

LIBERTIES

RULE OF LAW

REPORT

2026



#roi-report2026

GREECE



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FOREWORD

The Liberties Rule of Law Report 2026 is the seventh annual report on the state of rule of law in the European Union (EU) published by the Civil Liberties Union for Europe (Liberties). Liberties is a non-governmental civil society organisation promoting the civil liberties of everyone in the EU, and it is built on a network of national civil liberties groups from across the EU. Currently, we have member organisations in Belgium, Bulgaria, the Czech Republic, Croatia, Denmark, Estonia, France, Germany, Hungary, Ireland, Italy, Latvia, Lithuania, Malta, the Netherlands, Poland, Romania, Slovakia, Slovenia, Spain and Sweden, as well as a contributing partner organisation in Greece.

Liberties, together with its members and partner organisations, carries out advocacy, campaigning and public education activities to explain what the rule of law is, what the EU and national governments are doing to protect or harm it, and gathers public support to press leaders at EU and national level to fully respect, promote and protect our basic rights and values.

Drafted by Liberties and its member and partner organisations, the 2026 report covers the situation during 2025 with the purpose of providing the European Commission with reliable information and analysis from the ground to feed its own rule of law reports, and to provide an independent analysis of the state of the rule of law in the EU in its own right. Liberties' report represents the most in-depth reporting exercise carried out to date by a civil society network to map developments in a wide range of areas connected to the rule of law in the EU.

The 2026 report includes EU-wide trend analysis in the justice system, anti-corruption framework, media freedom, checks and balances, based on 22 country reports that follow a common structure, mirroring and expanding on the priority areas and indicators identified by the European Commission for its annual rule of law monitoring cycle. Nearly 40 organisations contributed to the compilation of these country reports. The 2026 report places particular emphasis on the recommendations made by the European Commission and how, in the assessment of Liberties' members, they have been implemented. Specific gaps were identified alongside new issues that arose in 2025.

[Download the full Liberties Rule of Law Report 2026 here.](#)

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GREECE

ABOUT THE CONTRIBUTING ORGANISATIONS

Inter Alia



Inter Alia is a civic non-profit organisation based in Athens and has been working transnationally since 2013. Inter Alia brings together concerned citizens, civil society actors, activists, social scientists, artists and community organisers in activities in the fields of political education, research, activism, advocacy and arts. The organisation aims to promote transformative civic action across borders, community empowerment and personal emancipation and development.

OVERALL ASSESSMENT: STAGNATOR

In 2025, Greece's rule of law context was shaped by a mix of technical reform activity and persistent structural deficits across the four pillars. On the one hand, the government advanced justice-system reorganisation and digitalisation projects and adopted sectoral legal changes affecting the media ecosystem, while the Commission noted improved legislative process discipline in terms of avoiding expedited procedures. On the other hand, longstanding weaknesses remained entrenched: very long court proceedings and continued concerns about perceived judicial independence. International and EU-level dynamics were also prominent: the annual EU Rule of Law cycle and Justice Scoreboard continued to place Greece among weaker performers on efficiency and trust indicators, while implementation backlogs of the European Court of Human Rights (ECtHR) judgments underscored systemic justice and rights-protection challenges.

Politically and societally, high-salience accountability cases continued to test institutions and polarise public debate. In anti-corruption, the Payment and Control Agency for Guidance and Guarantee Community Aid (OPEKEPE)(O.Π.E.K.E.Π.E.)/EU-funds file (with the European Public Prosecutor's Office (EPPO) involvement and subsequent parliamentary handling) became emblematic of perceived obstacles to pursuing high-level accountability, reinforcing a wider perception gap between formal frameworks and enforcement outcomes. In the media sphere, the year saw both regulatory/legal developments and sustained pressure on journalism: reports of physical attacks during demonstrations, intimidation and threats against investigative outlets, major fines and legal actions with chilling-effect potential, strategic lawsuits against public participation (SLAPP), and perceived political pressures that hinder independence. In checks and balances and civic space, civil society and international monitoring continued to describe a constrained enabling environment—particularly for organisations active on migration and human rights—amid legal proposals that further tighten Non-Governmental Organisations (NGO) registration and limited progress on structured dialogue with civil society organisations (CSO); at the same time, developments around the Pylos shipwreck investigation featured prominently in the broader debate on effective oversight and accountability for state actors.

Greece ranks 48th out of 143 countries in the World Justice Project (WJP) *Rule of Law Index 2025*, with an overall score of 0.60 (down from 0.61), placing 29th out of 31 in Europe/EEA amid an accelerated global rule-of-law recession affecting 68% of countries. Judicial independence faces notable erosion through indicators showing civil justice free from improper government influence declined (among 67% of countries globally), with Greece's judiciary losing ground to executive overreach and rising political interference; it ranks around 55th globally in criminal justice and 50th in civil justice, hampered by chronic delays, reduced alternatives to court, and weakening checks on executive power (decline in 61% of countries). The Index highlights Greece's shrinking civic space exacerbating these

pressures, with freedoms of expression/assembly and civic participation all declining, limiting public oversight of the judiciary.¹

Assessment of the trajectory

The 2025 reference year shows a clear pattern where reforms continue — they are largely technical, legalistic, and unevenly implemented, without shifting the underlying outcomes that matter for the rule of law. In other words, despite ongoing legislative changes, the day-to-day reality across the four pillars remains broadly unchanged: court proceedings stay excessively long and public trust in judicial independence remains low; corruption is still widely perceived as pervasive and the record of final judgments in complex/high-level cases remains limited; the media environment continues to raise concerns on independence, transparency and journalist safety; and civic space remains under sustained pressure through measures and practices that complicate or deter CSO operations. This combination—formal movement with limited practical effect—supports ‘stagnation’ rather than improvement.

Persistent non-delivery in judicial efficiency, repeated controversies that affect perceptions of judicial independence, continued patterns of intimidation/harassment and safety incidents affecting journalists (including chilling-effect dynamics through legal and financial pressures), and ongoing constraints on civil society that cumulatively shrink the space for oversight and accountability. While this may not always appear as abrupt ‘backsliding’, the risk is that stagnation becomes entrenched: implementation gaps across pillars reinforce one another (e.g., weak accountability and slow justice amplify corruption perceptions; constrained media and civic space reduce scrutiny; polarisation hardens institutional mistrust).

ACTIVATING OTHER PARTS OF THE EU RULE OF LAW TOOLBOX

The European Commission action should focus on stronger, measurable follow-up to recommendations, through clear milestones, regular reporting, and structured engagement with stakeholders, complemented by targeted technical support where relevant.

Beyond recommendations, additional parts of the rule of law toolbox could be activated through systematic follow-up under the annual Rule of Law cycle. Where sector-specific EU-law obligations

1 World Justice Project, *Rule of Law Index: Greece Profile 2025*, <https://worldjusticeproject.org/rule-of-law-index/country/2025/Greece>.

are engaged (for instance under the European Media Freedom Act, the Digital Services Act, etc.), the Commission should also rely on the standard compliance and monitoring tools available under those instruments. Areas warranting particular scrutiny include the effective application of EU rules on media freedom and journalist protection, and the shrinking of civic space with regulations incompatible with the EU standards.

