

COMMENTS

GREEK SYSTEM COLLAPSE AFTER THE EU MIGRATION PACT

JULY 2026

Submission to the Council of Europe Committee of Ministers
on the execution of asylum and reception cases

stiftung
PRO ASYL

Malakasa Camp. Photo: Private

RSA
REFUGEE SUPPORT AEGEAN

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Introduction

1. In view of the upcoming examination of the **A.R. v. Greece**,¹ **H.A. v. Greece**² and **Muhammad v. Greece**³ groups of cases at the 1569th meeting of the Committee of Ministers of the Council of Europe (hereafter “the Committee”) in September 2026, Refugee Support Aegean (RSA) and Stiftung PRO ASYL wish to hereby submit an updated assessment of Greek asylum system pursuant to Rule 9.2. of the Rules of the Committee. Our last contribution to the Committee on the **M.S.S. v. Greece**⁴ group was submitted in April 2025.⁵
2. We express deep concern at the Committee's decision to close the supervision of the **M.S.S. v. Greece** group of cases on 12 June 2025. We do not believe that the Greek government has demonstrated effective compliance with the findings and specific recommendations made by previous Committee decisions across all matters under supervision, on which we and other civil society organisations have closely engaged with the Committee and have made regular, detailed recommendations to support its work. These concerns are regrettably confirmed by the latest Action Plan and the failure on the part of the government to report on matters expressly requested by the Committee as regards reception and detention of asylum seekers. In addition, closure of supervision of matters pertaining to the asylum procedure refrained from assessing compliance with crucial outstanding aspects expressly highlighted in the Committee's earlier decisions, not least on access to the asylum process via an online platform chronically marred by dysfunctions and now indefinitely suspended.
3. Importantly, the closure of the **M.S.S. v. Greece / Rahimi v. Greece** group has created a notable disruption of the continuum in the Committee's supervision of longstanding structural issues around the asylum process, reception and detention of asylum seekers and a fragmentation of supervision across an array of separate groups of cases, not least **A.R. v. Greece**, **H.A. v. Greece**, **Muhammad v. Greece**, **T.K. v. Greece**⁶ and **M.Y. and Others v. Greece**.⁷ This piecemeal approach is liable to undermine the Committee's efforts to ensure thorough, holistic consideration of the protracted, structural nature of the issues at hand and of the inadequacy of general measures taken thus far by the Greek government to address them and to prevent re-emergence of similar violations.
4. The present Rule 9.2 submission provides updated information drawn from the implementation of new European Union (EU) rules governing asylum procedures, reception and detention of asylum seekers in Greece. These form part of EU legislation adopted in May 2024 e.g. the Asylum

¹ App No 59841/19, 18 April 2024.

² App No 4892/18, 13 June 2023.

³ App No 14606/20, 25 April 2024.

⁴ App No 30696/09, 21 January 2011.

⁵ DH-DD(2025)471. See also DH-DD(2023)903; DH-DD(2021)521; DH-DD(2020)723.

⁶ App No 16112/20, 18 January 2024.

⁷ App No 51980/19, 19 June 2025.

Procedures Regulation,⁸ the Screening Regulation⁹ and the new Reception Conditions Directive,¹⁰ as well as domestic implementing provisions adopted through L 5307/2026 and taking effect on 12 June 2026.¹¹ This submission also contains elements on the treatment of unaccompanied asylum-seeking children, relevant to the examination of the **M.Y. and Others v. Greece** and **T.K. v. Greece** cases.

⁸ Regulation (EU) 2024/1348 of the European Parliament and of the Council of 14 May 2024 establishing a common procedure for international protection in the Union [2024] OJ L 22.5.2024.

⁹ Regulation (EU) 2024/1356 of the European Parliament and of the Council of 14 May 2024 introducing the screening of third-country nationals at the external borders [2024] OJ L 22.5.2024.

¹⁰ Directive (EU) 2024/1346 of the European Parliament and of the Council of 14 May 2024 laying down standards for the reception of applicants for international protection [2024] OJ L 22.5.2024.

¹¹ Gov. Gazette A' 90/11.06.2026.

Access to the asylum process

5. Respect for Convention standards in relation to the treatment of asylum seekers is inextricably connected to the effectiveness of access to the asylum process. Under well-established EU and domestic law standards, “asylum seeker” or “applicant for international protection” status is acquired from the moment an application is “made”, i.e. the intention to lodge a claim for asylum is expressed before a responsible authority orally or in writing.¹² Said status grants individuals a right to remain on Greek territory and to reception conditions until a final decision is taken on their application.¹³
6. In addition to systemic, documented obstacles to access to the asylum process that were documented during the period under review,¹⁴ Greek asylum system faced collapse after the start of application of the new EU rules. Registration of asylum applications subject to the new legal framework was suspended due to an apparent lack of preparedness on the part of responsible services of the Ministry of Migration and Asylum, and newly arrived asylum seekers remained arbitrarily detained for protracted periods inside camps managed by its Reception and Identification Service (RIS). People present on Greek territory without prior apprehension at the border have no available avenues to access the asylum procedure, as discussed below. Through an unlawful practice followed by the Greek authorities, many appearing in person before responsible registration authorities to seek asylum are arbitrarily apprehended, detained, criminally prosecuted for “illegal stay” and issued deportation orders.

Absence of means of access to the procedure

7. As of 12 June 2026, Greece offers no means of access to international protection for asylum seekers who are present on its territory without having previously undergone screening. As a result of this, asylum seekers face not only denial of reception conditions but also potent risks of immigration detention and of prosecution, conviction and sentencing. Under Article 83 L 3386/2005, as amended by Article L 5226/2025, offences of “illegal entry” and “illegal stay” are punishable by a non-suspensive sentence of imprisonment of two years. Suspension is only granted upon agreement of the individual to immediately depart from the territory, in which case the person remains detained either in prison or in a pre-removal detention centre.¹⁵
8. **Discontinuation of the online platform for asylum registration appointments:** The Greek government has discontinued the operation of its online platform for appointments for registration

¹² Articles 2(13) and 26(1) Asylum Procedures Regulation; Articles 95(e) and 108 L 5307/2026.

¹³ Article 10(1) Asylum Procedures Regulation; Articles 2(6)-(7) and 19(1) Reception Conditions Directive; Articles 17(o) and (q) and 33(1) L 5307/2026.

¹⁴ DH-DD(2025)471. See also DH-DD(2023)903; DH-DD(2021)521; DH-DD(2020)723.

¹⁵ For a discussion of the provisions, see RSA et al., *The state of the rule of law in Greece today*, January 2026, paras 65-67, available [here](#). See also RSA, ‘Criminalisation of “illegal stay” in Greece puts almost 300 people behind bars’, 25 February 2026, available [here](#).

of initial applications before the RIS on the mainland and of subsequent applications before Asylum Service, without any official announcement or any alternative channels of access to the asylum process.¹⁶ It is therefore impossible for people already present on Greek territory to register an initial asylum application with the RIS or a subsequent application with the Asylum Service.

