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COMMUNICATION FROM THE COMMISSION TO THE COUNCIL AND THE EUROPEAN PARLIAMENT

on the status of migration management in mainland Greece

1. Introduction

In the past ten years, Greece has been one of the most affected Member States when it comes to irregular arrivals of third country nationals at its land and sea borders, creating significant challenges and putting its national migration management system under considerable strain.

To address these significant challenges, boost national capacities and improve migration management procedures, the Commission and EU Agencies (European Border and Coast Guard Agency (Frontex), EU Agency for Asylum (EUAA), European Union Agency for Law Enforcement Cooperation (Europol) and Fundamental Rights Agency (FRA), hereinafter: 'EU Agencies') have worked particularly intensively with the Greek authorities. This work has supported the establishment of a comprehensive migration management system and has been underpinned by significant financial, operational, and technical support to help the responsible ministries and services involved.

Efforts were also undertaken to improve the overall implementation of the Dublin III Regulation[1] by the Commission, in particular the implementation of the transfers of applicants for international protection as a precondition for the well-functioning of the Dublin system. This was a particular challenge for Greece and merited dedicated support from the Commission. In 2016, the Commission adopted several recommendations focusing on Dublin transfers to Greece[2]. More recently, the Commission worked with Member States on a Roadmap on improving implementation of transfers under the Dublin III Regulation ('the Dublin Roadmap'), as a basis necessary for the smooth transitioning towards the system established under the Asylum and Migration Management Regulation[3].

As a result of this continuous cooperation and support and the significant efforts of the Greek authorities in the last years, migration management in Greece has been significantly improved. Greece has set up functional asylum and reception systems and operational frameworks in key areas of migration management. Greece has also invested in novel initiatives in different areas such as the comprehensive system for supporting unaccompanied minors, IT systems for asylum and reception making the processes more efficient, and screening at the borders. These are particularly relevant for the implementation of the Pact on Migration and Asylum.

The number of irregular arrivals to Greece, mainly through the islands of Lesvos, Chios, Kos, Leros and Samos, and through the land border in the Evros region, has remained constantly high in the past

[1] Regulation (EU) No 604/2013 of the European Parliament and of the Council of 26 June 2013 establishing the criteria and mechanisms for determining the Member State responsible for examining an application for international protection lodged in one of the Member States by a third-country national or a stateless person (recast), OJ L 180, 29/06/2013, p. 31–59

[2] The latest being the Commission Recommendation (EU) 2016/2256 of 8 December 2016 addressed to the Member States on the resumption of transfers to Greece under Regulation (EU) No 604/2013 of the European Parliament and of the Council, C/2016/8525, OJ L 340, 15.12.2016, p. 60–71.

[3] Regulation (EU) 2024/1351 of the European Parliament and the Council of 14 May 2024 on asylum and migration management, amending Regulations (EU) 2021/1147 and (EU) 2021/1060 and repealing Regulation (EU) No 604/201, OJ L, 2024/1351, 22/5/2024. The Dublin Roadmap was endorsed by Member States at the Strategic Committee on Immigration, Frontiers and Asylum (SCIFA) meeting on 29 November 2022. After the endorsement of the Dublin Roadmap, all Member States have launched multiple initiatives, aimed at increasing the efficiency of the national Dublin units and at improving existing procedures. The Commission gathered all the emerging good practices following the enforcement of the Dublin Roadmap and presented them in a Commission Staff Working Document on 23 November 2023 (SWD(2023) 390 final Commission Staff Working Document The Dublin Roadmap in Action. Enhancing the Effectiveness of the Dublin III Regulation: identifying good practices in the Member States).

two years[4]. At the same time, Greece has remained one of the main countries of transit[5], with applicants and beneficiaries of international protection moving in an unauthorised manner from mainland Greece to other EU Member States and re-applying for protection there.

This Communication provides an updated overview of the current status of the asylum and reception systems in mainland Greece. The scope of this Communication focuses on the situation in the mainland, where Dublin transfers are received. Specifically, it focuses on the situation and services available to migrants, in particular for those going back or transferred to Greece from other EU Member States, be it international protection applicants under the Dublin Regulation or beneficiaries of international protection Its main objective is to provide an update to Member State authorities in the EU and thus help ensure that those who deal with these cases have the necessary information available to facilitate their smooth implementation. This is important to ensure that the overall migration management system within the EU functions effectively, based on close cooperation among Member States.

2. Operational and financial support provided to Greece

The European Commission ('Commission') and the EU Agencies support Member States to develop and implement **migration management systems** that are fit for purpose and in line with the EU *acquis*.

As part of this work across the EU, the Commission and the EU Agencies are providing significant financial, operational, and technical support to help the responsible ministries and services in Greece to manage migration. This has resulted in close cooperation with the relevant Greek authorities and information sharing on the situation in Greece.

In September 2020, at the time of presenting the Pact on Migration and Asylum and its accompanying proposals, and in the wake of the destruction by fire of the main facility of Moria on the Greek island of Lesvos, the Commission established a dedicated **Task Force for Migration Management**[6] (the 'Task Force'), to be responsible for the Union's work on strategic, operational, legal and financial issues of migration management[7]. The Task Force has built on the support the Commission and the EU Agencies had already been providing at the operational and financial level, including through deployment on the ground, in Italy, Malta, Cyprus, Spain and Greece since the migration and refugee crisis of 2015.

The Task Force's support includes the coordination with relevant national authorities, international organisations and other relevant actors in the following areas:

[4] Around 50,000 arrivals in 2023 and 60,000 in 2024 according to Frontex data. Like other Member States, Greece witnessed a significant reduction in arrivals of third country nationals during the Covid and post-covid period. A sharp increase in arrivals of third country nationals was noted in the summer of 2023, and high numbers (with fluctuations) continue to this day.

