

**Mandates of the Special Rapporteur on the situation of human rights defenders; the Special Rapporteur on the rights to freedom of peaceful assembly and of association and the Special Rapporteur on the human rights of migrants**

Ref.: AL GRC 2/2025  
(Please use this reference in your reply)

16 September 2025

Excellency,

We have the honour to address you in our capacities as Special Rapporteur on the situation of human rights defenders; Special Rapporteur on the rights to freedom of peaceful assembly and of association and Special Rapporteur on the human rights of migrants, pursuant to Human Rights Council resolutions 52/4, 59/4 and 52/20.

In this connection, we would like to bring to the attention of your Excellency's Government information we have received **concerning public statements by government officials targeting human rights organisations working in the field of migration and recently introduced restrictions on the right to seek asylum.**

[REDACTED]

[REDACTED]

Concerns as to threats, smears, intimidation and the misuse of criminal law against human rights defenders working in the field of migration in Greece have been communicated to your Excellency's Government on several previous occasions, notably through communications sent by Special Procedures mandate holders on 28 December 2022 (GRC 3/2022), 19 July 2022 (GRC 2/2022), 16 November 2021 (GRC 4/2021), 31 March 2021 (GRC 1/2021) and 1 May 2020 (GRC 2/2020).

Further concerns were expressed in the report of the Special Rapporteur on the situation of human rights defenders following her country visit to Greece in 2022 (A/HRC/52/29/Add.1), in which she documented increasing repression of the work of human rights defenders in the field of migration, including through restrictive legislation regulating non-governmental organisations, the NGO Registry of the Ministry of Migration and Asylum, smears by government officials against migrants' rights defenders, and criminalisation. Specific concerns were also raised by the Special Rapporteur in her report about government pushback creating an increasingly hostile environment for lawyers working in the field of migration in Greece.

We thank your Excellency's Government for the responses received to the above-detailed communications, however, we renew our concerns as to the situation for people defending the rights of migrants, refugee and asylum seekers in Greece, in light

of the following information received.

According to the information received:

On 11 July 2025, the Hellenic Parliament adopted Law 5218/2025, imposing a three-month ban on the submission of asylum claims from persons arriving in Greece from North Africa by sea. The law also ordered the immediate deportation of any such persons to their country of origin or transit without the registration of their asylum claims. Following the adoption of the legislation, people seeking asylum in Greece having arrived from North Africa have been automatically detained in 'pre-removal detention centres' on the Greek mainland, with generic removal orders issued against them, their right to seek asylum denied, and no-assessment of the risk of *refoulement* carried out, even in cases where specific concerns are raised as to this risk.

On 14 August 2025, the European Court of Human Rights (ECtHR), under rule 39 of its Rules of Court, indicated interim measures to the Greek government in relation to eight people from Sudan seeking asylum in Greece, ruling the Greek government must refrain from removing them from Greek territory until legal appeals filed against their removal had been heard in Greece. The eight Sudanese citizens were supported in bringing their case to the ECtHR by lawyers from [REDACTED].

On 20 August 2025, the Minister of Migration and Asylum of Greece, Mr. Thanos Plevris, was interviewed by the Hellenic Broadcasting Corporation. During the interview, Mr. Plevris addressed the decision of the ECtHR, as well as the role of [REDACTED] in bringing the case to the court, and announced that there would be an administrative audit of NGOs providing legal support to asylum seekers, referring in particular to organisations included on the NGO Registry of the Ministry of Migration and Asylum.

On 21 August 2025, media articles appeared in Greece reporting that the Minister of Migration and Asylum of Greece, Mr. Thanos Plevris, intends to establish a working group to revise the conditions for acceding to or remaining on the Ministry's registry for NGOs working in the field of migration and asylum. The reports, based on unnamed sources, indicated that under the measures being prepared by the Minister, NGOs could be removed from the registry if they oppose the government's migration policy, bring legal challenges against decisions of State bodies in the field of asylum, or misuse funds.