9. **Arbitrary arrest and prosecution of asylum seekers approaching registration camps:** Persons who spontaneously approach Reception and Identification Centres (RIC) to request asylum are not admitted by the RIS for screening and registration. On the contrary, the RIS has contacted police authorities in those cases, leading to the persons' arbitrary arrest, prosecution for "illegal stay" and pre-removal detention.
10. In one case represented by RSA, a single mother with two minor children arrived in Greece in early July 2026 unsuccessfully tried to book a registration appointment via the discontinued online platform. After appearing before RIC Malakasa with a copy of her appointment request and asking for asylum, she was told to leave the camp and threatened with police arrest. The RIS called the Hellenic Police and, despite reiterating their request for international protection and for family reunification in another EU country, the family was arrested, detained in a police station in squalid conditions, prosecuted for "illegal stay" and brought before the Misdemeanour Court of Athens, and subsequently detained in the Amygdaleza pre-removal detention centre. The Hellenic Police adopted a return decision against the family despite prior receipt of their asylum application. Following an appeal, the Hellenic Police released the family and transferred them to RIC Malakasa.
11. This is not an isolated incident. In similar cases known to RSA, two single mothers with minor children approached RIC Malakasa to request asylum were instructed to approach Hellenic Police authorities with a view to undergoing registration. Upon appearing at a police station, they were arrested, charged with "illegal stay" and brought before the Misdemeanour Court of Athens, and subsequently detained in Amygdaleza for several weeks before being transferred to RIC Malakasa to undergo registration.
12. **Protracted *de facto* detention of unregistered asylum seekers inside RIC and CCAC:** L 5307/2026 has maintained domestic provisions permitting *de facto* deprivation of liberty of asylum seekers inside RIC, CCAC and CTCR during screening and asylum procedures, through "restriction on freedom of movement" in the form of "prohibition on exit" ordered by the RIS.¹⁷ Asylum seekers who have been brought to RIC and CCAC from 12 June 2026 onwards have remained unregistered and *de facto* detained therein for over a month,¹⁸ despite the lapse of strict EU law deadlines for screening (7 days at the border, 3 days on the territory) and registration of asylum applications (5 days after screening).¹⁹ These asylum seekers have not been provided with any

¹⁶ RSA et al., 'Απουσία πρόσβασης στη διαδικασία ασύλου μετά την έναρξη ισχύος του Ν 5307/2026', β/213/08.07.2026, 8 July 2026, available [here](#).

¹⁷ Articles 5(1)(a) and 23(2) L 5307/2026.

¹⁸ Contrary to the view expressed in DH-DD(2026)812, para 14.

¹⁹ Article 8 Screening Regulation. The asylum application must be registered within 5 days from the completion of screening; Article 27(1) Asylum Procedures Regulation.

documentation or any decision or information on the reasons for their deprivation of liberty.²⁰ Requests to the RIS for information on the legal status of these persons and on the expected date of registration of their claims have not been met with a reply.

- ❖ In one case represented by RSA in CCAC Lesvos, a couple remained in *de facto* detention unregistered inside the camp from 12 June 2026 to 10 July 2026. The applicants' requests for information on their legal status and on the completion of their proceedings remained unanswered throughout that period. After they lodged objections against their detention before the Administrative Court of Mytilene on 9 July 2026, the applicants were screened and had their asylum claims registered on 10 July 2026, nearly a month after their entry into the RIC.
- ❖ In another case represented by RSA in RIC Malakasa, a woman from South Sudan has remained *de facto* detained inside the camp since 17 June 2026 without any documentation or detention order. Repeated written requests for information on her legal status and the expected completion of her screening and registration have remained unanswered by the RIS. The woman's asylum application was registered no later than 15 July 2026, nearly a month after her entry into the RIC.

13. In addition, asylum seekers *de facto* detained inside RIC and CCAC who lack an asylum seeker card continue to be denied the opportunity to authorise a legal representative pursuant to the formalities required by Greek law, even though these persons have already had their personal details declared and have been assigned a six-digit Asylum Case Number.²¹ This deficient practice is a recurring issue of concern²² and bears impact on asylum seekers' access to an effective domestic remedy for complaints regarding reception conditions, discussed below. It also affects their access to domestic remedies against deprivation of liberty, the latter considered under the Committee's ongoing supervision of execution of the **M.D. v. Greece** group.²³

Asylum bans

14. The **M.Y. and Others v. Greece** ruling of the Court found a violation of Article 3 of the Convention *inter alia* in respect of unaccompanied children for which "access to asylum procedure had not been available".²⁴ The Court's judgment includes at least one case of asylum seekers forbidden from applying for asylum under a one-month 'asylum ban' enacted in March 2020 for people arriving from Türkiye to Greece: **R.H. & R.A. v. Greece**.²⁵

²⁰ RSA et al., 'Απουσία πρόσβασης στη διαδικασία ασύλου μετά την έναρξη ισχύος του Ν 5307/2026', β/213/08.07.2026, 8 July 2026. See also News 24/7, 'Μεταναστευτικό: "Πάγωσε" η διαδικασία για αιτήματα ασύλου', 8 July 2026, available [here](#).

²¹ The RIS refuses to certify the signature of persons detained inside its premises who lack an asylum seeker card, contrary to Article 11(1) L 2690/1999 and Article 96(6) L 5307/2026.

²² Note the pending case of **S.A. and Others v. Greece** App No 34380/24. See also DH-DD(2025)471, para 6; Greek Ombudsman, *Annual Report 2025*, March 2026, 64-65, available [here](#).

²³ App No 60622/11, 13 November 2014. Note in particular DH-DD(2024)1235; DH-DD(2024)1329.

²⁴ **M.Y. and Others v. Greece** App No 51980/19, 19 June 2025, para 15.

²⁵ **R.H. & R.A. v. Greece** App No 15463/20, 19 June 2025.

15. Greece introduced a similar asylum ban in July 2025 for a period of three months, against the backdrop of continued arrivals from Libya and of absent reception infrastructure on Crete and Gavdos, as discussed below. Under Article 79 L 5218/2025, persons arriving from North Africa to Greece by boat were prohibited from applying for asylum and were subject to immediate deportation proceedings, without registration. This was a striking, direct breach of Greece's international, EU and domestic law obligations, denounced by Council of Europe bodies among other institutions.²⁶
16. In August 2025, the European Court of Human Rights granted interim measures under Rule 39 of the Rules of Court in two separate groups of pending cases – **H.A.H. and Others v. Greece** and **M.T. and Others v. Greece** – concerning asylum seekers facing imminent risk of *refoulement* due to the application of said asylum ban.²⁷ Following the first Rule 39 decision, the responsible Minister publicly attacked the civil society organisations legally representing the applicants before the Court,²⁸ leading to sharp criticism and concern from Council of Europe, United Nations and domestic bodies.²⁹ Similar interim relief decisions were delivered by domestic administrative courts in other cases.³⁰ We note with concern that the Action Plan discusses “management in periods of enhanced arrivals” with an express focus on the second half of 2025 without mention of the aforementioned measures.³¹

²⁶ For instance, Council of Europe Commissioner for Human Rights, ‘The Commissioner urges the Greek parliament to refrain from suspending the registration of asylum applications’, 10 July 2025, available [here](#).

²⁷ Pending cases of **H.A.H. and Others v. Greece** App No 24897/25 and **M.T. and Others v. Greece** App No 26680/25: RSA, ‘European Court of Human Rights blocks deportation of refugees detained by Greece under unlawful asylum suspension’, 18 August 2025, available [here](#); ‘New ECtHR decision: Greece prohibited from deporting refugees before they have had access to asylum procedure’, 2 September 2025, available [here](#).

