

EUROPEAN RULE OF LAW MECHANISM

ADDITIONAL INPUT FROM GREECE

ON THE 2026 RULE OF LAW REPORT

ANSWERS TO THE TARGETED QUESTIONS Country Visit 2-6 and 12 March 2026

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Please find attached:

1. *An ANNEX on PILLAR II- ANTICORRUPTION, with updated statistical data*
2. *An ANNEX on PILLAR III- JUDICIAL STATISTICS ON PRESS MEDIA, with updated statistical data.*
3. *The letter from the Secretary General for Communication and Media, circulated to all Task Force members on 9 March 2026.*
4. *The Memorandum of Understanding signed between Secretariat General for Communication and Media and the Centre for Research and Technology Hellas (EKETA).*

I. Meetings with authorities on Pillar I

A. Ministry of Justice

1. We understand that recent appointments to the highest judicial positions—made under the revised legal framework providing for greater judicial involvement in the selection process—have provoked reactions, including from judges’ associations. How do you assess the concerns raised?

As already highlighted in our previous contributions, the recent legislative reform (Article 27 of Law 5123/2024, as amended by Article 36 of Law 5197/2025) provides for the participation of the judiciary in the selection of its leadership. In particular, **Article 27 of Law 5123/2024** grants the Plenary Sessions of the Supreme Courts—composed exclusively of senior judges—the right to issue a non-binding opinion on the selection of their leadership.

This reform marks a historic development in Greece, as it introduces, for the first time, the formal participation of the judiciary in the selection of its own leadership. It represents a major step toward strengthening judicial independence and the rule of law, a development expressly recognized by the European Commission’s 2024 Rule of Law Report as fully implementing the relevant recommendation. At the same time, this arrangement is consistent with Article 90(5) of the Constitution, which confers broad discretion upon the Council of Ministers regarding the appointment of the leadership of the judiciary, grounded in the principles of popular sovereignty and democratic legitimacy.

The reform has been widely welcomed at the national level by judges of all supreme courts, judicial and bar associations, as well as civil society.

Furthermore, in view of the first implementation of the new framework, **Article 36 of Law 5197/2025** addressed issues relating to both the voting procedure and the pool of candidates. The same provision extended judicial participation to the selection of the General Commissioner of the State for Administrative Courts by establishing a new advisory body composed of members of the General Commission and the 50 most senior Presidents of the Administrative Courts of Appeal, tasked with issuing a non-binding opinion.

It should be recalled that these amendments were introduced following proposals by the Administrative Plenary Sessions of the Council of State, the Supreme Civil and Criminal Court (Areios Pagos), and the Public Prosecutor’s Office at the Court of Cassation (see Decision No. 47/2024 of the Council of State (Plenary Session and Council), Decision No. 53/2024 of the Plenary Session of the Court of Cassation (in Council), and Decision–Minutes No. 2/2025 of the Public Prosecutor’s Office at the Court of Cassation).

Following this amendment, all three supreme courts, as well as the Public Prosecutor’s Office at the Court of Cassation, promptly adapted their internal regulations in order to ensure the smooth implementation of the above provisions. The first application of the reform (in June 2026) has indeed been considered fully successful, as both the internal voting procedures and the subsequent stages (namely, the hearing before the Conference of Presidents of Parliament, the proposal by the Minister of Justice to the Council of Ministers, and the final decision of the Council of Ministers) were carried out without disruption. The entire process was completed in a timely manner, enabling the new leadership to assume its duties without affecting the continuity and proper functioning of the courts and prosecution services.

As regards the voting results from the first implementation of the reform (June 2026), it should be recalled, as noted above, that under the current constitutional framework (article 90(5) of the Constitution) the opinions expressed by both judges and Parliament during the selection process are advisory in nature and cannot be binding. However, this does not diminish the significance of the reform, as the system is fully consistent with European standards, given that the opinion expressed by the judiciary is duly taken into consideration and, in effect, substantively contributes to shaping the final decision of the Council of Ministers.

More specifically, in the recent selection procedures, the opinion of the judiciary was clearly taken into account and largely reflected in the outcomes. In particular, the positions of the President of the Supreme Court (Areios Pagos), the Prosecutor General at the Court of Cassation, four Vice-Presidents of the Council of State, and one Vice-President of the Court of Audit were filled by judges who ranked among the top five in the preferences expressed by their peers. With regard to the nine Vice-President positions in the Supreme Court, these were filled by judges who ranked within the top twenty of their colleagues' preferences. Furthermore, as noted above, the Council of Ministers also takes into consideration the opinion of the Conference of Presidents of Parliament, a body in which all parliamentary political parties are represented.

In conclusion, under the current system for the selection of judicial leadership, which has been assessed as consistent with European standards, all three branches of government participate: the judiciary and the legislature provide advisory opinions, while the executive exercises the decisive vote, in accordance with the principle of popular sovereignty. Any modification of this framework toward allowing the judiciary to express a binding opinion would require a constitutional revision. Nonetheless, the governmental majority has already indicated its intention to include Article 90(5) of the Constitution among the provisions to be revised.

In any event, it should be emphasized that even under the existing constitutional and legislative framework, judges now have a formal role in the selection of their leadership. Consequently, judicial self-governance in Greece has been further strengthened: decisions regarding judges' careers are made exclusively by judicial bodies, while the leadership of the highest courts is appointed with the formal involvement of the judiciary itself.

2. The Prime Minister announced in early February the launch of the process to revise the Constitution. Could you please provide further information on next steps as well as how the provisions possibly to be included might affect to rule of law issues?

The procedure for the revision of the Constitution is described in **Article 110, paragraphs 2–6**, as follows:

“2. The need for revision of the Constitution shall be ascertained by a resolution of Parliament adopted, on the proposal of not less than fifty Members of Parliament, by a three-fifths majority of the total number of its members in two ballots, held at least one month apart. This resolution shall define specifically the provisions to be revised.

3. Upon a resolution by Parliament on the revision of the Constitution, the next Parliament shall, in the course of its opening session, decide on the provisions to be revised by an absolute majority of the total number of its members.

4. Should a proposal for revision of the Constitution receive the majority of the votes of the total number of members but not the three fifths majority specified in paragraph 2, the next Parliament may, in its opening session, decide on the provisions to be revised by a three-fifths majority of the total number of its members.

5. Every duly voted revision of provisions of the Constitution shall be published in the Government Gazette within ten days of its adoption by Parliament and shall come into force through a special parliamentary resolution.
6. Revision of the Constitution is not permitted before the lapse of five years from the completion of a previous revision”.

From the above provisions, in conjunction with those set out in the Rules of Procedure of Parliament (Article 119), the following conclusions arise:

The body responsible for the constitutional revision function is Parliament, both in the initial and the final phase of the revision process. The initiative for constitutional revision may be undertaken exclusively by Parliament, through a written proposal submitted by at least fifty Members of Parliament, accompanied by an explanatory report. The President of Parliament announces the proposal (or proposals, if more than one is submitted) and distributes them to the Members of Parliament.

Subsequently, the President establishes the Revision Committee, which consists of 38 to 50 Members of Parliament, proportionally representing the parliamentary groups. Experts, representatives of institutions, or public officials may be invited to the Committee in order to express their views.

This is followed by the inclusion of the proposals on a special agenda and their discussion in the Plenary, which decides on the necessity of the revision, specifically determining the provisions to be revised. This decision is taken through two roll-call votes held at least one month apart. The second vote concerns the provisions approved in the first vote (Article 110(2) of the Constitution and Article 119(6) of the Rules of Procedure of Parliament).

Parliament is not required to be dissolved in order for the process to continue immediately; however, the second phase of the process begins after the term of Parliament expires or it is dissolved for reasons provided in the Constitution.

At the beginning of the first session of the next Parliament, the Revision Committee is reconstituted in order to process the content of the provisions to be revised, following a similar procedure to that of the previous Parliament. The key difference is that the final decision of the revising Parliament is taken in a single roll-call vote.

According to Article 110(4) of the Constitution, if the proposal for revision in the initiating Parliament is approved by a three-fifths majority of the total number of Members (180 MPs), then the revising Parliament may decide on the wording of the provisions to be revised by an absolute majority (151 out of 300 MPs). Conversely, if the initiating Parliament achieves only an absolute majority (151 MPs), then a three-fifths majority (180 MPs) is required in the revising Parliament.

As regards the current revision process, in early February, the Prime Minister announced the initiation of the constitutional revision procedure.

At present, the governing majority is in the process of collecting proposals from Members of Parliament, with the aim of forming a unified proposal. At the same time, opposition parties also have the possibility to submit proposals, provided that these are supported by at least 50 Members of Parliament.

Subsequently, as mentioned above, a cross-party committee will be established, and after discussion of the proposals, it will recommend to the Plenary the provisions to be revised. The proposal must be approved by a three-fifths majority of the total number of Members (180 MPs) in two votes held at least one month apart. This decision specifically determines the provisions to be revised.

Once the revision is decided by the current (“initiating”) Parliament, the next Parliament, referred to as the “revising” Parliament, decides during its first session, by an absolute

majority of the total number of its Members (151 MPs), on the provisions to be revised. The reverse majority requirement applies accordingly.

With regard to the content of the proposals relating to the rule of law, as already noted in our previous contributions, the Prime Minister has committed that the proposal of the governing majority will include the provision of Article 90(5) of the Constitution, which concerns the method of selecting the leadership of the courts.

However, it is not yet possible to predict the direction this proposal will take, since, as noted above, only Parliament is constitutionally competent both to determine the provisions subject to revision and the direction of their revision in the first phase, as well as to formulate them in the final phase of the process.

3. In the written input, it is noted that the introduction of a suspension (cooling-off) period (for judges) is not considered necessary. That said, associations of judges keep reiterating their views about the necessity of such measure. Have you discussed or plan to discuss this question with the associations of judges?

Judges emeritus, in addition to their extensive expertise, command respect, having consistently performed their duties throughout their tenure with full guarantees of personal and functional independence. Accordingly, their post-retirement appointment to positions requiring independence, objectivity, and exceptional competence is fully aligned with the public interest.

However, in order to address criticisms—often unfounded - regarding alleged deficiencies in judicial independence, and to strengthen public confidence in institutions, particularly in the judiciary, the Government is considering the establishment of a legislative framework governing the appointment of retired judges to positions of responsibility, based on objective and transparent criteria.

Once the relevant legislative proposal is drafted, all stakeholders, and particularly representatives of the judiciary and judges' associations, will be invited to provide their opinions and observations, which will be duly considered in the development of the legislative framework and the draft law. It is worth recalling that the Ministry of Justice has consistently demonstrated its commitment to broad consultation, beyond the mandatory requirements of Law 4622/2019, applying this approach to all significant legislative initiatives it submits for enactment. This was notably the case prior to the adoption of the landmark reform of the judicial map.

4. What is your assessment of the ongoing institutional dispute between the Bar Association and the Association of Judges and Prosecutors and its potential implications for the legal system?

These incidents are isolated and, in any case, are subject to disciplinary action by the competent disciplinary bodies of both judges and lawyers. The Ministry of Justice has furthermore taken the initiative to foster cooperation between the Bar Associations and the Judges' Association in order to address such occurrences, which undermine the proper functioning of the judiciary as well as public confidence in institutions.

It should be emphasized that the Ministry of Justice has demonstrably shown its trust in the legal profession of lawyer and its institutional role, particularly through the delegation of certain judicial subject matter to lawyers under Laws 5095/2024 and 5221/2025. In turn, lawyers must recognize their institutional role as co-actors in the administration of justice and perform their duties with responsibility and full awareness of that role.

As has been consistently highlighted in previous contributions, the legal profession of lawyer enjoys substantial autonomy and independence under the law, with disciplinary proceedings conducted within the framework of each Bar Association. Accordingly, the same institutional awareness and responsibility should be demonstrated in the exercise of its self-regulatory functions. Likewise, disciplinary oversight of lawyers should be exercised with an equivalent sense of responsibility and duty by the competent bodies of the Bar Associations.

Finally, it should be noted that the work of the working group for the revision of the Lawyers' Code has resumed, following suspension due to the elections of the Bar Associations and the appointment of a new Board, in order to renew representation in accordance with the electoral process. Within this context, should it be deemed necessary to strengthen or amend the existing provisions regarding disciplinary procedures under the Lawyers' Code, such matters should be duly addressed during the drafting of the new Code.

5. According to the written input, the preparation of a comprehensive ADR Code is expected in the first half of 2026. Could you please provide more information on the state of play. When is the new code expected to be adopted and enter into force?

The working group established to prepare the new Code of Alternative Dispute Resolution is expected to complete its work and submit its proposals to the political leadership of the Ministry of Justice by the end of April 2026. Immediately thereafter, the prescribed procedure for the submission and enactment of the Code of Alternative Dispute Resolution will commence, with the aim of completing the legislative process within the first half of 2026.

Regarding the entry into force, the exact timetable will depend on the internal structure and design of the individual provisions of the Code—certain articles may enter into force upon their publication in the Government Gazette, while others may be subject to transitional periods or later effective dates, as expressly provided in the relevant provisions.

6. What are the key objectives of the revision of the Code of Administrative Procedure and how do you respond to the concerns raised by the association of administrative judges?

The proposal for the amendment of the Code of Administrative Procedure originates from the initiative of the General Directorate of Administrative Courts and has been developed by a working group composed of administrative judges.

With the proposed new Code of Administrative Procedure, proceedings are to be expedited with the primary objective of addressing the so-called “periods of inactivity” (ECHR, 6 April 2000, Thlimmenos v. Greece, §§61-62), i.e., the interval between the filing of a case and the hearing, during which no attention is currently given to the case file. Under the new Code, a reporting judge will monitor the case from the moment it is filed with the registry, ensuring

that, prior to the hearing, all necessary documents (such as standing, court fees, and the administrative dossier) have been submitted. Additionally, parties will be informed regarding the correction of formal deficiencies so that the court does not reject a claim or appeal as inadmissible. Consequently, cases will be presented to the court fully prepared.

This system has been applied in the Council of State since early 2025, and it is intended to extend it to administrative first-instance and appellate courts. The effectiveness of this procedure will be further enhanced by the completion of upgrades to our information system (O.S.D.D.Y.D.D.) and the implementation of telematic hearings, as well as through the recruitment of judicial clerks of the special branch of “Judicial documentation and Judicial work”.

The Association of Administrative Judges has expressed strong reservations regarding this proposal, considering that the introduction of a front-loaded procedural system could impose additional burdens on: (a) the parties, due to the imposition of a rigorous framework of procedural obligations, and (b) judges, who would have to assume additional administrative duties because of the lack of judicial staff.

The Ministry of Justice, while recognizing the need to create a more efficient and citizen-friendly administrative justice system, simultaneously takes into account the concerns of administrative judges and their Association. Given that the objective is shared, the Ministry has decided to establish a working group tasked with drafting the new Code. This working group will include representatives from the General Directorate of Administrative Courts, representatives of the Association of Administrative Judges, judges from the Council of State and the administrative courts, as well as representatives of the Legal Council of the State. The working group is expected to commence its activities promptly, within the month of March.

7. With regard to delays in administrative justice, according to recent reports, there is a large backlog of tax disputes pending before the first and second instance of administrative courts, a significant percentage of which has not even received a hearing date. How do you plan to address this problem? We understand that the provisions enabling the submission of such disputes to arbitration remain inactive, for lack of the issuance of the necessary secondary legislation. Do you contemplate addressing this situation in the context of the ongoing work on the new ADR code?

The following clarification is provided: **tax cases** are divided into those exceeding the amount of EUR 250,000, which fall within the subject-matter jurisdiction of the Administrative Court of Appeal, and those below EUR 250,000, which fall within the jurisdiction of the Administrative Court of First Instance. The number of unassigned tax cases before the administrative courts nationwide currently stands at 2,689 before the Administrative Courts of Appeal and 4,311 before the Administrative Courts of First Instance. These figures represent a substantial improvement compared to previous years. The proposed amendments to the Code of Administrative Procedure, as outlined in response to the previous question, aim, inter alia, to expedite the adjudication of such unassigned cases.

i. With regard to the **out-of-court settlement of tax disputes**, this is achieved through: **(a) the administrative review procedure before the Directorate for the Resolution of Disputes**, and **(b) the Committees for the Extrajudicial resolution of Tax Disputes**, the operation of which

has been extended pursuant to Law 5222/2025 (Article 255) (for further information, please refer to our contributions submitted in the previous and the current year).

