

2026 Rule of Law Report - targeted stakeholder consultation

Fields marked with * are mandatory.

Introduction

The annual Rule of Law Report lies at the centre of the Annual Rule of Law Cycle, which acts as a preventive tool, deepening multilateral dialogue and joint awareness of rule of law issues. So far, six editions of the Rule of Law Report have been published since 2020.

As every year, the Commission would like to invite the stakeholders to provide contributions to the 2026 Rule of Law Report. On the basis of these contributions and on-going developments, further targeted questions may be shared at a later stage of preparation of the 2026 Rule of Law Report, in particular in the context of country visits, or bilateral contacts.

The Commission invites stakeholders to provide contributions which include:

(1) developments and measures taken in relation to the recommendations in the 2025 report,
(2) developments related to topics covered in the 2025 country chapters, as well as any other new developments related to the rule of law.

The input should consist of a short summary, if possible in English, covering the areas referred to below. Legislation or other documents may be referenced with a link. Contributions should focus on significant developments since the last Rule of Law Report both as regards the legal framework and its implementation in practice.

This questionnaire also integrates the separate questionnaire on the single market from last year. In addition to these specific questions, respondents to the questionnaire are invited to consider the Single Market dimension, including any relevant cross-border issues, in all their answers.

Where questions of particular relevance under the single market dimension, this is indicated before the relevant question.

[1] Unless the information was already submitted in the input for the previous Rule of Law Reports.

Type of information to be included:

Under each of the four pillars, the replies should include references to the following types of information:

A) Legislative developments

- Newly adopted legislation
- legislative drafts currently discussed in Parliament
- legislative plans envisaged by the Government

B) Policy developments

- Implementation and enforcement of legislation
- evaluations, impact assessment, surveys
- white papers/strategies/actions plans/consultation processes
- follow-up to reports/recommendations of Council of Europe bodies or other international organisations
- important administrative measures
- generalised practices

C) Developments related to the judiciary / independent authorities

- important case law by national courts
- important decision/opinions from independent bodies/authorities
- state of play on terms, nominations and expired mandates for high-level positions (e.g. Supreme Court, Constitutional Court, Council for the Judiciary, Prosecutor General, heads of independent authorities included in the scope of the request for input[2])

D) Any other relevant developments

- National authorities are free to add any further information, which they deem relevant; however, this should be short and to the point.

Where relevant, please also indicate whether the developments reported are linked to the implementation of reforms and investments under the national Recovery Resilience Plan. To simplify your answers to the questionnaire, if there are no developments, it is sufficient to indicate this and the information covered in the contributions for the previous Rule of Law Reports does not need not be repeated.

[2] Such as: media regulatory authorities and bodies, national human rights institutions, equality bodies, ombudsman institutions, supreme audit institutions and, where they exist, transparency authorities.

* I am giving my contribution as

- ☐ Academic/research institution
- ☐ Business association
- ☒ Civil society organisation/NGO
- ☐ International organisation
- ☐ Judicial association or network
- ☐ Media organisation or association
- ☐ Public authority or network of public authorities
- ☐ Other

* Organisation name

250 character(s) maximum

Main Areas of Work

- ☐ Justice System
- ☐ Anti-corruption
- ☒ Media Pluralism and Freedom
- ☐ Checks and Balances
- ☐ Other

Please insert an URL towards your organisation's main online presence or describe your organisation briefly:

500 character(s) maximum

Transparency register number

Check if your organisation is in the transparency register. It's a voluntary database for organisations seeking to influence EU decision-making

* Country of origin

Please indicate the country of origin of your organisation

- ☐ Austria
- ☐ Belgium
- ☐ Bulgaria
- ☐ Croatia
- ☐ Cyprus
- ☐ Czechia
- ☐ Denmark
- ☐ Estonia
- ☐ Finland
- ☐ France
- ☐ Germany
- ☐ Greece
- ☐ Hungary
- ☐ Ireland
- ☐ Italy
- ☐ Latvia
- ☐ Lithuania
- ☐ Luxembourg
- ☐ Malta
- ☐ Netherlands
- ☐ Poland
- ☐ Portugal
- ☐ Romania
- ☐ Slovak Republic
- ☐ Slovenia
- ☐ Spain
- ☐ Sweden
- ☒ Other - please specify

If "Other", please specify

Please indicate the country of origin of your organisation

United Kingdom

First name

Surname

Email Address of the organisation

*** Publication of your contribution and privacy settings**

You can choose whether you wish for your contribution to be published and whether you wish your details to be made public or to remain anonymous.

- ☒ Anonymous - Only your type of respondent, country of origin and contribution will be published. Organisation name, URL, transparency register number, first name and surname given above will not be published. **To maintain anonymity, please refrain from mentioning the name of your organisation and any details from which your organisation can be identified in the rest of your contribution as we will not be able to guarantee anonymisation of these elements.**
- ☐ Public - Your personal details (name, organisation name, transparency register number, country of origin will be published with your contribution).
- ☐ No publication - Your contribution will not be published. Elements of your contribution may be referred to anonymously in documents produced by the Commission based on this consultation.

☒ I agree with the personal data protection provisions.

[Specific privacy statement targeted stakeholder consultation 2026 rule of law report.pdf](#)

Questions on horizontal developments

In this section, you are invited to provide information on general horizontal developments or trends, both positive and negative, covering all or several Member States. In particular, you could mention issues that are common to several Member States, as well as best practices identified in one Member State that could be

replicated. Moreover, you could refer to your activities in the area of the four pillars and sub-topics (an overview of all sub-topics can be found below), and, if you represent a Network of national organisations, to the support you might have provided to one of your national members.