The launch of infringement proceedings and the withholding of EU funds under budget conditionality mechanisms should be considered after repetitive non-compliance, where a clear and systemic link can be demonstrated between identified rule-of-law deficiencies; this could be the case on the shrinking of civic space where, after five years of constant recommendations from the European Commission, the Council of Europe and the UN to put an end to arbitrary restrictions on the work of civil society organisations supporting refugees and migrants, the Ministry of Migration and Asylum continues to target the organisations deemed inconvenient solely for carrying out their work.²

State of play (versus 2025)

-  *Justice system*
-  *Anti-corruption framework*
-  *Media Environment and Media Freedom*
-  *Checks and balances*

Legend

- | | | |
|-------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------|
| <i>Regression</i> | <i>No progress</i> | <i>Progress</i> |
|  |  |  |

² Refugee Support Aegean (RSA) et al., Joint Civil Society Statement on the Migration Ministry bill, 23 January 2026, <https://rsaegean.org/en/greece-ngo-work-a-punishable-offence/>.

JUSTICE SYSTEM -

General assessment

Legislative and organisational reforms, such as the appointment procedure to the highest positions in the court system, efforts to promote the use of alternative dispute resolution, and justice digitalisation projects continued, but their impact on day-to-day access to justice remains limited and uneven. Key efficiency indicators remain among the weakest in the EU: the Commission reports that the estimated disposition time for litigious civil and commercial cases at first instance increased, while proceedings before the Council of State remained very long. Although national reporting indicates improved throughput at the Council of State, backlog and processing times remain high. Persisting delays continue to undermine timely judicial protection and contribute to perceptions of institutional dysfunction.

At the same time, the perceived judicial independence remains low, and stakeholders express concerns that trust has been affected by a series of high-profile cases. In parallel, 2025 saw renewed debate within the magistracy about disciplinary proceedings initiated on grounds resulting from the content of judicial decisions.

Overall, efficiency gains remain insufficient to reverse entrenched delays, while the cumulative effect of delays and perceived pressures continues to erode trust in the justice system. This systemic failure to provide effective judicial protection raises serious questions about compliance with the EU fundamental rights standards.

Implementation of 2025 Commission recommendations

There were no recommendations in this area in the Commission's *2025 Rule of Law Report*.

Gaps in the Commission's Report

Declining public perception of independent judiciary

The 2025 EU Justice Scoreboard depicts Greece as continuing to face acute challenges in efficiency and perceived judicial independence, which continues to decline among the general public.³ Overall, 38% of the general population perceive the level of independence of courts and judges to be 'fairly or

3 European Commission, 2025 EU Justice Scoreboard, 8 July 2025, https://commission.europa.eu/strategy-and-policy/policies/justice-and-fundamental-rights/upholding-rule-law/eu-justice-scoreboard_en.

very good' in 2025, down from 40% in 2024, while 60% of the general population perceive it as being 'fairly or very bad', further decreasing from previous years. Consistently, the leading stated influences behind the perceived lack of independence in Greece include perceived interference/pressure from government and politicians (53.7%), from economic or other specific interests (55.2%), and views that judges' status/position does not sufficiently guarantee independence (44.6%).⁴ While perception indicators do not attribute views to specific cases, the Commission records that stakeholders see perceptions as affected by high-profile cases; civil society and investigative journalism frequently cite emblematic cases such as *Tempi*⁵ and *OPEKEPE*⁶ as drivers of public distrust and concerns about accountability and political influence.

Efforts to increase the level of digitalisation continue: remote hearings for witnesses/accused were introduced in criminal proceedings; the public can monitor case progress online; funded by the Recovery and Resilience Facility (RRF) upgrades of case-management systems (administrative/civil/criminal) are expected to be completed in 2026. Independent reporting largely aligns with the European Commission's finding that the length of proceedings remains a 'serious challenge'⁷ in Greece, with the sharpest bottlenecks at first-instance civil/commercial courts and at the Council of State. In its 2025 country chapter, the Commission reports that litigious civil/commercial disposition time at the first instance rose to 771 days (2023) (longest in the EU) with a clearance rate of 92%, while Council of State proceedings remained very long (1,232 days in 2023) even as first-instance administrative disposition time improved (439 days). Overall, the country has a very lengthy justice system with delays significant enough to jeopardise the rule of law; the Commission notes that stakeholders consider persisting delays the biggest challenge, yet it does not provide any concrete recommendations in its report.

The International Monetary Fund's (IMF) analysis confirms Greece's significant lag in digital-ready procedural rules, secure remote access, and electronic court-prosecution communication, with courts deviating markedly from EU averages on digital tools that could reduce paper-based processes.⁸ Legal

4 European Commission, '2025 EU Justice Scoreboard – Quantitative Data Factsheet COM(2025) 375 final, 1 July 2025, https://commission.europa.eu/document/download/89509c03-d2d6-4031-be4e-ca385dc31480_en.

5 Human Rights Watch, *Greece: Rail Crash Highlights Wider Rule of Law Failings*, 6 March 2025, <https://www.hrw.org/news/2025/03/06/greece-rail-crash-highlights-wider-rule-law-failings>.

6 Politico, *EU fraud investigators raid Greek farm funds agency*, 14 October 2025, <https://www.politico.eu/article/eu-fraud-investigators-raid-greek-farm-funds-agency/>.

7 European Commission, 2025 Rule of Law Report: Country Chapter on the rule of law situation in Greece, SWD(2025) 908 final, Strasbourg, 8.7.2025, p. 6, https://commission.europa.eu/publications/2025-rule-law-report-communication-and-country-chapters_en

8 International Monetary Fund, *Enhancing Judicial System Efficiency in Greece: Drivers and Reform Opportunities, Selected Issues Paper, 2025, p. 18, May 2025, https://www.imf.org/-/media/files/publications/selected-issues-papers/2025/english/sipea2025057.pdf*

professionals speak of the incomplete rollout of electronic submissions across court instances and ongoing reliance on paper processes, creating delays and inefficiencies.⁹ Overall, and despite recent efforts, Greece remains among the European Union’s least efficient judicial systems.¹⁰

The Standing Scientific Committee of the Ministry of Justice on Artificial Intelligence is assessing AI uses in the justice system primarily for supportive administrative tasks (e.g., anonymisation of judgments) to speed up the procedure; Homo Digitalis warns that AI deployment must be assessed for ‘high-risk’ impacts on fair trial rights, with regular impact assessments, interoperability, and user support to avoid uneven, court-by-court algorithmic practices.¹¹

Civil society actors in Greece have explicitly framed accountability in high-profile cases involving state actors as a justice-system problem (effectiveness and independence), arguing that recurring failures to judicially scrutinise executive action and attribute responsibility to officials undermine public trust and require closer follow-up by the Commission. CSOs have been heavily critical of the Commission for failing its duty to scrutinise independence, effectiveness, and quality of the justice system, criticizing the 2025 Rule of Law Report for not sufficiently assessing the ‘absence of accountability’ problem and for under-linking ECtHR condemnations and United Nations (UN) observations on investigation failures (pushbacks/violence by law enforcement) to the justice-system pillar.¹²

9 Vanessa Panagiota Dega, *Critical Assessment of the Supreme Judicial Council’s Digitalization Plan* (‘Κριτική αποτίμηση του σχεδίου αναθεώρησης του Σχεδίου Αναθεώρησης του Κώδικα Πολιτικής Δικονομίας από την Ομάδα Εργασίας της Γενικής Επιτροπείας Δικηγόρων’), 5 December 2025, *Nomarchia.gr*, <https://nomarchia.gr/κριτική-αποτίμηση-του-σχεδίου-αναθεω/> [in Greek]

10 Stournaras *Highlights Low Efficiency of Judicial System at Justice Ministry Conference*, *eKathimerini.com*, 8 October 2025, <https://www.ekathimerini.com/politics/1283270/stournaras-highlights-low-efficiency-of-judicial-system-at-justice-ministry-conference/>.

