



**Permanent Mission of Greece
to the United Nations Office and other
International Organizations
in Geneva**

No.: 6170.3/ AS 464

NOTE VERBALE

The Permanent Mission of Greece to the United Nations Office and other International Organizations in Geneva presents its compliments to the Office of the High Commissioner for Human Rights and has the honor to attach herewith the reply of the Hellenic Republic, to the joint communication (Ref: OL GRC 1/2026) by the Special Rapporteur on the situation of human rights defenders, the Special Rapporteur on the rights to freedom of peaceful assembly and of association, the Independent Expert on human rights and international solidarity, the Special Rapporteur on the human rights of migrants and the Special Rapporteur on trafficking in persons, especially women and children.

The Permanent Mission of Greece to the United Nations Office and other International Organizations in Geneva avails itself of this opportunity to renew to the Office of the High Commissioner for Human Rights the assurances of its highest consideration.



Geneva, April 2, 2026

Encl. : As stated

To:
The Office of the High Commissioner for
Human Rights
In Town

RESPONSE OF THE HELLENIC REPUBLIC

In response to your Joint Communication, dated 19th February 2026, concerning our Law “on the promotion of legal migration policies amending the Greek Migration Code and its practical application to human rights defenders supporting migrants, refugees and asylum seekers in Greece”, with a particular emphasis on the NGO Registry, which was adopted on 5th February 2026, but also in view of our previous communication n. 135/12.11.2025 on relevant issues, we have the honour to bring to your knowledge the following:

The geopolitical position of the Hellenic Republic, as well as the current international developments, bring the country very often before the human drama of thousands of people fleeing their homes. According to data from the first six months of 2025, irregular entries from the Central Mediterranean route increased by three hundred and twenty percent (320%) compared to the corresponding period of 2024. In addition to that, we all witness an increasingly complex global landscape, where multifaceted factors exacerbate human rights violations and test the resilience of multilateralism, while international mechanisms and organs face a persistent funding and liquidity crisis that threatens their capacity to fulfil their vital mandate. In the meantime, we cannot stand idly by in the face of the ever-increasing challenges of instrumentalization of migration, posing a challenge at our external borders and undermining our Union ’s internal security.

This highly volatile environment necessitates a united and concerted response, which needs to be both prudent and pragmatic, shielded first and foremost by international law, in tandem with the promotion of a credible and sincere relationship with our societies within our established democracies. Concurrently, the need to protect our borders, which are at the same time the EU’s external borders, becomes an imperative need for both our national security and the European legal order, while serving as a strong message against the heinous action of human traffickers and smugglers.

Against this backdrop, the Hellenic Republic is committed to navigate its course with professionalism, courage, humanity and, of course, always with full respect for international law. This unwavering commitment is firmly established in both the Hellenic Republic’s Constitution and the pertinent legislative framework. And of course it is compounded by our country’s profound respect for all the mechanisms and organs of the U.N. human rights system. Furthermore, it is evidenced by the standing invitation, in effect since March 2001, extended by the Government of the Hellenic Republic to all thematic Special Procedures Mandate Holders of the United Nations.

More specifically, while managing migration, the Hellenic Republic, as non permanent member of the Security Council, but also as one of the front-line EU member-states receiving still large numbers of mixed arrivals, is strongly committed to: first, ensuring respect for international humanitarian law and international human rights law, second, stepping up humanitarian action in order to support refugees and displaced persons and the countries hosting them and third, finding meaningful solutions to reverse displacement trends. In this regard, our Authorities operate with the utmost care to protect human lives and with full respect for persons who may be entitled to international protection.

But of course we cannot succeed alone. Managing migration effectively entails a balance of fairness and control, shared responsibility and solidarity among Member States, and mutually beneficial cooperation with partners beyond Europe. We strongly believe that migration management requires a comprehensive and coordinated approach; one that addresses the root causes of migration by tackling the negative political, socio-economic and climate trends at source, counters irregular migration and fosters legal pathways to mobility. In this spirit, our country contends that the challenges of large movements of refugees and migrants can only be solved through effective cooperation between countries of origin, transit and destination. At the same time we value international cooperation, while we underline the fundamental importance of national sovereignty, the rule of law and due process, as well as the national competence on labour market management.