[5] Eurodac hits and Dublin statistics only provide a proxy for secondary movements as they do not currently relate to applicants, but only to applications. Eurodac hits with Greece as country of departure ranged between 75,000 and 121,000 per year between 2021 and 2024.

[6] https://home-affairs.ec.europa.eu/policies/migration-and-asylum/migration-management/task-force-migration-management_en

[7] PV(2020) 2350 final (23 September 2020). The Task Force was set up as an innovative structure within the European Commission's Directorate General for Migration and Home Affairs (DG HOME). It works in a matrix approach, tapping into established resources in DG HOME's relevant units (policy, operational, financial) and cooperates closely with all other Commission services involved. When Russia started its war of aggression against Ukraine in February 2022, support efforts were expanded to the Member States most affected, such as Poland, Czechia, Slovakia, Hungary and Romania, to support them in addressing challenges and in welcoming people fleeing the war.

- Management of arrivals and registration of applicants for international protection, beneficiaries of temporary protection, and illegally-staying third-country nationals;
- Providing adequate reception facilities;
- Protection of unaccompanied minors and other vulnerable groups;
- Application of efficient asylum and return procedures;
- Implementation of different voluntary relocation schemes;
- Border management in compliance with the Schengen *acquis*;
- Promotion of integration policies and access to social rights.

The total amount of **financial support** under the EU Home Affairs Funds made available to Greece since 2015 is just over EUR 5 billion, providing Greece with the means for an ambitious, robust and comprehensive migration management policy, which reflects the significant responsibility carried by Greece. During the 2014-2020 programming period, more than EUR 3.39 billion were made available to Greece to manage migration and borders under the Asylum, Migration and Integration Fund (AMIF), the Internal Security Fund (ISF- Borders and Visa, Police) and the Emergency Support Instrument (ESI). Under the 2021-2027 multiannual financial framework, so far more than EUR 1.66 billion have been made available under the Home Affairs Funds (AMIF, Border Management and Visa Policy Instrument, ISF) to support the implementation of existing and upcoming priorities in the area of migration, border management and internal security. Greece has also drawn approximately EUR 681 million from its cohesion envelope (almost 3%), to address migration management needs, and has requested to draw a further 2% of the aforementioned funds.

A large part of EU Home Affairs funds is used to improve reception capacity, living conditions for migrants and security in Greece. This includes e.g. the reinforcement of medical care for applicants for international protection; streamlining asylum procedures; the relocation of applicants for and beneficiaries of international protection to Member States and European Free Trade Association (EFTA) countries[8], and increasing the return of those with no right to stay in the EU.

The work of the Task Force was able to intensify **operational support** provided by the Commission and the EU Agencies to Greece since 2015. The Commission has deployed staff on the ground in Greece, who work in close collaboration with national authorities, EU Agencies, International Organisations and civil society to help ensure that migration is managed in an effective way. In the past two years, the team has consisted of approximately 9 staff members (EU officials and national experts seconded by Member States). The deployed team cooperates with all the relevant Ministries, such as the Ministry of Migration and Asylum, as well as the Ministry for Labour and Social Welfare, the Ministry for Social Cohesion and Family, the Ministry for Citizen's Protection, the Ministry of Maritime Affairs & Insular Policy, the Ministry of Education, the Ministry of Health and the Ministry of Defence, as well as with civil society organisations, international organisations, local and regional authorities, and resident communities in the centres.

EU Agencies have been providing a significant part of the EU's operational support to Greece, in line with their respective mandates, the EU *acquis* and in full respect of the Charter of Fundamental Rights of the EU.

The **EUAA** continues to provide operational support and technical assistance to Greece, through the latest Operational Plan (2025)[9]. The Plan aims to enhance national capacity in the areas of asylum,

[8] Iceland, Lichtenstein, Norway, Switzerland.
[9] https://euaa.europa.eu/sites/default/files/EUAA_Operational_Plan_to_Greece_2025.pdf

reception, vulnerable persons, through the deployment of around 450 experts and 100 interpreters. In addition, the Greek authorities are currently in the process of several strategic exercises regarding the planning for the future of the national reception system, in view of the implementation of the needed requirements under the Pact. The gradual scaling down and smooth handover of the Agency's operational assistance is deemed necessary to foster sustainability and is closely linked to the ongoing efforts of the authorities to put in place additional personnel and further enhance their own institutional capacity.

Frontex has a long-standing cooperation with Greece, and supports Greece with approximately 460 guest officers, who perform border surveillance, assist in the identification and registration of incoming migrants, as well as debriefing, screening and technical equipment. Frontex and Greece also cooperate in other activities, such as training and capacity building.

Europol continues to provide operational assistance particularly to the Greek law enforcement authorities - Hellenic Police and Hellenic Coast Guard - in the management of migratory flows in accordance with its responsibilities and mandate. Europol facilitates and supports Member State cross-border investigations targeted at dismantling criminal networks involved in organised migrant smuggling, trafficking in human beings, document fraud and other forms of serious and organised crime and terrorism.

As part of its mandate to provide assistance and expertise on fundamental rights to European Union institutions, bodies and agencies, as well as Member States, the **Fundamental Rights Agency (FRA)** engages in a wide range of activities, including monitoring and advisory roles. FRA regularly visits the Reception and Identification Centres to identify fundamental rights gaps and potential risks in breaching fundamental rights, collect and disseminate good practices, and share fundamental rights expertise[10].

International organisations and Civil Society Organisations (CSOs) provide support throughout the Greek territory. Many CSOs continue to be active in all areas of migration, despite a challenging environment[11]. They are often working in close cooperation with the Greek authorities, including e.g. for interpretation, legal aid, healthcare provision, cash assistance provision, non-formal education, as well as support to unaccompanied minors and families with children .