11 *Homo Digitalis, AI in the Justice System: Standing Scientific Committee Assessment*, *HomoDigitalis.gr*, 7 February 2025, <https://homodigitalis.gr/posts/134212/> [in Greek].

12 Refugee Support Aegean (RSA) et al., *New EU Rule of Law Report Greece 2025: Flawed and Selective Assessment of the State of the Rule of Law in Greece*, 11 July 2025, <https://rsaagean.org/en/eu-rule-of-law-report-greece-2025/>.

New Issues that Emerged in 2025

Rhodes ‘Urban Planning Department’ case

In the Rhodes ‘Urban Planning Department’ case,¹³ the decision by the Supreme Court President to initiate disciplinary proceedings against the investigating magistrate and prosecutor — combined with intense public commentary — sparked objections from judicial and legal professional bodies, who warned against disciplining the substantive assessment of evidence or the choice of coercive measures.

Both the Rhodes Bar Association and the Union of Prosecutors of Greece have strongly criticised this decision: the Rhodes Bar Association argues that such moves amount to an impermissible intervention in the functional independence of judicial officers,¹⁴ warning that the authority of justice is protected through strict adherence to procedural/substantive law — not ‘selective communicative interventions’ — and cautioning that interventions in the merits can pressure decision-makers and even undermine the presumption of innocence.¹⁵ In parallel, the Union of Prosecutors emphasises that prosecutors enjoy functional independence and that a judicial/prosecutorial assessment is not a disciplinary offence, stressing that — especially when coupled with its ‘wide disclosure’ — ordering disciplinary control for a jurisdictional assessment harms constitutionally protected independence and ultimately damages the administration of criminal justice and democratic legitimacy.¹⁶ The Commission report mentioned this controversy without providing any specific recommendation.

The new Regulation of Operation of the Supreme Court (Areios Pagos) adopted by Presidential Decree 34/2025,¹⁷ which took effect on 15 September 2025, introduces (a) strict page limits for key civil filings and (b) strict limits on oral argument time. The Coordinating Committee of the Greek

13 Thodoris Chondrogiannos, *Issue of Violation of Judicial Independence by the Supreme Court in the Context of a Criminal Case in Rhodes*, *govwatch*, 5 May 2025, <https://govwatch.gr/en/finds/zitima-paraviasis-tis-anexartiasis-toy-dikasti-apo-ton-areio-pago-sto-plaisio-poinikis-ypothesis-sti-rodo/>.

14 Invoking Articles 87 ff. of the Greek Constitution, Article 6(1) of the ECHR, and the Courts Code.

15 *Rhodes City Council: Announcement on the disciplinary control against an investigator and prosecutor in Rhodes* (‘ΔΣ Ρόδου: Ανακοίνωση για τον πειθαρχικό έλεγχο κατά ανακριτή και εισαγγελέα στη Ρόδο’), *Νομικά Νέα | Lawspot.gr*, 28 March 2025, <https://www.lawspot.gr/nomika-nea/ds-rodoy-anakoinosi-gia-ton-peitharhiko-elegho-kata-ana-kriti-kai-eisaggelea-sti-rodo/>

16 Hellenic Prosecutors’ Association Former Cadet School (‘Ένωση Εισαγγελέων Ελλάδος’), Press Release 26/3/2025 (ΔΕΛΤΙΟ ΤΥΠΟΥ 26/3/2025), [enosieisaggeleon.gr](https://enosieisaggeleon.gr/pressrelease26-3-2025/), March 26, 2025, <https://enosieisaggeleon.gr/pressrelease26-3-2025/>

17 Hellenic Republic, Presidential Decree No. 34/2025, Rules of Procedure of the Supreme Court (Areios Pagos), Government Gazette Issue 60/A/23.4.2025, <https://www.kodiko.gr/nomothesia/document/1151019/p.d.-34-2025>.

Bar Associations (the Plenary’s coordinating body) objected that these measures impose “restrictions on litigants’ rights and on the orality of the procedure” and overlook the right of unimpeded access to justice, calling on the Supreme Court’s leadership/Administrative Plenary to reconsider and warning that similar ‘acceleration’ tools at the Council of State did not deliver real speed gains.¹⁸

Implications and Recommendations for 2026

Overall, the Commission’s report failed to address the critically long disposition times in civil/commercial cases and the Council of State; the ongoing concerns regarding judicial independence, particularly the use of disciplinary proceedings; and the need for specific, measurable targets to complement digitalisation reforms.

Suggested recommendation: Take further steps to improve the efficiency and perceived independence of the justice system, in particular by reducing the length of proceedings in civil/commercial cases at first instance and before the Council of State, and by strengthening safeguards against pressures on judges and prosecutors, including through transparent, publicly accessible justice statistics and clear safeguards in disciplinary procedures.

Implementation of Judgments

The European Implementation Network (EIN) and Democracy Reporting International (DRI) joint briefing systematically tracks Greece’s compliance with Strasbourg and Luxembourg judgments;¹⁹ 2025 data classifies the country as a ‘problematic’ ECtHR performer (31 leading judgments pending implementation by June 2025, up from 30 on 1 January ; 34% of past decade’s leading cases remain open vs. EU average 20%) and ‘poor Court of Justice of the European Union (CJEU) complier’ on rule-of-law matters (four relevant rulings: two fully complied, one partial, one non-complied; 50% pending >two years). The ECtHR backlog specifics reveal an average pendency of six years one month, with the oldest case (16 years) concerning freedom of association barriers to NGO registration; legislative responses remain partial, such as the new Code of Civil Procedure grounds for ECtHR-based

18 “Cutter” and officially in the pleadings to the Supreme Court and 6-minute speeches by the parties – *The provisions of the new Rules of Procedure of the Supreme Court* (‘Κόφτης” σε δικόγραφα προς Άρειο Πάγο’), Dikastiko.gr, 28 April 2025, <https://www.dikastiko.gr/eidhsh/koftis-kai-episimos-sta-dikografa-pros-ton-areio-pago-kai-agoreyseis-6-lepton-apo-toys-diadikoys-oi-provlepseis-toy-neoy-kanonismoy-toy-areioy-pagoy/>.

