

Mandates of the Special Rapporteur on the situation of human rights defenders; the Special Rapporteur on the independence of judges and lawyers; 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

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(Please use this reference in your reply)

25 March 2026

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 independence of judges and lawyers; Independent Expert on human rights and international solidarity; Special Rapporteur on the human rights of migrants and Special Rapporteur on trafficking in persons, especially women and children, pursuant to Human Rights Council resolutions 52/4, 53/12, 53/5, 52/20 and 53/9.

In this connection, we would like to bring to the attention of your Excellency's Government information we have received concerning the increased restriction of civic space in Greece and the grave deterioration of the environment for defending the rights of refugees, migrants and asylum-seekers in the country.

Médecins Sans Frontières (MSF) is a non-governmental organisation active in more than 70 countries around the world, providing medical and humanitarian aid to people in crisis situations. The organisation has been operating in Greece for over a decade, providing humanitarian support to people arriving in the country by sea, including medical and psychological support and interpretation services.

Mr. **Tommy Olsen** is a Norwegian human rights defender and founder of Aegean Boat Report. He monitors and reports on the human rights situation of migrants, refugees and asylum seekers in the Aegean Sea.

Mr. **Dimitris Choulis** is a lawyer and human rights defender, he is co-founder of the Human Rights Legal Project, which offers legal aid for victims of human rights violations in the context of migration.

Mr. **Alexandros Georgoulis** is a lawyer working on immigration cases, notably where asylum seekers have wrongly been accused of people smuggling in Greece.

Mr. **Chris Avramidis** is a journalist and researcher covering a variety of issues including environmental questions, social and political issues in Greece.

In June 2022, the Special Rapporteur on the situation of human rights defenders carried out an official country visit to Greece at the invitation of the government. In her report following the visit (A/HRC/52/29/Add.1), she drew attention to legislation, policy and practice adopted by the government which she found, at the time of the report, to be seriously degrading to the environment for people to work in defence of the rights of migrants, refugees and asylum seekers. In paragraph 29 of her report she stated the following: "With regard to its migration policy, focusing on security and

prevention, the Special Rapporteur holds the view that certain practices of the Government, as well as the rhetoric of some government officials, have created an environment in which individuals and organizations wishing to support migrants, asylum-seekers and refugees increasingly find the space in which they might do so suffocated as a result, in particular, of restrictive legislation and smear campaigns aimed at delegitimizing their legitimate human rights work.” In her report, the Special Rapporteur also drew attention to the criminalisation of people working in defence of the rights of migrants, refugees and asylum seekers in the country, and expressed concerns about an increasingly hostile environment for lawyers engaged in such work and journalists reporting on migration issues (see paras. 76-85, 92-96 and 105-113).

Since her visit and the publication of the report, Special Procedures mandate holders have continually raised concerns with the Greek government regarding the further deterioration of the environment for defending the rights of migrants, refugees and asylum seekers in the country, while the Special Rapporteur on the situation of human rights defenders has repeatedly raised the absence of serious measures to implement the large majority of the recommendations in her report with the authorities.

Concerns with regards to threats, smear campaigns, intimidation and the misuse of criminal law against human rights defenders and members of civil society organisations working in the field of migration in Greece were previously conveyed through communications sent on 16 September 2025 (GRC 2/2025), 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).

These concerns about the continued deterioration of the situation for human rights defenders in Greece were compounded by the adoption of wide-ranging amendments to the Greek Migration Code on 5 February 2026.¹ A communication outlining the incompatibility of the adopted amendments with Greece's obligations under international human rights law, and their serious impact on the right to defend human rights as outlined in the UN Declaration on Human Rights Defenders, were addressed to the Greek government by multiple Special Procedures mandate holders on 19 February 2026 (GRC 1/2026). In the communication, particular concerns were raised as to the compatibility of the legislation with articles 2(1), 14(2), 22 and 26 of the International Covenant on Civil and Political Rights (ICCPR), guaranteeing non-discrimination, the right to freedom of association, the presumption of innocence and equality before the law, as well as provisions of the UN Protocol Against the Smuggling of Migrants by Land, Sea and Air.

We thank your Excellency's Government for the responses received to the above-detailed communications and for its continued engagement with Special Procedures mandate holders on these issues. We wish, however, to renew our serious concerns as to the restrictions being placed on civil society organisations in the country and the situation for people defending the rights of migrants, refugee and asylum seekers, given the continued degradation of the environment in which they work and the lack of any serious indication of efforts by the Greek government to improve it.