Finally, Greece has also been supported through bilateral arrangements with other EU and European Economic Area (EEA)[12] Member States, which have financed specific projects[13] and deployed specialised personnel, in particular in the area of the protection of unaccompanied minors. EU and Associated States have also supported Greece through voluntary relocation, first under a voluntary relocation scheme running between 2020-2023, which relocated more than 5 000 people from Greece, and currently under the Voluntary Solidarity Mechanism, following the political declaration of June 2022, which enabled over 2 100 transfers from Greece by mid-February 2025.

3. Reception conditions in the mainland

3.1 Reception System

[10] In July 2024, FRA published a report gathering examples of alleged rights violations of migrants and refugees between 2020 and 2024, setting out steps to promote investigations into incidents of ill-treatment at borders. https://fra.europa.eu/en/publication/2024/guidance-investigating-alleged-ill-treatment-borders
[11] 2024 Rule of Law Report, Country chapter for Greece, pp. 31-33.
[12] The EEA includes the 27 EU Member States, as well as Iceland, Liechtenstein and Norway.
[13] https://eeagrants.org/countries/greece

With the support of the Commission, the Ministry of Migration and Asylum has undertaken significant capacity building efforts to improve the reception system, establish and manage facilities in a sustainable manner, and operationalise the key governmental services responsible for migration management. However, Greece's reception system for applicants has also faced concerns about living standards, and systemic challenges, particularly due to the high numbers of irregular arrivals in the past 10 years, with trends dropping during the Covid-19 pandemic period (2020-2021) and reaching increased levels again in 2023 and 2024[14].

In the past years, **Greece has progressively centralised the management and coordination of reception facilities**. The **Reception and Identification Service (RIS)** is the governmental body responsible for managing the reception, identification and registration of applicants for international protection and irregular migrants arriving in Greece. Its staff includes registration officers, screening officers, social workers and psychologists, legal advisors, security personnel and administrative staff, and plays a critical role in handling migration-related processes. RIS staff undertakes tasks related to registration, information provision, identification of vulnerable persons, site management, administrative procedures related to applicants of international protection. Security, maintenance and cleaning services are provided by external RIS partners, under framework contracts, while medical and psychosocial services are provided by IOM under the 'Hippocrates' project (see below). RIS is supported by experts seconded by the EUAA, both with specialised staff in the facilities and with strategic support in the headquarters.

A series of **operational frameworks and tools** were introduced in the area of reception over the past years to improve the management and operation of reception facilities, including with the EUAA's contribution and support. These include, *inter alia*, site management, case management, communication and information provision, logistics, self-assessment of reception conditions, registration procedures, as well as specialised frameworks on the protection of unaccompanied minors and vulnerable applicants.

Over the past decade, the Greek Ministry of Migration and Asylum has been able to **streamline the reception system and the number of functioning facilities**, by deciding which mainland facilities should be upgraded or closed, with a focus on closing facilities that were either too small, not cost efficient or very remote, and maintaining facilities that offered better reception conditions and facilitated access to services. As of January 2025, 22[15] facilities were operational (out of which ten are in the Southern part of Greece and twelve are in the Northern part). In addition, three facilities are specifically designed for first arrivals, and include services for the registration of asylum applications (so-called Reception and Identification Centres)[16]. The number of open reception facilities in the mainland is considered to be sufficient in view of arrivals to Greece. In January 2025, the total capacity of all 22 mainland reception facilities was 21 393 places, with an occupancy rate of 56%, and the three Registration and Identification Centres had a capacity of 5 163 places, with an occupancy rate of 59%[17]. The facilities mentioned above are the primary form of housing for asylum applicants, except for the dedicated accommodation provided to unaccompanied minors. On 21 March 2025, the Minister for

[14] According to national data, in 2024, there were 54 888 arrivals to Greece by land and sea [excluding Crete], a 23% increase compared to 2023.
[15] https://migration.gov.gr/en/ris/perifereiakes-monades/domes/
[16] Malakasa, Diavata and Fylakio
[17] There may be slight deviations between the statistics and nominal capacity because of unavailable spaces, mainly due to necessary maintenance or repairs.

Migration and Asylum announced the upcoming closure of three facilities, out of which two are located in the mainland (Elefsina, Volos)[18].

The reception centres are open facilities managed by the Greek authorities and supported by International Organisations, the EU Agencies, and NGOs. The facilities all provide basic shelter, which can host people both in summer and winter time. **Tents are no longer used for accommodation** and Rubb Halls are currently used only in the Corinth, Katsikas and Filippiada facilities. The level and condition of infrastructure may vary between the facilities, while in some cases the available capacity is reduced due to damages, lack of repair or unavailability of spare parts.

The existing framework foresees the provision of certain key services in **all the mainland facilities**: **housing and shelter, food and basic necessities, including cash assistance, health support, information and legal aid**. Medical screening and vulnerability assessments are provided in the Reception and Identification Centres. The quality and availability of these services may vary depending on the type of facility, location and available funding, yet a satisfactory level of reception conditions is maintained. Cash assistance to applicants is managed by the Ministry of Migration and Asylum since October 2021 and is currently facing delays.

Cleaning, maintenance and security services operated by the Reception and Identification Service have largely contributed to the daily management of the reception facilities, which improve living conditions in the reception centres and security at the facilities, creating a safe environment. The Ministry of Migration and Asylum has used framework contracts in the management of these services to allow for flexibility according to the needs. Safety and security have also been improved following a review of site-specific risks and capacity building support to prevent and manage emergencies.