19 European Implementation Network (EIN) and Democracy Reporting International (DRI), *Preview Brief: Non-implementation of European Courts’ Judgments, 2025*, <https://static1.squarespace.com/static/55815c4fe4b077ee5306577f/t/6926e434c6ed241ed93d4265/1764156468547/Preview-Brief-Non-implementation-of-European-Courts-Judgments.pdf>.

case reopening and draft *Zoumboulidis v. Greece* state liability law,²⁰ but cluster around judicial delays, pushbacks, and property rights without resolving systemic execution gaps. The CJEU rule-of-law failures span data protection, public procurement transparency, and judicial independence safeguards, which the report correlates with Greece's stagnant *World Justice Project Rule of Law Index* scores.²¹

Against this backdrop, the long-running *M.D. v. Greece*²² execution file (leading judgment final 13 February 2015) is emblematic in the migration field: it concerns immigration detention and ineffective judicial review, and it remains under Committee of Ministers supervision.²³ In September 2024, the Government asked for supervision to be closed, but Rule 9.2 communications argue that systemic deficiencies persist in practice—especially lack of state-funded legal aid/interpretation and a remedy that is under-used and unevenly applied (with only around one-fifth of detainees able to challenge detention).²⁴ This case, along with its several clone cases (*J.R. and Others*,²⁵ *Mirzai and Others*,²⁶ *O.S.A. and Others*²⁷), spotlight the systemic, long-running non-execution problems around immigration detention and effective judicial review.

20 Application no. 57246/21, 4 June 2024, <https://hudoc.echr.coe.int/eng?i=001-233990>.

21 World Justice Project, *Rule of Law Index: Greece Profile 2025*, <https://worldjusticeproject.org/rule-of-law-index/country/2025/Greece>.

22 Application no. 60622/11, 13 November 2014, <https://hudoc.echr.coe.int/eng?i=001-147884>.

23 Council of Europe, Department for the Execution of Judgments, 2026 List of Cases Pending Execution Concerning Migration for DMR/DEJ, <https://rm.coe.int/2026-list-of-cases-pending-execution-concerning-migration-for-dmr-dej-/48802a522b>.

24 Committee of Ministers of the Council of Europe, Report by the State Parties 2024, <https://www.refworld.org/reference/statepartiesrep/coeministers/2024/en/148852>

25 Application no. 22696/16, 25 January 2018, <https://hudoc.echr.coe.int/?i=001-180319>.

26 Application no. 44312/13, 23 November 2023, <https://hudoc.echr.coe.int/?i=001-228990>.

27 Application no. 39065/16, 21 March 2019, <https://hudoc.echr.coe.int/eng?i=001-191742>.

ANTI-CORRUPTION FRAMEWORK –

General assessment

While the Commission considers that Greece has made ‘some further progress’ on the 2024 recommendation to build a robust track record of prosecutions and final judgments in corruption cases, our overall assessment remains ‘no progress’ because the steps taken in 2025 were largely procedural and have not yet translated into measurable enforcement outcomes or stronger preventive safeguards. On the first recommendation, investigations continued (including EU-funds cases such as OPEKEPE), but there is still no consistent track record of timely prosecutions and final judgments in complex/high-level cases, and structural obstacles (notably the special parliamentary procedure/ministerial immunity framework) continue to delay or dilute accountability. On the second recommendation, the lobbying Transparency Register remains sparsely populated and disclosures incomplete, with limited evidence of systematic verification or dissuasive sanctions for non-compliance. More broadly, key integrity tools (including regular updating and verification of disclosures such as gifts/asset declarations and effective whistleblower channels) show weak or uneven implementation, while public perceptions of corruption remain exceptionally high.

Implementation of 2025 Commission recommendations

Recommendation: Continue efforts to establish a robust track record of prosecutions and final judgments in corruption cases, including high-level corruption (first made in 2024)

High-profile corruption/fraud investigations with the EU dimensions continued. In the OPEKEPE case, the EPPO sent a case file to the Greek Parliament alleging organised fraud around EU farming subsidies; subsequent resignations of senior officials were reported.²⁸ According to Greek legislation,²⁹ only the national parliament has the authority to investigate and prosecute current or former members of the Greek government. This means that, despite its broad mandate to investigate the misuse of EU funds, the EPPO lacks the power to pursue such cases in Greece. The agency has called this a violation of its founding EU regulation.³⁰

28 Nektaria Stamouli, *Greek farm scandal triggers top-level government resignations*, POLITICO, 27 June 2025, <https://www.politico.eu/article/greek-farm-scandal-triggers-top-level-government-resignations/>.

29 Article 86 §1 of the Greek Constitution establishes that only Parliament can prosecute incumbent or former Ministers for criminal acts committed in office, with the Supreme Court (Areios Pagos) holding jurisdiction. Proceedings require a special parliamentary majority and lift parliamentary immunity where applicable.

30 *Ekathimerini*, ‘Kovesi: European Public Prosecutor’s Office here to stay’, 2026, <https://www.ekathimerini.com/economy/1282632/kovesi-european-public-prosecutors-office-here-to-stay>.

In July 2025, a Parliamentary investigative committee was set up to examine all issues that have arisen concerning OPEKEPE's operations.³¹ Overall, these developments show active investigations, but they do not demonstrate any significant prosecutions and final judgment track record in high-level cases.

The government appears to be investing in the logic of the parliamentary majority as a form of immunity. It avoided setting up a Preliminary Investigation Committee, since, as it claims, there are no criminal prosecutions yet. However, criticism is mounting.³² Opposition parties and independent media speak of a deliberate cover-up,³³ while commentators remind that the EPPO did not accidentally initiate the process of requesting investigation into the responsibilities of current or former ministers. The use of a Parliamentary investigative committee instead of a Preliminary Investigation Committee (the Article 86 preliminary investigation could directly address potential criminal responsibility of the former minister) is perceived as a dilution and delay tactic.³⁴ Moreover, it is becoming increasingly clear that these practices were not isolated initiatives of a few corrupt officials, but part of a systematic mechanism for distributing EU funds with political implications.

The recommendation itself is relatively clear, but specific indicators are not included. The Commission could improve the recommendation:

Build a credible track record of timely prosecutions and final judgments in corruption and fraud cases affecting EU funds (including agricultural subsidies), and strengthen paying-agency controls and recoveries, with systematic cooperation with EPPO/OLAF.

Commission's 2025 assessment: Some further progress	Inter Alia's current assessment: In progress (initial steps)
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31 The National Herald, Turbulent parliament approves ND OPEKEPE investigation proposal, 2026, <https://www.thenationalherald.com/turbulent-parliament-approves-nd-opekepe-investigation-proposal/>.

32 Panagiotis Tyannetatos, *What does the establishment of an investigative committee mean for OPEKEPE – What happens to the preliminary investigation and the timetables?* ('Τι σημαίνει η σύσταση εξεταστικής επιτροπής για τον ΟΠΕΚΕΠΕ - Τι γίνεται με την προανακριτική και τα χρονοδιαγράμματα?'), *in.gr*, 14 July 2025, <https://www.in.gr/2025/07/14/politics/politiki-grammateia/ti-simainei-systasi-eksetastikis-epitropis-gia-ton-opekepe-ti-ginetai-tin-proanakritiki-kai-ta-xronodiagrammata/> [in Greek]

33 Opposition rejects ND's OPEKEPE inquiry call as attempted 'cover up', *eKathimerini.com*, 14 July 2025, <https://www.ekathimerini.com/politics/1275276/opposition-rejects-nds-opekepe-inquiry-call-as-attempted-cover-up/>.

34 Greek parliament set to probe agency linked to EU farm-aid fraud, *Reuters*, 30 July 2025, <https://www.reuters.com/world/greek-parliament-set-probe-agency-linked-eu-farm-aid-fraud-2025-07-30/>.

