDCs. For instance, media reports²⁸ from May 2026 regarding the Corinth PRDC document absolutely unacceptable detention conditions, including dirty toilets and showers, torn and filthy mattresses, broken air conditioning, an absence of hot water, a lack of soap, and the outbreak of skin diseases among administrative detainees. Similarly, GCR monitoring of the Amygdaleza PRDC in July 2025 revealed dismal conditions for newly arrived

²⁶ CPT, *Report to the Greek Government on the visit to Greece carried out by the European Committee for the Prevention of Torture and Inhuman or Degrading Treatment or Punishment (CPT) from 20 November to 1 December 2023*, 12 July 2024 [CPT/Inf (2024) 21], available at: <https://www.ecoi.net/en/file/local/2112722/2024-21-inf-en.docx.pdf>.

²⁷ Also see Equal Rights Beyond Borders, *'Still Detained and Forgotten': 2025 update*, 13 July 2026, available at: <https://directus.equal-rights.org/assets/2e901298-46b4-4286-9e75-868f70cba768>.

²⁸ EfSyn, *'Corinth: Refugees Denounce Shameful Conditions of Abandonment – Videos of Despair'*, 13 May 2026, available in Greek at: <https://tinyurl.com/mwxxxyfm>.

persons transferred from Gavdos, who were additionally deprived of their right to seek asylum.²⁹

27. In fact, severe challenges regarding the use of detention further escalated following the three-month suspension of asylum between 14 July and 14 October 2025, which led to the arbitrary mass detention of asylum seekers arriving by boat from North Africa, in makeshift spaces in Crete and in the Special Detention Facility of Sintiki near the Greek-Bulgarian border. The Greek Ombudsman formally concluded, in June 2026, that the Sintiki facility is absolutely unsuitable for detention beyond a few days. Situated in a remote mountainous area, next to a river, the facility suffers from high humidity and low temperatures, and entirely lacks a sewage and water network.³⁰ Video evidence and testimonies from May 2026³¹ revealed that more than 700 individuals were forced to share just four toilets, sleeping on blankets on container floors without basic clothing provisions, amidst allegations of verbal and physical violence and numerous unaddressed medical emergencies.
28. Lastly, the widespread practice of prolonged administrative detention within police stations, in extremely poor conditions and for periods that frequently exceed one (1) month, continues to severely violate administrative detainees' fundamental rights. Indicative examples, reported by the CPT,³² include cramped conditions and detention alongside criminal suspects; dirty, torn and/or insufficient blankets and mattresses; no provision of basic sanitary items, such as soap and sanitary pads for women; and discriminatory arrangements. In March 2026, the CPT also noted a concerning increase, between 2022 and 2024, in the number of deaths in police precincts, such as Agios Panteleimonas and Omonia, as well as in the Amygdaleza PRDC, with the cause of death, in several cases, having yet to be identified.³³
29. Similar observations regarding the manifest unsuitability of holding cells in police stations, such as those in Drapetsona and Kaminia, have also been made following inspections of the Greek Ombudsman in 2025. Regarding PRDCs, the Ombudsman further noted, *inter alia*, that alongside infrastructural problems and prolonged detention periods –often exceeding six (6) months– the chronic shortages of

²⁹ GCR, 'No right to asylum and living in appalling conditions: GCR visit to Pre-departure Detention Center in Amygdaleza for those recently arrived in Gavdos from Libya', 30 July 2025, available at: <https://gcr.gr/en/news/item/choris-dikaioma-asyloy-kai-se-athlies-synthikes-episkepsi-toy-esp-sto-prokeka-amygdalezas-gia-toys-prosfata-afichthentes-sti-gaydo/>.

³⁰ For more, see GCR, Completely Inadequate Conditions of Detention at the Pre-Removal Detention Facility in Sintiki, Serres, in *News from the field - June 2026*, available at: <https://gcr.gr/en/news/item/nea-apo-to-pedio-ioynios-2026/> and Completely unacceptable detention conditions at the Corinth Pre-Removal Detention Centre and the Special Detention Facility in Sintiki, in *News from the field - May 2026*, available at: <https://gcr.gr/en/nea-apo-to-pedio/item/nea-apo-to-pedio-maios-2026/>.