Overall, **reception conditions in mainland reception centres have significantly improved since 2015** and can generally be deemed satisfactory, in terms of facilities, infrastructure, equipment and services provided, including with EU funding support. These facilities have also been instrumental in decongesting the islands. However, certain gaps were identified, and there were disruptions of important services, including the provision of interpretation, transportation, legal aid and cash assistance. Civil society organisations have reported on the suspension of these services, as well as other limitations, primarily related to the remote locations of some facilities and subsequent difficulties in social integration. In late 2024, the Greek authorities indicated they were taking measures at central level to remedy those gaps, through the signature of new contracts and arrangements. In this context, it is important to note that the existing gaps do not amount to deficiencies as envisaged under Article 3(2) of the Dublin III Regulation, i.e. of a particularly high level of severity causing a situation of extreme material poverty that does not allow the applicant to meet their most basic needs[19]. The Commission continues to work closely with the Greek authorities to ensure that the necessary services are maintained also after EU funding projects have come to an end. One example is the project "Supporting the Greek

[18] https://migration.gov.gr/kleinoyn-treis-domes-filoxenias-exoikonomoyntai-perissotera-apo-35-ekat-eyro/

[19] That level is attained where the indifference of the authorities of a Member State would result in a person wholly dependent on State support finding himself or herself, irrespective of that person's wishes and personal choices, in a situation of extreme material poverty that does not allow him or her to meet his or her most basic needs, such as, inter alia, food, personal hygiene and a place to live, and that undermines his or her physical or mental health or puts that person in a state of degradation incompatible with human dignity. That threshold cannot therefore cover situations characterised even by a high degree of insecurity or a significant degradation of the living conditions of the person concerned, where they do not entail extreme material poverty placing that person in a situation of such gravity that it may be equated with inhuman or degrading treatment. (See, to that effect, judgment of 19 March 2019 Jawo, C-163/17, EU:C:2019:218, paragraphs 91 to 93, and order of 13 November 2019, Hamed and Omar, C-540/17 and C-541/17, not published, EU:C:2019:964, paragraph 39 and judgement of 19 December 2024 in Joined Cases C-185/24 and C-189/24 [Tudmur], paragraph 37)

Authorities in Managing the National Reception System for Asylum Seekers and Vulnerable Migrants". The project, with a budget of over EUR 191 million, ensured that key services were delivered on time, in a flexible approach as demand arose, including the procurement of basic deliverables such as fuel or non-food item kits, while services concerning the management of mainland facilities have been taken over under the AMIF national programme of Greece ensuring a sustainable response.

IT systems operating in the Greek accommodation facilities are regulated by the existing national framework. However, some actors have raised concerns with regard to the impact of these IT systems on Data Protection and Fundamental Rights. The Hellenic Data Protection Authority (DPA) has issued a fine to the Ministry of Migration and Asylum regarding the installation of the HYPERION and CENTAUR systems in the reception and accommodation facilities for asylum applicants. The Ministry of Migration and Asylum has followed up and published the relevant data protection impact assessment (DPIA) and fundamental rights impact assessment (FRIA) for the IT systems to their corporate website[20].

Actions funded under the EU Affairs Funds for 2021-2027[21], are subject to the fulfilment of the Horizontal Enabling Conditions (HECs), one of which relates to the mechanisms for ensuring compliance with the Charter of Fundamental Rights of the European Union' in the implementation of the programmes supported by the Home Affairs Funds. Member States must demonstrate HEC compliance at the moment of the adoption of the national programmes and during their implementation. If the Charter HEC is no longer fulfilled at the level of the relevant specific objective, the Commission will not reimburse the affected expenditure. In the case of Greece, in the beginning of the programming period this requirement was deemed to have been met by Greece, enabling the disbursement of EU funding.

In summary, to satisfy these requirements Greece has set up a three-tier system that relies on:

- Internal control procedures tasked with the investigation and prosecution of criminal acts arising in the context of operations by the Hellenic Police or the Hellenic Coastguard,
- Investigations by independent authorities such as the Greek Ombudsman and the National Transparency Authority, and
- The possibility for public prosecutors to investigate allegations, following a relevant complaint or press, international organisations and NGO reports.

3.2 Health

The Commission supports the Greek Ministry of Migration and Asylum and the Ministry of Health to provide access to medical care, mental health and psychosocial support to applicants and beneficiaries of international protection in Greece. Health services are provided both in reception facilities and other premises (clinics run by NGOs or public hospitals).

[20] https://migration.gov.gr/privacy-policy/

[21] Regulation (EU) 2021/1147 of the European Parliament and of the Council of 7 July 2021 establishing the Asylum, Migration and Integration Fund PE/56/2021/INIT, OJ L 251, 15.7.2021, p. 1–47, Regulation (EU) 2021/1148 of the European Parliament and of the Council of 7 July 2021 establishing, as part of the Integrated Border Management Fund, the Instrument for Financial Support for Border Management and Visa Policy PE/57/2021/INIT OJ L 251, 15.7.2021, p. 48–93 and Regulation (EU) 2021/1149 of the European Parliament and of the Council of 7 July 2021 establishing the Internal Security Fund PE/58/2021/INIT, OJ L 251, 15.7.2021, p. 94–131

As of July 2024, medical care is supported through the **Hippokrates** project[22] by medical teams deployed on the ground in all open accommodation sites in mainland Greece. The project aims to enhance flexible health care services in a comprehensive way, especially given past inefficiencies that were primarily related to the challenges in identifying and hiring medical personnel in the context of a generalised shortage. The project also addresses existing gaps, in particular through adequate and timely vulnerability assessments (identification of vulnerable applicants) and referrals to special care, as well as more focus on mental health care for both residents and staff of reception facilities.

Hippokrates is managed by the Hellenic Ministry of Migration and Asylum and implemented by the IOM and a third-party healthcare provider. Key responsibilities under the contract are primary health services, identification of vulnerable people upon arrival and throughout the asylum process, transportation facilitation to external healthcare providers, operation of mobile clinics equipped with nursery rooms, laboratories, x-ray facilities, and reception areas, including radiologists, lab technicians and drivers, and medical equipment provision.

