

Greece to deliver another blow to independent NGO services and monitoring

In the context of growing negative rhetoric towards people on the move, Greek authorities are preparing to deliver another blow to independent NGO access and monitoring in reception facilities. The Hellenic Minister of Migration and Asylum (MoMA) is expected to announce measures that would de-register NGOs and bar them from access if they share with ‘migrants’ opinions contrary to MoMA’s official policies, or take legal action against detention orders or the suspension of the right to asylum, coupled with even tighter state scrutiny of funding.¹

NGO registration was introduced in 2020, despite strong criticism from international institutions for undermining freedom of association, enabling arbitrary decision-making, and disadvantaging smaller organisations.² The framework has since been institutionalised, with only vague promises of reform by Greek authorities. A legal challenge before the Council of State by Aegean NGO Network partner HIAS has remained stalled since 2021.³

Legislation has had a particularly damaging effect on independent access and services at Closed Controlled Access Centres (C.C.A.C.s) on the Greek islands. NGOs have been banned from conducting or starting programmes and threatened with expulsion from reception facilities. The sector has been smeared with allegations of smuggling or misconduct by government officials and the media, and targeted with defamatory language and investigations, including Refugee Biriyani & Bananas, a member of the Aegean NGO Network.⁴

Access to island C.C.A.C.s by independent organisations:

	Lesvos	Samos	Chios	Kos	Leros
Organisations	        	 			
Lawyers only	   	   		 	 

 Indicates an organisation that does not engage in monitoring

On Lesvos and Samos, only a handful of NGOs still retain access to the C.C.A.C.. On Chios, Leros and Kos, independent access has all but disappeared. Where entry is granted, NGOs and lawyers report being obstructed, threatened, refused, or temporarily denied access. The shrinking of NGO space has coincided with fewer visits and official reports from International monitoring bodies. When published, reports record degrading conditions, inadequate healthcare, poor sanitation, and excessive surveillance.⁵



C.C.A.C.s have already become fundamental rights black holes, and without urgent action to strengthen NGO access, service delivery, and independent monitoring, this reality will only worsen, silencing independent services and voices such as the Aegean NGO Network. To turn the tide:

- **Greek authorities** should revise NGO registration legislation to comply with European and international standards, refrain from targeting NGOs through criminalisation and inflammatory rhetoric, and engage in constructive dialogue with civil society.
- **Policy makers** must recognise the disappearance of NGO access to reception facilities and monitoring as a rule of law concern that directly threatens fundamental rights in Greece and the EU.
- **EU and UN bodies and institutions** should prioritise NGO access to reception facilities and independent monitoring, especially given that the C.C.A.C.s serve as a blueprint for EU border and screening procedures under the Pact on Migration and Asylum.
- **EU and UN bodies and institutions** should have a structured dialogue with Greek authorities to raise concerns about NGO access and civic space, and to monitor compliance with EU and international obligations.
- **The Council of Europe** should request an opinion on Greece's NGO legislation or issue an urgent opinion once legislative changes have been formalised by the MoMA.
- **The European Commission** should fully evaluate the NGO registration framework and condemn the targeting of registered NGOs with additional financial scrutiny, given that they are already subject to stringent audits under Greek law.⁶
- **The European Commission** should implement the EU Ombudsman's recommendation and publish a fundamental rights impact assessment of C.C.A.C.s including access and monitoring as a key component.⁷

The Aegean NGO Network is a coalition of 11 independent organisations present on the Greek islands, some of whom contribute anonymously due to the challenging environment for civil society. The Aegean NGO Network is supported by Oxfam Novib.

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Endotes

1. Stavros Papantoniou '[Greece to tighten rules on NGOs](#)' (Ekathimerini, 21 August 2025); Stavros Papantoniou '[Μεταναστευτικό: «Κόκκινη κάρτα» σε ΜΚΟ](#)' (Kathimerini, 21 August 2025); Hellenic Ministry of Migration and Asylum '[Θ. Πλεύρης στην ΕΡΤ: «Είναι σεβαστή η θέση των ΜΚΟ, αλλά αδιάφορη για το ΥΜΑ»](#)' (20 August 2025)
2. Human Rights Committee '[Concluding observations on the third periodic report of Greece](#)' (28 November 2024) CCPR/C/GRC/CO/3; Dunja Mijatović '[Statement: Greek authorities should reverse the trend undermining the work of human rights defenders and journalists](#)' (European Council, 12 January 2023); ECRE/ELENA '[Expert Opinion: Concerning the lawfulness of Greek legislation regulating the registration of NGOs on the registry of NGOs working with refugees and migrants](#)' (December 2021); Dunja Mijatović CoE Commissioner for Human Rights '[Letter to Mr Michalis CHRYSOCHOIDIS Minister for Citizens' Protection of Greece](#)' (3 May 2021) CommHR/DM/sf 019-2021; UN Special Rapporteur on the rights to freedom of peaceful assembly and of association, on the situation of human rights defenders and on the human rights of migrants '[Letter](#)' (31 March 2021) OL GRC 1/2021; Expert Council on NGO Law (Council of Europe) '[Addendum to the Opinion on the compatibility with European standards of recent and planned amendments to the Greek legislation on NGO registration](#)' (23 November 2020) CONF/EXP(2020)5; LIBE Committee (EU Parliament) '[Protecting Civil Society Space: Strengthening Freedom of Association, Assembly and Expression and the Right to Defend Rights in the EU](#)' (October 2020); Expert Council on NGO (Council of Europe) '[Opinion on the Compatibility With European Standards of Recent and Planned Amendments to Greek Legislation on NGO Registration](#)' (2 July 2020) CONF/EXP(2020)4
3. Together with Refugee Support Aeagean and Equal Rights Beyond Borders; GCR, Hellenic League for Human Rights, HIAS Greece et al. '[Struggle for Accountability - the State of the Rule of Law in Greece](#)' (January 2025)
4. Mandates of the Special Rapporteur on the situation of human rights defenders and the Special Rapporteur on the human rights of migrants '[Communication](#)' (28 December 2022) AL GRC 3/2022; European Commission '[2025 Rule of Law Report - Country Chapter on the rule of law situation in Greece](#)' (8 July 2025) SWD(2025) 908 final, p. 21.
5. CPT Committee 'Report to the Greek Government on the visit to Greece' (July 2024) CPT/Inf (2024) 21
6. On an annual basis, organisations must submit to the MoMA their annual reports, audited financial statements, balance sheets for the past two years, and proof of compliance with tax and insurance obligations. They are also required to notify the Ministry of any significant changes in their funding sources; Hellenic Republic Joint Ministerial Decision No. 10616/2020 Article 10-12 and Article 2(4)
7. EU Ombudsman '[Decision in strategic inquiry OI/3/2022/MHZ](#)' (7 June 2023)