Overview topics for contribution

[List of topics for contribution.docx](#)

Please provide any relevant information on horizontal developments here

5000 character(s) maximum

Questions for contribution

Under each pillar, you are invited to provide information on measures taken to implement the recommendations addressed to the Member State in the 2025 Rule of Law report, as well as developments with regard to the points raised in the respective country chapter of the 2025 Rule of Law Report and any other significant developments since January 2025 and up to the date of submission^[3]. Please always include a link to and reference relevant legislation/documents (in the national language and/or where available, in English). **Significant developments** can include challenges, positive developments and best practices, covering both legislative developments or implementation and practices.

Information provided in reply to the first question under each pillar, related to the follow-up to the recommendations, does not need to be repeated in subsequent parts of the questionnaire, but can be cross-referenced in the subsequent questions, where relevant. All other questions are not limited to the recommendations, but as in previous years, cover the entire scope of the Report.

^[3] Unless already covered in the input for the previous Rule of Law Reports.

Member State/enlargement country covered in contribution [only one choice possible]

If you wish to submit information concerning several Member States/enlargement countries, please fill in the questionnaire separately for each country. There is no limit to the number of contributions submitted by a single participant.

- ☐ Albania
- ☐ Austria
- ☐ Belgium
- ☐ Bulgaria
- ☐ Croatia

- ☐ Cyprus
- ☐ Czechia
- ☐ Denmark
- ☐ Estonia
- ☐ Finland
- ☐ France
- ☐ Germany
- ☒ Greece
- ☐ Hungary
- ☐ Ireland
- ☐ Italy
- ☐ Latvia
- ☐ Lithuania
- ☐ Luxembourg
- ☐ Malta
- ☐ Montenegro
- ☐ Netherlands
- ☐ North Macedonia
- ☐ Poland
- ☐ Portugal
- ☐ Romania
- ☐ Serbia
- ☐ Slovakia
- ☐ Slovenia
- ☐ Spain
- ☐ Sweden

I. Justice System

Please provide information on measures taken to follow-up on the recommendations received in the 2025 Report regarding the justice system (if applicable)

5000 character(s) maximum

A. Independence

Appointment and selection of judges, prosecutors and court presidents (incl. judicial review)

(The reference to 'judges' concerns judges at all level and types of courts as well as judges at constitutional courts)

5000 character(s) maximum

Irremovability of judges, including transfers, (incl. as part of judicial map reform), dismissal and retirement regime of judges, court presidents and prosecutors (incl. judicial review)

5000 character(s) maximum

Promotion of judges and prosecutors (incl. judicial review)

5000 character(s) maximum

Allocation of cases in courts

5000 character(s) maximum

Independence (including composition and nomination and dismissal of its members), and powers of the body tasked with safeguarding the independence of the judiciary (e. g. Council for the Judiciary)

5000 character(s) maximum

Accountability of judges and prosecutors, including disciplinary regime and bodies and ethical rules, judicial immunity and criminal/civil (where applicable) liability of judges (incl. judicial review)

5000 character(s) maximum

Independence/autonomy of the prosecution service

5000 character(s) maximum

Independence of the Bar (chamber/association of lawyers) and of lawyers

5000 character(s) maximum

Significant developments capable of affecting the perception that the general public has of the independence of the judiciary

5000 character(s) maximum

B. Quality of justice

(Under this topic, you are not required to give statistical information but should provide input on the type of information outlined in the introduction)

[single market relevance] Accessibility of courts (e.g. court/legal fees, legal aid, language)

5000 character(s) maximum

Resources of the judiciary (human/financial/material), remuneration/bonuses/rewards for judges and prosecutors, including observed changes (significant and targeted increase or decrease over the past year)

(Material resources refer e.g. to court buildings and other facilities. Financial resources include salaries of staff in courts and prosecution offices.)

5000 character(s) maximum

[single market relevance] Training of justice professionals (including judges, prosecutors, lawyers, court staff, clerks/trainees)

5000 character(s) maximum

Digitalisation (e.g. use of digital technology, including electronic communication and AI tools, within the justice system and with court users, procedural rules, access to judgments online)

5000 character(s) maximum

Use of assessment tools and standards (e.g. ICT systems, including AI-based systems, for case management, court statistics and their transparency, monitoring, evaluation, surveys among court users or legal professionals)

5000 character(s) maximum

Geographical distribution and number of courts/jurisdictions (“judicial map”) and their specialisation, in particular specific courts or chambers within courts to deal with fraud and corruption cases.

5000 character(s) maximum

[single market relevance] Specialisation (of judges/specific courts/chambers within courts) and training for the judiciary to deal with commercial cases, as well as alternative dispute resolution mechanisms and mediation as regards commercial cases.

5000 character(s) maximum

C. Efficiency of the justice system

(Under this topic, you are not required to give statistical information but should provide input on the type of information outlined in the introduction)

[single market relevance] Developments related to efforts to improve the efficiency of the justice system (e.g. as regards length of proceedings, to address backlogs)

5000 character(s) maximum

Any other developments related to the justice system - please specify

5000 character(s) maximum

II. Anti-Corruption Framework

Where previous specific reports, published in the framework of the review under the UN Convention against Corruption, of GRECO, and of the OECD address the issues below, please make a reference to the points you wish to bring to the Commission's attention in these documents, indicating any relevant updates, changes or measures introduced that have occurred since these documents were published.