The programme foresees the recruitment of 554 full-time and part-time medical specialists across different regions (106 for the Aegean islands, 182 for Northern Greece, and 147 for Southern Greece), including general practitioners, pathologists, gynecologists, pediatricians, psychiatrists, radiology technologists, midwives, nurses, laboratory technicians, social workers, and psychologists. The deployment of staff started in 2024 and is currently ongoing.

Beneficiaries of international protection have free access to healthcare in the same way as Greek citizens. Some have faced challenges due to administrative obstacles concerning the initial issuance or conversion of AMKA (Social Security Number) following the granting of status, or lack of information on the procedures and the required supporting documents. These challenges have been brought to the attention of the Task Force on Integration, instituted by the Ministry of Migration and Asylum (see also section 5).

3.3 Protection of vulnerable persons

Significant efforts have been made over the past years to improve conditions for **vulnerable persons**.

Since 2023, the Ministry of Migration and Asylum has taken over responsibility for protection services previously delivered by IOM from January 2021 to December 2023. The aim is to provide across all mainland reception centres in Greece protection activities, mental health services, psychological support, and skill-development in the mainland facilities. IOM's EU funded project **Harmonizing Protection Practices in Greece (HARP)**[23] enhanced the quality of humanitarian response and protection assistance for applicants within the Greek reception system, with a particular focus on vulnerable individuals.

3.4 Unaccompanied Minors

There has been significant progress in Greece regarding the protection of unaccompanied minors (UAMs), especially since 2020 when a **Special Secretariat for the Protection of Unaccompanied**

[22] https://greece.iom.int/ippokratis-i-provision-medical-and-psychosocial-services-residents-accommodation-facilities-under-responsibility-reception-and-identification-service

[23] This project is supported under the 2021-2027 Asylum Migration and Integration Fund.

Minors (SSUAM)[24] was established within the Ministry of Migration and Asylum. The SSUAM has been successful in creating a supportive ecosystem for the proper identification, reception and protection of unaccompanied minors. In 2023, the SSUAM was replaced by the General Secretariat for Vulnerable Persons and Institutional Protection (SGVP), including the protection of unaccompanied minors.

UAMs in Greece are hosted in dedicated facilities, with special care. These facilities are separate from the general mainland reception facilities, except in the Reception and Identification Centres of Malakasa and Fylakio where dedicated **safe zones for UAMs** operate. In the facility of Diavata, a safe area is expected to be created by March 2025 with 24/7 presence of a child protection actor.

The number of available places in long-term accommodation (shelters and SILs) is 1,775, funded under AMIF since 2017. As of 2020, **Supported Independent Living (SIL)** apartments were introduced for UAMs aged 16-17 offering accommodation and protection services. Statistics on the number and accommodation of UAMs are provided by the Greek authorities on a monthly basis[25].

As of December 2020, UAMs who have no safe or known accommodation are no longer allowed by law to be placed in protective police custody. The SGVP has established a **National Emergency Response Mechanism (NERM)** to identify UAMs living in precarious situations with a dedicated 24/7 telephone hotline, **mobile child protection units** in Attica and Thessaloniki, and dedicated emergency accommodation for the UAMs pending their referral to long-term accommodation.

Age assessments of unaccompanied minors are performed by the Reception and Identification Service of the Ministry of Migration and Asylum. A joint ministerial decision on age assessment[26] foresees a 3-step procedure (physical, psychosocial and medical examination). Age assessment shall only take place in case of doubt and the benefit of doubt is taken into account until the assessment is complete.

Another important reform is the establishment of a permanent **guardianship scheme** with the adoption of Law 4960/2022. Following an open call, two NGOs (METAdrasi and Praxis) were selected to provide up to 180 qualified guardians across Greece. As of January 2025, 120 guardians have been appointed by the Public Prosecutors so far and are being deployed across Greece. Each guardian can be responsible for up to 15 UAMs. Joint Ministerial Decisions lay down the rules for the functioning of a new Guardianship Council, the appointment of its members, and the setting up of the complaint mechanism in relation to the work carried out by the guardians. EUAA experts support the SGVP for the development of operational guidelines, Standard Operating Procedures and training necessary for the implementation and monitoring of the system.

Greece has also adopted measures to facilitate the **transition to adulthood of former UAMs**. The "HELIOS Junior" project will be implemented until end 2027 by IOM, in cooperation with partners, and is funded under AMIF (EUR 19 million). The project aims to comprehensively support around 2,000 former UAMs between 18 and 21 years to facilitate their integration in Greece.

3.5 Education

[24] https://migration.gov.gr/en/grammateies/eidiki-grammateia-prostasias-asynodeyton-anilikon/
[25] https://migration.gov.gr/wp-content/uploads/2025/01/SGVP_Statistics-January_EN.pdf
[26] Joint Ministerial Decision 9889/2020 (B'3390)

Under Greek legislation[27] minor children must be enrolled in public primary and secondary education establishments during their stay in the country. In addition to minors, adult applicants for international protection also have access to education, as long as no removal measure against them is being enforced. Access to education is organised by the Ministry of Education, Religious Affairs and Sports, and the relevant legal framework provides for the presence of a Local Coordinator of Refugee Education in all reception structures, as well as in urban areas (in local Education Directorates), to register and enroll minors (including unaccompanied minors) in schools. Their main role is to provide the necessary means to support the integration process, which should be carried out under conditions similar to those for Greek citizens, with facilitation of registration in cases of difficulties in submitting documentation.

The **'All Children in Education' (ACE) project,** financed by the EU and implemented by UNICEF, offered non-formal education to migrant children across Greece. More than 25,000 refugee and migrant children benefitted from the programme between 2021 and 2024, which helped to increase the number of children enrolled in formal education. The success of this project led to both Commission and Greek authorities agreeing to extend it in time, and for the project to be managed by the Greek authorities under ESF+, thereby ensuring the sustainability of positive results. The Commission has been following up with the Greek authorities and these services are expected to resume in summer 2025.