More specifically, as regards the operation of the **Directorate for the Resolution of Disputes**, it is worth noting that, according to statistical data provided by the Independent Authority for Public Revenue, in 2025 the Directorate issued decisions on 99.2% of administrative appeals, exceeding its overall target (90%) by 10.2%. A comparison between 2024 and 2025 shows an increase of 2.4% in the rate of examination of administrative appeals in 2025. Furthermore, the number of express decisions issued in 2025 exceeded that of 2024 by 52.7%, while the number of implicit rejections decreased by 38.7% compared to 2024. It is also noteworthy that in 2025 the Directorate issued the highest number of express decisions since its establishment. At the same time, a significant increase of 80.2% was recorded in the number of administrative appeals submitted compared to 2024.

ii. As regards tax arbitration, within the framework of the preparation of the new Code of Alternative Dispute Resolution (ADR), the appointed working group is examining all relevant data in order to assess the possible inclusion of tax disputes within the scope of the relevant mechanisms. However, such an initiative may be implemented at a later stage, as the matter falls within the joint competence of the Ministry of National Economy and Finance and requires further cooperation and coordination among the competent authorities.

B. Council of State

1. We understand that recent appointments to the highest judicial positions—made under the revised legal framework providing for greater judicial involvement in the selection process—have provoked reactions, including from judges’ associations. How do you assess the concerns raised, and what is your perspective on the broader implications for judicial independence and public trust?

Regarding the concerns raised about the recent appointments to the highest positions in the Judiciary, the first implementation of the new appointment procedure which took place in June 2025 proceeded smoothly. Specifically, the outcome of the vote among the members of the Administrative Plenary for the four positions of Vice-Presidents of the Council of State was mostly in line with the members’ seniority and the Government followed for the most part the proposal of the Administrative Plenary, as the four appointed candidates were selected from among the five candidates who received the highest number of votes. We are not in a position to comment on the corresponding procedure or the appointments in the other jurisdiction.

2. The written input indicates that, as part of its deliberations ahead of the forthcoming constitutional revision, the Administrative Plenary of the Council of State is considering extending the current incompatibility rules for sitting judges to retired judges for a period of two years. Could you please provide more information on this proposal?

As part of its deliberations ahead of the forthcoming constitutional revision, the Administrative Plenary of the Council of State is considering proposing the extension of the incompatibility rules for sitting judges laid down in Article 89 of the Greek Constitution to retired judges for a two-year period, in light of the relatively low level of public trust in the judiciary. According to this proposal, retired judges would be prohibited, for a two-year period after leaving office, from assuming administrative duties (including appointment to independent authorities) and from participating in the Government.

3. In your view, which key issues affecting the judiciary and the justice system should be prioritised for review in the forthcoming constitutional revision? Are there particular areas where reform is most urgently needed?

Regarding the forthcoming constitutional revision, members of the Council of State do not find that there are areas regarding the judiciary and the justice system where reform is urgently needed. However, as part of its deliberations ahead of the forthcoming constitutional revision, the Administrative Plenary of the Council of State is considering submitting the following proposals: a) the revision of article 88 in order to provide for a two-year trial period for judges prior to their appointment as regular judges, b) the revision of article 90 par. 1 in order to provide for the participation of judges of the ordinary administrative courts in the Supreme Judicial Council of the Administrative Justice, with a right to vote, when deciding on changes in the service status of the judges of the ordinary administrative courts, c) the revision of article 93 par. 3 in order to provide that the manner of the pronouncement of judicial decisions will be regulated by law, d) the revision of article 95 par. 3 in order to provide for the opinion of the Council of State on bills concerning the jurisdiction on administrative

disputes, e) the revision of article 100 par. 2 regarding the composition of the Special Highest Court, f) the establishment of a national independent body (with a mixed composition and a majority of judges), entrusted with advisory competences on the financial management of the judiciary.

4. How do you assess the quality of the legislation?

Regarding the quality of legislation, it is a fact that, in recent years, the quality of legislation has improved considerably: late amendments are no longer submitted, provisions are generally not included in unrelated bills (except in cases of urgent regulation) and consultation period prior to voting is respected. It is also very important that judges from the Council of State participate in most legislative drafting committees and in the Committee for Quality Evaluation of the Law-Making Process.

However, certain shortcomings still persist, e.g. **a)** there is **an overproduction of legislation**, with frequent amendments to the same provisions, which is often due to the complexity and novelty of the issues regulated, **b)** some **deficiencies are observed in the Impact Assessment** of the bills, which should clearly set out the content, rationale and potential implementation issues of each particular provision and **c)** there is a tendency to **avoid adopting regulations through presidential decrees**.

5. Could you share your perspective on the proposed reforms to Law 3068/2002 and other initiatives aimed at strengthening the framework for compliance with court decisions?

Regarding the proposed reform to Law 3068/2002, the working group has submitted its proposal. The proposed reform seeks to ensure effective administrative compliance with court decisions and align the legislative framework with the requirements of the European Convention on Human Rights and the ECHR case law. The key provisions of the proposed reform include **a)** the participation of administrative officials in the proceedings before the judicial council responsible to ensure compliance in order to promote cooperation and oversight, **b)** the issuance of binding decisions specifying the required actions and the responsible bodies to ensure compliance, **c)** possibility of imposing daily penalties in case of non-compliance and **d)** possibility to order temporary measures until full compliance.

6. Council of State statistics for 2025.

Finally, regarding the statistics for the Council of State, as mentioned in our RoL Input for 2026, during the first year of the implementation of the new Council of State procedure, the Court increased its efficiency. More specifically, **in 2025 the Court issued 2,490 judgments** (an increase of 8.1% compared to 2024), **494 judgments in Council** (an increase of 10.3% compared to 2024), **242 judgments of the Suspension Committee** (an increase of 23.5% compared to 2024) and **156 Opinions on the legality of presidential decrees** (an increase of 14.7% compared to 2024).

II. Meetings with authorities on Pillar II

A. Ministry of Justice

[on track-record]

1. Could you please explain how the statistics you provided in the Annex of the written input reflect Greece's efforts to improve the track record of prosecutions and final judgments, including high level corruption cases? How many cases concern high-level officials?

2. We understand there was only one prosecuted (corruption) case last year. Are there any obstacles preventing more prosecutions? There also seems to be a growing backlog of cases. Could you expand on the reasons behind it?

3. Do the statistics you provide allow us to follow the passage of cases through the system? Can the different numbers collected at different stages be reconciled? Explain how your statistical submissions help us to understand the lifecycle of cases, from report via investigations to prosecutions and adjudications?

Answers to Q.1, 2 and 3.

With regard to the corruption cases referred to in the Annex, **please consult the updated ANNEX, which contains revised statistical data.** Further information and explanatory notes on the statistics are provided in the contribution of the Financial Prosecutor.

4. A digital registry for the monitoring of corruption cases is planned to become operational in 2026. Can you elaborate how the records from the registry will help improve the overall number of investigations, prosecutions and judgments and improve the track record? (real operational impact on the ground). Can you provide additional information on the timeline leading to the creation of the digital registry, i.e. when do you expect the law to enter into force, launch the tender process, complete the development?

It should be emphasized from the outset that, to date, there has been no fully comprehensive recording of corruption cases, as has also been identified in the relevant recommendations set out in the Rule of Law Report.

In this context, the Ministry of Justice, by virtue of the recently enacted Law 5282/2026 (GG A' 30/27.02.2026) entitled "Establishment and operation of a Unified Digital Register for monitoring corruption cases...", has established **the Single Digital Register for Monitoring Corruption Cases**. The adoption of this legislative initiative was carried out in close cooperation with the Commission—following a series of technical meetings—with the aim of enabling Greece to develop a reliable track record of corruption cases up to their final judgment.

Through the operation of the Register, the recording of criminal corruption cases is ensured from the initial stage of investigation through to their final adjudication, allowing for the production of fully reliable, up-to-date, and qualitatively enhanced statistical data. The

Register is not merely intended as a tool for the statistical representation of corruption phenomena, but as a mechanism for active management, oversight, and accountability.

Each case under investigation for corruption offences will be recorded from the outset in a unified digital system, updated in real time by the designated—accredited—official of the competent authority, and centrally monitored throughout all procedural stages (such as the registration of an investigation order, submission of audit reports or investigative findings to the prosecution authorities, initiation of criminal proceedings or case dismissal, stages of the investigative procedure, imposition of procedural coercive measures, issuance of indicting or dismissing judicial decisions, referral to trial, and the issuance of final, binding and irrevocable judgments).

In particular, the systematic recording of all cases from the initial stage will facilitate the identification of delays at the stage of the preliminary examination or the main investigation and will contribute to mapping cases that remain pending for extended periods of time.

The Register will take the form of a digital platform accessible to authorized and accredited officials of the competent authorities (both audit and judicial), through the use of public administration credentials. These officials will record the cases under investigation that have been classified as corruption cases, assigning to each a unique serial number, which will follow the case from the initiation of the investigation through to the issuance of a final and irrevocable judicial decision. This will ensure that the competent official at each procedural stage systematically updates the platform with the required data.

The operation of the Register **will be supervised by a three-member committee chaired by the Financial Crime Prosecutor**, who holds the rank of Prosecutor at the Court of Appeal.

All data will be recorded **in a fully anonymized form and without qualitative identifiers or characteristics, as expressly provided by law**, in order to safeguard the confidentiality of the proceedings and to ensure the protection of personal data. This is expressly stipulated in the provisions of the law and the accompanying explanatory memorandum (Articles 6(2) and 7 of the draft law, as published for public consultation and subsequently adopted).

It is worth noting that, **during the technical meetings with the Commission**, useful guidance was provided, inter alia, on the recording of anonymized and pseudonymized data. In particular, the Commission presented its corresponding platform for organized crime cases to the working group responsible for drafting the law. A representative of the Ministry of Digital Governance, responsible for the development of the technical specifications and the operation of the platform, participated both in the working group for the establishment of the Register and in all technical meetings with the Commission, thereby acquiring valuable expertise and know-how regarding the anonymization of data.

Furthermore, following observations made by the **Hellenic Data Protection Authority** during the final stage of legislative processing before the competent parliamentary committees, **the draft law was further improved** through the addition of an explicit provision stipulating that “the data referred to in the first subparagraph shall not include personal data” (see Article 7(1), second sentence).

It is therefore evident and beyond dispute that the data entered in the Register are exclusively anonymized and, under no circumstances, may include personal data, in order to ensure

compliance with the General Data Protection Regulation (GDPR) and to safeguard the confidentiality of the proceedings.

As regards the timetable, the established working group (Decision No. 40004/08-07-2025) is already **preparing the Joint Ministerial Decision**, which will define in detail the terms governing the establishment and operation of the Register, the structure and technical specifications of the electronic database, the procedural stages for updating the Register by each competent authority, the categories of data to be recorded, the time limits for data entry, and the corresponding fields of the digital application. It will also designate the competent authorities responsible for the operation and updating of the Register, determine the number and capacity of accredited officials, specify the procedures for their accreditation, replacement or substitution, and regulate the process for anonymized data entry and the allocation of a unique identification number per case.

At the same time, **the technical specifications of the Register are being prepared**, with a view to launching the public procurement procedure for the technical development of the system.

The full operational deployment of the Register is expected to commence in early 2027.

7. Are there any developments or challenges to highlight in relation to the cooperation between the police and the economic and financial crime prosecution services and the EPPO or the resources allocated to EPPO cases, including secondments from the police?

Since 2023, the offices of the European Public Prosecutor's Office (EPPO), the Financial Prosecutor's Office, and the Authority for Combating Money Laundering have been reinforced.

More specifically, pursuant to Article 57 of Law 5026/2023, specialized scientific personnel were seconded to the European Public Prosecutor's Office, while the staffing of the EPPO Registry was strengthened under Article 56 of the same law (Government Gazette A' 45/28.02.2023).

Furthermore, Joint Ministerial Decision No. 51806 (Government Gazette B' 7492/29.12.2023) established additional remuneration for the scientific personnel serving in the Office of the European Delegated Prosecutors.

In addition, **a Joint Ministerial Decision currently pending publication** (No. KAΔ 11998/20/2/2026) provides for a further increase in the allowances granted to scientific personnel (including experts and registry staff) seconded to both the Financial Prosecutor's Office and the European Public Prosecutor's Office.

By Ministerial Decision No. 10810/2024 (Government Gazette B' 1886/26.03.2024), the premises of the Office of the European Delegated Prosecutors were expanded to include not only the ground floor but also the first floor of the new building of the Athens Court of Appeal, located at 14 Kyprou Loukareos Street.

Moreover, by Decision No. 34196 (Government Gazette B' 4714/27.07.2023), three (3) additional positions of European Delegated Prosecutors were allocated, increasing their total number in accordance with Ministerial Decision No. 25905/12-06-2023 (B' 3910). These

positions were filled in 2024, and the appointed prosecutors are already serving in the Office on a full-time and exclusive basis.

Furthermore, Articles 104 and 105 of Law 5162/2024 (Government Gazette A' 198/05.12.2024) strengthened the staffing of the Authority for Combating Money Laundering.

Finally, pursuant to **Law 5187/2025**, the Hellenic Police was reorganized, and the mandate and operational capacity of the Directorate for Combating Organized Crime were expanded. This Directorate operates under the supervision of a seconded Prosecutor at the Court of Appeal (Article 50).

10. What are the sectors most at risk of corruption? Have you noticed any particular or changing trends in the high-risk sectors in the past year? What about corruption as an enabler of organised crime?

Regarding sectors more prone to corruption-related offences, relevant statistical data are maintained by the Economic Prosecutor's Office and the National Transparency Authority, to which we refer for this response.

11. Are there any policy or legislative developments on the prevention or repression of corruption that you would like to bring to our attention?

Recently, pursuant to **Article 57 of Law 5282/2026** (GG A' 30/27.02.2026, the total number of established positions for prosecutorial officers **has been increased by fifty-two (52)**. In particular:

(a) The number of positions for Deputy Prosecutors at the Courts of First Instance has been increased by eighteen (18), bringing the total number of such positions, as well as those of Assistant Prosecutors, to two hundred and ninety-seven (297).

(b) The number of positions for Deputy Prosecutors at the Courts of Appeal has been increased by nineteen (19), bringing the total to one hundred and sixty-two (162).

(c) The number of positions for Prosecutors at the Courts of Appeal has been increased by thirteen (13), bringing the total to ninety-five (95).

(d) The number of positions for Deputy Prosecutors at the Supreme Court has been increased by two (2), bringing the total to twenty-eight (28).

It is also worth recalling the following:

Under Law **4090/2022**, as amended and currently in force, incorporating Directive (EU) 2019/1937, a framework for the protection of persons reporting breaches of Union law was established. The overall supervision of the functioning of this mechanism is entrusted to the National Transparency Authority, serving as an external channel for receiving reports.

Furthermore, pursuant to paragraph (d) added by Article 20 of **Law 5095/2024** (GG A 40/15.03.2024), corruption offences—including bribery and trading in influence, as defined in

Articles 159, 159A, 235, 236, 237, 237A, and 396 of the Penal Code (Law 4619/2019, A 95) and Article 134 of Law 5090/2024 (A 30)—were included within the material scope of the law.

Additionally, **Law 5090/2024 (Articles 134 and 135)** introduced **criminal liability for legal entities** in corruption offences and strengthened the framework regarding jurisdiction, the objective elements of corruption offences, and penalties, in alignment with OECD recommendations (Articles 4, 28, 31, 32, 39, 40).

The effective functioning of the whistleblower framework, as well as the legislative strengthening of **witness protection measures** (Article 79, Law 5090/2024), is evidenced not only by the increasing number of cases reported but also by the qualitative improvement of these cases. Equally important is the comprehensive protection afforded to whistleblowers, both through the provisions of Law 4090/2022 and the general provisions of the Code of Criminal Procedure regarding their designation as public interest witnesses (Articles 47, 218, 255), as well as the full judicial scrutiny that follows.