That said, at the epicenter of our current priorities on this issue lies the need for effective returns and sustainable reintegration, taking also into account of the involvement of criminal smuggling networks that exploit human suffering along migration routes. While we remain focused on preventing irregular migration, at the same time we keep facilitating legal, safe, and orderly migration, through bilateral agreements with key third countries.

Furthermore, the Hellenic Republic by hosting a significant number - in relation to its population - of refugees and asylum seekers, prioritizes protection of most vulnerable groups, especially women and children, who are exposed to violence, exploitation, separation from families, lack of access to education, long-term psychological trauma. At the same time, we have developed a comprehensive support system for unaccompanied minors, comprising, inter alia, accommodation, healthcare, nutrition, education, guardianship, and integration, based on the best interest of the child. Our relevant strategy builds on the enhancement of the protection of children, especially from violence and exploitation, and the establishment of legal pathways for joining family members, through multilateral agreements for relocation and family reunification.

In view of the aforementioned, Law 5275/2026 adopted in February 2026, establishes a functional and effective framework for legal migration. The new regulations are designed to reduce bureaucracy and accelerate administrative procedures to meet the evolving needs of the national economy. In this context NGOs remain valuable partners working together with the competent Greek Authorities in carrying out a complex and demanding humanitarian duty, establishing a longstanding and mutually beneficial cooperation, one significant parameter of which is the Registry of NGOs, destined to ensure transparency and safety for the beneficiaries of NGOs services.

Taking into account of the aforementioned basic pillars of our migration policy, but also of the need for an holistic and coordinated approach—encompassing all State and governmental entities—in ensuring the respect for human rights in the conduct of their daily activities, we wish to bring forward the following additional clarifications in response to more specific allegations outlined in the aforementioned Joint Communication:

(a) Law 5275/2026 aims to clarify the scope of application of the provision governing registration in the Registry of Greek and Foreign NGOs. The obligation for all organisations implementing activities in the fields of international protection, migration, and social inclusion within Greek territory to register in the NGO Registry has been abolished. The obligation is now limited to organisations that receive state or EU funding or that operate within facilities of the Ministry of Migration and Asylum and it is mainly linked to issues of transparency, accountability and administrative control in a particularly sensitive area. The NGOs operating within the structures of the Ministry (e.g. reception centers) have direct access to vulnerable populations, consequently the Ministry should know which agencies are active in its structures and to ensure, as much possible, the suitability of staff and partners.

It should also be noted that NGOs which are not registered in the Registry remain free to operate without restriction and may continue to receive funding from other sources.

(b) With regard to the requirement relating to the receipt of state funding, the newly introduced exemption aligns with the registration requirements of the Special Registry of Civil Society Organisations of the Ministry of Interior, pursuant to Law 5270/2026. Specifically, for both registries, registered organisations must not receive regular state funding exceeding thirty per cent (30%) of their operational budget, excluding payroll costs.

To ensure that access to the NGO Registry is transparent, accessible, non-discriminatory, expeditious, inexpensive and in conformity with international human rights law, the following measures are taken:

(a) The Ministry of Migration and Asylum will proceed with the adoption of a Ministerial Decision governing the operation of the NGO Registry, with the aim of simplifying procedures and reducing the required supporting documents. The draft decision has already been prepared and is expected to be published within the month of March 2026. The following changes are introduced compared to the previous Joint Ministerial Decision No. 10616/2020, with regard to registration requirements in the NGO Registry:

- i) Only the currently valid codified statutes will be required, rather than all previous versions.
- ii) Proof of registration with the competent court or the General Commercial Registry (GEMI) will be replaced by a general certificate or certificate of changes.
- iii) Instead of minutes of election and formation of Board of Directors, organisations may alternatively submit a certificate of representation.
- iv) The requirement regarding the non-conclusion of contracts with related parties is now subject to the same exceptions as those provided under the legal framework of the Ministry of Interior for the Special Registry of Civil Society Organisations, pursuant to Law 5270/2026.
- v) Financial statements will be required only for the most recent financial year, rather than for the previous two years.
- vi) Instead of annual activity reports for the previous two years, NGOs will only declare the activities carried out during the previous year.
- vii) Instead of income tax returns and financial data statements for the previous two years, only the corporate income tax assessment notice for the previous year will be required.
- viii) Submission of property declarations (E9) and property tax statements will no longer be required.
- ix) Organisational charts, employment contracts, volunteer agreements, and ISO EN 9001 certification will no longer be required.

These changes simplify the registration process and reduce any related cost. It should be noted that no public fee is required for the registration.

(b) Additionally, the opinion of a three-member committee will no longer be required for NGO registration. This change further simplifies the registration procedure and significantly reduces processing time. At the same time, substantive registration conditions are removed, thereby eliminating elements of subjectivity and ensuring a more objective and predictable registration framework.

(c) Moreover, significant progress has been made towards the implementation of interoperability between the registries of the Ministry of Interior and the Ministry of Migration and Asylum. Funding has been provided, and the technical specifications for the development of a new electronic registry platform of the Ministry of Migration and Asylum have been completed. On 25 November 2025, a call for expressions of interest for the submission of offers was published. The procedure was completed on 10 December 2025 with the submission of three offers. We expect the evaluation by the competent committee.

The platform under development will fully support interoperability with the Civil Society Organisations Registry of the Ministry of Interior and other public authorities, in accordance with the “Once-Only” principle, enabling organisations to submit data and supporting documents only once, with such data subsequently retrieved and updated automatically by the competent authorities. This development is expected to contribute significantly to the reduction of administrative burdens, the improvement of data quality, and the enhancement of administrative efficiency.

Pursuant to Law 5475/2026, the purpose of maintaining the Registry of Greek and Foreign NGOs is:

To ensure transparency in the way organisations operate and, through this, to optimise the services they provide. It also aims to safeguard the human rights of refugees, asylum seekers and beneficiaries of international protection, as well as migrants residing in the Greek territory.

In particular, with regard to the NGO Members’ Registry, its maintenance aims to prevent access to, and direct contact with, asylum seekers and beneficiaries of international protection by individuals exhibiting seriously unlawful behaviour, including those convicted of particularly serious criminal offences, such as, indicatively, sexual abuse, child sexual abuse, procuring, drug trafficking, causing bodily harm, and smuggling of third-country nationals. This is intended to ensure the protection of the human rights of asylum seekers and beneficiaries of international protection, and above all their life, safety, physical integrity and mental health, as required by national legislation and international instruments, as well as to prevent such incidents.

The provision of aggravated sentences on NGO Members for offences under the Migration Code is justified.

The status of a member of a registered NGO is considered as an aggravating circumstance in sentencing, because it is linked to committing specific offences through the abuse or exploitation of one’s capacity as a member of an NGO. This assessment reflects the contradiction between the criminal conduct in question and the very purpose of NGOs, which is to implement actions in the fields of international protection, migration and social inclusion. The gravity is further intensified by the fact that registered NGOs have authorised access to operate within facilities of

the Ministry of Migration and Asylum and may receive national or EU funding for this purpose. In this way, they enjoy privileged access to vulnerable populations who may constitute victims of the offences concerned and who are in need of protection.

It should be noted that Articles 15 and 16 of Law 5475/2026 do not establish any new criminal offences.

It is, in any event, expressly noted that pursuant to Article 25(6) of Law 5038/2023 — which remains unaffected by the present legislative amendments — no sanctions are imposed in cases of search and rescue operations at sea, the transport of persons in need of international protection, or other specified forms of humanitarian action. As under the previous legislative framework, whether the actions of an NGO member constitute the criminal offences referred to in Articles 15 and 16 is determined by the competent independent prosecutorial and judicial authorities, following an assessment of the specific facts of each case.