4. Procedures for granting international protection

The two main authorities relevant for asylum procedures are the Greek Asylum Service (GAS) and the Appeals Authority (AA). The Asylum Service, through the Regional Asylum Offices and the Asylum Units throughout the country, is the competent authority for examining and deciding on applications for international protection. An application may be examined in the regular, accelerated, admissibility or border procedure[28]. Appeals against GAS decisions are brought before the Appeals Authority . At this level, appellants have access to free legal aid. The Appeals Authority consists of 20 Independent Appeals Committees.

In 2024, the GAS employed a total of 856 staff members, including permanent and interim staff, while EUAA is supporting GAS with approximately 135 deployed experts[29]. There are 13 Regional Asylum Offices and 13 Asylum Units across the mainland and the Aegean islands, including two specialised vulnerability offices in Athens and Thessaloniki providing for specialised support throughout the entire asylum procedure. Moreover, there are Departments for Dublin, Withdrawal and Returns, Trainings and Administrative Support[30].

The processing of asylum applications has been rendered more efficient over the past years, with a particular effort of the GAS, supported by the EUAA, to decrease the backlog of pending decisions through the deployment of more staff.

The number of asylum applications has been increasing steadily in the last 4 years, from around 28,000 in 2020 to over 73,000 in 2024[31]. This places Greece as the second-highest EU Member State in terms of number of applications relative to its population for 2024. Top countries of origin of applicants are Syria and Afghanistan, followed by Pakistan (2021/2022), Iraq (2023) and Egypt (2024)[32]. The

[27] Art 55 and 56 of Law 4939/2022
[28] https://ecre.org/aida-country-report-on-greece-2023-update/, p. 29.
[29] According to information received by the GAS and EUAA.
[30] https://migration.gov.gr/en/gas/dioikisi/
[31] https://ecre.org/aida-country-report-on-greece-2023-update/
[32] https://migration.gov.gr/wp-content/uploads/2024/12/Report_A_November-2024_International-Protection_Appendix-A_NEW.pdf

recognition rate over the total number of decisions adopted has increased over the years from around 45% in 2021 to around 68% in 2024.

In November 2024, there was a total of 26 275 pending decisions on applications for international protection[33]. Efforts to reduce the backlog of ongoing cases have been put in place with the specialisation of certain offices. Backlog was also reduced due to a pilot project running since September 2023 whereby the interview is omitted for certain nationalities from countries with high recognition rates, namely Afghanistan, Syria, Eritrea, Palestine, Sudan and Yemen[34]. For these cases, the average duration of examination of an asylum application is approximately 45 days. As is the practice in other Member States, as of December 2024 after the fall of the Assad regime in Syria, the Greek Asylum Service has "frozen" the issuing of decisions on applications for international protection from Syrians.

Persons who are on the mainland without having previously undergone identification procedures at the border (on the islands or in Fylakio in the Evros region) are expected to submit their applications at the Malakasa and Diavata Reception and Identification Centres, by making appointments through the special online platform. The Reception and Identification Service is responsible for the registration of applications in those registration centres, with the support of EUAA. The introduction of the platform has raised concerns: as the platform currently does not include the possibility to verify the person's identity, the authorities do not consider that registration on the platform should be considered as making an application for international protection. The Commission has conveyed these concerns to the Ministry of Migration and Asylum[35] in particular with regard to access to material reception conditions.

In accordance with the EU-Turkey Statement and a Joint Ministerial Decision[36], Greece applies the safe third country concept (and the admissibility procedure) to applications submitted by applicants of certain nationalities[37] who have arrived in Greece through Türkiye. The Greek authorities intend to amend their procedures following the European Court of Justice ruling in Case C-134/23[38] relating to the the inadmissibility procedure, and following the announcement by the President of the Greek Council of State of 21 March 2025[39].

[33] https://migration.gov.gr/wp-content/uploads/2024/12/Report_A_November-2024_International-Protection_Appendix-A_NEW.pdf, p.10.

[34] According to information from the Ministry of Migration and Asylum. The pilot is based on Article 82(7) of Law 4939/2022 and applies to the applications of applicants from Afghanistan, Syria, Eritrea, Palestine, Sudan and Yemen.

[35] The AIDA Country Report on Greece provides a detailed overview of legislative and practice-related developments in asylum procedures and content of international protection in 2023 - https://ecre.org/aida-country-report-on-greece-2023-update/.

[36] Joint Ministerial Decision 42799/2021.

[37] Since June 2021, all applications for international protection submitted by nationals of Syria, Afghanistan, Somalia, Pakistan and Bangladesh throughout the Greek territory are examined under the safe third country concept pursuant to JMD 42799/2021, as amended by JMD 485868/2021 and 734214/2022

[38] Case C-134/23, Elliniko Symvoulio gia tous Prosfyges and Ypostirixi Prosfygon sto Aigaio, 04/10/2024..

[39] On 21 March 2025, the President of the Greek Council of State announced that the Plenary decided on 27 February 2025 to annul the joint ministerial decision 538595/12.12.2023 establishing a national list of safe third countries insofar as it includes Türkiye as a safe third country for applicants for international protection originating from Syria, Afghanistan, Pakistan, Bangladesh and Somalia. https://www.adjustice.gr/webcenter/portal/ste/pageste/epikairotita/anakoinwseis-proedrou?contentID=SNEWS-TEMPLATE1742568296785&_afrLoop=5703496456933569#!%40%40%3F_afrLoop%3D5703496456933569%26centerWidth%3D65%2525%26contentID%3DSNEWS-TEMPLATE1742568296785%26leftWidth%3D0%2525%26rigthWidth%3D35%2525%26showFooter%3Dfalse%26showHeader%3Dtrue%26_adf.ctrl-state%3Dblf2qupbn_83.