Please provide information on measures taken to follow-up on the recommendations received in the 2025 Report regarding the anti-corruption framework (if applicable):

5000 character(s) maximum

A. The institutional framework capacity to fight against corruption (prevention and investigation / prosecution)

List any **changes** as regards relevant authorities (e.g. national agencies, bodies) in charge of prevention, detection, investigation and prosecution of corruption and the resources allocated to each of these authorities (the human, financial, legal, and technical/specialised resources as relevant), including the cooperation among domestic and with foreign authorities. Indicate any relevant measures taken to effectively and timely cooperate with OLAF and EPPO

5000 character(s) maximum

Safeguards for the functional independence of the authorities tasked with the prevention and detection of corruption

5000 character(s) maximum

Information on the implementation of measures foreseen in the strategic anti-corruption framework (if applicable). If available, please provide relevant objectives and indicators

5000 character(s) maximum

B. Prevention

Measures to enhance integrity in the public sector in particular as regards high-level officials (including as regards incompatibility rules, revolving doors, codes of conduct, ethics)

5000 character(s) maximum

Measures to enhance general transparency of public decision-making (including rules on lobbying, asset and interest disclosure rules, gifts policy, transparency of political party, financing)

5000 character(s) maximum

Measures to prevent conflicts of interest in the public sector. Please specify the features and scope of their application (e.g. categories of officials concerned, types of checks and corrective measures depending on the category of officials concerned)

5000 character(s) maximum

--> For the three previous points, **please also provide information and figures on their application /enforcement if available to you**, such as number of detected breaches/irregularities of the various rules in place and the follow-up given (investigations, sanctions, etc.)

Measures to ensure whistleblower protection and encourage reporting of corruption, including their application (i.e. number of reports received, and the follow-up given)

5000 character(s) maximum

[single market relevance] Specific measures to enhance transparency, integrity and accountability in sectors with high risks of corruption, with a view to monitor and prevent corruption and conflict of interests, and where applicable measures to prevent and address corruption committed by organised crime groups.

- *Such high-risk sectors could include: public procurement, including construction, transport/infrastructure, defence, cohesion, agriculture, environment, healthcare, investor residence schemes, large-scale investments of national interest and the spending of EU funds, urban planning.*
- *In particular, measures to mitigate high risks of corruption in the area of public procurement, such as enhancing transparency and oversight (for example through digital technologies) and promoting fair competition and accountability in public procurement (e.g. targeted actions to address the high share of single bids) and measures to guarantee the effective and independent functioning of the public procurement review bodies.*

5000 character(s) maximum

[single market relevance] Measures for the prevention of corruption in relation to the issuing of official permits (e.g. related to environment, energy, service provision and various types of construction)

5000 character(s) maximum

C. Repression

The legal framework on the criminalisation and sanctions for corruption and related offences, including foreign bribery

5000 character(s) maximum

Official data on the number of investigations, prosecutions, final judgments and the application of sanctions for corruption offences (differentiated by offence if possible).

Please indicate whether the cases: involve legal persons; are related to the implementation of EU or national funds; involve high level corruption. Please indicate which data is publicly available and how policy-making is informed by the data

5000 character(s) maximum

Potential obstacles identified in law or in practice to the investigation and prosecution of high-level and complex corruption cases (e.g. political immunity regulation, procedural rules, statute of limitations, cross-border cooperation, pardoning)

5000 character(s) maximum

Information on effectiveness of criminal and non-criminal measures and of sanctions (e.g. recovery measures and administrative sanctions) on both public and private offenders

5000 character(s) maximum

Any other developments related to the anti-corruption framework - please specify

5000 character(s) maximum

III. Media pluralism and media freedom

Please provide information on measures taken to follow-up on the recommendations received in the 2025 Report regarding media pluralism and media freedom (if applicable)

5000 character(s) maximum

Even though the European Media Freedom Act (EMFA) entered into force on 8 August 2025, Greece has only taken limited steps towards aligning its legislation and practice with its provisions. While some legal frameworks

already partially comply with EMFA requirements, core problems persist across regulation, public service media, and funding. 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. In the beginning of October 2025, a public consultation regarding a draft law about the Hellenic Broadcasting Corporation (ERT) and some measures regarding the implementation of the EMFA were concluded. The modernisation law includes EMFA-related provisions regarding ownership transparency and public spending for advertising, and a national plan for the safety of journalists. The final law and the improvements it entails remain to be confirmed.

The Greek media sector has been adversely affected for decades by an unregulated licensing system that has concentrated significant political influence in the hands of a few media conglomerates. Attempts to regulate the media environment have been made, the most significant occurring in 2015, when media moguls were required to pay for TV licences. The National Council for Radio and Television (NCRTV) has repeatedly been found to be vulnerable to political influence. Although the Council is formally an independent authority, its members are selected by a parliamentary committee in which the ruling party holds a majority, making the process highly susceptible to political interference. In addition, a loose legal framework sometimes allows unqualified individuals to be appointed to the Council, creating a transparency gap. Furthermore, limited financial resources and chronic understaffing further hinder the Council's ability to fulfil its mandate effectively. Its operation must be funded, like that of other independent authorities, by the supervised entities. Moreover, the restriction of the Council's role, confined largely to administrative functions rather than full regulatory authority, further undermines its effectiveness.

The impact of the ongoing process to amend the law governing ERT on the broadcaster's independence remains to be seen, as the process remains in the draft phase and additional changes could be expected following the public consultation. In Greece, public media outlets have historically faced significant challenges due to political and economic pressures. Since its inception, the Hellenic Broadcasting Corporation (ERT) has been subject to varying degrees of government control. Despite repeated efforts to professionalise and depoliticise the broadcaster, ERT has consistently lacked the editorial and institutional independence required to shield it from political influence. While some managers and news directors have exercised more control than others, government interference in ERT's operations has remained a persistent issue. Another ongoing challenge is the routine replacement of state media executives following changes in government. The same can be observed at the Greek public news agency, the AthensMacedonian News Agency (ANA-MPA). Both media outlets have been subject to instances of censorship and repeated breaches of the principle of pluralism. In 2024, a new administration was appointed at ERT, following a more impartial process, though the final decision still rested with the Deputy Minister. The 2025 Liberties Media Freedom Report also found that public media in Greece remains vulnerable.