B. Hellenic Police

12. [in writing] Did the Police handle any internal disciplinary cases in 2025/26? How many were they? What measures have been taken or planned to prevent cases of members of the police and customs operating in conjunction with organized crime1? [Source: EPPO: Investigation Calypso: More than 2 400 shipping containers seized at port of Piraeus | European Public Prosecutor's Office and Reuters: Greek police officer arrested on suspicion of helping major drug ring | Reuters].

The following data is derived from the statistics kept:

In 2025, 3.052 disciplinary proceedings were conducted in accordance with Presidential Decree 120/2008. Of these, 360 concerned sworn administrative examinations for the imposition of higher disciplinary penalties (suspension or dismissal). Police officers were given 456 reprimands, 1.109 fines, and 4 higher disciplinary penalties (suspension or dismissal).

The reasons for initiating disciplinary proceedings were:

- A) Complaints from citizens
- B) Publications on the internet and in the mass media
- C) Correspondence with prosecuting authorities
- D) Correspondence with the Internal Affairs Service of the Security Forces
- E) Correspondence from police services
- F) Correspondence from services outside the Greek Police
- G) Direct perception of senior officers
- H) Complaints from police officers

In addition, 100 police officers were suspended during disciplinary proceedings against them, while in 2025, 10 police officers were dismissed from the Greek Police (including disciplinary proceedings that began before 2025).

It should be noted that the statistics vary daily because the majority of disciplinary proceedings have not been completed.

STATISTICS FROM THE INTERNAL AFFAIRS SERVICE OF SECURITY AGENCIES

In the year 2025, 1492 complaints about corruption offenses were submitted to our Service, 610 preliminary examinations were carried out to verify or confirm the commission of crimes related to corruption, 43 criminal offenses under our jurisdiction were investigated that were committed within the limits of the automatic procedure (in the act) and carried out in total 139 arrests.

Below are detailed specific statistics by area of interest, regarding the action of the Internal Affairs Service of the Security Forces in the year 2025: Out of the total of forty three (43) files filed for caught in the act offenses (51 in 2024 and 36 in 2023), apart from the offense of dereliction of duty which is present in the majority of them, among other things, fourteen (14) related to bribery of an employee, thirteen (13) of drug law violations, five (5) cases of guns law violation, three (3) cases of false statement, two (2) cases of fraud, two (2) theft cases, one (1) extortion case, one (1) case of illegal use of force, one (1) case of customs law violation and one (1) case of domestic violence. Of the one hundred thirty nine (139) arrested, twenty three (23) were police officers, five (5) were port officials, forty three (43) were civil servants in general, two (2) were firefighters and sixty six (66) were private citizens. In ten (10), out of a total of forty-three (43) cases filed for spontaneous offenses (in the act), the perpetrators had set up a criminal organization with a specific hard operational structure and hierarchy.

ACTIVITY TABLE PER YEARS 2023, 2024, 2025

Course	2025	2024	2023
Complaints	1492	1312	910
Preliminary examinations	610	607	524
Arrests	139	187	143
Caught in the act offences	43	51	36

Reported sectors Statistics

Reported Sectors	2024	2025	Variation
Police Personnel	644	747	+ 13,7%
Coast Guard Personnel	62	66	+ 6,06%
Fire Brigade Personnel	20	25	+ 25%
Public Servants Personnel	335	440	+ 23,8%

13. [in writing] Have you received any whistleblower reports on corruption in the past year and have they been investigated?

Relevant statistical data are maintained by the National Transparency Authority, to which we refer for this response.

C. Responses from other authorities to additional questions

14. [in writing] Have any steps been taken to implement GRECO's recommendation to oblige political advisors to submit asset declarations and to make sure they are subject to the highest standards of integrity? If yes, can you elaborate on what they are? [GRECO, Fifth Evaluation Round, Evaluation Report Greece, GrecoRC5(2020)4, March 2022, para 37 (Recommendation i)].

In response to Recommendation i (para. 37), the following measures have already been adopted and implemented in the Greek legal framework.

First, a **Code of Conduct for Political Appointees** has been formally adopted and published. The Code sets out binding standards of integrity, impartiality, transparency, and conflict-of-interest management applicable to political advisers and other appointed officials.

Second, in line with Article 36 of Law 4940/2022, **an official and publicly accessible register of collaborators and advisers** has been established and published on the website of the Presidency of the Government, thereby enhancing transparency regarding their appointment and status.

Third, pursuant to Article 76 in conjunction with Articles 71 and 72 of Law 4622/2019 (Executive State Act), **a structured conflict-of-interest monitoring mechanism** is in place. The competent service of the Presidency of the Government (currently the General Secretariat for Legal and Parliamentary Affairs) is responsible for overseeing compliance, receiving relevant declarations, and monitoring potential conflicts of interest.

In addition, under Article 5 of Law 5026/2023, political appointees are expressly included among the persons obliged to submit **declarations of assets and financial interests** ("pothen esches"). They are therefore subject to the national asset declaration regime, including submission, control and oversight procedures provided by law.

Taken together, these measures establish a clear legal status for political advisers, introduce binding integrity standards, provide transparency through public disclosure of appointments, and ensure institutional monitoring of conflicts of interest within the framework of the Presidency of the Government. These measures apply equally to the Government's paid and unpaid associates and advisers.

With specific regard to the issue of potentially strengthening the control of asset declarations by extending the relevant obligations to a level equivalent to that applicable to political office holders, the Central Audit Committee notes the following:

The "three consecutive years" rule has been applied mainly to elected persons whose activities must take place mainly in public. Increased transparency regarding their assets and interests' disclosure is therefore due to increased and obvious public interest, as these persons are asking a public body [society] for [its] public expression of trust [through vote]

while running for a public office [representation]. Politicians have to presumably accept their public exposure and therefore they consent to the public disclosure of their data [as well as of their spouses'] to their public mandators/voters and in-return-to-this, they accept the mitigation of the GDPR restrictions according to their personal data.

The above requirements cannot be copied straight forward to other data subjects (obligates and spouses) that have not accepted public exposure, are not called by society to serve to a public office and certainly not through a public procedure such as elections. Towards that steps have already been taken such as the obligations of these persons to submit assets and interests' declaration from the first day until one year after they leave the office. However, information about their assets constitutes sensitive personal data, which is subject to strict data protection requirements under the GDPR. Therefore, the possibility of a balanced formula for a more extensive disclosure, equivalent to politicians' asset and interest disclosure for these PTEF persons, is about to be carefully examined.

15. [in writing] OPEKEPE was integrated into AADE on 1 January 2026. Have you already noted any improvements in transparency, efficiency and accountability? What practical changes has this step brought and what are your expectations for the future operations of OPEKEPE?

With the integration of OPEKEPE into the Independent Authority for Public Revenue (IAPR) on 1 January 2026, a series of specific measures were adopted which demonstrate a clear direction towards strengthening transparency, efficiency, and accountability in the management of EU agricultural payments. Changes have already taken place as follows:

A) Staff evaluation, implementation of integrity safeguards, and conflict of interest checks for personnel

As of 1 January 2026, IAPR initiated a systematic process for the collection and verification of conflict of interest declarations from employees of the former OPEKEPE who are involved in the management of EU agricultural payments. These declarations are cross-checked with income tax returns in order to verify declared agricultural income and to identify potential conflicts of interest. At the same time, asset declaration checks ("Pothen Esches") have been initiated, with priority given to officials in positions of responsibility. Furthermore, in accordance with the relevant legislative provisions governing the transfer of OPEKEPE personnel to the IAPR, employees must declare any private professional activity or participation in companies, in order to assess potential incompatibilities. Finally, the ARACHNE risk analysis system, widely used at European level for detecting irregularities and potential conflicts of interest, is being utilized.

The above approach ensures the operation of an effective mechanism for controlling cases of conflict of interest and, at the same time, acts as a deterrent mechanism against potential irregularities for personnel involved in the management of EU funds.

At the same time, the evaluation of the suitability and professional competence of OPEKEPE staff has also commenced, based on the evaluation standards applied by the IAPR, in relation to the implementation of the redesigned procedures within the Authority.

Personnel have been integrated into Job Descriptions, clearly outlining their duties and responsibilities, according to the above evaluation, and a corresponding salary classification will follow in accordance with the IAPR salary framework (scale).

The specialized personnel of OPEKEPE with expertise in agricultural policy, verification and technical controls are being assigned in a targeted manner to the competent organizational units of the IAPR, in its role as Paying Agency, in order to ensure administrative continuity and operational capacity.

B) Fight against fraud

A strategy for the prevention and combating of fraud has been developed, which includes a description of the procedures for the submission and management of complaints, as well as a mechanism for the regular reassessment of risks. Within this framework, the periodic evaluation of the measures adopted to prevent or mitigate identified risks is foreseen, as well as the identification and assessment of any changes that could significantly affect the effectiveness of the internal control system.

In addition, a Risk Management Office has been established within the new structure of the Paying Agency in the Independent Authority for Public Revenue (IAPR), as well as a risk management team, with the aim of regularly updating the risk assessment tool.

C) Increased number and types of data cross-checks through the use of interoperability between information systems for the execution of EU subsidy payments

Already, since the beginning of the process for integrating the former Paying Agency into the IAPR, prior to 1 January 2026, and in order to carry out the latest payments, close cooperation took place with the IAPR in order to cross-check data and verify the information contained in IACS 2025 applications, in addition to the checks carried out by OPEKEPE.

In particular, beneficiaries' property ownership data were verified, as well as the relevant changes compared with previous years. At the same time, business data were checked through the invoices of producers and traders. Checks were also conducted using the records of slaughterhouses, milk processors, and milk producers, with the aim of verifying transactions and the amounts declared in databases. These procedures strengthened the control framework and ensured the validity of the data submitted by applicant farmers for the granting of EU payments.

At present, changes to the IACS 2026 application are being studied, which will enable the verification of even more information from the IAPR databases, as derived from taxpayer declarations, myDATA transactions and/or third-party sources, many of them in real time, such as information on natural or legal persons, professional activity, economic activities, relationships, deaths, etc. Furthermore, the Integrated Information System MIDA, which the IAPR will soon place into operational production, will be connected with the National Cadastre and will be updated in real time regarding the use of agricultural parcels/plots of land, leases and concessions. Finally, interoperability services will be utilised with any authority that provides such services whenever required.

From a technological and administrative perspective, the integration process is supported by due diligence checks carried out by external consultants. These include the mapping of existing procedures, information flows, information systems and technological

infrastructures. These assessments identify risks, dependencies and potential weaknesses, while at the same time proposing mitigation measures and a structured transition framework for integrating OPEKEPE's systems into the broader digital ecosystem of the IAPR. These assessments are taken into account for the creation of the final architecture of the information system used for the calculation and payment of EU subsidies.

Finally, the IAPR has also initiated training programs for personnel transferred from OPEKEPE, based on the principles and philosophy of controls, information systems and the overall functioning of the Authority. In this context, the experienced personnel of the IAPR are also utilized for the transfer of expertise/know-how, particularly in core functions such as the extensive use of information systems and combined cross-checking controls.

In conclusion, the first practical steps demonstrate a transition towards stronger data-based controls, enhanced interoperability between public systems, improved integrity safeguards and stronger technological governance. Looking ahead, the IAPR as Paying Agency will utilize the Authority's advanced data infrastructures, risk analysis tools and interoperability services. The objective is that future subsidy applications will rely to a greater extent on pre-verified data, originating from tax declarations, electronic transactions and reliable public databases, thereby reducing the risk of incorrect or fraudulent declarations.

In this way, the IAPR will further strengthen preventive controls, improve the reliability of subsidy management, and enhance public confidence in the control and payment system of EU agricultural payments.

16. Next steps: Establishment of a General Secretariat for Public Procurement under the Ministry of Finance as a National Central Purchasing Body in Greece

Public procurement constitutes a critical pillar of public expenditure and economic governance, yet in Greece it remains characterized by fragmentation, administrative inefficiencies, and uneven institutional capacity. Competences are dispersed across multiple ministries, supervisory bodies, and independent authorities, leading to overlapping responsibilities, inconsistent regulatory interpretation, and the absence of a unified strategic direction. Contracting authorities repeatedly conduct similar procurement procedures for common goods and services, generating significant administrative burdens, delays, and duplication of effort. At the same time, the decentralized nature of procurement limits the State's ability to exploit economies of scale, weakening its bargaining power and resulting in higher prices. Differences in technical capacity across contracting authorities further exacerbate inefficiencies, as less experienced entities systematically achieve poorer procurement outcomes. Although digital tools exist, such as national e-procurement systems, they are not fully integrated, reducing transparency, interoperability, and the ability to leverage data for strategic decision-making. These structural weaknesses highlight the need for a comprehensive institutional reform that consolidates procurement functions, strengthens governance, and enhances efficiency.

In this context, the establishment of a General Secretariat for Public Procurement under the Ministry of Finance, which will simultaneously operate as the National Central Purchasing Body, emerges as a necessary reform. The proposed entity would integrate regulatory, legislative, strategic, and operational responsibilities, bringing together currently fragmented competences into a single coherent framework. Its mandate would include the design and continuous improvement of the legal and regulatory framework for public procurement, the provision of guidance and training to contracting authorities, and the consolidation and

management of digital procurement systems. At the same time, it would undertake centralized procurement procedures for standardized and recurrent goods and services (except defense and healthcare), aggregating demand across the public sector and executing framework agreements on behalf of contracting authorities and providing e-procurement tools, such as e-marketplaces, for the coverage of minor non-aggregated needs. By combining regulatory authority with operational capacity, the General Secretariat would function not only as a coordinator but as a central mechanism for implementing procurement policy and ensuring consistent application across the public sector. The scope of the General Secretariat for Public Procurement and its function as a National Central Purchasing Body will explicitly exclude procurement related to defence and security, as well as pharmaceuticals and medical supplies, which will continue to be managed under their existing specialized institutional frameworks due to their distinct operational, regulatory, and strategic requirements.

International and European evidence strongly supports such a model. The experience of the Italian central purchasing body Consip demonstrates that procurement centralization can generate substantial direct savings of up to approximately 28 percent, while also producing indirect savings of around 22 percent even for entities that continue to procure independently, due to improved price transparency and information spillovers. These benefits are particularly pronounced for less experienced contracting authorities and for more complex goods, where access to benchmarking information significantly improves procurement outcomes. Beyond cost savings, centralization contributes to reducing administrative burdens, accelerating procurement processes, limiting legal disputes, and strengthening transparency and accountability. It also enables the State to use public procurement more strategically, supporting broader policy objectives such as innovation, sustainability, and social impact.

Overall, the creation of a General Secretariat for Public Procurement as a National Central Purchasing Body represents a feasible and high-impact reform that can modernize the procurement system, improve fiscal efficiency, and align Greece with best European practices.

Reform Timeline

Milestone	Description	Regulatory Instrument
Q2 2026	Completion of the draft legislative proposal in the form of a Presidential Decree	
Q1 2027	Adoption (issuance of the Presidential Decree)	Presidential Decree
Q2 2027	Start of operation	

C. Meeting with Prosecutors

1. What do you consider to be the main challenges for prosecutors in Greece concerning (i) the level of (human, technical, financial) resources and (ii) legal, procedural or other issues? Are there particular challenges when it comes to fighting corruption and economic crime?

The main challenges may be summarised as follows:

- Structural complexity of economic and corporate schemes, often involving cross-border transactions and the use of offshore entities.
- Dependence on specialised expert examinations (accounting, financial and digital forensics), which may significantly prolong the duration of investigations.
- Delays in international judicial cooperation, particularly in obtaining banking or corporate records from third countries.
- Limitations in human and technical resources, especially in relation to investigative and scientific support personnel.
- Institutional particularities, such as the special constitutional framework governing the criminal liability of ministers, which may affect the timing and procedural structure of criminal proceedings.