Greece imposes fee on second and further subsequent applications; the Commission has underlined to the Ministry of Migration and Asylum the need to waive such fee, in line with EU law.

The Commission maintains a dialogue with the Ministry of Migration and Asylum on these aspects, as well as with the Turkish authorities.

The productivity of the **Appeals Authority** has improved over time[40]. At the end of 2022, EUAA concluded its support activity to the Appeals Authority in reducing the backlog to manageable levels. In the period between 1 December 2019 to 30 November 2024, 54 596 appeals with an average waiting time of 91 days were lodged on the Greek mainland.

Legal aid at second instance is provided by the State through the creation and support to a **Legal Aid Registry**, staffed with approximately **110 lawyers**. In parallel, the GAS has developed systematic information provided to applicants at all stages of the procedure.

5. Integration of beneficiaries of international protection

In February 2022, Greece adopted a **National Strategy for Integration**[41] acknowledging the need for a comprehensive approach to integration. Numerous projects, many of which are EU funded, are under implementation and are supporting the integration of third-country nationals, in particular regarding their access to the labour market.

The **HELIOS** project has to date been the main integration project in Greece through which 47 753[42] beneficiaries of international protection have received **welcome courses**, **education** and **employability support**. The project also offered **accommodation support** and activities that helped people connect and contribute to their new community. Up to 10,816 households have been actively supported with **rental subsidies** from its activation until 31 October 2024. The HELIOS project has been implemented by IOM[43] with around €60 million in EU funding and the support of several NGOs and municipalities[44]. As of 1 January 2022, the Ministry of Migration and Asylum took over its management and funding.

The Helios project ended on 30 November 2024 and was replaced by **Helios+** as of January 2025, funded under the European Social Fund (ESF+) to ensure its long-term continuation of these services. Indeed, the services that will be provided to beneficiaries of international protection will remain similar, in particular regarding rental subsidies, language training and integration classes, but importantly offer more **focus on employability**.

HELIOS+ services include:

[40] 21 Independent Appeals Committees operate under the Appeals Authority. The three-member Appeals Committees are composed by three active Administrative Judges. Each Committee has at least one secretary. Each judge has one rapporteur. Rapporteurs and secretaries were provided by EUAA (regulation for the functioning of the Appeals Authority of 4/11/2020).

[41] https://migration.gov.gr/en/migration-policy/integration/politiki-entaxis-se-ethniko-epipedo/. The Strategy includes four main pillars: pre-integration of asylum seekers; social integration of beneficiaries of international protection; prevention of and effective protection from all forms of violence, exploitation and abuse; monitoring the integration process.

[42] IOM factsheet, until 31/10/2024

[43] https://greece.iom.int/hellenic-integration-support-beneficiaries-international-protection-and-temporary-protection-helios

[44] Catholic Relief Services (CRS), Danish Refugee Council Greece (DRC Greece), Greek Council for Refugees (GCR), Solidarity Now, INTERSOS, Municipality Development Agency Thessaloniki S.A (MDAT), Metadrasi, PLOIGOS, Public Benefit foundation of the Municipality of Livadeia (ΚΕΔΗΛ), TSoC- The smile of the Child

- Housing support: Strengthening independent living in Greece by providing accommodation support to secure accommodation, including rental subsidies,
- Employability support: Strengthening and facilitating the access of HELIOS+ target group to the labour market through group and individual sessions of career counselling, vocational training and networking with local employers,
- Access to Social and Public Services: Facilitating autonomous access to social and public services and monitoring the integration process of HELIOS+ target group through individualised and group support sessions,
- Language and Communication Skills: Supporting HELIOS+ beneficiaries' independent communication in the local society and workplace through Greek language courses,
- Integration: Raising awareness and strengthening the host communities and involved stakeholders at the local and regional levels through activities fostering social cohesion and cultural exchange.

In addition, Greece and Germany jointly initiated a bridge project in January 2025 to support beneficiaries of international protection immediately upon their transfer from Germany to Greece. The bridge project provides beneficiaries with accommodation, food and social counselling, as well as support to prepare the necessary documents to ensure a seamless integration into Helios+. This bridge project will be supported by EU funding and implemented by IOM.

The capacity of the **Greek Social Integration Directorate** has been strengthened through the Technical Support Instrument (TSI)[45] of the Commission, in particular regarding the design, development and implementation of reforms in the area of integration. In addition, the Ministry of Migration and Asylum is designing a **social inclusion online platform** to facilitate third-country nationals' access to the Greek labour market. This will complement other initiatives to promote the integration of beneficiaries of international protection into the labour market.

Similarly, a project supported by the Recovery and Resilience Facility (RRF)[46], implemented since the second half of 2022, **prepares refugees to enter the workforce** and fosters cooperation with companies and other stakeholders. Other integration initiatives include **dedicated Job Fairs** for local employers and beneficiaries of international protection at the Reception and Identification Centres (organised in cooperation with UNHCR and IOM) and the setting up of **one stop shops** to inform and provide specialised services to third-country nationals (Centres for Migrant Integration funded by ESF+). These initiatives result in collaborations and networks that help beneficiaries connect with social integration services and programmes and implement social integration activities that promote social cohesion[47].

The Ministry of Migration and Asylum has announced more initiatives in this area, such as the integration offices in reception facilities and dedicated projects under the Switzerland-Greece Cooperation Programme 2023-2026. Moreover, the authorities are working on additional integration

[45] https://commission.europa.eu/funding-tenders/find-funding/eu-funding-programmes/technical-support-instrument/technical-support-instrument-tsi_en

[46] https://ec.europa.eu/info/business-economy-euro/recovery-coronavirus/recovery-and-resilience-facility/greeces-recovery-and-resilience-plan_en

[47] There are 11 KEMs around Greece and are run by the municipalities and funded under ESF+. Only migrants legally residing in Greece can access their services which include counselling, legal information, social and psychological support, application for benefits, provision of non-mandatory Greek classes, preparation for the exams for the Greek citizenship

actions, using the funding available through the European Social Fund+ in the programming period of 2021-2027.