Recommendation: Improve the lobbying framework, including by reviewing the definition of a lobbyist and ensuring effective implementation (introduced in 2025)

The Commission reports continued operation of the Transparency Register with still limited uptake, and that annual declarations were published only from mid-2024 and “do not seem to cover all those obliged”.³⁵ Currently, only 42 entities have been currently registered to the Transparency Register (so, only nine during 2025, taking into consideration the date from the National Transparency Authority’s (NTA) report);³⁶ in most entries, data are scarce and incomplete.

The Commission’s recommendation is relatively clear but indicators to track progress are not clearly articulated. It concerns preventive transparency: clarifying who is covered by lobbying rules (definition/scope of lobbyists) and ensuring the lobbying register and disclosure obligations are implemented effectively (completeness, accuracy, sanctions, and usability). An improved recommendation that could fulfill the aim would be:

Enforce timely registration of all actors obliged in the Transparency Registry, with regular follow-up and sanctions for non-compliance.

Commission’s 2025 assessment: N/A

Inter Alia’s current assessment: In progress (initial steps)

Gaps in the Commission’s Report

Perception of widespread corruption

According to the Special Eurobarometer 2025, Greece ranks first, for another year, in the EU in corruption perception, with 97% of the respondents considering corruption to be widespread in the country (EU average: 69%). Greece exhibits Europe’s most acute corruption perception crisis according to Eurobarometer’s metrics. The primary reason mentioned for not reporting corruption is that it is “difficult to prove anything”, showcasing the gap between legislation and its enforcement in practice. The most prominent reason reported is “too close links between business and politics”.³⁷

35 European Commission, *2025 Rule of Law Report: Country Chapter on the rule of law situation in Greece*, SWD(2025) 908 final, 8 July 2025, p. 10.

36 Annual Report of the Hellenic Human Rights Commission for the year 2024 (‘Εθνική Αρχή Διαφάνειας (ΕΑΔ), Έκθεση Απολογισμού 2024’), National Transparency Authority (‘Εθνική Αρχή Διαφάνειας’), 5 August 2025, <https://aead.gr/publications/essays/ead-ekthesi-apologismou-2024> [in Greek].

37 *Special Eurobarometer 2023: Citizens’ Attitudes Towards Corruption in the EU: National Factsheet Greece*, European Commission, Οεδη 2023, https://govwatch.gr/wp-content/uploads/2023/07/Citizens_attitudes_corruption_in_EU_2023_sp534_factsheet_el_en.pdf.

It is worth mentioning that, since the first published gifts registry for cabinet/deputy ministers (covering 2022–2023), containing a very small number of declared gifts, no updating of the list has been performed throughout the year of reference.³⁸ The same applies to the Transparency Register, where only 42 entities have been currently registered (so, only nine during 2025, taking into consideration the date from NTA’s report).³⁹ As was the case in the previous year, the data are scarce, with incomplete records and inconsistencies. All the above situations point to a process where, although formally aligning legal frameworks, beneath the surface lies a troubling workaround that undermines this progress, having a pretextual only approach to the legislation.

In its annual report 2024–2025, VouliWatch frames whistleblower protection as another ‘on paper only’ reform-risk: according to the legislation, both public and private entities are required to establish internal reporting channels and appoint an Internal Reporting Officer (IRO). These obligations should have been met by 2023. However, a basic check on the Ministry of Interior’s website - responsible for introducing the law - did not reveal any public information about its compliance or appointment of an IRO. As the law’s implementation deadline has long passed, these questions are crucial to assessing whether whistleblower protection in Greece is being taken seriously, or whether it remains another democratic reform undermined by bureaucratic inertia and lack of political will.⁴⁰

New Issues that Emerged in 2025

High-profile EU-fund fraud and corruption investigations

The OPEKEPE scandal⁴¹

High-profile corruption/fraud investigations with the EU dimensions continued. In the OPEKEPE case, the EPPO sent a case file to the Greek Parliament alleging organised fraud around EU farming subsidies; subsequent resignations of senior officials were reported.⁴² According to Greek law, only the

38 Presidency of the Government(Προεδρία της Κυβέρνησης), [primeminister.gr](https://www.primeminister.gr/primeminister/proedria-tis-kivernisis), accessed 7 January 2026, <https://www.primeminister.gr/primeminister/proedria-tis-kivernisis>.

39 Annual Report of the Hellenic Human Rights Commission for the year 2024 (‘Εθνική Αρχή Διαφάνειας (ΕΑΔ), Έκθεση Απολογισμού 2024’), National Transparency Authority (‘Εθνική Αρχή Διαφάνειας’), 5 August 2025, <https://aead.gr/images/essays/2024-ekthesi-apologismou.pdf> [in Greek]

40 Vouliwatch , *Annual Report 2024–2025, Vouliwatch*, <https://vouliwatch.gr/resources/file/2025/7/25/165b4a5c-a665-4a96-a3ac-c630bfb243fa.pdf>.

41 see Section “Implementation of 2025 recommendations”

42 Nektaria Stamouli, *Greek farm scandal triggers top-level government resignations*, POLITICO, 27 June 2025, <https://www.politico.eu/article/greek-farm-scandal-triggers-top-level-government-resignations/>.

national parliament has the authority to investigate and prosecute current or former members of the Greek government. This means that, despite its broad mandate to investigate the misuse of EU funds, the EPPO lacks the power to pursue such cases in Greece. The agency has called this a violation of its founding EU regulation. In July 2025, a Parliamentary investigative committee was set up to examine all issues that have arisen concerning OPEKEPE's operations. Overall, these developments show active investigations, but they do not demonstrate any significant prosecutions and final judgment track record in high-level cases.

The government appears to be investing in the logic of the parliamentary majority as a form of immunity. It avoided setting up a Preliminary Investigation Committee, since, as it claims, there are no criminal prosecutions yet. However, criticism is mounting.⁴³ Opposition parties and independent media speak of a deliberate cover-up,⁴⁴ while commentators remind that the EPPO did not accidentally initiate the process of requesting investigation into the responsibilities of current or former ministers. The use of a parliamentary investigative committee instead of a Preliminary Investigation Committee (the Article 86 preliminary investigation could directly address potential criminal responsibility of the former minister) is perceived as a dilution and delay tactic.⁴⁵ Moreover, it is becoming increasingly clear that these practices were not isolated initiatives of a few corrupt officials, but part of a systematic mechanism for distributing EU funds with political implications.

Implications and Recommendations for 2026

The perception of widespread corruption is generally corroborated by investigative reports; Greece continues to score very low at the perceived levels of the public sector corruption index (49%) by Transparency International, a ranking that places the country among 'flawed democracies'.⁴⁶ Weak or uneven enforcement of preventive safeguards increases corruption risks, undermines accountability in

43 Panagiotis Tyannetatos, *What does the establishment of an investigative committee mean for OPEKEPE – What happens to the preliminary investigation and the timetables?* ('Τι σημαίνει η σύσταση εξεταστικής επιτροπής για τον ΟΠΕΚΕΠΕ - Τι γίνεται με την προανακριτική και τα χρονοδιαγράμματα?'), *in.gr*, 14 July 2025, <https://www.in.gr/2025/07/14/politics/politiki-grammateia/ti-simainei-systasi-eksetastikis-epitropis-gia-ton-opekepe-ti-ginetai-tin-proanakritiki-kai-ta-xronodiagrammata/> [in Greek].