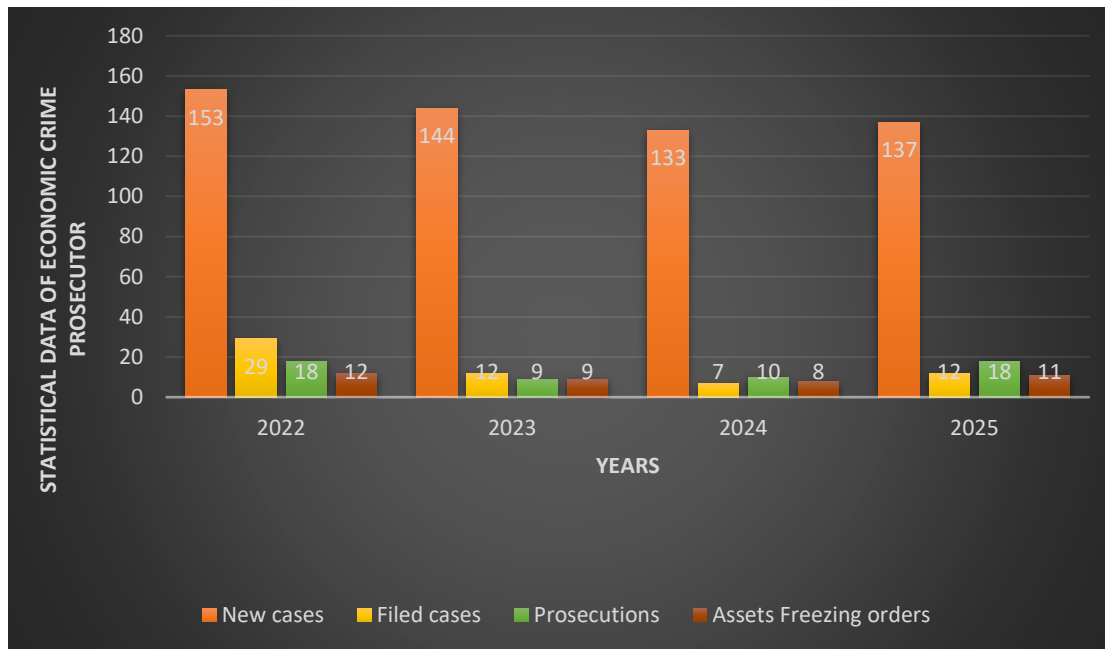
These factors should not be interpreted as reflecting any lack of willingness to prosecute corruption. Rather, they constitute objective structural and institutional challenges inherent in complex corruption and financial crime investigations.

4. Could you please explain how the statistics provided in the Annex of the written input reflect Greece's efforts to improve the track record of prosecutions and final judgments, including high level corruption cases? We understand that only one case was prosecuted last year and it seems that there is a growing backlog of cases as well; what are the factors preventing more prosecutions and what has contributed to the backlog? What about high-level cases?

A. Clarification concerning the nature of the statistics

The statistical data presented in the Annex reflect the overall flow of cases (incoming, pending and completed cases) rather than solely the number of criminal prosecutions initiated. Consequently, the number of prosecutions within a given calendar year does not necessarily correspond to the number of investigations that are ongoing, particularly in complex corruption and financial crime cases.

The reference to only one case in which criminal prosecution was initiated is attributable to an administrative recording error that occurred during the compilation of the statistical data by the secretariat of the Office of the Prosecutor for Economic Crime. According to the Office's internal case-management system, the actual number of cases in which criminal prosecution was initiated amounts to eighteen (18). Detailed figures relating to those cases are provided below:



The internal information system from which these data were extracted had been developed informally by the secretariat of the Office of the Prosecutor for Economic Crime for organisational purposes and was not interconnected with the information system of the Ministry of Justice. Therefore, the statistical data produced by the two systems should not be directly compared.

Since the beginning of 2026, the relevant information systems have been unified and the Office now operates within the Integrated Case Management System for Civil and Criminal Justice (OSDDY-PP), which is also used by other prosecutorial services and to which the Ministry of Justice has access.

In addition, the establishment of the Unified Digital Registry for Monitoring Corruption Cases, introduced by Law 5282/2026 (Official Gazette A' 30/27-2-2026), is expected to ensure the availability of official, unified and continuously updated statistical data regarding corruption cases at all procedural stages, from the initiation of the investigation to the execution of the sentence.

B. Factors affecting the number of prosecutions

- Transfer of a significant number of case files to territorially competent prosecutorial authorities, where it becomes evident – either at the initial stage or following the assessment of the available evidence – that the Office lacks subject-matter jurisdiction, particularly in cases where no public official or person falling within its competence is involved, where no financial damage to the Greek State or the European Union can be established, or where the alleged acts constitute misdemeanours.
- High degree of complexity of financial and corporate structures.

- Need for specialised expert examinations (accounting, digital or financial).
- Delays in international judicial cooperation and in the collection of cross-border evidence.
- Significant delays in the translation of documents and requests for mutual legal assistance, mainly due to the prolonged strike of interpreters and the limited availability of alternative translation mechanisms.

The Ministry of Justice has already announced the introduction of Artificial Intelligence applications within the justice system for the automatic translation of judicial documents, interpretation and recording of testimonies of foreign witnesses, as well as speech-to-text recording of oral proceedings. These technological tools are expected to contribute significantly to improving procedural efficiency.

- Large-scale investigations involving a substantial volume of evidence, long time spans and multiple suspects, often accompanied by interconnected case files.
- Parallel administrative or investigative proceedings, the completion of which may be required before the criminal investigation can proceed.

In particular:

– In cases involving members of the Government or Deputy Ministers, the special regime governing ministerial criminal liability under Article 86 of the Constitution and Law 3126/2003 applies, under which the Hellenic Parliament retains exclusive competence to initiate prosecution. Consequently, the continuation of criminal proceedings presupposes a relevant decision of the Plenary of Parliament.

A constitutional revision process has already been publicly announced, within which the Government has proposed reforms to Article 86 of the Constitution, including limiting the involvement of Parliament at the preliminary stage, transferring the investigative phase to a judicial authority and introducing a single parliamentary decision for the initiation of prosecution.

– In cases involving state officials, public bodies or entities exercising public authority, parallel investigations are frequently carried out by the National Transparency Authority (NTA) and other supervisory bodies. Until such investigations are completed, and in order to ensure coherence in the investigative process, the relevant case files may remain pending.

- Limitations in human and technical resources, particularly at the level of specialised prosecutorial and support staff, as well as in services playing a key role in the investigation of economic crime. The need for further strengthening of the relevant structures has been identified, in order to effectively respond to the increasing complexity and volume of corruption and financial crime cases.

C. High-level cases

High-level corruption cases are characterised by heightened evidentiary requirements, the need for extensive financial analysis and frequently interconnected proceedings. Ensuring procedural completeness and safeguarding the integrity of the investigation inevitably affects the duration of proceedings.

The introduction of prioritisation mechanisms, targeted investigative measures and the monitoring of procedural milestones through the Unified Digital Registry for Monitoring Corruption Cases constitute important tools for improving efficiency in such cases.

D. Measures aimed at improving efficiency

- Strengthening initial jurisdiction screening mechanisms and standardising subject-matter jurisdiction criteria.
- Ensuring full traceability of procedural stages through the Digital Registry and interoperability with the OSDDY-PP system.
- Accelerating expert examinations and mutual legal assistance procedures through standardised requests and specialised expert lists.
- Addressing translation delays through temporary operational solutions and the gradual integration of AI-based translation and transcription tools.
- Institutional strengthening and specialisation of investigative and support services (DEOE, Economic Police, Scientific Support Department).
- Establishing case-prioritisation mechanisms for complex and high-impact investigations.
- Strengthening coordination with supervisory and oversight authorities (e.g. National Transparency Authority) in order to avoid duplication of investigations and ensure the timely exchange of findings.

5. Are there any developments in relation to investigations, prosecutions and adjudication of foreign bribery offences?

Foreign bribery cases are inherently cross-border in nature and involve increased evidentiary requirements. They typically include:

- Collection of corporate and banking data from foreign jurisdictions.
- Submission and execution of mutual legal assistance requests.
- Use of financial intelligence and international cooperation mechanisms.

At the level of bribery of foreign public officials, the following case files are currently pending before the Office of the Prosecutor for Economic Crime:

1. E.O.E. 375/2022: A case of cross-border corruption and market manipulation involving a multinational group, with references to payments made to foreign public officials. Significant administrative sanctions have been imposed at international level, while criminal investigations continue in relation to natural persons.
2. E.O.E. 127/2025: A case of international bribery related to contracts of an international organisation, involving alleged payments of substantial amounts aimed at influencing award procedures and avoiding controls. The investigation is ongoing in cooperation with foreign authorities.
3. E.O.E. D 8/2021: A large-scale corruption case with a cross-border dimension, related to public contracts and the granting of undue competitive advantage through commission payments. Acts of bribery and money laundering are under investigation.
4. E.O.E. 186/2024: A case of an international nature concerning suspected bribery of a foreign public official and the management of public investment funds through financial and corporate structures. The investigation includes issues relating to access to seized data.

Furthermore, in 2025, case E.O.E. 376/2022 was closed, which concerned EU-funded programmes and alleged unlawful payments, due to the existence of res judicata in another Member State and, in part, due to statutory limitation.

The main challenge in cases of this nature lies in the timeliness and completeness of cross-border evidence gathering.

6. Are there any developments or challenges to highlight in relation to the cooperation with EPPO or the resources allocated to EPPO cases?

Cooperation with the European Public Prosecutor's Office (EPPO) is well established and operationally effective. Nevertheless, cases falling within EPPO competence are often particularly demanding due to the extensive documentation required and the need for cross-border coordination.

7. Have you received any whistleblower reports on corruption in the past year and have these been investigated?

Reports are received through various channels, including citizens, public authorities and internal reporting mechanisms.

All reports are subject to an initial triage assessment, based on:

- jurisdiction,
- credibility and verifiability,
- urgency and risk of loss of evidence,
- possible links with existing case files.

Where the relevant criteria are met, preliminary investigative measures are initiated and appropriate steps are taken to secure evidence.

8. What are the sectors most at risk of corruption? Have you noticed any particular or changing trends in the high-risk sectors in the past year? What about corruption as an enabler of organised crime?

High-risk sectors

- Public procurement and major infrastructure projects,
- Procurement and reimbursement schemes in the health sector,
- Licensing and urban-planning decisions at local government level,
- Tax and customs controls,
- Environmental regulation, waste management and energy,
- Management and allocation of EU funds and public subsidies.

Observed trends

- Increasing complexity of corruption schemes (use of intermediaries, fragmented payments and digital concealment techniques).
- Stronger links between corruption, fraud and money laundering.

Corruption as an enabler of organised crime

Corruption may act as a force multiplier for organised crime, as it:

- facilitates access to confidential information or internal control mechanisms,
- allows the circumvention of administrative or customs controls,
- facilitates the laundering and concealment of illicit proceeds,
- creates an environment of impunity that strengthens criminal networks.

In particular, in sectors such as **public procurement, licensing, customs and the management of EU funds**, corruption may function as a key enabling mechanism for organised criminal activity.

D. Hellenic Single Public Procurement Authority (HSPPA)

3. [In writing] Is statistical data available covering the past year regarding the number of reviews in case of breach of public procurement rules and, if so, would you be able to share them with us in writing?

Number of Reviews, year 2025

Total number of Reviews: 2.215, of which, depending on the type of procurement: 923 (42%) concerned supply contracts, 765 (35%) services contracts, 315 (14%) Works, 186 (6%) Mixed contracts (supply and services), and 26 (1%) Design contracts

4. Could you provide us with statistical data on single bids in procurement related to EU funds, versus those related to national funds?"

Regarding the inquiry on statistical data in the case of single-bid procurement procedures, in particular depending on the source of funding of the procurement, please find below the current assessment of technical constraints regarding data retrieval and analysis:

Technical Assessment and System Limitations

The generation of comprehensive and accurate comparative statistics for the requested data set is currently not feasible due to systemic limitations and the architecture of the existing procurement infrastructure. The reasons for this inability to provide the requested data are as follows:

- Absence of Interoperability with the ESIDIS BI System: The current configuration of the National Electronic Public Procurement System (ESIDIS), for Supplies and Services, lacks the necessary interoperability with its internal Business Intelligence (BI) tools to facilitate the cross-referencing of procurement funding sources with bidder participation rates. Consequently, an automated extraction of this data is not supported by the system's current architecture. Moreover, ESIDIS for Works does not incorporate a BI system.
- Constraints within the Central Electronic Registry (KHMDHS): Retrieval of this information from the Central Electronic Registry of Public Procurement (KHMDHS) is precluded by the following factors:

Temporal Limitations:

The specific functional modules required to capture and categorize this data will be operational as of May 2026. Therefore, there is insufficient historical data depth to conduct a robust or statistically significant analysis.

Data Integrity and Standardization:

There is currently significant variability regarding the consistency and accuracy of data input by Contracting Authorities within the KHMDIS environment. Due to these discrepancies in reporting standards, the extracted information does not meet the necessary threshold for reliability required for official statistical reporting or comparative analysis.

Given the lack of system integration, the recent implementation of the relevant reporting functionality, and the existing challenges regarding data uniformity across Contracting Authorities, it is not possible to generate a verified dataset that would satisfy the requirements for accuracy and professional standards.

III. Meetings with authorities on Pillar III

1. The written input mentions that the draft law establishing the necessary conditions and rules for the licensing of regional television broadcasting stations has already been presented to the Council of Ministers, with a similar draft on radio to follow soon. Can you provide us with a timeline for adoption and an overview of the substance of the two laws respectively?

In August 2025, a presentation of the draft Law: "*Licensing of free-to-air terrestrial digital television broadcasting content providers with regional scope and other provisions*" was made to the Council of Ministers¹. The National Council for Radio and Television (NCRTV) will be the competent supervisory authority for the licensing procedure and continue to supervise the operation of television stations. Instead of a fee for obtaining a license annual supervision sum to be paid in favor of the NCRTV is foreseen, in order to strengthen its financial and operational capacity. In addition, the operating conditions are streamlined and rules are set, significantly strengthening the supervisory work of the NCRTV.

Finally, the framework for adaptation to the technological broadcast standard (DVB-T2) is created, so that all regional television stations broadcast in high definition (HD).

All candidates wishing to be licensed by the NCRTV must meet certain minimum requirements, such as:

- Tax and insurance compliance
- Transparency regarding ownership status, with the disclosure of each shareholder who owns at least 5% of the business
- Criminal record check
- Minimum number of employees, journalists and non-journalists
- Minimum necessary building facilities and basic equipment
- Completeness of the broadcasting program (original content, local content, alignment with AVMSD etc.)

As part of the legislative process, the draft has been distributed to the competent authorities and will be put out for public consultation within the next month and the licensing process will commence within the year 2026. Furthermore, when the above process is finalized the draft bill on the licensing process of radio stations will follow taking into account that the NCRTV, as the national regulator, will be the responsible authority for both licensing processes, as well as further technical issues that need to be addressed by the competent Ministry.

¹ <https://media.gov.gr/parousiasi-sto-ypourgiko-symvoulío-tou-schediou-nomou-adeiodotisi-parochon-periechomenou-epigeias-psifiakis-tileoptikis-evryekpompis-elftheris-lipsis-perifereiakis-emveleias-kai-loipes-diatakseis/>

2. Can you provide us with further information on the timeline of the transposition of Directive 2024/1069 and about which actions you are taking to implement the different aspects of Anti-SLAPP Recommendation issued by the Commission, specifically since the publication of the last Report? Have you already appointed an anti-SLAPP “focal point” as required by the Directive?

A. [Answer provided by the Ministry of Justice] Greece has committed to transposing Directive (EU) 2024/1069 on the protection of public participation from abusive litigation (SLAPPs) by the deadline (May 2026). A Ministerial Decision (GG 43/21.01.2025, GG YODD43) established a Legislative Drafting Committee, which includes senior judges, university professors, lawyers, and members of the Working Group for the Protection of Journalists (Task Force). The working group has already accepted a request from representatives of journalists to participate and be heard during the group's work. Indeed, two of its members (representatives from media unions, members of the Task Force) participated in the January 2026 meeting of the Legislative Drafting Committee. The members presented the positions and views of the Task Force on the key issues related to the transposition of the Directive, with the aim of fostering structured and constructive dialogue between the two Committees.

The Committee, which meets at regular intervals, has progressed in its work and will be in a position to submit its proposals in a timely manner for the formulation of a draft law, through which all provisions of the Directive concerning the enhanced scope of protection against manifestly unfounded and abusive lawsuits, as well as the establishment of more expedited procedures for their dismissal, will be fully incorporated.