²⁸ Ministry of Migration and Asylum, ‘Θ. Πλεύρης στην EPT: «Είναι σεβαστή η θέση των ΜΚΟ, αλλά αδιάφορη για το ΥΜΑ»’, 20 August 2025, available [here](#); ERT, ‘Θ. Πλεύρης στο EPTNews: Κυρώσεις για όποιον δεν σέβεται τις αποφάσεις της Πολιτείας για το Μεταναστευτικό – Διαχειριστικός έλεγχος για ΜΚΟ’, 20 August 2025, available [here](#).

²⁹ Council of Europe Conference of INGOs, ‘CINGO President and Expert Council react to recent statements by Greece’s Minister of Migration and Asylum’, 5 September 2025, available [here](#); UN Special Rapporteurs on human rights defenders, on the freedom of peaceful assembly and of association, and on the human rights of migrants, AL GRC 2/2025, 16 September 2025, available [here](#); Plenary of Greek Bar Associations, ‘Συνάντηση αντιπροσωπείας της Ολομέλειας με τον Υπουργό και την Υφυπουργό Μετανάστευσης και Ασύλου’, 27 August 2025, available [here](#); UNHCR & Greek National Commission for Human Rights, ‘UNHCR and GNCHR express concern over rhetoric undermining civil society’, 28 August 2025, available [here](#).

³⁰ Administrative Court of Piraeus, NΔ152/2025, 24 October 2025; NΔ183/2025, 6 November 2025, NΔ184/2025, 6 November 2025; NΔ198/2025, 17 November 2025, available [here](#).

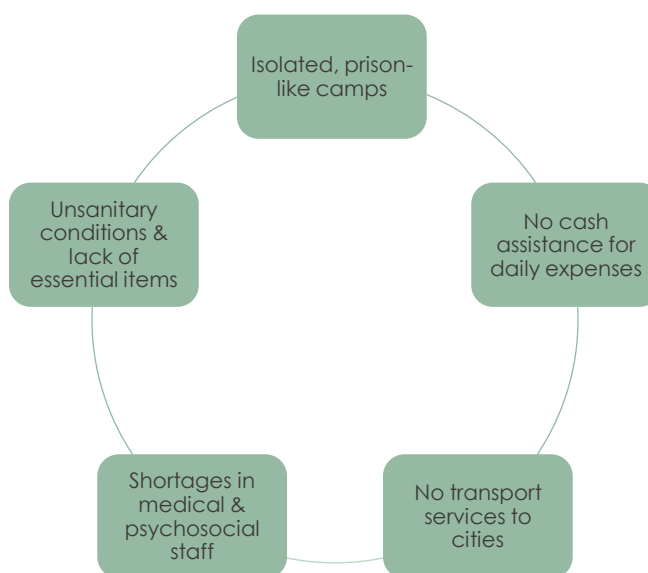
³¹ DH-DD(2026)812, para 36.

Living conditions for asylum seekers

17. Reception conditions granted to asylum seekers throughout their asylum procedure pursuant to the Reception Conditions Directive include housing, clothing, food, health care, education, employment and language courses.³² In Greece, encampment in the three Reception and Identification Centres (RIC), five Closed Controlled Access Centres (CCAC) and 22 Controlled Temporary Reception Facilities for asylum seekers (CTRC) managed by the RIS is the only form of accommodation offered to asylum-seeking adults and families with children.

Quality of services in camps on the Aegean islands & mainland

18. We reiterate that camps on both the Greek mainland and islands are prison-like facilities marred by insufficient staffing, complete absence of cash assistance to asylum seekers, poor connection of isolated facilities to urban services, and unsanitary conditions and lack of essential non-food items.³³ These are chronic deficiencies, systematically highlighted by EU institutions and agencies such as the Directorate-General for Migration and Home Affairs (DG HOME) of the European Commission, the European Union Agency for Asylum (EUAA) and the European Union Agency for Fundamental Rights (FRA).³⁴ We draw again the attention of the Committee to the accumulated effects of those systemic deficiencies as treatment that may in certain circumstances reach the threshold of Article 3 of the Convention.



³² Articles 30-36 L 5307/2026.

³³ DH-DD(2025)471, paras 39 et seq.

³⁴ Not least at a time of increased pressure for returns of asylum seekers to Greece: European Commission, *Assessment pursuant to Article 4 of Commission Implementing Decision (EU) 2025/2323*, COM(2026) 387, 15 July 2026, 3-5.

19. There has still been no fundamental rights impact assessment of the CCAC by the European Commission, or by the Greek authorities, three years after the European Ombudsman recommended such an assessment and periodic reviews thereof.³⁵
20. **Complete absence of cash assistance for 16 months:** Cash assistance is a monthly financial allowance for daily expenses, forming an indispensable part of material reception conditions offered to asylum seekers.³⁶ Yet, not a single one of the asylum seekers entering the Greek reception system has received cash assistance for the past sixteen months. The EU-funded programme implemented by the RIS came to an end in March 2025 and has not been reinstated since,³⁷ while the Greek government has conceded to the European Commission that there is “no solution in sight regarding cash assistance”.³⁸
21. There do not appear to be effective domestic judicial avenues to allow asylum seekers to recover outstanding payments, often entailing several months of arrears. In one case recently represented by RSA under Article 42 L 5307/2026, an asylum seeker's objections regarding arrears in disbursement of cash assistance instalments from July 2025 to June 2026 were dismissed by the Administrative Court of Kavala on the ground that the applicant was no longer residing in a RIS camp as of mid-June 2026.³⁹
22. **Unsanitary conditions & lack of essential items:** Camps on both the islands and the mainland suffer from systematic maintenance and sanitary issues, as well as shortages in non-food items such as hygiene kits, blankets, mattresses etc. These flaws are consistently highlighted by an array of authorities e.g. EU institutions and agencies in reports that dispute the views expressed in the Action Plan of the Greek government.⁴⁰ For example, European Commission recently stressed that “RIS continues to face persistent shortages of basic materials like paper and ink, and chronic [non-food items] gaps remain a major issue across sites... with recurring shortages in clothing, hygiene products, beds, mattresses and now winter items such as sleeping bags and blankets. Although the Ministry occasionally provides supplies, they are often insufficient and gaps become particularly visible during periods of higher arrivals.”⁴¹ Indicative examples of recent findings from EU bodies in selected camps are reproduced below:

³⁵ European 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 [here](#).

³⁶ Article 17(q) L 5307/2026. See also CJEU, C-621/24 *Landkreis Schweinfurt*, 4 June 2026, paras 62-63.

³⁷ Ministry of Migration and Asylum, Reply to parliamentary question, 128128/2026, 8 July 2026, available [here](#); 24237/2026, 6 February 2026, available [here](#).

³⁸ European Commission, ‘Meeting DG Gminder / Greek Minister for Migration and Asylum’, Ares(2025)357776, 2 October 2025.

³⁹ Administrative Court of Kavala, AP418/2026, 10 July 2026.

⁴⁰ DH-DD(2026)812, paras 15-19.

⁴¹ European Commission, *Bi-weekly update on the migratory situation in Greece (islands and mainland)* 18/12/2025, Ares(2025)11350035, 18 December 2025.