The ownership of private media by vested interests represents the most acute form of media capture in Greece. The high concentration of legacy media ownership in the hands of wealthy families and shipowners with various political ties, particularly to the New Democracy party, has significantly shaped a media landscape where, despite the abundance of media outlets, effective pluralism that provides a wide plurality of information sources and views remains weak. Following the financial crisis, several traditional media groups ceased trading, allowing new owners, primarily oligarchs, to enter the market. The lack of effective media regulation over previous decades, combined with gaps in beneficial ownership disclosure, has further entrenched media capture. In 2025, this trend continued as oligarchs expanded their holdings by acquiring additional assets ranging from traditional newspapers to popular news sites, thereby increasing their media share. Concerns over the lack of transparency in digital media ownership have also intensified, raising further risks for pluralism.

<https://ipi.media/wp-content/uploads/2025/12/GREECE-Media-Capture-Monitoring-Report-Overview-1.pdf>

A. Media authorities and bodies

(Cf. Article 30 of Directive 2018/1808)

Measures taken to ensure the independence, enforcement powers and adequacy of resources (financial, human and technical) of media regulatory authorities and bodies

5000 character(s) maximum

The lack of media regulation in previous decades has been a significant contributing factor to the current situation, whereby private media is being captured and it is becoming increasingly challenging to protect independent journalism. The National Council for Radio and Television (NCRTV), which oversees the radio and television market, has been and continues to be subject to political influence. The main reason for this is that its members are selected by a parliamentary committee where the ruling party has a majority. One of the key concerns regarding the Council is its transparency in terms of ownership. The publication of NCRTV's annual reports on major developments of the authority is often subject to long delays, which raises concerns about the execution of the regulator's operational responsibilities. Consequently, the public is not made aware of significant changes in media ownership in a timely manner, and there is a lack of transparency in the media registries. The Council has experienced a reduction in funding since the Greek financial crisis, which has resulted in a shortage of personnel, leading to operational difficulties.

In selecting its members, the Conference reviews the applicants' CVs and acts in accordance with the guidance of its President and the President of the Parliament. The ruling party has a majority, which gives it control over the process. As a result, the selection of NCRTV members is often subject to political connections. This procedure lacks transparency and accountability. In September 2023, there were reports of attempts to interfere in the functioning of the independent authorities of the Hellenic Authority for Communication Security and Privacy (ADAE) and the NCRTV.¹⁴ 13 More specifically, Articles 13 and 14 of Parliament's Rules of Procedure, as amended and in force, govern matters relating to the composition, convening and powers of the Conference of Presidents of Parliament. On 7 September 2023, the Plenary of the Parliament amended this provision of the Parliament's Rules of Procedure and added another member to the Conference of Presidents: the President of the Special Standing Committee on Research and Technology. ¹⁵ The specific decision was the element that determined the majority which enabled the government to appoint new members to the two independent authorities. It should be noted that both authorities were about to meet in order to take two very important decisions concerning a) the Hellenic Authority for Communication Security and Privacy (ADAE) for a fine of €100,000 against the National Security Agency in the case of the wiretapping scandal, and b) the NCRTV for a fine of €2 million against the party Hellenic Solution (whose representatives voted for the appointment of the new members in both authorities). In the first case, the decision came two weeks later (with the new members of ADAE) and the majority decided not to impose a fine on the National Security Agency. In the second case, the NCRTV also decided to reconsider the height of the fine against Hellenic Solution. ¹⁶ In May 2024, the Athens Bar Association asked the Council of State to annul the ministerial decisions electing the members of the ADAE and the NCRTV. The Council of State rejected the appeals of the Athens Bar Association claiming that the Bar "has no legal interest".

The latest annual report of the authority, published in summer 2024, includes a dedicated chapter on human resources. The number of permanent staff, which in 2009 was 81, has now reduced to 57, with 18 positions remaining vacant. The plenary of the authority concluded that the 18 vacant positions must be filled. According to the European Commission's 2025 Rule of Law Report on Greece, some of these posts were filled by the end of 2024. In 2025, nine new employees joined the NCRTV, all of whom hold administrative roles. However, none of them are expert professionals such as lawyers or political scientists. Moreover, two staff members have since resigned. As a result, the staffing issue remains unresolved. ²⁰ In terms of the financial resources of the NCRTV, it is worth noting that they are indeed ensured by national law, as is the case with every independent

authority. The Ministry of Finance is the “proprietor” of NCRTV. Annually, the authority presents a budget proposal, and the Ministry determines the amount to be allocated. Therefore, the budget is not fixed but is subject to the country’s financial situation. 21 The 2022 annual report recorded a budget of €2.3 million, which remained largely unchanged in 2023. Furthermore, the report notes that the Authority’s budget has undergone a significant reduction since 2010, largely due to the broader cuts in state budget expenditure that have been implemented.

<https://ipi.media/wp-content/uploads/2025/12/GREECE-Media-Capture-Monitoring-Report-Overview-1.pdf>

Conditions and procedures for the appointment and dismissal of the head / members of the collegiate body of media regulatory authorities and bodies

5000 character(s) maximum

The NCRTV is composed of nine members appointed by the Conference of Presidents, a special body of the Parliament responsible for appointing the independent authorities, in which all political parties are represented. 11 The Conference of Presidents, acting unanimously or by a majority of 3/5 of its members, has the power to select the members of the independent authorities provided for by the Constitution and to exercise parliamentary control over them. It should be noted that prior to the constitutional amendment in 2019, the members of the independent authorities were elected by a 4/5 majority of the Conference of Presidents. 12 The members of the Authority are appointed for a non-renewable period of six years and are guaranteed absolute personal and operational independence in the performance of their duties under the Constitution. Members of the NCRTV are expected to be personalities of high standing and social prestige, distinguished by their scientific competence and professional expertise in the legal, academic, or mass media fields. There is no provision for the dismissal of a member. However, the current legal framework for appointments allows the selection of individuals who lack in-depth knowledge of the media landscape, retirees from unrelated fields (some over 75 years of age), and part-time professionals unable to fully contribute due to limited availability. Moreover, the appointment process is marked by a lack of transparency, in breach of Article 30(5) of Directive 2018/1808 of the European Union (partially transposed by Law 4779/2021). Consultations between political parties do not guarantee a merit-based selection process, as they lack transparency safeguards such as a public call for applications, clear candidate assessments, and other accountability measures.

