

Brussels, 22 July 2026
(OR. en)

11674/26
ADD 9

FREMP 239
JAI 965
AG 114
POLGEN 189

COVER NOTE

From:	Secretary-General of the European Commission, signed by Ms Martine DEPREZ, Director
date of receipt:	17 July 2026
To:	Ms Thérèse BLANCHET, Secretary-General of the Council of the European Union
No. Cion doc.:	SWD(2026) 908 final
Subject:	COMMISSION STAFF WORKING DOCUMENT 2026 Rule of Law Report Country Chapter on the rule of law situation in Greece Accompanying the document Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions 2026 Rule of Law Report The rule of law situation in the European Union

Delegations will find attached document SWD(2026) 908 final.

Encl.: SWD(2026) 908 final



COMMISSION STAFF WORKING DOCUMENT

Accompanying the document

2026 Rule of Law Report

The rule of law situation in the European Union

{COM(2026) 900 final}	- {SWD(2026) 901 final}	- {SWD(2026) 902 final}	-
{SWD(2026) 903 final}	- {SWD(2026) 904 final}	- {SWD(2026) 905 final}	-
{SWD(2026) 906 final}	- {SWD(2026) 907 final}	- {SWD(2026) 909 final}	-
{SWD(2026) 910 final}	- {SWD(2026) 911 final}	- {SWD(2026) 912 final}	-
{SWD(2026) 913 final}	- {SWD(2026) 914 final}	- {SWD(2026) 915 final}	-
{SWD(2026) 916 final}	- {SWD(2026) 917 final}	- {SWD(2026) 918 final}	-
{SWD(2026) 919 final}	- {SWD(2026) 920 final}	- {SWD(2026) 921 final}	-
{SWD(2026) 922 final}	- {SWD(2026) 923 final}	- {SWD(2026) 924 final}	-
{SWD(2026) 925 final}	- {SWD(2026) 926 final}	- {SWD(2026) 927 final}	-
{SWD(2026) 928 final}	- {SWD(2026) 929 final}	- {SWD(2026) 930 final}	-
	{SWD(2026) 931 final}		

ABSTRACT

In Greece, appointments to the highest positions in the court system were made with the involvement of the judiciary. Initiatives to restore trust in the justice system, including a post-retirement cooling-off period for judges, continue to be discussed. Major projects to improve the level of digitalisation are advancing well and efforts to promote the use of alternative dispute resolution continue. Recruitments of prosecutors and court staff alongside improvements in building infrastructure aim to address shortcomings. Reforms show promising results in judicial efficiency, as the length of proceedings has slightly decreased but still remains a serious challenge. Efforts to decongest civil courts and reduce delays include transferring non-litigious cases to lawyers and notaries, the digital publication of wills and revisions to the Code of Civil Procedure.

The National Anti-Corruption Action Plan (NACAP) 2022-2025 was successfully implemented and a new NACAP is being finalised. While the number of prosecutions and final judgments, including high-level corruption, remains limited, the legal framework is in place and implementing rules are being finalised for a digital registry that allows a comprehensive monitoring of corruption cases. The police stepped up efforts to combat corruption. The submission of asset declarations continues, including through the new electronic system ‘e-pothen’, though some delays in submissions and publications remain. While implementation measures and awareness-raising activities are ongoing, no legislative changes have been introduced regarding the definition of lobbyists and the number of registered lobbyists remains low. Most political parties complied with funding rules, while concerns remain regarding transparency and implementation. Recent reforms aim to address structural inefficiencies, enhance centralisation and transparency in public procurement to reduce corruption risks.

The strengthening of the media regulator’s supervisory role, its funding and staff continues, including through the adoption of new legislation and in order to ensure adaptation to its new competences. For the first time, a self-regulatory body for the media sector is provided for by law. A new law modernises and strengthens public service media’s governance, although concerns regarding the latter’s political independence remain. A new law for the licensing of regional television has been adopted. Transparency of state advertising is further improved with the adoption of legislation and funding measures to support the media sector are planned or have been adopted. New requirements relating to the legal framework on access to information start being applied. As provided by law, a national action plan is in preparation to address threats to the safety of journalists. Additional measures have been taken, and further work is ongoing on adopting legislative and non-legislative safeguards to improve the protection of journalists, in particular as regards abusive lawsuits.

The constitutional revision process started, touching upon a range of rule of law issues, including judicial independence, ministerial immunities, protection of journalists and better regulation. The quality of the legislative process shows improvements, yet challenges persist, including frequent legislative changes. Reforms seek to target the administration’s delays in enforcing final judgments. The immunity regime for members of Government remains debated, with broad agreement on the need for reform. Judicial scrutiny of certain aspects of the use of spyware continues. New staff positions have been approved for the Constitutional Independent Authorities, while their request for autonomous staff recruitment has yet to be addressed. While the registration framework remains fragmented, further steps have been taken and the basis for a structured dialogue with civil society has been laid. The Council of State is engaging in awareness campaigns to instil a rule of law culture among young people.