¹ Through the Law on the promotion of legal migration policies transposition of Directive (EU) 2024/1233 on a uniform application procedure for third-country nationals for a single permit to reside and work in the territory of a Member State and on a common set of rights for third- country workers legally residing in a Member State; amendments to the Immigration Code and other provisions”

According to the information received:

Concerning Tommy Olsen

In early 2023, the Prosecution Office of Kos opened a criminal investigation against Mr. Olsen accusing him of three charges: 1) membership of a criminal organization having committed the felony of migrant smuggling; 2) illegal facilitation of the entry and the transfer of migrants (?) to Greece, acting professionally and for profit; and 3) illegal facilitation of staying in Greece.

On 14 May 2024, the Investigating Judge of Kos issued an arrest warrant for Mr. Olsen, in the context of the investigation. On the same date, the Investigating Judge requested the Prosecutor of Kos to proceed with all the necessary actions for an international arrest warrant against the human rights defender.

On 3 December 2025, a European Arrest Warrant was issued for Mr. Olsen and on 5 December 2025 it was entered into the European SIRENE system, exposing him to arrest in Norway and extradition to Greece.

The case against Mr. Olsen reportedly concerns an incident in 2021, when he and another human rights defender alerted the Greek authorities to the presence of eight people on the island of Kos seeking to apply for asylum. The investigation concerning the incident was initiated in the context of public statements by the then-Minister for Migration and Asylum, Mr. Notis Mitarachi, accusing Aegean Boat Report of helping smugglers bring people to Greece. It was accompanied by media reports outlining the details of the investigation into those concerned, including Mr. Olsen, who had been made aware of it (see GRC 3/2022).

Concerning Dimitris Choulis and Alexandros Georgoulis

On 3 February 2026, a collision between a Hellenic Coast Guard vessel and a small boat occurred off the coast of the island of Chios, in the Aegean Sea, resulting in the death of 15 people and injuries to 24 others, including 11 children. In the aftermath of the deadly incident, the Hellenic Coast Guard claimed that the small boat, which was carrying foreign nationals, was traveling without navigation lights and ignored repeated light and sound signals from a patrol vessel before colliding with it and capsizing. Survivors, however, recounted that the Hellenic Coast Guard was carrying out dangerous manoeuvres around their boat, causing it to capsize. According to a statement made following the shipwreck by the Minister for Migration and Asylum, Mr. Thanos Plevris, the Hellenic Coast Guard vessel was equipped with a camera, but it was not activated. A 31-year old Moroccan national who survived the shipwreck was arrested, accused of facilitating illegal entry, causing a shipwreck and disobeying orders, and placed in pre-trial detention. The person in question is being legally represented by Messrs. Choulis and Georgoulis.

On 9 February 2026, Mr. Plevris delivered a public statement to the Action24 television station concerning Messrs. Choulis and Georgoulis, in the context of their legal representation of the Moroccan national arrested following the shipwreck. According to a transcript of the remarks he reportedly said the following: “I saw that he went with two lawyers. Usually, you know, those who are poor are appointed [lawyers] by the court. What was the interesting part I saw? And what I am telling you, I did not perform an investigation, I googled. That one of the two lawyers, I assume a respectable colleague, is also a member of an NGO for refugee and migrant rights. There is therefore an NGO – put the names in and google them... so you can see what I am interested in when I say I should control the NGOs – so we have an NGO that works for the rights of refugees and migrants. The logical thing would be for us to see that NGO today with those who lost their people. He is saying ‘I believe the alleged smuggler, that he is saying the truth, and I am going to support him and to accuse the Coast Guard’ because according to the alleged smuggler’s line of defence the Coast Guard is to blame for everything. And I am asking you a very simple thing: if tomorrow we had an NGO for abused women and there were women who report a rape and a person alleged to be the rapist and said ‘I am innocent’ what would you find reasonable, for the NGO and its lawyers to go to the women reporting the rape or to the alleged rapist? So here we have a fellow lawyer whom – you will find the names – you can google and see with which NGO he works and specifically he is on Samos, an alleged smuggler who is able to have a lawyer both on Chios and outside Chios, and that NGO that is interested in the pain and the problems of illegals, of refugees and migrants appearing, undertaking the alleged smuggler’s defence and its first line of defence being that it is the Coast Guard’s fault.”