<https://ipi.media/wp-content/uploads/2025/12/GREECE-Media-Capture-Monitoring-Report-Overview-1.pdf>

Existence and functions of media councils or other self-regulatory bodies

5000 character(s) maximum

B. Safeguards against government or political interference and transparency and concentration of media ownership

[single market relevance] Measures taken to ensure the fair and transparent allocation of state advertising

5000 character(s) maximum

A significant factor in the context of media capture in Greece is the financial reliance of media outlets on state support and advertising, which creates a vulnerability to the potential for editorial interference. For decades, the

Greek state and the media have enjoyed a close relationship. It is standard practice for the state to provide funding to any media outlet it chooses, without the usual prerequisites such as circulation figures or audience measurement. A scandal, known as the Petsas List, which broke during the pandemic shone a spotlight on this issue and led to significant reform in 2022. However, it remains to be seen whether this reform will prove effective, and other issues regarding state support for the media remain. Subsequently, the General Secretariat for Media and Communication has launched an updated version of the e-Pasithea platform, which provides electronic services for reporting advertising expenditure and submitting applications for approving public sector advertising programmes. The data in question is not yet available to the public.

In the case of public funds allocated to media service providers, the same criteria are applied as in other public contracts. The state's dealings with private parties are governed by a set of overarching principles. National law provides for the distribution of public funds allocated for state advertising to a wide plurality of media service providers, but the implementation process lacks transparency. In accordance with Greek law, the distribution of state advertising is contingent upon a number of factors.^{67 68} For example, online media outlets are required to register with the Online Media Registry in order to qualify for state advertising. Furthermore, funding is to be distributed in a proportional manner, based on factors such as the size, reach and region of the media in question. However, in the case of the scandal known as the “Petsas list,” a few years ago, an intermediary company was used to distribute funding to selected media outlets without the necessary accountability or transparent process.⁶⁹ In order to facilitate the dissemination of public health messages encouraging people to stay at home during the lockdown, the government allocated €20 million to the media. The distribution of these funds was outsourced to a private company, thus circumventing the obligation to make public all transactions conducted by the state, as well as those recorded in the Online Media Registry. Following mounting pressure from the public, the government finally released the so-called “Petsas list”, named after government spokesperson Stelios Petsas, which detailed all media outlets and their allocated sums. The list substantiated the assumption that the funds had been distributed in accordance with the government’s agenda.

Vouliwatch, the parliamentary monitoring and transparency watchdog, has been campaigning for three years for effective transparency and accountability of the use of public money in the case of the Petsas List. In October 2023, having exhausted all national legal avenues, the non-profit organisation appealed to the European Court of Human Rights, requesting full transparency and access to all data and criteria related to the allocation of funds. The e-Pasithea platform went online in September 2024 but took almost a year to become fully operational. It provides a range of digital services, including the electronic submission of advertising expenditure reports and applications for the approval of public sector advertising programmes. As of September 2025, the platform offers access to all approval decisions for the year 2024 (including application number, year, agency, approval number, approval date, decision in PDF format, and the corresponding hyperlink to the publication in DIAVGEIA) as well as approval decisions for 2025, which are still being processed.⁷² Some services of the platform are designed for use by public sector departments, which are required to upload information on state advertising. Specifically, public bodies whose annual communication plan has been approved must submit, in the year following the completion of the programme, statements via the e-Pasithea application detailing the amounts they spent in the previous year on all forms of advertising services and on broadcasting or registration contracts. These amounts are itemised for each economic operator that provided advertising or related services to the public sector. In this context, the submission of financial statements for 2024 by public and wider public sector entities, publicly accessible under the “financial statements” field, is still being finalised, while the corresponding data for 2025 will be submitted in 2026.

<https://ipi.media/wp-content/uploads/2025/12/GREECE-Media-Capture-Monitoring-Report-Overview-1.pdf>

Safeguards against state / political interference, in particular:

- safeguards to ensure editorial independence of media (private and public)
- specific safeguards for the independence of heads of management and members of the governing boards of public service media (e.g. related to appointment, dismissal), safeguards for their financial and operational independence (e.g. related to reporting obligations and the allocation of resources) and safeguards for plurality of information and opinions
- **[single market relevance]** information on specific legal provisions and procedures applying to media service providers, including as regards granting /renewal/termination of licenses, company operation, capital entry requirements, concentration and corporate governance

5000 character(s) maximum

The public service media sector in Greece comprises the Athens News Agency-Macedonian Press Agency (ANA-MPA) and the national TV broadcaster ERT. 32 33 ERT comprises six TV and web channels (ERT1, ERT2, ERT3, ERT Sports HD, ERT World, ERTNews) and eight radio stations (First Programme, Second Programme, Third Programme, ERA Sport, Kosmos 93). The company's other assets include six TV and web channels (Voice of Greece, ERA 5, 102 FM, 95.8 FM), the websites ert.gr, ertflix.gr (streaming platform), mousikasynola.ert.gr (Music Ensembles), ertnews.gr, and ertsports.gr. It has approximately 3,000 employees. It is notable that there are no legal guarantees in place to ensure that public service media providers are editorially independent. According to its mandate, ERT is required to ensure pluralism, the independent transmission of information and news, and the promotion of works of art and literature. 34 In line with its mandate, the NCRTV is the authority responsible for supervising the public broadcaster, with the objective of ensuring "the objectivity, equality of conditions and quality of the programmes, in accordance with the Constitution" . According to law 4173/2013 about ERT's operation, the public broadcaster is obliged to submit a report on the transparency of the use of the license fee both to the Institutions and Transparency Committee of the Hellenic Parliament and to the NCRTV during the first quarter of each year. This report has never been delivered. 35 36 Nevertheless, there have been numerous instances where the public broadcaster has been found to be non-compliant. One illustrative example of the control exerted over ERT can be observed in its coverage of the Greek spy scandal. This scandal revealed that the Greek secret service (EYP) had been spying on journalists, politicians, the head of the Greek army, and other individuals. Concurrently, the same individuals were subjected to surveillance via Intellexa's Predator spyware. 37 The scandal was brought to light in April 2022. Until March 2023, neither the victims of surveillance nor the journalists who had uncovered the story had been interviewed by the public broadcaster. Furthermore, the findings of the European Parliament's Committee of Inquiry on Pegasus and other spy programs (PEGA) , which included specific conclusions and recommendations for Greece, were never disseminated.