Camp	EU body	Date	Finding
Malakasa	EUAA EUAA	19 Mar 2026 23 Oct 2025	"Lack of hygiene products in Malakasa."⁴² "RIC Malakasa continued to face increased registration backlogs and strained operational efficiency, as the RIC consistently operated above its reduced functional capacity... while unrepaired container damages, interpretation shortages, (which during July worsened by the termination of contract between Metadrasis and RIS) and strained identification capacity by the Hellenic Police remained challenges during the reported period. The factors resulted in intensified systemic pressure as overcrowding and processing delays compounded reception challenges."⁴³
Lesvos	DG HOME DG HOME	18 Dec 2025 19 Nov 2025	"RIC Mavrovouni's WASH system has long faced hot water shortages."⁴⁴ "Lack of clothing, footwear, linen, sleeping bags is problematic in view of colder temperatures. Actors provided some items but general stock remains lacking."⁴⁵
Chios	DG HOME DG HOME	18 Dec 2025 19 Nov 2025	"Accommodation and WASH facilities on Chios are generally operational, but repairs continue to be slow. Building maintenance remains slow, partly due to municipal responsibilities... The cockroach issue is partly resolved through container repairs and a local technician's intervention."⁴⁶ "The [non-food item] situation remains challenging... Stocks of hygiene items, sleeping bags and duvets are very limited and may be exhausted by end November if arrivals continue. Clothing supplies are nearly depleted, with RIS staff covering some gaps through private donations. Diapers and baby kits remain available, but there are no blankets in stock and fewer than ten waterproof items left.... WASH facilities are often in a bad state. Repairs are ongoing but progress slowly due to lack of technicians on the island."⁴⁷
Samos	DG HOME DG HOME DG HOME	18 Dec 2025 3 Dec 2025 19 Nov 2025	"With colder temperatures approaching, the reparation of heating and hot water issues should be prioritized. Requests to repair the heating pump have been pending with the Ministry for almost two years... The Hippocrates coordinator will leave by the end of the year with no replacement announced so far."⁴⁸ "The water, hygiene issues, and staff shortages challenge service delivery... There is a water cut for a few hours in the afternoon as well as during the nighttime. Water restrictions are affecting personal hygiene and laundry services."⁴⁹ "Several sectors in the camp have been affected by a lack of hot water over prolonged periods... With colder weather approaching, the lack of mattresses and blankets for new arrivals is concerning... Littering is a problem around the camp and in town affecting the relationship with the local residents... Following systematic efforts by Hippocrates doctors and staff, scabies is no longer a general issue for the population... Main issues raised by local NGOs concern the lack of [non-food items] for winterization..."⁵⁰

⁴² EUAA, *EL-AS-1.2 Field Asylum Report Malakasa*, 19 March 2026.

⁴³ EUAA, *EL Operational Plan 2025 Quarterly Measure-based Report – EL-REC-2: Reception*, 23 October 2025, 8.

⁴⁴ European Commission, *Bi-weekly update on the migratory situation in Greece (islands and mainland)* 18/12/2025, Ares(2025)11350035, 18 December 2025.

⁴⁵ European Commission, *Bi-weekly update on the migratory situation in Greece (islands and mainland)* 19/11/2025, Ares(2025)10019283, 19 November 2025.

⁴⁶ European Commission, *Bi-weekly update on the migratory situation in Greece (islands and mainland)* 18/12/2025, Ares(2025)11350035, 18 December 2025.

⁴⁷ European Commission, *Bi-weekly update on the migratory situation in Greece (islands and mainland)* 19/11/2025, Ares(2025)10019283, 19 November 2025.

⁴⁸ European Commission, *Bi-weekly update on the migratory situation in Greece (islands and mainland)* 18/12/2025, Ares(2025)11350035, 18 December 2025.

⁴⁹ European Commission, *Bi-weekly update on the migratory situation in Greece (islands and mainland)* 03/12/2025, Ares(2025)10656910, 3 December 2025.

⁵⁰ European Commission, *Bi-weekly update on the migratory situation in Greece (islands and mainland)* 19/11/2025, Ares(2025)10019283, 19 November 2025.

	FRA	2 Sep 2025	"The main point FRA observed concerns hygiene conditions. There had been scabies outbreaks earlier this year . Although access to running water has improved (now there is running water in the morning and for 3-4 hours in the evening), this remains an issue. Some of the systemic concerns observed in other facilities appear to create more hardships on Samos. Repair works – including of simple things, like replacing a light bulb – take weeks. "
Leros	DG HOME	18 Dec 2025	"Facilities (both accommodation and WASH installations) are damaged, in particular the [unaccompanied minors] safe zone . Repairs are happening at a very slow pace. The boiler in one sector was recently fixed. With temperatures dropping, the continuous lack of blankets is concerning... The only Hippocrates doctor left a week ago with no replacement announced so far." ⁵¹
	DG HOME	3 Dec 2025	"The safe area for [unaccompanied children] is severely damaged and minors are accommodated in common areas. " ⁵²
	DG HOME	19 Nov 2025	"The only concerning shortage is in regard to men's clothing and blankets where RIS is awaiting the delivery of orders placed months ago... There are complaints about the quantity and quality of the food, especially for the minors in the safe zone with no option to buy additional food elsewhere." ⁵³
Kos	DG HOME	18 Dec 2025	"RIS should use low occupancy rate to progress on necessary works. Continuous shortages of [non-food items] such as blankets and sleeping bags are affecting winter preparedness." ⁵⁴
	FRA	4 Sep 2025	" Large parts of the centre in Kos are not usable. This did not create a major issue when we visited (except for unaccompanied children in the safe areas in Kos and Leros), as the centres were operating well below their capacity. That being said, many used housing units had water leakages and damages on the floor. In Kos, the absence of shading significantly limits the use of open spaces by the residents of the camp during the summer months and affects working conditions for staff." ⁵⁵

23. **Chronic gaps in health & psychosocial care:** A total of 58 doctors were deployed throughout the RIS camps at the end of 2025. Doctors and other medical staff profiles are deployed in camps under the EU-funded "Hippocrates" programme. This number corresponds to one doctor per 390 people, given the total number of 22,622 residents at the end of 2025. However, the rate of doctors to residents is significantly lower in the largest RIS camps that hosted over 1,000 people at the time. The distribution of medical personnel in those camps was as follows:⁵⁶

Health care personnel in the largest RIS camps: 31 Dec 2025							
Camp	Residents	Vulnerable	Doctors	Nurses	Midwives	Psychologists	Social workers
Malakasa	2,250	591	2	2	2	3	3
Samos	1,783	348	2	2	1	2	1
Kos	1,738	153	1	2	-	2	-
Koutsochero	1,535	325	3	2	-	2	3
Ritsona	1,400	390	2	1	1	1	1
Leros	1,363	207	-	6	2	2	1

⁵¹ European Commission, *Bi-weekly update on the migratory situation in Greece (islands and mainland)* 18/12/2025, Ares(2025)11350035, 18 December 2025.

⁵² European Commission, *Bi-weekly update on the migratory situation in Greece (islands and mainland)* 03/12/2025, Ares(2025)10656910, 3 December 2025.

⁵³ European Commission, *Bi-weekly update on the migratory situation in Greece (islands and mainland)* 19/11/2025, Ares(2025)10019283, 19 November 2025.