Concerning MSF

On 4 February 2026, following the shipwreck off Chios, a team from MSF visited the survivors in the hospital on the island to offer them support, in line with their standard work.

On the morning of 5 February 2026, the Minister of Health, Mr. Adonis Georgiadis published a social media post stating that he had received a serious complaint from the administrator of the hospital in Chios, noting that members of an NGO showed up at the hospital, and – according to the complaint he claimed to have received – assisted a survivor in shaping the narrative for a possible asylum application or complaint against the Hellenic Coast Guard. In his post, the Minister stated that the incident had been reported to the National Intelligence Services. The Minister ended his post stating that the Greek government would not allow foreign interests to jeopardize the Greek homeland and their unwavering determination to protect Greece's borders. As of the time of writing, the post, which was issued on the social media platform 'X', had been viewed 50,000 times. Mr. Georgiadis subsequently identified the NGO in question as MSF in a media interview.

Concerning Chris Avramidis

On 9 February 2026, during a press conference with Deputy Minister to the Prime Minister and Government Spokesperson, Mr. Pavlos Marinakis, Mr. Avramidis questioned whether the Hellenic Coast Guard had been carrying out a rescue operation or a deterrence operation when it approached the boat carrying migrants off the coast of Chios on 3 February 2026. After Mr. Marinakis's initial response to the question, Mr. Avramidis asked a follow-up question, asking for clarification as to whether it had been a rescue operation or an attempt to deter the boat from advancing towards Greece. According to a transcript of the conversation, Mr. Marinakis's response to the follow-up question included a warning that Mr. Avramidis should not misrepresent his words or else he might face legal consequences, accusing him of falsifying information.

Without wishing to prejudge the accuracy of the above-detailed allegations, we express serious concern at each of these cases, which we believe to be illustrative of the government's deliberate and persistent attempt to undermine, stigmatise and criminalise the defence and promotion of the rights of migrants, refugees and asylum-seekers in Greece, and to mark a further step towards the restriction of civic space in the country.

Our concerns in this regard are based on repeated incidents of this nature, as communicated to your Excellency's government on multiple previous occasions, and the lack of evidence of any serious steps to remedy or improve the situation.

We emphasise that where the right to defend human rights is restricted and repressed, further human rights violations follow, and lament the deaths in the tragedy off the coast of Chios on 3 February 2026, along with the injuries suffered by the survivors.

We note that the allegations involve an individual human rights defender, lawyers, humanitarian workers and a journalist, demonstrating the variety of actors facing retaliation for their work related to migration in Greece. In this regard, considering the repeated instances in which Special Procedures mandate holders have raised concerns with the Greek authorities about the situation for people defending and promoting human rights in the country, we call on the authorities to urgently change course and abide by its obligations under international human rights.

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 provide information as to the legal and factual basis for the issuing of an arrest warrant against Mr. Olsen.
3. Please provide information as to any measures taken to adopt a zero-tolerance policy in cases of intimidation and stigmatization of human rights defenders, journalists and lawyers and to show solidarity with them, as recommended by the Special Rapporteur on human rights defenders in her report on her official country visit to Greece.

This communication, and any response received from your Excellency's Government, will be made public via the communications reporting [website](#) at the 60 days mark. Should Your Excellency's Government respond within 60 days, both the communication and the response, may be published before the 60 days mark. The communications and responses will also be made available in the subsequent periodic 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, including the smear campaigns, threats and criminalization of human rights defenders and lawyers, 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

Margaret Satterthwaite
Special Rapporteur on the independence of judges and lawyers

Cecilia M. Bailliet
Independent Expert on human rights and international solidarity

Gehad Madi
Special Rapporteur on the human rights of migrants

Siobhán Mullally
Special Rapporteur on trafficking in persons, especially women and children

Annex

Reference to international human rights law

In connection with the allegations detailed above and our connected concerns, we would like to refer your Excellencies Government to articles 6, 19 and 22 of the International Covenant on Civil and Political Rights, acceded to by Greece on 5 May 1997, which guarantee the rights to life, freedom of expression and freedom of association.

Article 6(1) provides that every human being has the inherent right to life and that no one shall be arbitrarily deprived of one's life. We wish to underline the relevance of the article in relation to the Chios shipwreck of 3 February 2026 and the above-detailed cases connected with it.