It should be emphasized that the Committee will go beyond the obligations arising from the Directive, as the proposed protective provisions will not be limited to disputes of a “cross-border” nature, as provided for in the Directive, but will extend to all disputes, including purely domestic ones.

In other words, beyond fully complying with the provisions of the Directive, the Committee also takes into account the criteria and recommendations of the Council of Europe, as reflected in Recommendation CM/Rec(2024)2 of 5 April 2024 of the Committee of Ministers of the Council of Europe, with a view to combating strategic lawsuits against public participation (SLAPPs).

This is not self-evident, as many Member States have expressed their intention to limit the relevant protection strictly within the scope of the Directive and not to extend it to domestic law disputes, despite the contrary recommendation of the Council of Europe.

Moreover, regarding the appointment of **a national focal point** and an alternate for the renewed mandate **of the Expert Group Against SLAPP**, most recently (on March 18th) on behalf of the Hellenic Ministry of Justice, two national legal experts have been designated as permanent and alternate focal points. Both nominees possess the requisite expertise and professional experience to contribute effectively to the work of the Expert Group, including **in relation to the implementation of Directive (EU) 2024/1069** and the follow-up to the Commission Recommendation (EU) 2022/758.

Furthermore, by decision of the Minister of Justice, a senior official (Decision No. 4360oικ./19-09-2024) has been appointed as a **Focal Point, responsible for monitoring the implementation of Recommendation (EU) 2022/758 of the European Commission of 27 April 2022** on addressing abusive litigation against public participation (Anti-SLAPP), as well as for

coordinating the submission of the required data and statistical information referred to in Article 31 of the aforementioned Recommendation.

Within the framework of these responsibilities, and in view of the preparation of the forthcoming annual report on the implementation of Recommendation (EU) 2022/758, as well as the ongoing national process of transposing Directive (EU) 2024/1069, the Focal Point submitted, on 30 January 2026, to the competent Anti-SLAPP Expert Group of the European Commission, a targeted technical report on Greece, with reference year 2025.

The report was prepared in accordance with the relevant questionnaire of the Commission and aims to present the main developments recorded since the previous reporting cycle. In particular, it sets out the measures supporting the effective implementation of protection mechanisms against strategic lawsuits against public participation (Anti-SLAPP) during the current transposition period. Furthermore, it provides an overview of the progress achieved and the initiatives undertaken in various areas, including the relevant legal and institutional framework, training and awareness-raising actions, as well as monitoring mechanisms. Finally, it presents the most recent relevant statistical data, as collected at national level.

With regard to court statistics on lawsuits against the press, we hereby submit, in ANNEX, updated tables containing the full statistical data for the year 2025.

It is worth highlighting the overall statistics for 2025:

Courts of First Instance: 265 lawsuits were filed, of which 82 were upheld.

Courts of Appeal: 37 appeals were lodged, of which 14 were upheld, with a significant reduction or elimination of the amounts awarded at first instance, as shown in the table below.

Courts of Appeal

Court	Outcome	Amount claimed for moral damages	Amount awarded
Court of Appeal of North Aegean	Acceptance in whole or in part	50.000	0
Court of Appeal of Athens	Acceptance in whole or in part	200.000 €	20.000 €
Court of Appeal of Athens	Acceptance in whole or in part	30.000 €	1.000 €
Court of Appeal of Athens	Acceptance in whole or in part	3.000 €	2.000 €
Court of Appeal of Athens	Acceptance in whole or in part	60.000 €	5.000 €
Court of Appeal of Athens	Acceptance in whole or in part	15.000 €	15.000 €

Court of Appeal of Athens	Acceptance in whole or in part	5.000 €	1.000 €
Court of Appeal of Athens	Acceptance in whole or in part	300.000 €	1.000 €
Court of Appeal of Athens	Acceptance in whole or in part	50.000 €	3.000 €
Court of Appeal of Athens	Acceptance in whole or in part	5.000 €	3.000 €
Court of Appeal of Athens	Acceptance in whole or in part	200.000 €	16.000 €
Court of Appeal of Athens	Acceptance in whole or in part	30.000 €	4.000 €
Court of Appeal of Athens	Acceptance in whole or in part	100.000 €	5.000 €
Court of Appeal of Athens	Acceptance in whole or in part	50.000 €	6.000 €

For the full judicial statistics regarding lawsuits against the press, please refer to the relevant ANNEX accompanying the present submission.

B. [Answer provided by the GGEE] Apart from that, POESY (Panhellenic Federation of Journalists Unions) established, in 2023, a SLAPPs Observatory in Greece to monitor corresponding incidents, an initiative that was launched within the framework of the Task Force. Journalists can report any SLAPPs on the Observatory's platform and receive legal support from POESY.

In addition, under article 38 of law 5253/2025, economic support for the POESY SLAPPs Observatory by the Greek State is foreseen, ensuring its sustainability and capacity to aid journalists facing abusive litigation. For the first time, Greek legislation explicitly foresees direct, recurring public funding for an entity dedicated to monitoring and responding to SLAPPs against journalists.

More specifically, article 38 of law 5253/2025 states that:

1. By joint decision of the Minister to whom the responsibilities of the Secretariat General for Communication and Media have been assigned and the Minister of National Economy and Finance, annual funding is granted to the civil non-profit company with the name "STRATEGY OBSERVATORY (Slapps) of the PANHELLENIC FEDERATION OF JOURNALIST UNIONS (P.F.J.U.)" (hereinafter: the Observatory).

2. The funding of par. 1 is granted annually as a contribution for the realization of the statutory objectives of the Observatory, up to the amount of fifty thousand (50,000) euros and the relevant expenditure is borne by the budget of the Presidency of the Government.

3. The funding referred to in paragraph 1 shall be paid subject to the operation of the Observatory in accordance with its statutory objectives and Commission Recommendation (EU) 2022/758 of 27 April 2022 on protecting journalists and human rights defenders who engage in public participation from manifestly unfounded or abusive court proceedings ('Strategic lawsuits against public participation') (L 138/30)).

3. Which initiatives did the Task Force on the Protection, Safety and Empowerment of Journalists and Media Professionals undertake since the publication of the last Report? In addition, which new concrete measures are envisaged under the National Action Plan for the Safety of Journalists and what is the timeline for its adoption?

Greece has demonstrated in practice that it has implemented structural and substantive reforms on guaranteeing journalist's independence and safety. The targeted legislative and administrative initiatives of recent years are not merely fragmentary measures, but are part of a broader strategy to strengthen the constitutionally guaranteed freedoms of expression and the press.

Among the most prominent initiatives of the Task Force is the creation of the International Training Center for the Safety of Journalists and Media Professionals. **Between 16-18 March 2026**, the ICSJ will organize the annual **"Safety for Journalists" training school**, with the support of the Secretariat General for Communication and Media of the Presidency of the Hellenic Government. This three-day international program is designed to provide media professionals with both theoretical and practical knowledge to be able to respond to war zones or hazardous environments (Hazardous Environment Awareness Training - HEAT). It includes topics such as field safety, first aid, survival in hostile environments, digital security and information management, with the aim of strengthening the international protection of press freedom and providing journalists with tools to cover conflicts and crisis affected situations safely. The school takes place at the Multinational Peace Support Operations Training Center in the city of Kilgis and all sessions are held in English.

The annual conference under the title **"Bearing Witness: Trauma and Resilience in Contemporary Journalism"** will then take place between **19-20 March 2026**, in Thessaloniki. Following the training school, the conference will shift its emphasis to critical reflection, scholarly analysis, and policy-oriented debate and will examine the cumulative impact of sustained exposure to trauma—arising from armed conflict, humanitarian crises, environmental disasters, and digital hostility—on journalistic practice, ethical decision-making, and the psychological well-being of media professionals^{2 3}.

Secondly, a new subject was introduced in **Hellenic Police Academy** curricula on freedom of expression and safety of journalists in 2025: The Hellenic Police, in collaboration with UNESCO and the ICSJ, have introduced a new subject entitled: **"Freedom of expression and information – Freedom of the Press"** in the Constitutional Law – Human Rights course of the first year at the Cadets Academy of the Hellenic Police⁴. The new module is a direct result of the participation of the Ministry of Citizen Protection in the *Task Force for the Protection, Safety and Empowerment of Journalists and Other Media Professionals*, which is coordinated by the Secretariat General for Communication and Media. The lectures are organized with the

² <https://icsj.net/index.php/el/training-school>

³ <https://icsj.net/index.php/el/conference-2026/conference-2024-gr>

⁴ <https://www.astynomia.gr/2025/09/18/18-09-2025-nea-thematiki-enotita-stin-ekpaidefsi-tis-astynomikis-akadimias-gia-tin-elftheria-tis-ekfrasis-kai-tin-asfaleia-ton-dimosiografon-kai-epangelmaton-ton-m-m-e-synergasia-me-tin-unesco-ka/>

participation of representatives of the journalistic community and police officers, with the aim of strengthening dialogue, cultivating mutual understanding and developing collaborative practices that will contribute to the protection of rights and strengthening trust and interaction between the police and the media.

Thirdly, within the framework of the Task Force, the Secretariat General for Equality and Human Rights along with SGCOMM are in the process of developing an initiative concerning the creation of a **Guide for the Use of Inclusive Language** in the field of journalism and media. The initiative includes the scientific documentation, drafting, and editing of the guide, as well as training activities for media professionals, with the aim of promoting equality, non-discrimination, and high-quality information.

Furthermore, Article 40 of Law 5253/2025 introduces the establishment of a **National Action Plan for the Safety of Journalists** with clear timelines, monitoring and evaluation mechanisms. This Plan will be shaped with the contribution of the Task Force established in July 2022, having recently renewed its mandate for the fourth consecutive year, with the addition of representatives from two new institutions, (1) the Hellenic Coastguard and (2) the National Cybersecurity Authority (Government Gazette B' 6728/2025)⁵. The Task Force comprises of 8 ministries, 2 public media entities (ERT and APE-MPE), 4 academic institutions and 9 journalists and other media professionals' associations, ensuring a coherent strategy for the implementation of reforms and the delivery of concrete results.

Article 40 of law 5253/2025 states that:

"1. A National Action Plan for the Safety of Journalists (Action Plan) is hereby established, with the aim of holistically addressing threats to the physical, psychological and professional safety of journalists, strengthening their protection in the field, as well as strengthening the institutional response to phenomena of violence, intimidation or surveillance.

2. The Action Plan is drawn up by the Secretariat General for Communication and Media, following a recommendation from the Task Force on the Protection, Safety and Empowerment of Journalists and Media Professionals, and is approved by decision of the Minister to whom the responsibilities of the Secretariat General for Communication and Media have been assigned.

3. The Action Plan includes in particular:

- a) recording incidents of threats or violence against journalists and other media professionals,*
- b) development of early warning and support mechanisms,*
- c) planning and implementation of educational actions and development of synergies,*
- d) strengthening of cross-sectoral cooperation,*
- e) connection with European mechanisms and institutions.*

4. The Secretariat General for Communication and Media is responsible for monitoring, coordinating and evaluating the implementation of the Action Plan, as well as for issuing an annual progress report, which is published on its website.

5. The Action Plan is updated every three years or earlier, if significant developments occur at national, European or international level."

The National Action Plan (NAP) will be drafted based on the priorities formulated by the Task Force, which has successfully functioned for four years, embracing the views, suggestions and interests of all stakeholders. During the first meeting of its 4th annual term, the Task Fore

⁵ <https://search.et.gr/el/fek/?fekId=791009>

members began discussing the outline of the NAP and were asked to contribute with concrete proposals that are continuously discussed in consequent meetings.

At the moment, the proposed framework for the NAP includes the following:

1. Mapping of the working and operational environment of journalists
2. Development of good practice frameworks / Benchmarking
3. Establishment of new training programmes for the Safety of Journalists
4. Drafting of manuals (guidelines), indicative topics:
 - Inclusive discourse in journalism
 - Tackling hate speech in the media
 - Managing hybrid threats and campaigns
5. Organize and implement seminars on the subject of mental health and protection of journalists
6. Communication strategy for the National Action Plan

In this context, the Secretary General for Communication and Media has circulated a letter to all Task Force members outlining that the SGCoMM is planning a comprehensive cycle of four (4) consultation events so that, at the end of the day, this NAP will constitute international best practice, worthy of our leading international role⁶. The consultation cycle includes a central workshop to be held in Athens and three regional workshops. A draft NAP will be circulated prior to the Athens workshop, that is scheduled to take place in May 2026, and the whole process up to its adoption is expected to be finalized by the end of Autumn of the same year.

Furthermore, Law 5253/2025 foresees a National Strategy for Media Literacy operating in three-year cycles with multi-stakeholder governance, developed in cooperation with academia, NGOs, EU institutions, and international organizations. To operationalize this strategy, we are now establishing a dedicated committee for Media Literacy composed of specialized experts, university professors, and practitioners in the field of media education and digital literacy. This expert body will guide the design, implementation, and evaluation of our media literacy initiatives, ensuring they are grounded in the latest academic research and pedagogical best practices.

Cultivating Critical Readers

To put this strategy into practice on the ground, our flagship pilot program, “Cultivating Critical Readers,” aims to cultivate news literacy, critical thinking, and digital responsibility in students aged 12 to 18, in order to protect younger generations from fake news. The program connects news to subjects such as History, Sociology, and Language, and students take on the roles of reporters, editors, photographers, and content creators. The initiative launched in October 2025 in over 30 middle and high schools throughout the country for a duration of 12 months. Its implementation involves training both teachers and journalists who participate in it. Professors from Universities, as well as Media Professionals who participate in the Task Force are part of this genuinely innovative approach that bridges formal education with journalistic practice.

Alitheia Forum

SGCoMM organized a two-day conference entitled between **10-11 March** in Athens, touching upon the issues of **disinformation and toxicity in public discourse**, as critical challenges to

⁶ Please find attached (as Annex) the letter of the Secretary General for Communication and Media which was circulated to all Task Force members on 9 March 2026.

democracy and to the quality of public debate today. In an environment marked by the rapid dissemination of information and increasing polarization, it is crucial to strengthen responsible information, evidence-based documentation, and substantive dialogue. The Conference was held for the first time in 2026, with the objective of being established as an annual forum for public discussion and reflection.

During this conference, there was a dedicated panel with students (as speakers) from schools that participate in the “Cultivating Critical Readers” program, where they had the opportunity to describe their experiences from the program, to share their views on the challenges on the issue of disinformation. Students also participated as speakers in several other panels of the conference, offering the perspectives from their own standpoint.

Lastly, it must be noted that the SGCOMM signed **an MoU with the Centre for Research and Technology Hellas (EKETA in Greek)**, taking into account its coordinating role in the regional hub of EDMO in Greece, during the Alitheia Forum, that participated actively as a panelist, showcasing the deep commitment for the exchange of European best practices (**please find attached -as Annex- the MoU between GGEE and EKETA- in Greek**)

4. Are there any legislative changes envisaged when it comes to providing financial support for news media in Greece, in particular local media?

Financial support measures were launched during 2025 covering all media categories (printed and electronic press, radio and regional TV channels and magazines) except the national TV channels. The above media categories received a total of 1.637.377 euros to cover a 2% of the 2022 turnover of the media outlets as a contribution fee to the insurance fund of Unified Press Organization of Auxiliary Care Insurance (EDOEAP) and 855.000 euro were given as support to national, local and regional press. Strengthening these media categories is essential to addressing regional disparities. In addition, the pandemic highlighted the need to strengthen the resilience of the media sector. Besides, regional media are a crucial pillar for informing local communities and maintaining social cohesion at regional level. Therefore, support for regional media is necessary not only for reasons of economic survival but also as a democratic choice to strengthen information provision in every part of the country, far from the communication centers of power.

All beneficiaries had to fulfill specific transparent, fair and non-discriminatory criteria in order to be eligible for funding. Beneficiaries of printed and electronic press had to be registered to the Registries of the Secretariat General for Communication and Media (SGCM) and consequently to meet all eligibility criteria, while radio and regional TV channels had to be registered at the Registries of the independent authority National Council of Radio and TV. The goal of these support measures was to enhance the sustainability of all media categories with emphasis to printed press that has been mostly negatively affected by digital transformation, as well as regional media (radio, TV and printed press) in order to protect plurality, inclusiveness and regional economic and societal support.