On 2 September 2025, the Hellenic Parliament adopted legislation introducing new measures in relation to persons who see their claims for asylum in Greece rejected. The measures adopted include: 2 to 5 year prison sentences for people who remain in Greece irregularly for more than 14 days following a negative asylum decision; fines of up to €10,000 for "illegal entry" into Greece; an increase from 18 to 24 months for the period of possible detention for people who enter Greece and claim asylum without correct documentation; an expansion of the list of countries deemed safe for the return of people who have had their asylum claims rejected in Greece; and an increase in the duration of

entry bans imposed on individuals for security reasons.

Without wishing to prejudge the accuracy of the above-detailed allegations, we wish to express our grave concern at the public statements by the Minister of Migration and Asylum of Greece, Mr. Thanos Plevris, in relation to non-governmental organisations working in the field of asylum and migration. We fear that the statements by Mr. Plevris amount to an attack on the legitimate work of these organisations in defence of the rights of refugees and asylum seekers, and to be designed to intimidate them and delegitimise their human rights work in the eyes of the public. Our fears in this sense are compounded by the repeated denigration of the work of people acting in defence of the rights of migrants, refugees and asylum seekers in Greece, including lawyers, as raised in previous communications addressed to your Excellency's Government on the matter and the report of the Special Rapporteur on the situation of human rights defenders following her official country visit to Greece. The allegations, if proven to be true, would confirm concerns expressed in these communications and the Special Rapporteur's report as to the necessity and proportionality of the NGO Registry of the Ministry of Migration and Asylum, and its potential to be used to restrict, sanction and halt the work of human rights organisations in the country.

We express further concern at the recent legislation adopted by the Hellenic Parliament restricting the right to claim asylum in Greece. The right to seek asylum is a fundamental human rights held by all persons irrespective of where they come from or how they arrive in a given jurisdiction. States must ensure that those wishing to seek asylum have access to asylum procedures, while the principle of non-refoulement is a core, non-derogable principle of international law. People must not be punished for seeking asylum.

In connection with the above alleged facts and concerns, please refer to the **Annex on Reference to international human rights law** attached to this letter which cites international human rights instruments and standards relevant to these allegations.

As it is our responsibility, under the mandates provided to us by the Human Rights Council, to seek to clarify all cases brought to our attention, we would be grateful for your observations on the following matters:

1. Please provide any additional information and/or comment(s) you may have on the above-mentioned allegations.
2. Please indicate whether the NGO Registry under the Ministry of Migration and Asylum and associated legislation is compatible with Greece's obligations under international human rights law, in particular the right to freedom of association as guaranteed under article 22 of the International Covenant on Civil and Political Rights, as recommended in the report of the Special Rapporteur on the situation of human rights defenders on her official country visit to Greece.
3. Please provide information about the compatibility of the above-detailed legislation concerning the right to seek asylum with Greece's obligations under international law.

This communication and any response received from your Excellency's Government will be made public via the communications reporting [website](#) within 60 days. They will also subsequently be made available in the usual report to be presented to the Human Rights Council.

While awaiting a reply, we urge that all necessary interim measures be taken to halt the alleged violations and prevent their re-occurrence and in the event that the investigations support or suggest the allegations to be correct, to ensure the accountability of any person(s) responsible for the alleged violations.

We may publicly express our concerns in the near future as, in our view, the information upon which the press release will be based is sufficiently reliable to indicate a matter warranting immediate attention. We also believe that the wider public should be alerted to the potential implications of the above-mentioned allegations. The press release will indicate that we have been in contact with your Excellency's Government's to clarify the issue/s in question.

Please accept, Excellency, the assurances of our highest consideration.

Mary Lawlor

Special Rapporteur on the situation of human rights defenders

Gina Romero

Special Rapporteur on the rights to freedom of peaceful assembly and of association

Gehad Madi

Special Rapporteur on the human rights of migrants

## **Annex**

### **Reference to international human rights law**

In connection with above alleged facts and concerns, we would like to refer your Excellencies Government to article 22 of the International Covenant on Civil and Political Rights, acceded to by Greece on 5 May 1997, which guarantees the right to freedom of association.