The Human Rights Committee, in its general comment No. 36 (CCPR/C/GC/36), confirmed that the right to life has crucial importance both for individuals and for society as a whole and that article 6 guarantees this right for all human beings, without distinction of any kind. The right is not to be narrowly interpreted and includes acts and omissions that would cause any unnatural or premature death. Its protection thus requires that the State adopt positive measures, which are only discharged if individuals are protected by the State against violations of its own agents, and private persons and entities alike. The Committee has made this clear, stating that the State duty to respect the right to life includes an obligation to take action in the case of foreseeable threats to the right to life and in life-threatening situations, even where those threats and situations are not caused directly by the State. Permitting or failing to take appropriate action to exercise due diligence to prevent the death of any individual on its territory or under its jurisdiction will result in a violation by the State party of the ICCPR and give rise to State responsibility.

Article 19 of the ICCPR guarantees the right of all persons to freedom of expression, encompassing the freedom to seek, receive and information and ideas of all kinds. Any restrictions on freedom of expression must be strictly limited and meet the high threshold set out in article 19(3) of the Covenant, following which any limitations must be determined by law and conform to the strict tests of necessity and proportionality. As underlined by the Human Rights Committee in general comment No. 34, attacks on persons because of the exercise of their freedom of expression cannot under any circumstance be compatible with article 19 (CCPR/C/GC/34, para. 23). As highlighted by the Committee, persons engaged in gathering, analysing and reporting on human rights are frequently subjected to such acts of intimidation because of their activities.

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".

In addition to these articles of the ICCPR, 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.

Article 1 of the Declaration 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) 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 6(a) holds that everyone has the right, individually and in association with others, to seek, obtain, hold and receive information about human rights and fundamental freedoms. Article 9 holds that everyone has the right to offer and provide professionally qualified legal assistance in defending human rights and fundamental freedoms. Article 12 complements these articles, 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 highlight Article 9(3) of the Protocol to Prevent, Suppress and Punish Trafficking in Persons Especially Women and Children, ratified by your Excellency's government in 2011, which specifies cooperation with non-governmental organizations, other relevant organizations and other elements of civil society, in actions to prevent trafficking in persons. We would like to refer to the OHCHR Recommended Principles and Guidelines on Human Rights and Human Trafficking (2002), guideline 5(9) encouraging law enforcement authorities to work in partnership with nongovernmental agencies in order to ensure that trafficked persons receive necessary support and assistance.

The Council of Europe Convention on Action against Trafficking in Human Beings, which your Excellency's government ratified in 2014, sets important obligations aimed at improving the protection of victims of trafficking, and in particular we would like to refer to article 35 which imposes an obligation to cooperate with civil society to meet the objectives of the Convention and article 12(5) which relates to provision of assistance to victims, specifically 'to co-operate with non-governmental organisations, other relevant organisations or other elements of civil society engaged in assistance to victims.' We would also like to highlight Directive 2011/36/EU of the European Parliament and of the Council of 5 April 2011 on preventing and combating trafficking in human beings and protecting its victims, especially article 18(2).

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 would also like to refer your Excellency's Government to the UN Basic Principles on the Role of Lawyers, adopted by the Eighth United Nations Congress on the Prevention of Crime and the Treatment of Offenders, held in Havana (Cuba) from 27 August to 7 September 1990. In particular, we would like to highlight principle 16 of the Basic Principles, which requires governments to take all appropriate measures to ensure that lawyers are able to perform all of their professional functions without intimidation, hindrance, harassment or improper interference, and to prevent that lawyers be threatened with prosecution or administrative, economic or other sanctions for any action taken in accordance with recognized professional duties, standards and ethics.

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.

Finally, we recall the Report of the Special Rapporteur on trafficking in persons, especially women and children, Siobhán Mullally, on Trafficking in persons, mixed migration and protection at sea (A/HRC/56/60), and specifically the Recommendation in para. 60. (1): "Recalling the importance of partnerships with civil society actors, ensure an enabling environment for civil society and human rights defenders, recognizing their significant role in search and rescue, the provision of assistance to victims of trafficking and persons at risk of trafficking and the prevention of trafficking at sea". We also recall that the Special Rapporteur expressed at para. 54, "serious concern at the criminalization of human rights defenders assisting migrants and refugees in distress and on disembarkation", and highlighted the concerns raised in relation to Act No. 4825/2021 adopted in Greece, which imposes limitations on private persons and non-governmental organizations volunteering to work on search and rescue operations, which have been described as a "de facto prohibition of civilian search and rescue".