In addition, 1.053.799 euro were granted as financial support to local and regional news agencies in order to ensure the distribution of all newspapers and magazines throughout the territory of Greece, reaching even the most remote areas, given the national geographical rugged terrain. Funding was given to the agencies based on their travelling expenses to reach municipalities with a population of less than twenty thousand (20,000) inhabitants. The scope was to ensure wide distribution for the diffusion of information and the enhancement of pluralism and quality information in the public debate as a means to democratic resilience.

Based on the escalating experience of previous funding schemes under the de minimis framework, the SGCoMM has prepared a five-year funding proposal to cover all media categories (printed and electronic press, radio and regional TV channels and magazines) except the national TV channels. This proposal aims to provide the necessary support for the smooth transition of the business model of media entities to adapt to the current digital transformation challenges and at the same time to sustain and increase journalists' and other media professionals' jobs. All regional media are included as potential beneficiaries at the scheme to maintain plurality and quality of information, given that information has the characteristics of a public good with externalities that cannot be monetized. Democratic resilience is supported by securing a safe, rigorous, transparent and diverse media ecosystem. After rigorous and fruitful consultations with the DG Comp since August, we have recently submitted the final detailed and substantiated five-year strategic plan to the European Commission for approval under the State Aid rules and we are soon expecting the outcome.

5. We are aware that new requirements have been introduced by Article 1 of Ministerial Decision 8229/2025 regarding the filing of non-anonymous requests for access to documents. In your experience, what impact has this change had on the number of non-anonymous requests filed?

Answer provided by the Ministry of Interior

This Ministerial Decision was issued in late May 2025. Consequently, its implementation by Greek government agencies has been in an initial transitional phase over the past few months as they adapt to the new institutional framework.

A circular to be issued in the very near future by the Ministry of the Interior—and which will be sent immediately to all public administrative agencies—will collect statistical data regarding the implementation of the new framework concerning requests for access by natural and legal persons to public documents.

In this way, within a short period of time, the leadership of the Ministry of the Interior will have at its disposal a clear picture, based on quantitative data, for the evaluation of the entire process, as amended by the recent Ministerial Decision 8229/2025.

IV. Meetings with authorities on Pillar IV

A. Secretariat General for Legal and Parliamentary Affairs

[on law-making]

1. [In writing] Could you provide an update on the timeline and progress for adopting legislation to implement Article 73(6) of the Constitution on the Citizens Legislative Initiative?

Following the development of reliable mechanisms for verifying the authenticity of citizen support through the implementation of a unique personal identification number, the Ministry of Interior is in the process of finalizing a draft bill on implementing legislation of the Citizens Legislative Initiative. The next steps include the necessary deliberation with the General Accounting Office as to the assessment of the Initiative's fiscal implications and the Parliament as to the necessary amendments in the Parliament's Rules, so as to enable the bill's public consultation and submission to Parliament within the current legislative period.

2. [In writing] The written input highlights that developing the public legal database of the Codification Portal is technically complex due to the scale and fragmentation of the legislative corpus, and the need to ensure accuracy, reliability, and continuous updating of codified texts. Could you elaborate on the specific challenges encountered? Additionally, is there an expected timeframe for when the Portal will be made publicly accessible?

The National Codification Portal (Portal) is being developed to ensure free, reliable, and user-friendly access to legal information. It operates on two complementary pillars. The first concerns the support of the law-making process through the Legal Provisions Processor, a legal informatics tool designed to assist the drafting of legislative and regulatory texts and to ensure their structured integration into the system through the use of metadata. This component has already been implemented and is currently in operation. Nevertheless, practical experience has shown that the user interface is more complex than initially anticipated. For this reason, efforts are underway to further simplify the interface and improve usability, in order to facilitate the broader use of the Portal.

The second pillar concerns the public interface of the Portal, which aims to provide citizens and economic operators with free, complete and reliable access to the legislation in force through the administrative codification and thematic organisation of legal texts. The attainment of this objective presupposes substantial technical preparation, as it requires the integration, processing and verification of a very large body of legislative material covering the entire history of the modern Greek state. In this context, several significant challenges have arisen, which are outlined below.

First, the database must incorporate the entirety of Greek legislation since the establishment of the modern Greek state. This presents a substantial structural challenge. Over approximately two centuries, legislation has been issued in different technological formats. A considerable portion of older statutes exists only in scanned PDF form, without machine-readable structure. These documents must undergo extensive processing, including optical character recognition (OCR), structural tagging, metadata enrichment and legal formatting, in order to meet the technical specifications required by the Portal. Without such transformation, they cannot support automated consolidation functions.

Second, even more recent legislation, although available in digital format, is often not structured in a way compatible with the Portal's consolidation engine. Automated consolidation requires a standardized legislative architecture (e.g., clearly defined articles, paragraphs, amendments, entry-into-force clauses, and cross-references in structured markup). Where such standardization is absent, the system cannot reliably generate updated consolidated versions. This creates a risk of fragmentation and undermines the objective of systematic and dynamic codification.

Third, inaccuracies have been detected in already processed and codified legislative texts within existing databases. This raises a fundamental rule of law issue. A public legislative portal must guarantee absolute textual accuracy. Legal certainty presupposes that citizens, judges, lawyers, and public authorities can rely on the authenticity and precision of published norms. If discrepancies exist between the officially enacted text and the consolidated version presented online, this may compromise predictability and trust in the legal system.

Consequently, the institutional question arises as to whether a comprehensive one-to-one verification of all legislative texts against their official sources is required. Such an exercise would inevitably require considerable time and resources. Nevertheless, accuracy is of fundamental importance for a public legislative database: even limited discrepancies may create legal uncertainty and potentially expose the State to claims of liability. For this reason, systematic verification is difficult to avoid if the Portal is to meet the standards expected of an official source of legislation. In this context, we are working in close cooperation with the National Printing Office, a service operating under the General Secretariat for Legal and Parliamentary Affairs, which constitutes the authentic source for the publication of Greek legislation since the establishment of the Greek State.

Overall, the issues of technological heterogeneity, structural limitations affecting automated consolidation, and identified textual discrepancies are not purely technical matters. They have direct implications for the reliability and practical usability of the Portal. Their resolution depends not only on appropriate technological tools, but also on clear quality-control procedures and sustained institutional supervision, so that the Portal can operate as a dependable source of legislative information.

As regards the timeline, the duration of the project reflects the scale and complexity of the task undertaken. The integration and verification of extensive legislative material inevitably require time, particularly where accuracy and technical consistency are concerned. While steady progress is being made, the overriding priority remains the delivery of a reliable and coherent system. As soon as these challenges will be fully assessed, the expected timeframe will be finalized.

B. Responses from other authorities to additional questions

3. [in writing] Could you confirm the following for the five independent authorities established by the Constitution: (i) the exact number of members whose mandates have expired, and (ii) the dates on which their terms ended?

The current status of mandates in the five constitutionally established Independent Authorities is as follows:

- **Hellenic Data Protection Authority (HDPa)**
 - o President: Mandate expired on 18 August 2022.
 - o Three (3) Members: Mandates expired on 18 August 2022.
 - o Their mandates were extended until the appointment of successors, in accordance with Article 101A of the Constitution.
 - o On 25 June 2025, the President resigned; the Deputy President is currently serving as Acting President.
- **National Council for Radio and Television (NCRTV)**
 - o No expired mandates.
- **Hellenic Authority for Communication Security and Privacy (ADAE)**
 - o President: Mandate expired on 5 June 2025.
 - o The President resigned upon expiry of the mandate, and therefore the mandate was not extended pending the appointment of a successor.
- **Supreme Council for Civil Personnel Selection (ASEP)**
 - o Two (2) Vice-Presidents: Mandates expired on 14 July 2025.
 - o Six (6) Councilors: Mandates expired on 14 July 2025.
 - o One (1) Councilor: Mandate expired on 27 July 2024.
 - o All above mandates remain extended until the appointment of successors, as provided for under Article 101A of the Constitution.
- **Greek Ombudsperson**
 - o Ombudsperson: Mandate expired on 26 July 2022.
 - o Mandate extended until the election of a successor, in accordance with Article 101A of the Constitution.

4. [in writing] When is the study on improving the functioning of the independent authorities expected to be finalised? Will it address the long-standing demand from these authorities to have autonomy in recruiting their own staff (including the types of contracts) and operational independence (including managing appraisals, promotions and appointments in managerial positions)?

The study on improving the institutional arrangements of independent authorities, implemented by the OECD with the support of the European Commission's Technical Support Instrument, is currently in its final implementation phase. The project period runs until September 2026, at which point the progress achieved will be summarised in the final

implementation report. The recommendations produced under the project are being assessed by the Hellenic Government in consultation with the relevant Independent Authorities. A number of recommendations have been endorsed for implementation, focusing mainly on practical improvements such as enhancing transparency (e.g. publication of board members and tenure), facilitating access to expertise (e.g. secondment arrangements), strengthening knowledge-sharing (communities of practice), improving access to data through model MoUs, supporting structured reporting practices, and promoting targeted cooperation and data-sharing mechanisms among certain authorities. The Government considers that matters relating to recruitment regimes, contractual arrangements and internal personnel management must remain consistent with the general public administration framework, in order to preserve coherence within the national annual public-sector recruitment planning process, while fully respecting their constitutionally guaranteed independence under Article 101A of the Constitution and taking into account the constraints of the current fiscal framework.

5. [In writing] What concrete actions have been taken to implement the Bekir Ousta group of cases, including the planned revision of the Civil Code?

According to the decision adopted by the Committee of Ministers of the Council of Europe (hereinafter: the Committee of Ministers) at its meeting of December 2025, as well as the relevant Notes on the Agenda, the execution of the Bekir Ousta and Others v. Greece case continues to be supervised by the Committee of Ministers within the framework of the group of cases bearing the same title, which concerns violations of Article 11 of the European Convention on Human Rights arising from the refusal of Greek courts to register associations or from decisions upholding the dissolution of an association. The leading judgment was delivered by the European Court of Human Rights on 11 October 2007 and became final on 11 January 2008, while similar findings of violations were made in the cases of Emin and Others v. Greece (27 March 2008, final on 1 December 2008) and Tourkiki Enosi Xanthis and Others v. Greece (27 March 2008, final on 29 September 2008). The latter judgment concerned the refusal of the domestic courts to annul the decision ordering the dissolution of the association. The Court found that the refusal to register the applicant associations, as well as the dissolution of the association «Tourkiki Enosi Xanthis» was based on assumptions regarding the real aims of the founders and members of the associations and emphasised that even the promotion of the idea of the existence of a national minority could not, in itself, be regarded as a threat to a democratic society.

Following these judgments, the applicants sought the reopening of the relevant proceedings through the legal remedies available under domestic law. Following a relevant recommendation by the Committee of Ministers at its 1280th meeting (March 2017, DH), Article 758 of the Code of Civil Procedure was amended on 10 October 2017 in order to allow the reopening of proceedings in cases where the European Court of Human Rights found a violation of the Convention concerning the fairness of the procedure followed or a provision of substantive law of the Convention. However, the applicants' requests for reopening of the proceedings before the Thrace Court of Appeal were rejected, and their subsequent appeals before the Court of Cassation were also dismissed by decisions delivered on 29 June 2021 and 31 August 2022.

These developments were examined by the Committee of Ministers at its 1411th meeting (September 2021, DH), 1436th meeting (June 2022, DH) and 1451st meeting (December 2022, DH), during which the Committee expressed serious concern that the reasoning of the Court of Cassation relied on grounds that had already been found incompatible with the Convention

by the European Court of Human Rights. On 19 December 2022, the Chair of the Committee of Ministers addressed a letter to the Minister for Foreign Affairs of Greece, noting that full *restitutio in integrum* for the applicant associations had still not been achieved.

The Greek authorities replied on 20 January 2023, reiterating their commitment to the execution of the Court's judgments. At its 1483rd meeting (December 2023, DH) the Committee reiterated its concern that, despite the 2017 legislative amendment, the applicants had still not obtained redress for the violations established, and emphasised again at its 1531st meeting (June 2025, DH) that progress regarding individual measures now depends on the adoption of effective general measures.

In this context, the Greek authorities established a Committee of Experts tasked with examining the matter and advising on the next steps to be taken, with a view both to enabling the applicant associations to obtain *restitutio in integrum* and to effectively preventing similar violations in the future. The Committee of Experts finalised its report at the end of May 2025, setting out in detail a number of possible avenues capable of leading to the full execution of the relevant judgments.

The Committee of Ministers subsequently welcomed the decision of the Greek authorities, following their examination of the solutions outlined in the report, to amend the Civil Code by introducing a general clause expressly requiring that the grounds for the registration and dissolution of associations be interpreted in accordance with international human rights standards, including the case-law of the European Court of Human Rights. The Committee further noted, in its decision adopted in December 2025, that the legislative process had already commenced and that the authorities expected the proposed amendment to be submitted to Parliament for deliberation and adoption once the drafting process had been completed.

6. [in writing] Could you outline the timeline for reforming Law 3068/2002, and finalising other legislative initiatives aimed at strengthening the overall framework for compliance with court decisions?

A. As already stated in our initial input, a working group was established at the Ministry of Justice (GG YODD 1031/25.08.2025) to reform the legislative framework of Law 3068/2002 (with a view to creating an effective legal remedy for ensuring compliance, in line with the requirements of the case law of the European Court of Human Rights. The group, chaired by a Councillor of State, consisted of distinguished lawyers, judicial officials, and academics specializing in European and administrative law.

The working group has completed its work and submitted a draft law, which has in fact already been presented to the Council of Ministers. Therefore, the process for its legislative adoption has already been set in motion.

The proposed draft law repeals Law 3068/2002 and reforms the framework which, pursuant to Article 95(5) of the Constitution, governs the compliance of the Administration with judicial decisions.

The reform is undertaken in light of the need to enhance both the effectiveness and the speed of the compliance mechanism of administrative authorities with judicial rulings. The compliance procedure is substantially restructured with the aim of:

- (a) strengthening the effectiveness of the framework
- (b) accelerating the compliance process.

Key reforms in this direction include:

- The “functional” involvement of the Administration in the compliance procedure, with the participation of the Administration, the State Legal Council, and the applicant;
- The expansion and strengthening of the powers of the Compliance Council, which may, inter alia, order any appropriate interim measures to protect the legal interests and rights of the parties, without being bound by their submissions, and may supplement or amend such measures. These remain in force until full compliance is achieved;
- The acceleration of procedures and the imposition of fines accruing until the Administration complies;
- The indication of the appropriate means of compliance by the Administration, in accordance with the requirements stemming from the case law of the European Court of Human Rights.

Particular importance is attached to the establishment of mandatory disciplinary proceedings in cases of non-compliance, thereby strengthening the binding force of judicial decisions and acting as a deterrent against administrative inertia.

B. In parallel, a draft provision is set to be introduced in Parliament by the Vice-President of the Hellenic Government, which includes a provision establishing an internal administrative mechanism to strengthen compliance within public administration.

The proposed provision assigns Internal Audit Units in public bodies the responsibility to monitor and facilitate compliance with judicial decisions, including forwarding decisions to the competent services, overseeing implementation, informing the political or administrative leadership of progress, and signaling potential disciplinary omissions. It also mandates the identification of systemic issues and the formulation of recommendations to improve overall compliance.

7. [In writing] What measures do you plan to take to implement the Vervele judgment of the ECtHR, in particular regarding the finding that the existing compensatory remedy does not afford appropriate redress and was not effective in practice.

On a preliminary note, it should be highlighted that since 2024 multifaceted and extensive reforms have been adopted in the justice system, signifying a profound reorganisation aimed at enhancing judicial efficiency in Greece. The relevant measures include legislative reforms, a broad digital transformation of judicial services, the reorganisation and upgrading of court infrastructure (including construction works), training of justice professionals, and the comprehensive collection and evaluation of statistical data, among others. These reforms, according to the available statistical indicators, have already contributed to accelerating judicial proceedings and improving the quality of justice delivered by the civil courts. The positive results are expected to be reflected in the forthcoming Reports of the CEPEJ and the EU Justice Scoreboard (for detailed information on the reforms and the relevant statistical indicators, please refer to our RoL report Inputs of 2024 and 2025).