⁵⁴ European Commission, *Bi-weekly update on the migratory situation in Greece (islands and mainland)* 18/12/2025, Ares(2025)11350035, 18 December 2025.

⁵⁵ FRA, 'Greece No. 4 – Kos and Leros', Ares(2025)9429523, 4 September 2025.

⁵⁶ RSA, *Statistics on reception & refugee camps in Greece 2025*, March 2026, available [here](#).

Lesvos	1,168	608	2	6	2	2	1
Polykastro	1,124	324	2	2	1	2	3

Source: Ministry of Migration and Asylum, Reply to parliamentary question, 6 Feb 2026, [here](#)

24. At least five camps had no doctor at all at the end of 2025: Leros, Filippiada, Veria, Kylini and Pyrgos.⁵⁷
25. **Absence of transportation services to cities:** The majority of camps are located at a great distance from urban centres. This exacerbates difficulties faced by asylum seekers in accessing goods and services, particularly in light of the complete halt of cash assistance for daily expenses from March 2025 to present. It also hampers asylum seekers' ability to attend mandatory appointments such as asylum interviews before Asylum Service offices, often located several hundreds of kilometres away from their camp of residence.⁵⁸
26. **Restrictions on access of civil society:** Greek law conditions access to camps to prior registration of civil society organisations and of their staff, partners and volunteers on the NGO Registry and NGO Members Registry of the Ministry of Migration and Asylum, and to prior authorisation from the RIS.⁵⁹ The Greek legislative framework on said registries has been consistently criticised *inter alia* by Council of Europe bodies as contrary to Article 11 of the Convention.⁶⁰
27. In addition, even registered organisations face frequent obstruction of access to RIC, CCAC and CTRC that hamper their activities and asylum seekers' access to advice and support. The European Commission has stressed "recent instructions limiting access to officially registered organisations"⁶¹ and highlighted in particular that "MSF medical team faces problems with accessing the camp to run the clinic" in CCAC Samos, that "access to camp for NGOs" is an issue in CCAC Kos.⁶² These findings corroborate observations made by civil society organisations on obstruction of access to RIS camps.⁶³
28. Drawing on the accumulation of consistently documented deficiencies in the Greek reception system, we highlight that the abundant and steadily increasing case law of the Court on the reception conditions of asylum seekers in Greece remains pertinent to the RIC, CCAC and CTRC currently operating in the country.

⁵⁷ *Ibid.*

⁵⁸ For example, CTRC Koutsochero, 'Απάντηση σε αίτημα κάλυψης κόστους μετακίνησης διαμένοντα στην ΕΔΠΦΑΑ Κουτσόχερου για τη διενέργεια συνέντευξης', 234184/2025, 5 December 2025, stating that the RIS is not in a position to cover transport costs from CTRC Koutsochero to Athens for attendance of a personal interview at the Autonomous Asylum Unit for Vulnerable Groups of the Asylum Service.

⁵⁹ Articles 13(2) and 113(2) L 5307/2026.

⁶⁰ For recent positions, see Expert Council on NGO Law, 'Presidents of CINGO and its Expert Council reiterate concerns about Greece's NGO registration and Ministerial Decision No. 82876 of 8 May 2026', 23 June 2026, available [here](#); *Opinion on the Law of Greece "Law on Promotion of Legal Migration Policies"*, CONF/EXP(2026)3, 18 March 2026, available [here](#).

⁶¹ European Commission, *Bi-weekly update on the migratory situation in Greece (islands and mainland)* 18/12/2025, Ares(2025)11350035, 18 December 2025.

⁶² European Commission, *Bi-weekly update on the migratory situation in Greece (islands and mainland)* 19/11/2025, Ares(2025)10019283, 19 November 2025.

⁶³ RSA et al., *The state of the rule of law in Greece today*, January 2026, para 247.

Absence of reception conditions on Crete

29. Greece still has no adequate facilities for reception of asylum seekers on the islands of Crete and Gavdos that have been an established point of entry in the last three years. 33,900 people have arrived from Libya to Crete and Gavdos from 1 January 2024 to 30 June 2026.⁶⁴
30. Government plans for the creation of two camps on Crete continue to face uncertainty and postponements. In Chania, the government started works in 2026 to convert the former exhibition centre of Agyia into a RIS camp. The status of the facility remains unclear: the Ministry of Migration and Asylum initially described it as a reception and identification “facility” (δομή) but subsequently issued a corrigendum referring to a “temporary facility” (προσωρινή δομή). Municipal authorities confirm that Agyia remains a temporary accommodation place. As of the end of June 2026, the camp had yet to be fully staffed. As for Heraklion, discussions on the location of a prospective RIS camp remain in stalemate.
31. In the meantime, asylum seekers arriving on Greek soil via Libya continue to face inhuman living conditions due to the absence of adapted accommodation places. In Heraklion, for example, the “Old Fridge” (Παλιό Ψυγείο) on the port is still used for temporary accommodation of arrivals. The site hosts up to 80 people sleeping on the floor, on cardboard boxes, blankets and thin mattresses. More than 450 people were held there in early June 2026, and many had to sleep outside. There is no shower or sink and there is no ventilation system. In Rethymno, people are brought to the old Port Authority building and remain there for two to three days before being transferred out of Crete. The site has capacity for up to 120 people but has no shower and no beds, only mattresses and blankets. In Ierapetra, people are brought to an old school in Kalogeroi.⁶⁵

Reception of vulnerable asylum seekers

32. The Greek reception system still offers no alternatives to encampment even for adult asylum seekers and families with acute vulnerabilities. We are still not aware of any differentiation in the living conditions afforded in camps to asylum seekers in camps deemed vulnerable by the RIS to the aforementioned general conditions and services offered to the remainder of the population, nor has the Action Plan provided specific information in that regard.⁶⁶

⁶⁴ RSA, ‘Crete - Gavdos: 8,552 refugee arrivals in the first half of 2026 - The issue of safe accommodation remains unresolved’, 16 July 2026, available [here](#); ‘Crete – Gavdos 2025: Fourfold increase in refugee arrivals and absence of state planning’, 17 February 2026, available [here](#); ‘Crete – Gavdos: Sixfold increase in refugee arrivals in 2024 – Lack of organised first reception and accommodation infrastructure’, 30 January 2025, available [here](#).

⁶⁵ RSA, ‘Crete - Gavdos: 8,552 refugee arrivals in the first half of 2026 - The issue of safe accommodation remains unresolved’, 16 July 2026.

⁶⁶ Regrettably, no specific information is provided to detail the meaning of “an appropriate structure in the mainland” in DH-DD(2026)812, para 33.