44 Opposition rejects ND's OPEKEPE inquiry call as attempted 'cover up', *eKathimerini.com*, 14 July 2025, <https://www.ekathimerini.com/politics/1275276/opposition-rejects-nds-opekepe-inquiry-call-as-attempted-cover-up/>.

45 Greek parliament set to probe agency linked to EU farm-aid fraud, *Reuters*, 30 July 2025, <https://www.reuters.com/world/greek-parliament-set-probe-agency-linked-eu-farm-aid-fraud-2025-07-30/>.

46 Transparency International Greece (2025), *Corruption Perceptions Index (CPI) 2024*,: <https://transparency.gr/wp-content/uploads/2025/02/CPI2024.pdf>.

high-level decision-making processes, and fuels public perceptions that integrity rules are formalistic rather than effective.

Overall, Greece's corruption problem extends far beyond individual scandals into the very structure of its economic and political systems. The data from the Bridgegap⁴⁷ project shows that Greece performs poorly in terms of the Index of Public Integrity - a composite index measuring judicial independence, online services, budget transparency, press freedom, and administrative transparency.

Suggested recommendation: Ensure robust integrity and disclosure safeguards for political office holders and senior advisers by (i) strengthening the scope and public accessibility of asset declarations and gifts registries; (ii) ensuring systematic verification, effective sanctions, and publication of compliance/enforcement statistics.

Suggested recommendation: Remove or mitigate legal/procedural obstacles that hinder effective investigation and prosecution of high-level corruption/fraud, including clear, time-bound procedures for lifting immunity where constitutionally required, and strengthened resources for specialised prosecution and judicial handling of complex corruption/EU-fraud cases.

47 BridgeGap Foundation (2025), *Greece's Enduring Struggle with Corruption: Why Systemic Change Remains Elusive*, <https://corruptiondata.eu/greeces-enduring-struggle-with-corruption-why-systemic-change-remains-elusive>.

MEDIA ENVIRONMENT AND MEDIA FREEDOM -

General assessment

Overall, the trajectory in 2025 reflects no progress, with elements of further deterioration, despite some formal/legal steps, such as the enhancement of resources of the media regulator, the new appointment procedures of administrative bodies and the improvement of the legal framework concerning the right of access to documents. International and civil-society monitoring continues to portray Greece as a structurally high-risk media environment, where persistent concerns around political influence, legal harassment, lack of plurality, market concentration, and opaque public-resource allocation undermine pluralism and journalistic autonomy. These structural problems are mirrored in exceptionally low public trust.⁴⁸

Implementation of 2025 Commission recommendations

Recommendation: Continue ongoing efforts to strengthen legislative and non-legislative safeguards to improve the safety and protection of journalists, in particular as regards abusive lawsuits, in line with the adopted Memorandum of Understanding and taking into account European standards on the protection of journalists (first made in 2024)

As reported by the Commission, drafting committees/expert work continued on the Anti-SLAPP transposition and on implementing the Memorandum of Understanding on journalist protection.

48 *International Monetary Fund (IMF), Selected Issues Paper (2025/57), Enhancing Judicial System Efficiency in Greece: Drivers and Economic Impact, 2025, <https://www.imf.org/-/media/files/publications/selected-issues-papers/2025/english/sipea2025057.pdf>*

However, CSO monitoring continues to document SLAPP risks and censorship related pressures, supporting the need for concrete procedural safeguards and stronger source-protection guarantees. The typical SLAPP ‘toolkit’ observed in Greece includes claims commonly grounded in defamation/insult, ‘lost profits’, and personal data arguments, paired with excessive damages claims (in the mapping reaching into the millions of euros, sometimes with ‘per-mention’ penalty demands).⁴⁹ CSO reporting indicates that new SLAPP cases continued to emerge in Greece, and that state initiatives had not yet produced tangible SLAPP-specific results: three years after the creation of the journalists’ protection task force, no concrete SLAPP-focused action had been publicly communicated. Also, a legislative drafting committee was in the process of being formed to transpose the Directive (EU) 2024/1069; that transposition should be carried out in dialogue with those most likely to be targeted and that protection is needed at national level (not only for cross-border cases). Separately, the European Commission issued a reasoned opinion on 19 March 2025 to Greece (iShares Global Infrastructure UCITS ETF (INFR)(2022)0297) for failing to fully transpose the European Accessibility Act (Directive (EU) 2019/882) into national law, despite the 28 June 2022 deadline, after identifying remaining gaps following Greece’s self-assessed complete measures.⁵⁰

The Commission’s recommendation is relevant but not comprehensive: beyond SLAPPs/safety, civil society highlights the need to address systemic issues, such as government influence over public media and the use of state advertising to shape narratives, as well as smear campaigns and online harassment (often government-aligned) and insufficient accountability mechanisms, including attempts to block disclosure on ‘national security’ grounds and efforts to identify whistleblowers. Inter Alia would like to see the following recommendation:

Prioritise procedural ‘early dismissal’ provisions (prompt rejection of manifestly unfounded/abusive claims) and cost-shifting rules as a core safeguard to reduce time/cost and chilling effects on public participation.

Commission’s 2025 assessment: Significant progress Inter Alia’s current assessment: In progress (steps reported; limited practical impact so far)

49 Hellenic League for Human Rights (HLHR) (2024), Research: Mapping the SLAPP landscape in Greece (‘Έρευνα: Χαρτογραφώντας το τοπίο των SLAPPs στην Ελλάδα’) <https://www.hlhr.gr/wp-content/uploads/2024/04/SLAPPs-research-Greece.pdf>.

50 European Commission, Commission calls on Greece to fully transpose into its national law EU requirements on accessibility requirements for products and services, INFR(2022)0297, reasoned opinion, Accessible EU Centre, 19 March 2025, https://accessible-eu-centre.ec.europa.eu/content-corner/news/european-commission-calls-greece-fully-transpose-eaa-2025-03-19_en.

Gaps in the Commission's Report

Media capture

Independent monitoring continued to flag risks of ‘media capture’ via public resources and opaque distributions. The Media Capture Monitoring Report notes that, even though the European Media Freedom Act (EMFA) entered into force in 2025, Greece has only taken limited steps towards aligning its legislation and practice with its provisions; Greece has not yet introduced substantive reforms to guarantee the independence of regulators and public service media, ensure fair state funding practices, or strengthen media pluralism.⁵¹ Overall, core problems persist across regulation, public service media, and funding.

Separately, Data Journalists reported tens of millions being spent in media funding for advertising and promoting government work,⁵² according to data gathered by Data Journalists from all public sources of government information (ministries, agencies, and authorities managed or supervised by the government), commitments exceeding €108,000,000 were made in the first seven months of 2025, for advertising and publicity expenses. It highlights especially large allocations, including €21,600,000 (via Information Society) for a Climate Crisis awareness campaign and €17,000,000 for tourism advertising in Attica directed to international media, arguing this scale of spending raises concerns about how public advertising can shape media coverage and information flows.

New Issues that Emerged in 2025

Eco-SLAPPs

A November 2025 report on Eco-SLAPPs underlines actors, such as local communities, environmental groups, and journalists, raising environmental concerns, increasingly facing legal actions aimed at silencing and intimidation. Eco-SLAPPs are described as a distinct sub-category with specific features and impacts, requiring tailored understanding to support effective counter-measures; they constitute abusive legal actions intended to silence public debate and public participation in matters that centrally concern environmental harm.