In particular, as regards the European Court’s finding that the existing compensatory remedy does not afford appropriate redress and has not proven effective in practice, it is noted that **a special working group has been established by decision of the Minister of Justice in order to formulate proposals addressing the issues arising from the judgment Vervele v. Greece.** The group consists of senior judicial officials representing different levels of jurisdiction as well as a representative of the Legal Council of the State responsible for matters relating to the

execution of the judgment before the Committee of Ministers of the Council of Europe. The first meeting of the working group took place on 10 March 2026 and the next one is scheduled for March 24, 2026, demonstrating the determination to swiftly complete the task at hand.

Moreover, the Government Agent has already sent a detailed communication (registration no. 103-1210/200307/09-03-2026) to all competent authorities, including the President of the Court of Cassation, in which the Court's findings, inter alia regarding the existing compensatory remedy provided for by Law 4239/2014 and the reasons for which the Court considered it ineffective, are set out in detail. In this document, the authorities are invited to ensure the wide dissemination of the Court's findings among members of the judiciary, with a view to preventing the recurrence of similar violations.

In addition, the Agent has requested the National School of the Judiciary to assess the need for organizing targeted training activities on the case-law of the European Court of Human Rights concerning the length of judicial proceedings in general, and in particular on the criteria applied by the Court when awarding compensation in cases where the length of proceedings has been found excessive

[spyware]

8. [in writing] Reports indicate that the administration/EYP has not complied with the final judgment of the Council of State, which ruled the absolute prohibition on informing individuals of intercepted communications (for national security reasons) unconstitutional. Could you provide a response to these claims?

Pursuant to paragraph 1 of Article 87 of Law No. 4790/2021 (Government Gazette A' 48), paragraph 9 of Article 5 of Law No. 2225/1994 (Government Gazette A' 121), concerning the notification of the imposition of the measure of lifting the confidentiality of communications, was amended.

By its Judgment No. 465/2024, the Plenary of the Council of State declared the provision of paragraph 1 of Article 87 of Law No. 4790/2021 unconstitutional. In the same judgment, the new legislative framework governing the lifting of the confidentiality of communications (Law No. 5022/2022, Government Gazette A' 228) was described as: "...a legislative regime encompassing the entire procedure for the imposition of the measure lifting the confidentiality of communications, from the submission of the relevant request and the approval of the impugned measure to the notification of its implementation. This regime constitutes a system endowed with internal coherence, the substantive and procedural requirements of which are specifically tailored to applications for the lifting of confidentiality submitted pursuant to its provisions, in order to be processed in accordance with its specific regulations and the safeguards which it itself establishes. [...]".

Furthermore, in paragraph 26 of Judgment No. 465/2024, the Council of State observed that paragraph 9 of Article 5 of Law No. 2225/1994, as it stood prior to its amendment by paragraph 1 of Article 87 of Law No. 4790/2021, is consistent with the case-law of the Court of Justice of the European Union concerning restrictions on the confidentiality of communications conducted through a public communications network, in so far as the person concerned is able, subject to the conditions laid down therein, to be informed of the reasoning underlying the imposition of the measure lifting the confidentiality of his or her

communications, thereby enabling him or her to avail himself or herself of effective judicial protection.

In compliance with both the reasoning and the operative provisions of Judgment No. 465/2024, the National Intelligence Service informed the Hellenic Authority for Communication Security and Privacy, in response to a query addressed to it, that the purpose of safeguarding national security would not be jeopardised by notifying the applicant concerned of the imposition of the measure lifting the confidentiality of his communications, providing all information at its disposal.

Accordingly, compliance with Judgment No. 465/2024 of the Council of State has been achieved.

C. Ministry of Migration and Asylum

[Registries]

9. How does Law 5275/2026 simplify registration requirements for civil society organisations in view of maintaining an open framework for them to operate? What are the concrete improvements?

Law 5275/2026 aims to clarify the scope of application of the provision governing registration in the Registry of Greek and Foreign NGOs and to align, as possible, the registration requirements with those applicable to the Special Registry of Civil Society Organisations of the Ministry of Interior.

First, the obligation for all organisations implementing activities in the fields of international protection, migration, and social inclusion within Greek territory to register in the NGO Registry has been abolished. The obligation is now limited only to organisations that receive state or EU funding or that operate within the facilities of the Ministry of Migration and Asylum.

Second, with regard to the requirement relating to the receipt of state funding, the newly introduced exemption aligns with the registration requirements of the Special Registry of Civil Society Organisations of the Ministry of Interior. Specifically, for both registries, registered organisations must not receive regular state funding exceeding thirty per cent (30%) of their operational budget, excluding payroll costs.

10. The revised article 56 permits additional registration requirements to be introduced by ministerial decision. Do you intend to issue such a decision? If so, what specific requirements might it include?

The Ministry of Migration and Asylum will proceed with the adoption of a Ministerial Decision governing the operation of the NGO Registry and the Registry of NGO Members, with the aim of simplifying procedures and reducing the required supporting documents. The draft decision has already been prepared and is currently under review regarding its final details. In the forthcoming Ministerial Decision, the registration requirements will be fully aligned with those set out in the law. The only additional requirement introduced concerns transparency and relates to the organisation's public presence.

Specifically, organisations will be required to operate a website, at least in Greek or English, where the following minimum information is published: the organisation's Articles of Association, the names of its legal representatives and members of the Board of Directors, the most recent annual audit report, contact details, as well as any subscribers or sponsors.

This requirement is not new, as it is also included in the existing legal framework.

The registration of NGOs in the Registry of the Ministry of Migration and Asylum will require the submission of the following supporting documents:

a) The valid Articles of Association/ Statute, duly registered and published with the competent authorities, or the most recent amended and codified Articles of Association/ Statute.

- b) A general certificate or certificate of changes issued by the competent authority, where applicable
- c) Minutes of election and constitution of the board of directors, managers, legal representatives and other statutory bodies, or alternatively a certificate of representation issued by the competent authority
- d) Any relevant court decisions or orders issued in relation to the legal representation of the entity.
- e) Certificate of tax clearance for all lawful uses.
- f) Certificate of social security clearance.
- g) Detailed financial statements for the most recent financial year.
- h) Audit report, prepared by a certified statutory auditor or audit firm.
- i) A solemn declaration by the legal representative stating that the organisation does not receive regular state funding exceeding 30% of its operational budget and does not receive loans guaranteed by the State.
- j) A solemn declaration by the legal representative stating that the organisation does not enter into contracts of any kind with: (a) natural persons who participate in its governing bodies, members or partners exercising statutory control, their spouses, children, parents, or persons with whom they have entered into a civil partnership, except for employment or independent services contracts covering up to 10% of the total workforce per year and in any case not more than three persons, with a contract value not exceeding twice the national minimum wage; and (b) legal persons controlled by the above individuals, where the annual consideration exceeds EUR 1,000.
- k) A solemn declaration by the legal representatives and/or members of the Board of Directors stating that no criminal prosecution has been initiated against them for any felony and that no final conviction exists for the offences listed in the Law.
- l) Criminal record certificates of the legal representatives and/or members of the Board of Directors.
- m) Income tax notice for the previous tax year.
- n) Internal rules of procedure and a code of conduct.

11. Law 5275/2026 has attracted significant attention, particularly the differentiated penalties applied to individuals associated with registered NGOs. For instance, the law introduces a penalty of up to two years' imprisonment for general cases of facilitation, three years' minimum imprisonment if committed for profit, and ten years' imprisonment if the convicted person is a member of a registered NGO. What empirical evidence, risk assessments, or other data informed the decision to introduce stricter penalties specifically for NGO members? Were there documented cases or trends that indicated a need for such differentiated measures?

The provisions of Articles 15 and 16 of Law 5275 /2026 do not establish any new criminal offences. The status of a member of a registered NGO is considered as an aggravating circumstance in sentencing, because it is linked to committing the specific offences through the abuse or exploitation of one's capacity as a member of an NGO. This assessment reflects the contradiction between the criminal conduct in question and the very purpose of NGOs, which is to implement actions in the fields of international protection, migration and social inclusion. The gravity is further intensified by the fact that registered NGOs have authorised access to operate within facilities of the Ministry of Migration and Asylum and may receive national or EU funding for this purpose. In this way, they enjoy privileged access to vulnerable populations who may constitute victims of the offences concerned and who are in need of protection.

It is, in any event, expressly noted that pursuant to Article 25(6) of Law 5038/2023 — which remains unaffected by the present legislative amendments — no sanctions are imposed in cases of search and rescue operations at sea, the transport of persons in need of international protection, or other specified forms of humanitarian action.

As under the previous legislative framework, whether the actions of an NGO member constitute the criminal offences referred to in Articles 15 and 16 is determined by the competent independent prosecutorial and judicial authorities, following an assessment of the specific facts of each case.

12. Could you provide further details on the simplification of required supporting documents, including the expected timeline for adoption and the specific changes to their content?

According to the draft Ministerial Decision to be published, the following changes are introduced compared to the previous Joint Ministerial Decision No. 10616/2020, with regard to registration requirements in the NGO Registry:

- i) Only the currently valid codified statutes will be required, rather than all previous versions.
- ii) Proof of registration with the competent court or the General Commercial Registry (GEMI) will be replaced by a general certificate or certificate of changes.
- iii) Instead of minutes of election and formation of Board of Directors, organisations may alternatively submit a certificate of representation.
- iv) An additional criminal record certificate will be required for the legal representative or members of the Board of Directors.
- v) The requirement regarding the non-conclusion of contracts with related parties is now subject to the same exceptions as those provided under the legal framework of the Ministry of Interior for the Special Registry of Civil Society Organisations, pursuant to Law 5270/2026.
- vi) Financial statements will be required only for the most recent financial year, rather than for the previous two years.
- vii) Instead of annual activity reports for the previous two years, NGOs will only declare the activities carried out during the previous year.
- viii) Instead of income tax returns and financial data statements for the previous two years, only the corporate income tax assessment notice for the previous year will be required.
- ix) Submission of property declarations (E9) and property tax (ENFIA) statements will no longer be required.
- x) Organisational charts, employment contracts, volunteer agreements, and ISO EN 9001 certification will no longer be required.

Additionally, the opinion of a three-member committee will no longer be required for NGO registration. This change further simplifies the registration procedure and significantly reduces processing time. At the same time, substantive registration conditions are removed,

thereby eliminating elements of subjectivity and ensuring a more objective and predictable registration framework.

With regard to registration in the Registry of NGO Members (covering employees, volunteers and collaborators), the procedure is also simplified and documentation requirements reduced. In particular:

- a) The type of identification document required from foreign members is specified to enable their registration.
- b) Submission of a curriculum vitae will no longer be required.
- c) Employment or volunteer contracts will no longer be required; instead, NGOs will declare the period of cooperation.
- d) The revised framework clearly specifies the offences for which a conviction or the initiation of criminal proceedings constitutes a ground for refusal of registration in the Registry of NGO Members. The new wording provides greater legal clarity and certainty, as it removes the need for interpretation.

Moreover, significant progress has been made towards the adoption of a new electronic NGO registry platform of the Ministry of Migration and Asylum. Funding has been provided, and the technical specifications for the development of a new electronic registry platform of the Ministry of Migration and Asylum have been completed. On 25 November 2025, a call for expressions of interest for the submission of offers was published. The procedure was completed on 10 December 2025 with the submission of three offers. Currently, we expect the evaluation by the competent committee.

The platform under development will fully support interoperability with the Civil Society Organisations Registry of the Ministry of Interior and other public authorities, in accordance with the “Once-Only” principle, enabling organisations to submit data and supporting documents only once, with such data subsequently retrieved and updated automatically by the competent authorities. This development is expected to contribute significantly to the reduction of administrative burdens, the improvement of data quality, and the enhancement of administrative efficiency.

Finally, the Ministerial Decision is expected to be published in March 2026 and will enter into force upon the operational launch of the new information system for the NGO Registry.

13. The written input did not address the establishment of a structured dialogue with civil society. Could you provide an update on any plans or progress in this area, including in relation to the implementation of Commission Recommendation (EU) 2023/2836 on citizens and civil society participation?

The draft Ministerial Decision expected to be issued in March 2026 includes an obligation for the Ministry of Migration and Asylum to organise, at least twice annually, meetings with civil society organisations, with the aim of consultation, exchange of views, and formulation of proposals on matters within its competence.

With regard to this matter, following the completion of the online meetings with the European Commission, an additional technical-level meeting was held, attended by policy officers of the competent Directorates of the Commission and the leadership of the Ministry. During this discussion, the draft ministerial decision was presented to the competent officials of the Commission, who put forward their proposals and observations, which were to a large extent accepted by the Ministry's leadership.

Accordingly, the draft of the Ministerial Decision has been adapted as follows: Pursuant to article 17 of the draft, these meetings are held on a mandatory basis at least twice (2) per year and follow a regular schedule, ensuring continuous participation with a long-term perspective. NGOs determine their representation in the dialogue and appoint their own representatives. The number of participants must ensure broad representation. Additional participants may be invited to the meetings depending on the topics under discussion. The competent Unit shall determine the invitation procedure, the format of the meetings (in person, remote, or hybrid), as well as any other necessary practical detail for the implementation of this provision.

In addition, under the Ministry's Annual Action Plan for 2026, the NGO Registry Unit aims to organise at least two thematic meetings with civil society organisations. These meetings will be held by main policy area (such as funding issues, reception of beneficiaries of international protection, vulnerable groups, unaccompanied minors, asylum procedures, etc.) and aim at the systematic exchange of views and the systematic collection of organisations' requests, in order to establish a stable framework for dialogue and continuous feedback, based on transparency, improved cooperation, and strengthened trust among stakeholders.

In this context, a meeting with representatives of NGOs registered in the Registry of the Ministry of Migration and Asylum was already held on 25 February 2026, on the topic: "Structured Dialogue with Civil Society Organisations: Briefing on the Child Protection Policy of the Reception and Identification Service." Following the presentation, NGO representatives were invited to submit questions, views, and proposals for possible improvements.

The Ministry of Migration and Asylum also issued a press release regarding the event, which is available at the following link:

<https://migration.gov.gr/domimenos-dialogos-me-o-koi-p-ekdilosi-paroysiasis-tis-politikis-paidikis-prostias-tis-ypiresias-ypodoichis-kai-taytopoiisis/>

D. Ministry of Interior

1. Despite your extensive awareness-raising efforts, the number of registered lobbyists and declared meetings remains persistently low. In your view, what are the key reasons for this? What further measures could be taken to improve compliance?

The Ministry of the Interior and the National Transparency Authority (NTA), in collaboration with the National Center for Public Administration and Local Government and within the framework of the “Leadership Academy” that is to operate within it, have already begun implementing initiatives in institutional bodies regarding the necessity of recording their meetings with interest representatives.

More specifically, on Monday, March 9, 2026, an initiative was carried out to brief members of the Government, Deputy Ministers, and General and Special Secretaries of the Ministries and their respective offices regarding the operation of the Transparency Register and the process of recording meetings with interest representatives within it. More than 70 people participated in this workshop organized by the Ministry of the Interior and the NTA (EAD). In the coming period, similar awareness-raising initiatives are planned regarding the operation of the Transparency Register and other institutional bodies, with the aim of fostering a new culture regarding lobbying and its contribution to the design of public policies.

3. [in writing] Have you received annual declarations for lobbying activities in 2025 from all registered individuals and legal entities for the reference year?

(Input received from NTA)

With regard to the submission of annual declarations for lobbying activities for the reporting year 2025 (reference year 2024), the obligation applies to all registered natural and legal persons under Law 4829/2021, who are required to submit an annual activity report within the prescribed deadline.

By the end of the reference year 2024, the total number of registered interest representatives who were obligated to submit an annual declaration in the reporting year 2025 amounted to thirty-three (33): fifteen (15) self-employed natural persons, six (6) legal entities, one (1) civil non-profit legal entity, and one (1) non-profit association. Ten (10) of them did not submit annual declarations.

4. [in writing] How many verifications and inspections of information in the Transparency Register have been carried out since July 2025? Have you found any irregularities? If yes, have these been investigated, and were any sanctions imposed?