UNHCR is actively involved with targeted activities that aim to advance refugee integration. With pilots like a **Driving and Road Safety** project, **language classes** for adult refugees on the islands, **assistance to people with disabilities** to have access to social welfare. The ADAMA centre[48] run by UNHCR is a place where beneficiaries can receive practical help, advice and assistance on how to navigate the Greek labour market. Moreover, there are several initiatives at **local level** such as the **Migrant and Refugee Integration Councils** that several Municipalities have activated in order to conduct activities that enable civic participation. Several Cities have formed the **Cities Network for Integration (CNI)**, which plans, organises, implements and exchanges information on good practices in migrant and refugee integration. The Municipality of Athens has established the Athens Coordination Center for migrant & refugee issues to facilitate the cooperation between the City of Athens and civil society, international organisations and the central government.

All these initiatives seek to further facilitate the transition from the status of applicant to the one of beneficiary of international protection, and the overall integration into the Greek society. While the Greek legal framework generally allows for integration, deficiencies in implementing the existing legislation add significant challenges to a seamless integration. These **challenges** include issuance and renewals of residence permits, formalities for the issuance of basic documentation (such as health insurance, bank accounts, tax credentials), recognition of qualifications, access to work and education, access to housing and lack of social housing in Greece generally.

While beneficiaries of international protection have access to some form of **financial assistance** (the minimum guaranteed income[49]), administrative issues can limit their access. Moreover, they are not granted immediate access to some other social benefits available to Greek citizens upon recognition of their status, due to requirements linked to the duration of legal stay in the country. This restriction has resulted in a pending infringement procedure against Greece[50]. In practice, beneficiaries of international protection often remain in reception facilities meant for international protection applicants beyond the applicable transition period.

Travel documents, requested by beneficiaries of international protection, are often issued together with the residence permit, often resulting in onward travelling of beneficiaries of international protection to other Member States.

In order to tackle these obstacles, an **Integration Task Force** was established by the Ministry of Migration and Asylum in January 2024[51]. It aims to facilitate effective integration policies on the ground, and to enhance cooperation and coordination among different Ministries and public authorities. The implementation of the relevant legislation and administrative bottlenecks are regularly discussed in this forum.

[48] ADAMA Centre - UNHCR Greece

[49] The Minimum Guaranteed Income offers a monthly cash allowance to households living below the poverty line. It also has a component for promotion to employment along with activation services.

[50] Directive 2011/95/EU of the European Parliament and of the Council of 13 December 2011 on standards for the qualification of third-country nationals or stateless persons as beneficiaries of international protection, for a uniform status for refugees or for persons eligible for subsidiary protection, and for the content of the protection granted (recast) OJ L 337, 20.12.2011, p. 9–26. See also https://ec.europa.eu/commission/presscorner/detail/en/inf_23_142

[51] https://commission.europa.eu/publications/2024-rule-law-report-communication-and-country-chapters_en

6. Conclusions

Over recent years, Greece has developed a national migration management system, with the infrastructure, equipment and tools required. By scaling up its authorities' capacity, Greece has addressed issues of overcrowding and sub-standard reception conditions in mainland centres. Reception and international protection procedures have been streamlined and accelerated. Protection of the most vulnerable persons has improved, and the legislative framework put in place for unaccompanied minors offers a positive outlook. Integration is now evolving as a national policy priority.

On this basis, while improvements may continue to be necessary in certain aspects of migration management, it can be concluded that there are no systemic deficiencies in the Greek mainland asylum and reception system resulting in a risk of inhuman or degrading treatment within the meaning of Article 4 of the Charter of Fundamental Rights of the EU. As a result, Dublin transfers to Greece should take place in the same manner as for the other Member States, *i.e.* without the requirement of individual assurances recommended by the Commission in its Recommendation (EU) 2016/1117, and in accordance with the jurisprudence of the Court regarding the interpretation of Article 3(2) of Regulation (EU) 604/2013. This Recommendation therefore ceases to apply. The Commission will continue to be in close contact with the Greek authorities to ensure compliance with Regulation (EU) 604/2013 in particular, as well as the proper implementation of the EU acquis and the Pact on Migration and Asylum.

The Task Force Migration Management, in cooperation with all relevant stakeholders, proved to be an efficient and beneficial tool to achieve significant improvements in Greece, through better collaboration and communication. As in all Member States, there is room **for improvement in certain policy areas**. The Commission will continue working with Greece and the EU Agencies to consolidate the existing framework of cooperation and assist in fulfilling Greece's declared goal of further improving the migration management system and the treatment of third-country nationals arriving in the country. Operational, technical and financial support to Greece will continue, including through the deployment of Commission staff and the EU Agencies deployed on the ground, as well as through the implementation of the EU Home Affairs Funds for the 2021-2027 Multiannual Financial Framework.

Finally, the Commission is working closely with Member States, including Greece, to support the implementation of the Pact on Migration and Asylum. Following the Common Implementation Plan[52] presented by the Commission in June 2024, Greece prepared its own **National Implementation Plan**, setting out the next steps envisaged by the national authorities to implement the provisions of the Pact by June 2026, following the suggested breakdown into thematic building blocks. It outlines targets and requirements needed to enable the corresponding legislative, structural and operational changes foreseen in the design of the national migration management system, including but not limited to the review of the reception system, procedures for examining applications for international protection, preparedness, integration, as well as rules on responsibility and solidarity. Until the Pact's legal instruments start applying in mid-2026, the Commission will continue supporting Member States' efforts to translate the Pact from legislative acts into an operational reality.

[52] Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions on the Common Implementation Plan for the Pact on Migration and Asylum, COM/2024/251 final