51 International Press Institute (IPI) and Media and Journalism Research Center (MJRC), Media Capture Monitoring Report: Greece Measuring EMFA Compliance, International Press Institute, November 2025, <https://ipi.media/wp-content/uploads/2025/12/GREECE-Media-Capture-Monitoring-Report-Overview-1.pdf>.

52 Data Journalists (2025), Revealed: €108 million for the “Petsa Lists” in the first half of 2025, 10 October 2025, Data Journalists, <https://www.datajournalists.co.uk/2025/10/10/revealed-e108-million-for-the-petsa-lists-in-the-first-half-of-2025/?lang=en>.

The report links the phenomenon to wider pressures (climate impacts, overtourism, natural-resource exploitation/pollution) and notes that eco-SLAPPs are increasingly frequent and threaten local environmental action, affecting not only professional actors (e.g. journalists) but local civic participation more broadly. It identifies two main eco-SLAPP patterns: (a) pollution-related disputes (e.g., waste burning in Volos;⁵³ pollution linked to Neorio shipyard in Syros⁵⁴) and (b) disputes over encroachment/appropriation of public or protected spaces for business exploitation, where communities mobilise to defend access, nature protection, and/or cultural heritage.

A core finding is the power asymmetry: plaintiffs are predominantly powerful economic actors (groups/companies/businesspeople), while targets are often ordinary citizens and citizen associations (formal or informal), amplifying chilling effects at the community level. It also identifies recurring features in the cases examined: high civil damages claims are often based on alleged personality-rights violations via defamation/insult and sometimes data-protection claims, frequently combined with criminal complaints, with claimed amounts in the reviewed eco-SLAPP cases ranging from €80,000 to €3,000,000 (and additional penalty threats in some instances).⁵⁵

Implications and Recommendations for 2026

The Media Pluralism Monitor 2025 assesses Greece as medium–high risk overall (63%), with Market Plurality escalating to high risk and particularly alarming risks around editorial independence from commercial/owner influence (very high risk).⁵⁶ It highlights persistent structural problems, including high media concentration, political influence over media and regulators, continued exposure to SLAPPs and pressures on journalists, and unresolved concerns around surveillance/accountability, all contributing to low public trust and weak pluralism. Overall, without enforceable transparency

53 ERT News, *A Volos Polites Network opposes the new waste incineration plants*, (‘Αντίθετο στις νέες μονάδες καύσης απορριμμάτων το Δίκτυο Πολιτών Βόλου’), 25 August 2025, <https://www.ertnews.gr/perifereiakoi-stathmoi/volos/anti-theto-stis-nees-monades-kaysis-aporrimmaton-to-diktyo-politon-volou/>.

54 efsyn.gr, *The outrageous SLAPP lawsuit against Syros citizens goes to appeal*, (‘Στο εφετείο η εξωφρενική αγωγή SLAPP εναντίον πολιτών της Σύρου’), 6 February 2026, https://www.efsyn.gr/ellada/dikaiosyni/462230_sto-efeteio-i-exofreniki-agogi-slapp-enantion-politon-tis-syroy?amp.

55 Hellenic League for Human Rights (ΕΛΕΑΑ) and Heinrich Böll Foundation, *Eco-SLAPPs: Legal intimidation and local environmental action in Greece* (‘Eco-SLAPPs: Νομικός εκφοβισμός και τοπική περιβαλλοντική δράση στην Ελλάδα’), Heinrich Böll Foundation, Thessaloniki Office, 2025, https://gr.boell.org/sites/default/files/2025-11/eco-slapps_digital_final.pdf.

56 European University Institute (EUI) (2025), *Monitoring media pluralism in the European Union: results of the MPM2025. Country report: Greece, 2025*, <https://cadmus.eui.eu/entities/publication/54e739b2-d5c7-42cd-af77-f16c38fde485>.

and independent oversight, state financing can distort competition and encourage self-censorship, undermining pluralism.

Suggested recommendation: Adopt and implement the EMFA-aligned safeguards to prevent media capture and strengthen pluralism, in particular by (i) introducing binding rules for objective, transparent and non-discriminatory allocation of state advertising and other public funding to media, and (ii) ensuring the structural independence and adequate resourcing of public service media and the broadcast regulator through transparent, merit-based appointment and dismissal procedures, safeguards against political interference in editorial/management decisions, and regular public reporting on compliance with the EMFA requirements.

Suggested recommendation: Adopt and operationalise anti-SLAPP safeguards explicitly covering Eco-SLAPPs, including early dismissal/expedited filtering of manifestly abusive cases; effective cost-shifting and compensation for targets; and dissuasive consequences for abusive claimants.

CHECKS AND BALANCES

General assessment

While the Commission notes a continued positive trend of avoiding expedited legislative procedures and observing statutory consultation timeframes, it also records that engagement with CSOs is still not on a regular and sustained basis and that Greece made only limited progress on evaluating and improving the CSO registration framework and establishing structured dialogue.

Civil society and international monitoring in 2025 continued to flag a constrained civic space, especially for organisations working on migration and human rights. The International Federation for Human Rights (FIDH)/The World Organisation Against Torture (OMCT)'s Observatory similarly documented pressures and stigmatisation targeting refugee-support and rights organisations.⁵⁷ The CIVICUS continues to classify civic space in Greece at a restrictive level, reinforcing the picture of a difficult enabling environment.⁵⁸

The Ministry of Migration and Asylum is currently in the process of passing a new legislation; the proposed changes in the Immigration Code radically escalate criminal liability for members and employees of registered NGOs. As CSOs explain, “The mere status of membership in an organisation registered in the NGO Registry upgrades misdemeanours such as facilitating illegal stay or refusing to hand over a travel document to felonies, carrying up to ten years’ imprisonment and fines of tens of thousands of euros”. At the same time, they note, “The initiation of criminal prosecution alone is sufficient to remove an organisation from the Registry.”⁵⁹

57 *Greece: Government systematic constraints and politically motivated accusations against migrants rights NGOs must end!*, the Observatory for the Protection of Human Rights Defenders, 29 September 2025, <https://observatoryfor-defenders.org/alert/greece-government-systematic-constraints-and-politically-motivated-accusations-against-migrants-rights-ngos-must-end/>.

58 *Monitor Tracking Civic Space, Greece, 2025*, <https://monitor.civicus.org/country/greece/>.

59 *Refugee Support Aegean (RSA) et al., Joint Civil Society Statement on the Migration Ministry bill, 20 January 2026*, <https://rsaegean.org/en/greece-ngo-work-a-punishable-offence/>.