On 24 June 2025, the management of ERT, unilaterally terminated the collaboration contract with journalist Thomas Sideris over what the journalist claimed was a political motive linked to his reporting on the humanitarian situation in Gaza. ERT management also discontinued and in practice cancelled the broadcasting of the last three episodes of a multi-part radio series Sideris had been producing about the human rights situation in Gaza. The removal of the journalist sparked reactions of censorship from Greek journalist unions and political parties. No reason was provided for the cancellation of his eight-part radio series by ERT. 45 46 With regard to ANA-MPA, the principal source of political influence over the agency remains the appointment of government officials to its management board. The board of directors is constituted of nine members, the majority of whom are appointed by the government. In November 2022, the Journalists' Union of the Athens

Daily Newspapers (ESIEA) issued a statement in which it was asserted that the ANA-MPA had repeatedly violated the journalistic principle of pluralism. The Union asserted that it frequently receives complaints pertaining to the manner in which the agency presents current affairs. These are presented solely through the responses of government officials, without any reference to the news that prompted the response or to statements that would provide a more comprehensive picture.

<https://ipi.media/wp-content/uploads/2025/12/GREECE-Media-Capture-Monitoring-Report-Overview-1.pdf>

[single market relevance] Transparency of media ownership and public availability of media ownership information, including on direct, indirect and beneficial owners

5000 character(s) maximum

Many elements of Articles 6 and 22 of EMFA are covered by Greek law, but they're not always followed. In accordance with the provisions set forth in the Greek Constitution, all Greek TV channels and radio stations are required to disclose their ownership status to the National Council for Radio and Television (NCRTV). 77 The NCRTV is requesting the following data from TV and radio stations: A certificate from the business registry and a Certificate of Valid Representation A copy of the minutes from the most recent Annual General Meeting A copy of the balance sheet and summary of the financial statements. In particular, and only for licensed stations of national scope, a certificate from the auditor/accountant on the amount of the paid-up share capital and the amount of equity capital must be submitted for the relevant financial year A list of all employees with an employment relationship A certificate of insurance coverage A certificate of tax compliance A copy of the most recently submitted Statement of Assets and Liabilities to the AntiMoney Laundering Authority, along with proof of registration and a table with the details of the individuals required to submit it and their status A declaration by the shareholders, members of the board of directors, legal representatives and executives of the company regarding disabilities and incompatible qualities A statement by the legal representative of the company regarding: a) its potential holdings in other media companies; b) its potential participation in other companies other than online media; and c) its incompatible qualities A statement by the shareholders regarding: a) their potential shareholdings in other media companies; b) their potential participation in other companies other than online media; and c) any assignment of voting rights at the General Meeting or the signing of contracts or proxies related to their shares A detailed list of shareholders up to and including natural persons The Online Media Registry commenced operations in March 2023, following the abolition of the former Registry, which had launched operations in 2017. Websites began registering in large numbers from 2024 onwards. Prior to this, the majority of websites did not disclose the legal owner, let alone the beneficial owner. The Register of Beneficiaries, maintained by the General Secretariat for Information Systems, could serve as a valuable tool for journalistic investigations. It is a central digital database in which the ultimate beneficial owners of companies, along with any relevant changes, must be recorded. However, although the register is operational, it is not accessible to the public. While the European Court of Justice provides an explicit exemption granting journalists access even where public access is blocked, the Ministry of Finance continues to restrict use of the register to the competent auditing authorities.

<https://ipi.media/wp-content/uploads/2025/12/GREECE-Media-Capture-Monitoring-Report-Overview-1.pdf>

C. Framework for journalists' protection, transparency and access to documents

Rules and practices guaranteeing journalists' independence and safety, including as regards protection of journalistic sources and communications, referring also, if applicable, to follow-up given to alerts lodged with the Council of Europe's Platform to promote the protection of journalism and safety of journalists

5000 character(s) maximum

Law enforcement capacity, including during protests and demonstrations, to ensure journalists' safety and to investigate attacks on journalists

5000 character(s) maximum

In April 2025, press freedom groups marked the fourth anniversary of the killing of Greek crime reporter Giorgos Karaivaz in April 2021 with a renewed call for justice and an end to ongoing impunity, which continues to cast a dark shadow over the Greek media and press freedom landscape. Karaivaz, a veteran reporter specialised in police and crime issues, was gunned-down outside his home in Athens by two men on a moped on 9 April 2021, in what is widely suspected to have been a professional contract killing linked to organised crime groups. In July 2024, two brothers arrested in May 2023 and charged with participating in the murder were found not guilty by a court due to insufficient evidence following an investigation in which key evidence was mysteriously destroyed. Karaivaz's family has appealed this decision, arguing that evidence and testimonies were not properly assessed. However, these appeals to the Supreme Court were rejected and in December 2024, the Prosecutor of the Supreme Court issued a ruling closing the case. In December 2024, the Mixed Jury Court of Athens then ruled conclusively that Karaivaz was murdered because of his journalistic work. This ruling represented a welcome recognition of the centrality of his journalistic work to his killing, though did nothing to further the case. Since the acquittals, no additional arrests have been made and our organisations are aware of no further tangible progress in the criminal investigation, despite the fact that two other suspects are still wanted in connection with the murder. The result is that one of the most serious attacks on journalism in the European Union in recent years remains in a state of total impunity.