33. By way of illustration, a woman who survived a deadly incident involving a Hellenic Coast Guard operation near the island of Chios in February 2026,⁶⁷ suffered a serious injury and stillbirth and was hospitalised for three months on the island, was transferred to CTRC Schisto. The woman requires specialised rehabilitation for mobility issues and medical treatment for sustained head injuries. In CTRC Schisto, the woman is accommodated in a container with her husband and two minor children, as the RIS has not secured appropriate housing e.g. an apartment and no places are available in a rehabilitation centre. The entire family, represented by RSA, requires special reception conditions as they have survived a deadly incident at sea that resulted in the loss of the family's 12-year-old child, serious injury of the woman and loss of her unborn child, as well as injuries of the father and of the 14-year-old girl. The woman frequently travels an hour's journey to attend her treatments. There is no child psychologist available for the girl. The family has not received any cash assistance throughout their stay in Greece.
34. The Greek government has not made any progress on delivery of a long-anticipated "Stirixsis" programme aimed at restoring 500 accommodation places in apartments for vulnerable applicants, more than three years since its assurances to that effect.⁶⁸ No information is provided in that respect in the latest Action Plan.
35. As regards the specific situation of unaccompanied asylum-seeking children, current legislation and practice create potent risks of backsliding in the efforts to execute the Court's case law in **M.Y. and Others v. Greece** and **T.K. v. Greece**. We draw the attention of the Committee to three issues of concern: expansion of detention in camps; disinvestment from child protection measures and alternatives to camps; and flawed new rules on age assessment.
36. **Expanded detention of unaccompanied children in unsuitable conditions in "safe zones" of camps:** Unaccompanied children continue to be held in "safe zones" of RIC, CCAC and CTRC. We recall that stay inside "safe zones" amounts to arbitrary *de facto* detention, as children are forbidden from exiting the area against their will and for reasons beyond their control e.g. where supervising staff are not available.⁶⁹
37. Conditions of *de facto* detention in safe zones are wholly unsuitable for children, as confirmed by recent findings of EU institutions, as well as case law of Greek administrative and criminal courts:
- ❖ The European Commission noted in November 2025 that "All main accommodation units remain severely damaged, infested and unusable, technically rendering the capacity of the safe zone to zero" in CCAC Leros, adding that "One of the main concerns remains regarding the quantity of food, as minors have no possibility to get extra food from outside the camp." As for the "safe zone" of CCAC Kos, the European Commission stated that "Due to the damaged accommodation units, minors are sleeping in the lesser damaged common rooms" and that "Minors complain about the quantity of food which is distributed

⁶⁷ For more information, DH-DD(2026)315.

⁶⁸ DH-DD(2023)903, para 43.

⁶⁹ For recent case law, see Administrative Court of Rhodes, AP88/2025, 3 September 2025, AP63/2025, 24 July 2025; AP61/2025, 14 July 2025, available [here](#).

once a day. Zevxis can no longer provide minors with extra snacks out of financial reasons.”⁷⁰

- ❖ As for the “safe zone” of RIC Malakasa, the Judicial Misdemeanour Council of Crete (Συμβούλιο Πλημμελειοδικών Κρήτης) held in July 2025 in respect of a detained unaccompanied child that “... the provision of personal hygiene items and clothing is absolutely limited. He has only been given an additional shirt and pair of trousers and no underwear. As a result, it is very difficult for him to stay clean in those conditions. In addition, the container in which he has been placed is in a state of poor maintenance and hygiene, it is dirty and the bathroom is broken, while stay therein borders on inhuman in light of weather conditions. His access to a doctor occurred only once... as for his education, this is non-existent and no adequate activity for his age is provided. As a result, he has absolutely nothing to occupy himself with throughout the whole day. In light of the above, it is clear that the RIC space is absolutely unsuitable for accommodation of children...”⁷¹

38. The recent adoption of L 5307/2026 substantially exacerbates the risk of accommodation of unaccompanied children under such conditions. Since the reform, Greek law expressly permits placement of unaccompanied children in “safe zones” within CCAC or CTRC,⁷² as well as accommodation of unaccompanied children over the age of 16 in facilities accommodating adults.⁷³ Unaccompanied children subject to the accelerated and border procedures shall be placed in “safe zones” of CCAC and CTRC and are excluded from semi-independent living.⁷⁴
39. Worryingly, Greek law now expressly permits detention of children “when they are unaccompanied minors and detention safeguards their protection”.⁷⁵ The provision is akin to the domestic rule of “protective custody” abolished in 2020.
40. The aforementioned expansion of encampment of unaccompanied children inside RIC, CCAC and CTRC is coupled with efforts at **disinvestment from child protection measures and from alternatives to camps** for the population of unaccompanied children. In May 2026, civil society organisations expressed alarm at “serious shrinking” of the protective framework elaborated over previous years, through (i) closure of emergency shelters for unaccompanied children, (ii) gradual phase-out of semi-independent living (SIL) in apartments for unaccompanied children over the age of 16, (iii) suspension of Child Protection Units of the National Emergency Referral Mechanism (NERM) partner in Athens due to non-renewal of its contract and to serious arrears in payments from the Ministry of Migration and Asylum.⁷⁶

⁷⁰ European Commission, *DG HOME Mission Report: Kos and Leros, 10-14 November 2025*, Ares(2026)1721911.

⁷¹ Judicial Misdemeanour Court of Crete, 349/2025, 25 July 2025, available [here](#).

⁷² Articles 40(9), 78(1) and 82(1) L 5307/2026.

⁷³ Article 40(9) L 5307/2026.

⁷⁴ Article 78(4) L 5307/2026.

⁷⁵ Article 27(2)(b) L 5307/2026.

⁷⁶ GCR et al., ‘Κοινή Δήλωση Δικτύου Συνηγορίας για τα Δικαιώματα του Παιδιού’, 21 May 2026, available [here](#). On the government’s intention to phase out SIL, see also European Commission, ‘Meeting with Deputy Minister Voloudaki 24/11/2025’, Ares(2026)358424, 26 November 2025.

41. **Flawed legal framework on age assessment:** Secondary legislation on age assessment of unaccompanied asylum-seeking children was revised in August 2025.⁷⁷ JMD 147627/2025 presents a number of elements contrary to the Convention and to the Asylum Procedures Regulation since it: (i) states that all stages of age assessment (macroscopic, psychosocial, X-ray examination) shall take place cumulatively on the same day without succession from least to most intrusive, and that the medical examination has primacy over other methods; (ii) establishes a presumption of majority where the asylum seeker refuses the medical examination; (iii) limits the presumption of minority during the age assessment process to persons “registered as minors”, thus excluding asylum seekers wrongly registered as adults.
42. The European Commission has expressly stressed to the Greek government “that the Joint Ministerial Decision of 8 August 2025 is not compatible with the Pact which aims at minimizing the use of intrusive medical examinations...”⁷⁸ The legal framework in question is pending judicial review before the Council of State.⁷⁹ The hearing has been set for 1 December 2026 following multiple *ex officio* postponements by the Council of State.

Remedies in relation to reception conditions

43. **Objections before administrative courts:** The introduction through Article 42 L 5307/2026 of the objections remedy in the area of reception conditions is a positive reform in principle. Yet, several safeguards crucial to the accessibility and effectiveness of the remedy have regrettably been disregarded despite prompt, detailed recommendations ahead of the adoption of the bill.⁸⁰ As regards the accessibility of the remedy:

- ❖ For objections relating to non-provision of deficient provision of material reception conditions in particular, objections are conditioned on prior submission of a request for material reception conditions (*αίτηση αποκατάστασης υλικών συνθηκών υποδοχής*) to the manager of the applicant's camp of residence.⁸¹ Said application can only be lodged once (*άπαξ*) and must be decided upon within five days, failing which it is deemed to be tacitly rejected. The provision does not make any arrangements to ensure that asylum seekers are effectively able to submit such a request to the RIS without wielding the Greek language or even without being literate. In addition, no provision is made for asylum seekers who may not be accommodated in a RIS camp and whose objections may concern that very issue.