Implementation of 2025 Commission recommendations

Recommendation: Develop a regular and sustained structured dialogue with civil society organisations, and simplify registration requirements for civil society organisations in view of maintaining an open framework for them to operate (first made in 2023)

According to the stated need for “Revision of the institutional framework and procedures for the registration of NGOs and NGO members” by the Ministry of Migration and Asylum (MMA), there was a stated goal to digitise and modernise the way NGOs and their volunteers/members are registered and operate, making the procedures more transparent, effective, and compliant with European directives, within the framework of the 2025 Single Government Policy Plan (ESKyP).⁶⁰

However, in the draft law currently under deliberation, in Article 54, “Conditions for registration in the Register of Greek and Foreign Non-Governmental Organizations and in the Register of Members of Non-Governmental Organizations of the General Secretariat for the Reception of Asylum Seekers of the Ministry of Migration and Asylum”,⁶¹ there is no provision for modernisation and harmonisation with European directives. On the contrary, there is an explicit provision to tighten the institutional framework for the supervision of NGOs active in the fields of international protection, migration, and social integration, making civic space even more suffocating.⁶²

The Commission’s recommendation is too narrow; structured dialogue and registration requirements are just one dimension of the reforms needed. A stronger recommendation would be:

60 Unified Government Policy Plan ESKyP 2025, General Secretariat for Coordination, Presidency of the Government, Athens, p. [relevant page, e.g. 198 or 340 from context], January 2025, <https://gsco.gov.gr/wp-content/uploads/2025/01/%CE%95%CE%A3%CE%9A%CF%85%CE%A0-2025.pdf> [in Greek].

61 Article 54, Conditions for registration in the Register of Greek and Foreign Non-Governmental Organizations and in the Register of Members of Non-Governmental Organizations of the General Secretariat for the Reception of Asylum Seekers of the Ministry of Migration and Asylum – Amendment of paragraphs 1 and 2 of Article 78 of the Legislative Code on Reception, International Protection for Third-Country Nationals or Stateless Persons, and Temporary Protection in Case of Mass Influx of Displaced Foreigners | Ministry of Migration and Asylum, Draft Law under Public Consultation, Immigration and Asylum Consultation Website (‘Μετανάστευσης και ΑσύλουΔικτυακός Τόπος Διαβουλεύσεων’), 30 December 2025, <https://www.opengov.gr/immigration/?p=1944> [in Greek].

62 Refugee Support Aegean (RSA), Draft Law Attacking Civil Society in Greece, 15 January 2026, <https://rsaegean.org/en/draft-law-attacking-civil-society-in-greece/> (accessed 23 January 2026).

Adopt and implement a comprehensive ‘enabling environment’ framework for civil society by: (i) institutionalising a regular, documented structured dialogue mechanism (early-stage consultation on draft laws/policies); (ii) ensuring registration rules cannot be used retaliatorily against advocacy, monitoring, or litigation; (iii) refraining from smearing campaigns and targeting of CSOs by high-ranking officials.

Commission’s 2025 assessment: No progress

Inter Alia’s current assessment: No progress

Gaps in the Commission’s Report

Pylos shipwreck investigation

The Commission’s report underlines that “Progress with the judicial investigation following the Pylos shipwreck is a positive development to start addressing deficiencies in investigating incidents of alleged misconduct involving law enforcement officers”;⁶³ yet, what is not included is that this progress is far from comprehensive.

In May 2025, charges had already been brought against 17 Coast Guard officers, but the prosecutor at the time dismissed the charges against the current chief and other officers on the grounds that they had no direct responsibility for handling the incident. Only after an appeal of the victims’ lawyers to the Reviewing Court, the Prosecutor of the Reviewing Court initiated criminal proceedings against four senior officers of the Coast Guard, including its current chief, whose case had been shelved by the prosecutor of the Piraeus Naval Court.⁶⁴

Consultation during lawmaking process

The Commission report also notes that, “The positive trend of avoiding expedited legislative procedures for the adoption of legislation continues and the statutory timeframe for public consultations is being observed, while participation and transparency in the law-making process could be further improved.” However, reporting from the (Center for Liberal Studies - Markos Dragoumis) KEFiM highlights that, “Despite the institutional progress made over the last decade, Greece still lags behind

63 *European Commission, 2025 Rule of Law Report: Country Chapter on the rule of law situation in Greece, SWD(2025) 908 final, 8 July 2025, p. 19.*

64 *Pylos shipwreck: Criminal prosecution on felony charges against the current head of the Coast Guard and senior members of its leadership, Refugee Support Aegean, 7 November 2025, <https://rsaegean.org/en/pylos-shipwreck-prosecution-against-the-head-of-the-coast-guard/>*

in terms of good lawmaking.” The KEFiM’s policy brief on legislative quality compares 190 Greek laws (2022–2024) with 61 EU Directives and finds a mixed picture: Greek laws are longer on average (about 54 articles/60 pages vs. 49 articles/25 pages for EU Directives), but written in less syntactically complex language, and they more often meet formal ‘better regulation’ requirements such as being put to consultation and being accompanied by an impact report.

However, the study highlights major weaknesses in the substance of these processes: consultation time is far shorter in Greece (average 16 days vs. 95 at the EU level), and Greek impact reports rarely quantify consequences (~10% include quantitative estimates vs. ~65% for EU Directives). It leads the KEFiM to argue that Greece’s system shows formal compliance without adequate time and evidence for meaningful scrutiny; it therefore proposes reforms such as reducing omnibus law length (one main issue per law), simplifying language through dedicated review, publishing all draft provisions for consultation, extending consultation to around four weeks, and requiring impact assessments to include quantified effects (economy, budget, environment, SMEs, administrative burdens).⁶⁵

Safeguards for independent oversight bodies

Another important gap in the Commission’s 2025 recommendations concerns the need for stronger, operational safeguards for independent oversight bodies - in particular, transparent and merit-based appointments, adequate resources, and genuine operational autonomy - together with enforceable access-to-information guarantees, which are a practical precondition for effective checks and balances. The Commission itself notes quite vaguely that “Previously identified challenges regarding the appointment of members of Independent Authorities established by the Constitution remain.”⁶⁶

Implications and Recommendations for 2026

The need for stronger, operational safeguards for independent oversight bodies is significant and should be addressed by a new recommendation from the Commission.

Suggested recommendation: Take further steps to reinforce the independence and effectiveness of oversight institutions by (i) improving appointment procedures (clear, objective criteria; open calls; strengthened parliamentary scrutiny), (ii) ensuring stable and sufficient resourcing and

65 Center for Liberal Studies (KEFiM) (Κέντρο Φιλελεύθερων Μελετών), *The quality of legislation in Greece and the EU (Η ποιότητα της νομοθέτησης στην Ελλάδα και την ΕΕ)*, Center for Liberal Studies (KEFiM), 24 November 2025, <https://kefim.org/i-poioutita-tis-nomothetisis-stin-ellada-kai-tin-ee/> [in Greek]

66 European Commission, *2025 Rule of Law Report: Country Chapter on the rule of law situation in Greece*, SWD(2025) 908 final, 8 July 2025, p. 1.

safeguards against undue interference, and (iii) strengthening implementation of access-to-information rules through effective, independent review mechanisms and the regular publication of compliance and enforcement statistics (e.g., response times, refusal grounds, appeal outcomes).

CONTACTS

Inter Alia

Inter Alia is a civic non-profit organisation based in Athens and has been working transnationally since 2013. Inter Alia brings together concerned citizens, civil society actors, activists, social scientists, artists and community organisers in activities in the fields of political education, research, activism, advocacy and arts. The organisation aims to promote transformative civic action across borders, community empowerment and personal emancipation and development.

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The Civil Liberties Union for Europe

The Civil Liberties Union for Europe (Liberties) is a non-governmental organisation promoting the civil liberties of everyone in the European Union. We are headquartered in Berlin and have a presence in Brussels. Liberties is built on a network of 24 national civil liberties NGOs from across the EU.

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