<https://ipi.media/greece-total-impunity-persists-on-fourth-anniversary-of-giorgos-karaivaz-murder/>

All media freedom violations reported to Mapping Media Freedom in Greece in 2025 - <https://www.mapmf.org/explorer?f.year=2025&f.country=Greece&show=list&sort=timestamp%3Adesc>

Access to information and public documents by public at large and journalists (incl. transparency authorities where they exist, procedures, costs/fees, timeframes, administrative/judicial review of decisions, execution of decisions by public authorities, possible obstacles related to the classification of information)

5000 character(s) maximum

Lawsuits (incl. SLAPPs - strategic lawsuits against public participation) and convictions against journalists (incl. defamation cases) and measures taken to safeguard against manifestly unfounded and abusive lawsuits

5000 character(s) maximum

On 8 April, the Multi Member Court of First Instance of Athens ruled in favour of journalists Nikolas Leontopoulos, Thodoris Chondrogiannos and Christoforos Kasdaglis from investigative media outlet Reporters United and reporter Dimitris Terzis of newspaper Efimerida ton Syntakton (EfSyn), concluding that their reporting on Grigoris Dimitriadis and his connection to a spyware scandal had been accurate. The reporting revealed how Dimitriadis' phone number had been used to target 11 individuals with spyware hacks. At the time, Dimitriadis was serving as the Secretary General of the PM's Office and was responsible for overseeing the Greek National Intelligence Service (EYP). The spyware targets had included the head of the Greek Police and the prosecutor of the EYP. The reporting did not suggest Dimitriadis was responsible for the hacking, only that his phone number had been used. Dimitriadis had demanded exorbitant fees of €950,000 in compensation. In its ruling, the court dismissed the allegations and ordered him to pay legal costs of €4,750. It did not identify a single defamatory or objectionable element in the articles. The court did rule that a single headline by EfSyn in its newspaper article constituted simple defamation and ordered the media outlet to pay €3,000 in damages and €450 for legal costs. After the verdict, Dimitriadis claimed he had been "vindicated" and claimed the media outlets had spread "fake news". EfSyn said it plans to appeal that verdict. The MFRR welcomes the ruling, which found the reporting itself to have been 100% accurate. However, we note with concern the singular ruling against EfSyn and hope this will be swiftly overturned on appeal. These lawsuits were widely considered to be SLAPPs, a form of abusive litigation aimed at suppressing legitimate public interest reporting. In October 2021, Dimitriadis was awarded the satirical 'SLAPP Politician of the Year Award' 2022 by the Coalition Against SLAPPs in Europe (CASE). In its latest verdict, the court did not rule on whether the lawsuits were SLAPPs, which are not recognised under Greek law. Our organisations, which provided financial support to Reporters United for legal fees through our MFRR Legal Support Fund, will continue to defend independent investigative journalism in Greece. As noted in our 2023 report following a mission to Athens, SLAPPs and abusive lawsuits pose an increasing threat to media freedom in Greece.

<https://ipi.media/greece-investigative-media-win-latest-victory-in-spyware-slapp-ruling/>

All legal cases documented on Mapping Media Freedom from Greece in 2025 - https://www.mapmf.org/explorer?f.year=2025&f.country=Greece&f.type_of_incident=Legal+incident&show=list&sort=timestamp%3Adesc

Any other developments related to media pluralism and freedom - please specify

5000 character(s) maximum

All cases of media freedom violations in Greece on Mapping Media Freedom in 2025 - <https://www.mapmf.org/explorer?f.year%3D2025%26f.country%3DGreece%26show%3Dlist%26sort%3Dtimestamp%253Adesc&sa=D&source=docs&ust=1769184971525765&usg=AOvVaw07m1vjrR4aaoe1-gaDmvjG>

The International Press Institute (IPI) joined media freedom and journalist organisations in publishing an open letter sent to the Greek Prime Minister Kyriakos Mitsotakis outlining a number of reforms required to improve the worrying climate for media freedom in the country, as part of the Council of Europe's Journalists Matter

Campaign.

Recommendations --

Fully implement the recommendations of the European Parliament's PEGA Committee regarding surveillance, including strengthening institutional and legal safeguards, effective ex ante and ex post scrutiny, as well as independent oversight of state surveillance practices; re-opening investigations into the abusive deployment of spyware against journalists with a view to providing full judicial remedy; re-establishing the authority of the Hellenic Authority for Communication Security and Privacy to inform citizens about lifting confidentiality for communications; removing the existing three-year period preventing targeted individuals from accessing information about their surveillance initiated for reasons of national security.

Abolish criminal defamation, in line with calls by the Council of Europe's Parliamentary Assembly and the Organization for Security and Cooperation in Europe.

Undertake all necessary legal, procedural, and practical safeguards to end Strategic Lawsuits against Public Participation, in line with the EU's anti-SLAPP Directive and the Council of Europe Committee of Ministers' Recommendation on SLAPPs, and fulfil the commitment that the government has made — in meetings with NGOs — to broaden the implementation of the EU anti-SLAPP Directive to apply to domestic cases.

Repeal Law No. 1178/81 "On civil liability of the press and certain other provisions" and reform civil defamation provisions to introduce adequate safeguards to prevent unwarranted limitations on freedom of expression, including through SLAPPs. These safeguards should include a limitation on non-material damages claimed in civil defamation suits against journalists and media outlets.