⁷⁷ JMD 147627/2025, Gov. Gazette B' 4581/22.08.2025.

⁷⁸ European Commission, 'Meeting with Deputy Minister Voloudaki 24/11/2025', Ares(2026)358424, 26 November 2025.

⁷⁹ Council of State, E2969/2025, lodged on 14 November 2025. Note that the Greek government has public statements against the civil society organisation representing the application: Hellenic Parliament, *Επεξεργασία και εξέταση του σχεδίου νόμου του Υπουργείου Μετανάστευσης και Ασύλου «Προώθηση πολιτικών νόμιμης μετανάστευσης*, 27 January 2026, available [here](#).

⁸⁰ Comments on the provision submitted in the public consultation of the bill available [here](#).

⁸¹ Article 33(3) L 5307/2026.

- ❖ The remedy is subject to an extremely short deadline of five days, including in the case of challenge against deprivation of liberty ordered in the form of “prohibition of exit” from RIC, CCAC or CTCR.⁸² For objections relating to non-provision or deficient provision of material reception conditions, the five-day deadline runs from the moment of explicit or tacit rejection of the prior request to the RIS. This rule casts significant uncertainty into the process, given the high likelihood of such requests going unanswered in the short period of five days allotted by the law. It means that asylum seekers must be aware of the exact moment their request has been tacitly rejected by the RIS so as to meet the strict five-day deadline to lodge their objections before the administrative court.
- ❖ Access to legal aid is not practically feasible for people wishing to avail themselves of the remedy. Article 42(4) L 5307/2026 makes a general reference to the general legal aid framework of L 3226/2004 without laying down any measures to render it accessible to asylum seekers in view of their specific circumstances. Accordingly, asylum seekers – who may have recently arrived in Greece, may be detained in RIS camps and may still be unregistered – must be in a position to (i) draft a legal aid application in Greek, (ii) collect official documentation in Greek to attest their lack of resources, and (iii) physically access the territorially competent administrative court to submit the legal aid application in person,⁸³ all the while complying with the obligation to lodge their objections before the court within the five-day deadline.

44. We recall that the Committee has raised similar concerns in relation to the lack of accessibility of objections against detention in the context of the **M.D. v. Greece** group and point to similar observations raised in our respective contributions thereon.

45. Furthermore, the requirement of immediate proof (*παραχρήμα απόδειξη*) of the applicant's submissions on non-provision or deficient provision of material reception condition sets too onerous a standard of proof in the objections procedure, given that necessary documentation to demonstrate the asylum seeker's claims may be precisely owed to the state's failure to afford the appropriate reception conditions e.g. delays in provision of health care resulting in lack of medical documentation, inappropriate accommodation due to delays in age assessment etc. These matters come directly within the scope of cases such as **E.F. v. Greece** and **T.K. v. Greece** and are thus of central importance to the effectiveness of the domestic remedy in question.

46. **Complaint before the Fundamental Rights Officer of the Ministry of Migration and Asylum:** We echo the Committee's view that the Fundamental Rights Officer (FRO) established under the Ministry of Migration and Asylum pursuant to Article 49 L 4960/2022 does not constitute a domestic remedy in the meaning of the Convention.

47. According to Article 49(1) L 4960/2022, the FRO is required to transmit admissible complaints of human rights breaches in reception and asylum procedures to the National Transparency Authority (*Εθνική Αρχή Διαφάνειας*, NTA) or to “the responsible bodies”. However, the

⁸² Articles 23(2) and 42(1) L 5307/2026.

⁸³ The competent court may be located hundreds of kilometres away or even on a different island to the asylum seeker's place of stay or detention.

overwhelming majority of complaints against Ministry of Migration and Asylum services deemed admissible by the FRO have been transmitted for processing to services within that same Ministry, corresponding to the alleged actors responsible for human rights breaches or to their hierarchy. The FRO has no set criteria or guidelines to decide which authority is competent for deciding on a complaint.⁸⁴

48. In addition, the transmission of admissible complaints by the FRO to Ministry of Migration and Asylum services and communication of their reply to the complainant appears to mark the closure of the case without any further involvement of the FRO. The FRO does not reach any conclusion on the existence or not of a human rights violation, does not carry out any assessment of the authorities' response to the complaint on points of fact or law, and does not issue recommendations to ensure that similar violations are not repeated.⁸⁵ In our experience, this has consistently been the approach followed by the FRO in all four complaints represented by RSA in relation to human rights violations in the area of reception conditions and asylum procedures:

Complaint	Admissibility & referral	Outcome
Date & Topic	Date & Referral to authority	Date & Reply
27 Oct 2023 – Complaint against the RIS for lack of special reception conditions for single mother and minor child, survivors of sexual abuse	17 Nov 2023 – Transmitted to the Secretary-General for Reception of Asylum Seekers supervising the RIS	12 Mar 2024 – Transmission of reply of the RIS , stating: "... for the second complainant, it is submitted that she should have requested assistance or referral to a child psychologist and it is stated that she was studying at a public school and followed educational / leisure activities inside the camp and in the context of NGO activities". No further follow up.
28 Apr 2025 – Complaint against the RIS for non-disbursement of cash assistance to a young woman with a serious disability	12 Jun 2025 – Transmitted to the Secretary-General for Migration Policy and the Secretary-General for Reception of Asylum Seekers	31 Jul 2025 – Transmission of reply of the Secretary-General for Reception of Asylum Seekers , stating that the cash assistance programme "was terminated... on 31 March 2025" and that "the financial allowance operates based on current legislation as a supplementary provision to material reception conditions and therefore does not amount to a main means of subsistence for applicants, hence temporary delays in its disbursement do not preclude guarantee of dignified living conditions." No further follow up.
5 May 2025 – Complaint against the RIS for non-disbursement of cash assistance to a four-member family	12 Jun 2025 – Transmitted to the Secretary-General for Migration Policy and the Secretary-General for Reception of Asylum Seekers	31 Jul 2025 – Transmission of reply of the Secretary-General for Reception of Asylum Seekers , stating that the cash assistance programme "was terminated... on 31 March 2025" and that "the financial allowance operates based on current legislation as a supplementary provision to material reception conditions and therefore does not amount to a main means of subsistence for applicants, hence temporary delays in its disbursement do not preclude guarantee of dignified living conditions." No further follow up.
28 Jun 2025 – Complaint against the Asylum Service for nine-month delay in registration of subsequent application of a single woman	18 Aug 2025 – Transmitted to the Director of the Asylum Service	16 Aug 2025 – Transmission of reply of the Director of the Asylum Service , stating that the automated order of appointments granted by the online platform "contributes to optimal organisation by order of priority to the benefit of applicants, while potential long waiting times are reasonable and proportionate, given the particularly high number of applications for international protection, in particular subsequent applications, and apply generally and indiscriminately to all persons concerned" and that

⁸⁴ RSA et al., *The state of the rule of law in Greece today*, January 2026, para 221.

⁸⁵ *Ibid*, para 222.