Article 22 of the ICCPR implies a wide range of positive and negative obligations for the State to ensure its enjoyment. The article foresees that: “No restrictions may be placed on the exercise of this right other than those which are prescribed by law and which are necessary in a democratic society in the interests of national security or public safety, public order (ordre public), the protection of public health or morals or the protection of the rights and freedoms of others”. While States may have a legitimate interest in establishing reporting requirements to registered associations to ensure their compliance with the law, these requirements should not limit associations’ functional autonomy and operation, by adding costly and protracted burdens. All restrictions of the right to freedom of association should be necessary and proportionate. Suspension and the involuntarily dissolution of an association are the severest types of restrictions on freedom of association, including de-registration of NGOs making it impossible for them to continue their legitimate work.

In this regard, we would also like to recall United Nations Human Rights Council resolution 22/6, which calls upon States to ensure that procedures governing the registration of civil society organizations are transparent, accessible, non-discriminatory, expeditious and inexpensive and in conformity with international human rights law.

We would also like to refer to the principles set forth in the Declaration on the Right and Responsibility of Individuals, Groups and Organs of Society to Promote and Protect Universally Recognized Human Rights and Fundamental Freedoms, also known as the UN Declaration on Human Rights Defenders, adopted by consensus by the UN General Assembly in 1998 and of which article 1 states that everyone has the right to promote and to strive for the protection and realization of human rights and fundamental freedoms at the national and international levels. Article 5(b) of the Declaration holds that everyone has the right to form, join and participate in non-governmental organisations, associations or groups with the purpose of promoting and protecting human rights and fundamental freedoms. Article 12 complements this, holding that everyone has the right, individually and in association with others, to participate in peaceful activities against violations of human rights and fundamental freedoms. Article 12 further provides that the State shall take all necessary measures to ensure the protection of any persons exercising their rights as referred to in the Declaration from violence, threats, retaliation, de facto or de jure adverse discrimination, pressure or any other arbitrary action they are subjected to as a consequence.

We would also like to recall Human Rights Council resolution 38/12, which calls on States to take all steps necessary to prevent threats, attacks, discrimination, arbitrary arrests and detention or other forms of harassment, reprisals and acts of

intimidation against civil society actors, to investigate any such alleged acts, to ensure access to justice and accountability, and to end impunity where such violations and abuses have occurred. We wish to further highlight that the resolution emphasises the essential contribution of civil society to regional organisations, and unequivocally reaffirms the right of everyone, individually and in association with others, to unhindered access to and communication with regional and international bodies, and their representatives and mechanisms.

We further wish to recall the report of the UN Special Rapporteur on the rights to freedom peaceful assembly and association, on Protecting the rights to freedom of peaceful assembly and of association from stigmatization (A/79/150) which notes that's stigmatization of civil society, civic mobilization and activism often have a severe and lasting "chilling effect", not only on directly affected individuals and groups, but also a detrimental impact on civic space broadly. Its impact is especially deeper for individuals and groups that already experience heightened barriers to exercise their freedoms and are subjected to inequality, marginalization, racism, discrimination and violence because of, among other grounds, their gender, race, ethnicity, religion, age and/or migration status.

Finally, we would like to refer to the recent report of the UN Special Rapporteur on the situation of human rights defenders, presented at the 77th session of the UN General Assembly, on the situation of human rights defenders working on the rights of migrants, asylum-seekers and refugees. We would in particular like to make reference to the recommendations made therein, including the recommendations for States to provide, in law and in practice, a safe, accessible and supportive environment for individuals and organizations that work to promote and protect the human rights of migrants, asylum-seekers and refugees, and to desist from targeting human rights defenders working on issues related to migration, refugees and asylum-seekers and stop treating them as national security threats. We would further like to highlight the recommendation that States ensure that criminal law is not misused to punish migration-related humanitarian acts or to harass civil society organizations that work with migrants.