(Input received from NTA)

The following figures refer to the reporting year 2024 (reference year 2023), as the latest data are not yet available. According to the NTA’s latest annual report for the reporting year 2024, no complaints had been submitted by institutional bodies or third parties regarding potential violations of interest representatives’ obligations. No audits had been conducted, either following complaints or ex officio. However, the National Transparency Authority (N.T.A.) has identified certain issues and will take necessary actions upon completion of the audits. No sanctions have been imposed to date. Any future sanctions and audit results will be published in the Transparency Register.

In the first half of 2026 and as part of the general restructuring of the National Center for Public Administration and Local Government, “Leadership Academy” to be established there, awareness-raising and information-sharing activities are being planned jointly with the NTA (EAD) for government members, deputy ministers, and general and special secretaries of the ministries and their respective offices.

5. In previous discussions, you mentioned plans for a voluntary-based platform for civil society organizations (CSOs). However, Law 5270/2026 now makes registration with the Observatory mandatory. What were the key considerations behind this shift in approach?

Regarding the issue of whether registration is “mandatory,” it should be noted that the legislative framework does not provide for penalties for non-registration in the Observatory (Article 23 of Law 5270/2026). Therefore, the concept of mandatory registration is more declaratory in nature, emphasizing the importance and necessity of making the existence of these entities and their areas of activity known, and in no way constitutes an enforcement mechanism. The basic rationale is that there can be no meaningful support without recognition of an organization’s existence and the work it performs. For this reason, registration with the Observatory can be viewed, among other things, as a tool for promoting the planned activities of the OKIPs to attract new volunteers and identify new sources of funding for their work.

The establishment of the Observatory aims to give organizations the opportunity to showcase their planned actions, seeking synergies, partnerships, and potentially funding from interested parties who wish to implement similar initiatives.

The Civil Society Organizations Observatory, therefore, was established to address the critical need for a unified registry, mapping, and consolidation of all civil society organizations operating at the national level into a single platform. For this reason, it serves as the central hub—or, in other words, the primary gateway—for any civil society organization seeking to publicize its activities to the broader public. Subsequently, if the organization in question wishes to have its activities funded by state agencies and organizations, it registers either in the Public Database, if the sought state funding—and not co-funding—does not exceed 50,000 euros, or in the Special Registry of CSOs, if it exceeds 50,000 euros (Article 10 of Law 4873/2021). In addition to the two separate registries (Public Database and Special Registry) maintained by the Ministry of the Interior, other ministries may maintain additional thematic registries based on the public policies they implement in order to record the relevant active social enterprises. These thematic registers are governed by the specific legislation of each competent Ministry. It should be noted, however, that in cases where there are common supporting documents required for registration in a registry of the Ministry of the Interior and in a thematic registry of another ministry, then through interoperability and by applying the “once-only principle” (Article 26 of Law 5270/2026), these are transferred to the second registry without the need for the CSO to resubmit them. A prime example is the interoperability currently being developed between the registries of the Ministry of the Interior and the thematic registry of the Ministry of Migration and Asylum, applying the aforementioned statutory principle in practice for the first time.

Registration with the Observatory is a fairly simple process:

- No application is required
- No supporting documents are required
- No administrative review

The entity enters only basic information, and even then only limited details, as most data is automatically retrieved, through interoperability, from other government information systems. More specifically, the information it is required to enter is: the address of its headquarters (if this is not automatically retrieved via interoperability from the TAXIS system), its areas of activity, and the actions it plans to undertake in the immediate future. In fact, at any time they wish, any organization can log into the Observatory's platform and update its activities, which helps connect it with citizens wishing to volunteer for a specific initiative, as well as with potential funding sources.

In any case, it is emphasized that the role of the state is not to interfere with or restrict the independence of organizations, but to strengthen their activities. For this reason, there is no form of administrative control regarding the inclusion of CSOs in the Observatory. However, to effectively support their activities, it is necessary for both the state and other stakeholders to be aware of the existence of these organizations, their planned activities, and the sectors in which they operate. The Observatory ensures precisely this visibility.

6. The written input states that the Observatory was developed in dialogue with civil society and addresses "reasonable and rational demands." Could you elaborate on the specific needs and concerns it was designed to meet and how the consultation with civil society was conducted?

The leadership of the Ministry of the Interior and its competent Directorate are engaged in ongoing and substantive dialogue with all organizations registered to date, that is, those listed in the Special Registry and the Public Database. Within the framework of this cooperation, we are working systematically together, with the aim of continuously improving the institutional framework so that civil society can function in an organized, smooth, simple, and, above all, unimpeded manner.

On the part of the organizations, there has recently been a coordinated initiative—perhaps for the first time—which resulted in the Bodossaki Foundation's Action Plan for Civil Society (<https://www.bodossaki.gr/wp-content/uploads/2024/12/%CE%A3%CE%A7%CE%95%CE%94%CE%99%CE%9F-%CE%94%CE%A1%CE%91%CE%A3%CE%97%CE%A3-%CE%93%CE%99%CE%91-%CE%A4%CE%97%CE%9D-%CE%9A%CE%9F%CE%99%CE%9D%CE%A9%CE%9D%CE%99%CE%91-%CE%A4%CE%A9%CE%9D-%CE%A0%CE%9F%CE%9B%CE%99%CE%A4%CE%A9%CE%9D-%CE%A3%CE%A4%CE%97%CE%9D-%CE%95%CE%9B%CE%9B%CE%91%CE%94%CE%91.pdf>).

This Plan includes substantive proposals and ideas for improving the functioning and effectiveness of civil society organizations. These proposals, in fact, include the consolidation of all civil society organizations certified by the Court of First Instance and the General Commercial Registry (GEMI) into a single platform (pp. 82–83 of the Plan), which led to the creation of the Observatory. In this way, as noted in the Draft, citizens' access to information about the activities of each organization is ensured, which may encourage volunteerism and further funding of their actions. Thus, it is clear that the main objective of establishing the Observatory—namely, the need for a unified mapping of organizations—is fully aligned with the spirit and objectives of the Plan in question.

At the same time, after carefully reviewing the Action Plan, the leadership of the Ministry of the Interior collaborated with the organizations that supported it and proceeded, beyond the establishment of the Observatory, to incorporate other improvements into Law 5270/2026,

in accordance with the proposals that were put forward. Among the proposals incorporated into the law, the following stand out: the doubling (from 5% to 10%) of the percentage of relatives of members of the administrative bodies of O.Koi.P. who are registered in the Special Registry, with whom the signing of employment contracts is now permitted (Article 24 of Law 5270/2026) , as well as the removal of the disqualification from appointment as members of the administrative bodies of registered organizations active in relevant sectors, for individuals who have previously been convicted of a misdemeanor under the Narcotics Act, provided that such individuals have attended or enrolled in a program for detoxification, rehabilitation, and social reintegration (Article 25 of Law 5270/2026). It should be noted, in fact, that for the first time, representatives of specific social cooperatives participated in the parliamentary debate during the session of the relevant parliamentary committee and, through the proposals they submitted there, contributed to the formulation of provisions of Law 5270/2026 (e.g., Article 24).

By the end of 2026, the relevant Directorate of the Ministry of the Interior will send an electronic questionnaire to all organizations registered with the Observatory, in which they will be able to submit comments and observations regarding its operation and any necessary improvements. In this way, civil society organizations are once again involved in the effort to highlight their work and activities, while the Ministry of the Interior reaffirms its commitment to open dialogue and consultation with them.

7. Will there be penalties or other consequences for organizations that fail to register with the Observatory? What strategies will be employed to raise awareness, support, and encourage compliance?

As noted in the response to question 5, there are no consequences or penalties for failure to register in the Observatory of CSOs. Any organization that chooses not to register faces no penalties; it simply misses the opportunity to highlight its work, promote its activities, and take advantage of the networking and collaboration opportunities offered by the system.

8. In your written submission, you refer to the Register of Non-Commercial Economic Activity and state that its needs will be met by existing databases. Could you please elaborate further?

The Ministry of the Interior's initiative is fully in line with your recommendations, as well as our steadfast commitment to streamlining this specific field by reducing existing registries and avoiding the creation of new ones with the same or similar scope, and the Bodossaki Foundation's Action Plan for Civil Society, as mentioned above.

The Registry of Non-Commercial Economic Activity had been provided for, though never implemented, in legislation of the Ministry of Development (Article 52 of Law 4919/2022), in an effort to fill the gap in the unified registration of organizations that do not have a commercial purpose—that is, to a large extent, civil society organizations. The aim was to register entities that do not engage in economic or commercial activities, so that they could be clearly distinguished from the core remit of the Ministry of Development, which is the country's economic and business life.

Through close cooperation and consultation between the Ministry of the Interior and the Ministry of Development, we have concluded that this need is fully met by the Observatory. Furthermore, it is important to emphasize that the Observatory is hosted on an already developed digital application, , which means that the relevant requirement of the Registry of Non-Commercial Economic Activity is met without additional budgetary costs for the development of a new information system and, at the same time, without an additional administrative burden on the entities.

9. Is our understanding correct that Law 5270/2026 establishes the legal basis for interoperability among the different registries? What additional regulatory or technical steps are being taken to ensure seamless interoperability in practice? Do you have a timeline for full implementation?

Law 5270/2026 (Article 26) explicitly refers, on the one hand, to the application of the “once only principle” (OOP), but also the provision for interoperability between the databases maintained by the Ministry of Interior and other government databases that hold data or supporting documents concerning civil society organizations. By explicitly incorporating the OOP principle into the registration of active civil society organizations in Greece, and given the existence of many different registries, it is ensured that a supporting document submitted once to a public body will not be requested again, but the information contained therein can be shared through interoperability with other public authorities that may request it. The implementation of the OOP principle will be technically implemented in every new interoperability between the Ministry of Interior’s Information System and the individual registries/Information Systems that also maintain data on Civil Society Organizations. In this context, the Ministry of Interior’s Information System is ready to interoperate with the Ministry of Migration’s Information System, currently under development, having ensured technical implementation through the application of the “once-only principle.”

It should be noted that the introduction of the “once-only principle” (OOP) has been a long-standing demand of CSOs, to which the leadership of the Ministry of the Interior also responded through Law 5270/2026.

10. More broadly on CSOs and civic space, do you have any update on the implementation of the 2023 Commission Recommendation (EU) 2023/2836 on the participation of citizens and civil society organizations in public policy-making?

The Ministry of the Interior, as has already been noted, is engaged in ongoing consultation and open dialogue with all organizations wishing to participate in this process.

However, there is a fundamental and complex issue that civil society itself must address: the issue of representation. This is not a simple or technical matter. Who represents whom, through what process, and with what legitimacy? And, ultimately, does civil society itself wish to organize itself into a unified representative body? This issue clearly concerns civil society organizations themselves and touches upon their self-organization. The absence, of a collective representative body for civil society organizations at the secondary or tertiary level, which hinders the development and establishment of a structured and systematic dialogue

between the state and civil society, is addressed in Chapter 2.4 of the Bodossaki Foundation's Action Plan for Civil Society (pp. 23–29).

The question of how civil society can have an institutional voice and meaningful participation in policy-making remains open. Making use of the Economic and Social Committee (ESC) could be a solution. Nevertheless, it is not certain that even this framework fully resolves the problem of representation—and especially the deeper issue of civil society's meaningful participation in the design of public policies.

In any case, it should be noted that Law 5270/2026 is the result of consultations with a significant number of organizations and largely addresses their key demands, such as the introduction of the “once only principle” (OPP) (Article 26), the doubling of the percentage of relatives of members of the administrative bodies of CSOs who are registered in the Special Registry, with whom the signing of employment contracts is permitted (Article 24), and the removal of the disqualification from serving as members of the administrative bodies of registered organizations active in relevant sectors for individuals who have previously been convicted of a misdemeanor under the Narcotics Act, provided that such individuals have attended or participated in a program of detoxification, rehabilitation, and social reintegration (Article 25). Furthermore, during the parliamentary voting process, representatives of organizations and institutions were, for the first time, invited to participate and express their views. Their observations and comments were carefully considered, and substantive remarks were taken into account in the final shaping of the law (e.g., Article 24).

ADDITIONAL TARGETED QUESTIONS PILLAR IV

E. Ministry of Maritime Affairs and Insular Policy

1. In the written input (p.136), it is mentioned that “a new disciplinary framework has been drafted by Personnel Directorate of the H.C.G., taking into account, on the one hand, cases that are not covered by the pre-existing legislative framework and, on the other hand, the needs of the modern era, in the line with the principles of the administration and legal certainty, contemporary social and administrative developments, as well as the applicable European standards.» Could you please provide some additional information in this respect and clarify if the new disciplinary framework refers to an ongoing process of revising the framework or this has already been completed. What are the main elements of this new framework and what do you mean by “needs of the modern era”? What needs the (planned) changes aim to address?

a. Following instructions from the Office of the Minister of Maritime Affairs and Insular Policy, a working group of the Hellenic Coast Guard Personnel Directorate drafted provisions of Disciplinary Law for the Hellenic Coast Guard – H.C.G. These provisions were forwarded through the appropriate channels and are currently at the Office of the Minister of Maritime Affairs and Insular Policy in order to be incorporated either independently or as supplementary provisions in a future draft law of the Ministry of Maritime Affairs and Insular Policy. This process is still pending.

b. The aim of the above legislative initiative is to modernize the existing framework of disciplinary law provisions governing the Hellenic Coast Guard – H.C.G., and specifically:

i. to redefine the general principles that should govern the Disciplinary Law of the Hellenic Coast Guard – H.C.G.,

ii. to clearly group disciplinary offenses, using as a main framework the corresponding provisions of the Hellenic Navy— with which the Hellenic Coast Guard – H.C.G. is aligned in matters of discipline—while enriching them in accordance with the responsibilities of the Hellenic Coast Guard – H.C.G. and the service duties of its personnel,

iii. to redefine the competent disciplinary bodies in accordance with the modern organizational structure of the Hellenic Coast Guard – H.C.G., as well as the level of ordinary disciplinary penalties they may impose,

iv. to clearly determine the competent disciplinary authorities for the examination of administrative appeals against the imposition of ordinary disciplinary penalties,

v. to clearly define the procedure for referring personnel before the Disciplinary Councils of the Hellenic Coast Guard – H.C.G., and to accelerate the disciplinary procedure for referrals before the secondary Disciplinary Councils, **vi.** to introduce a new enabling provision for the

conduct of Sworn Administrative Inquiries, as well as— for the first time—Administrative Investigations and the handling of complaints,

vi. to eliminate legislative inconsistencies caused by the issuance of Law 4504/2017 (A' 184), such as the issue of reopening disciplinary proceedings, the existence of contradictory provisions regarding the procedure for referring Hellenic Coast Guard personnel before Disciplinary Councils, etc.

2. In November 2025, the Greek Ombudsman criticised the fact that no disciplinary proceedings were launched in relation to the Pylos shipwreck despite his inquiry and the initiation of criminal proceedings. In the written input (p.136), you referred to the Opinion 84/2025 of the Legal Council of State and its imminent acceptance by the competent Minister. Could you please provide more context. Could you please explain what were the legal issues that prevented or had to be clarified before disciplinary proceedings could be launched. Are there any more recent developments?

a. The questions that had been raised with the Legal Council of the State concerned, among others gaps in the existing legislation, which required interpretation, regarding who would conduct the Sworn Administrative Examination, given that it potentially would refer to actions of the leadership of the Coastal Authorities.

b. The opinion of Legal Council of the State (84/2025) determined that from the combined interpretation of the existing provisions, the Minister could assign the examination even to one of the heads of the three branches of the armed forces.

c. Indeed, in execution of the above and of the opinion accepted by the Minister of Shipping and Insular Policy, the conduct of a Sworn Administrative Examination was ordered. By virtue of the Minister's order dated 26 January 2026, the inquiry was assigned to the Chief of the Hellenic Navy General Staff and the relevant order was served on him on 5 February 2026.

Please find attached:

- 1. An ANNEX on PILLAR II- ANTICORRUPTION, with updated statistical data*
- 2. An ANNEX on PILLAR III- JUDICIAL STATISTICS ON PRESS MEDIA, with updated statistical data.*
- 3. The letter from the Secretary General for Communication and Media, circulated to all Task Force members on 9 March 2026.*
- 4. The Memorandum of Understanding signed between Secretariat General for Communication and Media and the Centre for Research and Technology Hellas (EKETA).*