		"the booking of an appointment for lodging of a subsequent application through a digital software (platform) does not amount to expression of intention to lodge an application for international protection". 21 Oct 2025 – Request by the complainant to the FRO for clarification, namely on the reasons why booking of a registration appointment via the online platform is not considered as making of an asylum application, since the platform is the only indicated official channel for access to the asylum procedure. 13 Mar 2026 – Transmission of the reply by the Director of the Asylum Service, reiterating that "the proof of submission of a request for a registration of appointment cannot be deemed as expression of the intention to lodge an application for international protection".
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Conditions of detention

49. **Pre-removal detention facilities:** The Hellenic Police implements immigration detention in seven Pre-Removal Detention Centres (PRDC), one "Special Detention Facility" inside CTRC Sintiki managed by the RIS, as well as police stations.⁸⁶
50. We reiterate our longstanding concerns regarding the conditions of detention of asylum seekers in Greece, not least due to poor infrastructure and chronic, unresolved shortages in medical personnel inside the pre-removal detention centres managed by the Hellenic Police.⁸⁷ These are corroborated by observations made by EU institutions, with recent examples provided below:

Camp	EU body	Date	Finding
Sintiki	FRA	8 Sep 2025	"Sintiki hosts some 800 men subject to the suspension of asylum, mainly from Egypt, Sudan and Bangladesh. There were three arrivals (the latest last week). The facility has four wings – three are used as a detention facility and one operates as an open camp. There is medical and reception staff, but they were overwhelmed with the new situation with most people in detention... Detainees had overall a poor look, with some of them saying that they still have the same cloths and shoes they came with from Libya. Some said that they have to sleep on the floor. The camp manager was aware of these issues but shared his limitations in addressing them. Detainees complained that they are always handcuffed when they are brought to the doctor or the hospital , an issue which FRA raised with the police." ⁸⁸
Kos	EUAA	31 Jan 2026	"Most of the sections of the PROKKEKA... have been declared non-operational... Collaboration with the Police at the Pre-removal Centre often presents challenges... which at times hinder effective coordination and the smooth implementation of procedures. Also, residents of PROKEKA lack health care coverage and access to medical or psychosocial support. " ⁸⁹
	FRA	4 Sep 2025	" Most parts of the facility are destroyed , which means that the capacity is reduced to some 70 persons... There are no medical or social staff , only police guards. UNHCR visits regularly. The containers in which detainees are placed are partly damaged and, overall, in bad shape." ⁹⁰

51. **Police stations:** The Greek government continues to implement immigration detention in police stations, under conditions clearly incompatible with Article 3 standards according to the established case law of the Court. The last decision of the Committee in the **Muhammad v. Greece** group expressly requested "comprehensive statistical information about the number of individuals detained in police establishments as well as the average length of their detention". The Action Plan only refers to a total number of 321 people detained in police stations,⁹¹ without further detail.
52. **Prisons:** Crucially, the landscape of places of detention of asylum seekers has further expanded following the criminalisation of "illegal entry" and "illegal stay" by non-suspensive imprisonment

⁸⁶ DH-DD(2026)812, paras 44-45.

⁸⁷ DH-DD(2025)471, paras 68 et seq.; DH-DD(2023)903, paras 58-60; DH-DD(2021)521, paras 51 et seq.

⁸⁸ FRA, 'Greece No. 5 – New arrivals from Crete', Ares(2025)9429523, 8 September 2025.

⁸⁹ EUAA, *EL-AS-1.2 Field Report Kos*, January 2026.

⁹⁰ FRA, 'Greece No. 4 – Kos and Leros', Ares(2025)9429523, 4 September 2025.

⁹¹ DH-DD(2026)812, para 45.

sentences after entry into force of Article 27 L 5226/2025, discussed above. People convicted of “illegal entry” or “illegal stay”, including asylum seekers, are held in prisons under non-suspensive imprisonment sentences of at least two years. This includes asylum seekers who have been prosecuted, tried and convicted before having had effective means of access to the asylum process.⁹²

53. Conditions in Greek prisons remain a chronic matter of concern to the Committee, supervised in particular in the context of the **Nisiotis v. Greece** group.⁹³ The placement of an increasing number of asylum seekers in prisons comes as a direct result of implementation of Article 27 L 5226/2025 and adds to systemic deficiencies identified by the Committee in its September 2025 decision.⁹⁴ We therefore draw the attention of Committee to linkages between the **Muhammad v. Greece** and the **Nisiotis v. Greece** groups as regards the predicament of asylum seekers deprived of their liberty for immigration purposes in Greece.

⁹² RSA, ‘Criminalisation of “illegal stay” in Greece puts almost 300 people behind bars’, 25 February 2026, available [here](#).

⁹³ App No 34704/08, 10 February 2011.

⁹⁴ CM/Del/Dec(2025)1537/H46-14, 17 September 2025.

Recommendations to the Committee

54. Drawing on the observations made in our present contribution, we stress that the Committee's recommendations on reception and detention of asylum seekers are yet to be implemented. We also underline that matters pertaining to access to the asylum process remain pertinent and directly linked to living conditions of asylum seekers, as illustrated in ***M.Y. and Others v. Greece***. The Committee should therefore urge the Greek government to communicate concrete measures ensuring that access to the asylum system is real and effective and not theoretical or illusory.
55. We urge the Committee to consider the following recommendations in its upcoming meeting:

Supervision process

- ❖ The Committee should ensure a coherent approach to supervision of execution of a range of cases relating to living conditions and detention of asylum seekers (not least ***H.A., A.R., M.Y. and Others, T.K., Muhammad***) so as to avoid fragmentation of the supervision process and appropriate monitoring of general measures taken by the Greek government.

Asylum procedure

- ❖ Request concrete legislative measures and instructions to prevent arbitrary arrest, pre-removal detention and prosecution for entry- and stay-related offences against asylum seekers presenting themselves before authorities responsible for receiving asylum applications.
- ❖ Urge for compliance by the RIS with the strict deadlines for screening and registration of asylum applications in all locations carrying out such procedures.

Living conditions for asylum seekers

- ❖ Urge for immediate reinstatement of cash assistance and transport services in RIS camps to prevent Article 3 risks stemming from the accumulation of encampment of asylum seekers in isolated facilities and lack of access to essential services.
- ❖ Request clarification on the exact content of "special reception conditions" due under domestic law to thousands of vulnerable asylum seekers in the reception system and on how such conditions are offered in camps.
- ❖ Urge for reinstatement of alternatives to camp accommodation and for full, constant access to services.
- ❖ Urge for discontinuation of *de facto* detention of unaccompanied children inside "safe zones" of RIC and CCAC, akin to "protective custody", and for prioritisation of accommodation in appropriate facilities.
- ❖ Urge for legislative measures to ensure that the remedy of Article 42 L 5307/2026 is accessible, not least through (i) effective mechanisms for asylum seekers' access to legal assistance, (ii) reasonable deadlines.

Detention conditions

- ❖ Reiterate the prohibition on use of police stations for immigration detention purposes.
- ❖ Request a thorough assessment on the adequacy of health care and interpretation services in pre-removal centres and "special detention facilities".



<https://rsaegean.org/en/eu-migration-pact-asylum-breakdown-arbitrary-detention/>



Refugee Support Aegean (RSA)

Iasona Kalampoka 30
82131 Chios, Greece
+30 22711 03721
info@rsaegean.org
<https://rsaegean.org>



Stiftung PRO ASYL

P.O. Box 16 06 24
Frankfurt 60069, Germany
+49 69 2423150
europa@proasyl.de
<https://proasyl.de>