³¹ See Oxford Border Criminologies, 'Exclusive images and testimonies reveal conditions inside the Sintiki 'Special Detention' centre in Greece', 20 May 2026, available at: <https://www.law.ox.ac.uk/content/news/exclusive-images-and-testimonies-reveal-conditions-inside-sintiki-special-detention> and EfSyn, 'The Hell of the Sintiki Facility in Oxford: Research Platform Highlights the Inhumane Conditions', 22 May 2026, available in Greek at: <https://tinyurl.com/3smrpj52>.

³² CPT, *Visit Report Greece: January 2025*, 4 March 2026 [CPT/Inf (2026) 9], available at: <https://www.coe.int/en/web/cpt/greece>, paras. 244-248.

³³ para. 255.

interpretation and legal aid services further exacerbate the insecurity experienced by administrative detainees.³⁴

30. In Heraklion, Crete, the local Bar Association –which, it should be noted, was refused access to inspect the police holding cells for at least a month– and media have documented that administrative detainees are held in police cells for extended periods ranging from one to four months. These individuals are subjected to abysmal hygiene conditions, are explicitly denied access to fresh air and sunlight, and are unlawfully co-mingled with criminal detainees for long durations, leading to severe physical deterioration.³⁵
31. Despite these recurrent concerns expressed by competent fundamental rights monitoring bodies, a total of 265 third country nationals (TCNs), 15 of whom had expressed their will to apply for asylum, were administratively detained in police stations and other holding facilities under the competence of the Police (excluding PRDCs), such as police precincts and border outpost cells, at the end of 2025.³⁶

VI. Recommendations to the Committee of Ministers

32. In light of the above, GCR urges the Committee of Ministers to maintain the *A.R. and Others v Greece* and *Muhammad v Greece* group of cases under enhanced supervision.
33. Furthermore, GCR invites the Committee of Ministers to urge the Greek Government to take the following immediate, binding actions:
- ❖ *Restore access to asylum and to the timely provision of material reception conditions:* This would require immediately reactivating and stabilising the online initial registration platform, and providing accessible alternative channels for registration of asylum claims, so as to ensure asylum seekers are not left destitute and/or at risk of detention pending their registration.
 - ❖ *Cease ongoing practices of de facto detention, particularly for minors:* Terminate the systematic practice of holding unregistered arrivals and UAC in *de facto* administrative detention inside RICs, CCACs, and mainland facilities without individualised decisions, ensuring full compliance with European law.
 - ❖ *Reinstate the provision of financial allowance:* Immediately resume the AMIF-funded monthly financial allowance for all eligible asylum seekers to ensure access to essential nutrition, medicine, and transit.

³⁴ Greek Ombudsman, *National Report 2025*, 26 March 2026, available in Greek at: <https://www.synigoros.gr/el/category/default/post/deltio-typoy-or-ethsia-ek8esh-2025>, pp.142-143.

³⁵ ThePressProject, 'Heraklion Holding Cells: For months in cells in deplorable conditions without outdoor time, ban on solidarity – 'Detainees are emaciated'', 3 July 2026, available in Greek at: <https://tinyurl.com/5n7t63bn>; Heraklion Bar Association, 'Announcement Regarding Detention Conditions at the Heraklion Holding Cells', 18 June 2026, available in Greek at: https://dsh.gr/anakoinwseis/page/2/?et_blog and 'Announcement Regarding Conditions at the Heraklion Holding Cells', 23 March 2026, available in Greek at: https://dsh.gr/anakoinwseis/page/8/?et_blog.

³⁶ Information provided by the Directorate of the Hellenic Police, 6 March 2026.

- ❖ *Urgently improve reception infrastructure, particularly on Crete:* This would entail immediate steps to ensure newcomers on Crete are not funneled into makeshift, unsuitable spaces or left destitute, while simultaneously improving conditions on both the islands and the mainland, with a particular focus on creating additional reception places outside of camps (urban accommodation), particularly for those assessed as vulnerable.
- ❖ *End the use of police facilities for prolonged detention:* Urgently cease the widespread practice of holding administrative detainees in police stations, border outposts, and other holding cells for periods exceeding a few days.
- ❖ *Upgrade material conditions and services in PRDCs:* Take immediate, concrete steps to address the severe material deprivations in PRDCs. This includes ensuring adequate hygiene standards, unhindered access to healthcare, interpretation services, and legal aid, while simultaneously reviewing their carceral design to align with European human rights standards.