Ambitiously undertake all necessary reforms — using the European Media Freedom Act as a basis — to address media capture in Greece, including ownership and market concentration, such as the establishment of a truly transparent and operational media ownership registry; measures to guarantee editorial independence, including the independent appointment of leadership positions, management and oversight of government-run news outlets; transparent oversight of state funding to the media; and the immediate removal of the public broadcaster, ERT, and the Athens-Macedonian News Agency from under the oversight of your office.

Put in place measures to stop smear campaigns against journalists, and the harassment and intimidation of journalists by public officials, including the immediate condemnation of such acts by political leadership in Greece and, where possible, hold individuals to account in line with the European Commission Journalist Safety Recommendation 2021.

Increase resources and support to law enforcement with a view toward strengthening their capacity to investigate all crimes against journalists, and publicly share information on what support activities are being put in place as well as their intended outcome; address impunity for unsolved murders of journalists, and where possible publicly disclose actions taken by the authorities to do so.

<https://ipi.media/greece-ipi-joins-open-letter-to-pm-mitsotakis-outlining-urgent-need-for-further-media-freedom-reforms/>

IV. Other institutional issues related to checks and balances

Please provide information on measures taken to follow-up on the recommendations received in the 2025 Report regarding the system of checks and balances (if applicable)

5000 character(s) maximum

A. The process for preparing, enacting and implementing laws

[single market relevance] Framework, policy and use of impact assessments and evidence based policy-making, stakeholders*/public consultations (including rules and practices on the transparent participation of civil society to policy development and decision-making processes), and transparency and quality of the legislative process in the preparatory, the parliamentary and implementation phase (including guidance on how to implement legislation)

* This includes also the consultation of social partners

5000 character(s) maximum

[single market relevance] Rules and use of fast-track procedures and emergency procedures (for example, the percentage of decisions adopted through emergency /urgent procedure compared to the total number of adopted decisions)

5000 character(s) maximum

[single market relevance] Safeguards to ensure legal certainty, the stability of the legal framework and non-discrimination.

5000 character(s) maximum

Rules and application of states of emergency (or analogous regimes), including judicial review and parliamentary oversight

5000 character(s) maximum

Regime for constitutional review of laws

5000 character(s) maximum

B. Independent authorities

Independence, resources, capacity and powers (including effective access to relevant data) of national human rights institutions ('NHRIs'), of ombudsman institutions if different from NHRIs, of equality bodies if different from NHRIs and of supreme audit institutions

(Cf. the website of the European Court of Auditors: <https://www.eca.europa.eu/en/Pages/SupremeAuditInstitutions.aspx#>)

5000 character(s) maximum

Statistics/reports concerning the follow-up to recommendations by National Human Rights Institutions, ombudsman institutions, equality bodies and supreme audit institutions in the past year

5000 character(s) maximum

[single market relevance] Safeguards to ensure the effective independence of supervisory and regulatory authorities with a direct impact on economic operators such as national economic oversight, enforcement and competition authorities

C. Accessibility and judicial review of administrative decisions

[single market relevance] Transparency of administrative decisions and sanctions (incl. their publication and rules on collection of related data) and respect of the good administration principle (including the obligation of the administration to give reasons for decisions)

5000 character(s) maximum

[single market relevance] Judicial review of administrative decisions: short description of the general regime (in particular competent court, scope, suspensive effect, interim measures, and any applicable specific rules or derogations from the general regime of judicial review)

5000 character(s) maximum

[single market relevance] Safeguards (other than judicial review) regarding decisions or inaction of administrative authorities, including remedies (e.g. administrative review)

5000 character(s) maximum

[single market relevance] Rules and practices related to the application by all courts, including constitutional jurisdictions, of the preliminary ruling procedure (Art. 267 TFEU)

5000 character(s) maximum

[single market relevance] Implementation of final judgments by the public administration and State institutions and follow-up given to supranational judgments, including decisions from the European Court of Human Rights, as well as available remedies in case of non-implementation

5000 character(s) maximum

Oversight, including by courts, of the use of intrusive surveillance software by national authorities

5000 character(s) maximum

D. The enabling framework for civil society

Measures regarding the framework for civil society organisations and human rights defenders (e.g. legal framework and its application in practice incl. registration, transparency and dissolution rules)

5000 character(s) maximum

Rules and practices having an impact on the effective operation and safety of civil society organisations and human rights defenders. This includes measures to protect them from attacks – verbal, physical or on-line –, intimidation, legal threats incl. SLAPPs, negative narratives or smear campaigns, measures capable of affecting the public perception of civil society organisations, etc. It also includes measures to monitor threats or attacks and dedicated support services, as well as available remedies

5000 character(s) maximum

Organisation of financial support for civil society organisations and human rights defenders (e.g. framework to ensure access to funding, and for financial viability, taxation/incentive/donation systems, measures to ensure a fair distribution of funding)

5000 character(s) maximum

E. Initiatives to foster a rule of law culture

If there have been developments related to initiatives to foster a rule of law culture, please specify, which (e.g. debates in national parliaments on the rule of law, public information campaigns on rule of law issues, contributions from civil society, education initiatives, etc.)

5000 character(s) maximum

Any other developments related to the system of checks and balances - please specify

5000 character(s) maximum

Cross-pillar elements: cross-border rule of law issues related to the Single Market

If there are any significant challenges concerning the Single Market you have been facing in a cross-border context relating to any of the four pillars of the report, including for example issues with market access and the conditions for economic activities, that you would like to highlight, please do so here.

Given the cross-cutting nature of this question, it is included as a separate section in the questionnaire. Information collected under this question will however be integrated under the relevant existing pillar(s) of the Report.

5000 character(s) maximum

Supporting document upload

If you would like to submit any supporting document(s) to your contribution, please upload your file(s) here

Contact

rule-of-law-network@ec.europa.eu