RECOMMENDATIONS

Overall, based on the recommendations in the 2025 Rule of Law Report, considering other developments that took place in the period of reference and in addition to recalling the relevant commitments made under the Recovery and Resilience Plan, and the country-specific recommendation under the European Semester on the efficiency of the justice system, the Commission concludes the following:

- Limited progress has been made in establishing a robust track record of prosecutions and final judgments in corruption cases, as the legal framework for a digital register of corruption cases has been set up and the register is expected to be operational on 1 January 2027; however, as the number of prosecutions and final judgments in corruption cases, including high-level corruption, remains low, it is recommended to Greece *to continue efforts to establish a robust track record of prosecutions and final judgments in corruption cases, including high-level corruption.*
- There has been only limited progress in improving the lobbying framework, as no legislation expanding the definition of a lobbyist has been adopted while implementation measures and awareness raising activities are ongoing. Therefore, it is recommended to Greece *to improve the lobbying framework, including by reviewing the definition of a lobbyist and ensuring effective implementation.*
- Some further progress has been made on strengthening legislative and non-legislative safeguards to improve the safety and protection of journalists, in particular as regards abusive lawsuits, as additional measures have been taken and draft anti-SLAPP legislation is being finalised. Therefore, it is recommended to Greece *to complete the work on strengthening legislative and non-legislative safeguards to improve the safety and protection of journalists, in particular as regards abusive lawsuits, in line with the adopted Memorandum of Understanding and taking into account European standards on the protection of journalists.*
- Some further progress has been made in developing a structured dialogue with civil society organisations (CSOs), and in simplifying registration requirements in view of maintaining an open framework for them to operate, given that the framework for a structured dialogue with CSOs has been laid and some steps have been taken to reduce documentation requirements and streamlining procedures. Since the structured dialogue is yet to become regular and sustained and the registration framework remains fragmented, it is recommended to Greece *to intensify efforts to consolidate a regular and sustained structured dialogue with CSOs, and to simplify registration requirements in view of maintaining an open framework for them to operate.*

I. JUSTICE SYSTEM¹

Independence

The level of perceived judicial independence in Greece is now average among the general public and low among companies. Overall, 43% of the general population and 33% of companies perceive the level of independence of courts and judges to be ‘fairly or very good’ in 2026². The perceived judicial independence among the general public has increased in comparison with 2025 (38%) and has significantly decreased in comparison with 2022 (53%). The perceived judicial independence among companies has significantly decreased in comparison with 2025 (49%), as well as in comparison with 2022 (59%).

Appointments to the highest positions in the court system were made under the new legal framework with the involvement of the judiciary. Building on the significant reform of 2024³, the Government appointed, in 2025, four vice-presidents of the Council of State, a vice-president of the Court of Audit, the Prosecutor General of the Supreme Court as well as eight Supreme Court vice-presidents. These appointments were largely welcomed by the judiciary⁴. In June 2026, the administrative plenaries of the three highest courts conducted for the second time the consultative procedure for further appointments⁵. The Government appointed the candidates who came first in the judiciary’s vote as the new President of the Supreme Court and the new Prosecutor General. There is broad consensus among the judiciary, lawyers and political parties that the legal framework for the appointment of the judiciary should be further revised in the context of the constitutional revision, to help improve public trust⁶. According to the proposal submitted to Parliament in June 2026 by the ruling majority, the decision-making power will be transferred from the executive to a parliamentary committee, which would appoint, with increased majorities, one of the three candidates nominated by the judiciary. The Court of Audit and judicial associations proposed that the Parliament select candidates from a judiciary-vetted shortlist using transparent criteria as well as setting term limits for the vice-presidents⁷. The Council of State proposes to improve the existing system by making the opinion expressed by the judiciary binding upon the executive⁸.

¹ An overview of the institutional framework for all four pillars can be found [here](#).

² Figures 48 and 50, 2026 EU Justice Scoreboard and 51 and 53, 2024 EU Justice Scoreboard. The level of perceived judicial independence is categorised as follows: very low (below 30% of respondents perceive judicial independence as fairly good and very good); low (between 30-39%), average (between 40-59%), high (between 60-75%), very high (above 75%).

³ 2024 Rule of Law Report, Greece, pp. 3-4.

⁴ Country visit Greece, Council of State, Court of Audit and Supreme Court; Association of Judges of the Court of Audit, written input, p. 1. Some nominations also drew criticism of a number of stakeholders: Association of judges and prosecutors (2025a); Association of administrative judges; Centre for European Constitutional Law (2026) and Civil Society (2026a), written inputs, pp. 3,8 and 13-14.

⁵ Notably, for the appointments of the President, vice-presidents and the Prosecutor General of the Supreme Court; vice-presidents of the Council of State, as well as the General Commissioner of the Court of Audit and the General Commissioner of the ordinary administrative courts. Greek Government (2026c).

⁶ In February 2026, the procedure for the constitutional revision was launched. Greek Government (2026b), p. 6; Country visit Greece, Court of Audit, Judicial associations, Greek Bar Associations.

⁷ Under the Constitution, the tenure of presidents of the highest courts is limited to four years. Country visit Greece, Ministry of Justice and Court of Audit; Association of Judges of the Court of Audit and Association of administrative judges (2026), written inputs, pp. 2 and 2-3 respectively.

⁸ Council of State (2026).

Initiatives to restore trust in the justice system, including a post-retirement cooling-off period for judges, continue to be discussed. The Government is reflecting on a legislative framework for post-retirement activities for judges based on objective and transparent criteria and has proposed to introduce a three-year cooling off period in the forthcoming constitutional revision⁹. The judiciary supports a cooling-off period as key to rebuilding public trust¹⁰. In this context, the Plenary of the Council of State has proposed that retired judges should not be able to assume duties incompatible with their former judicial status for a two-year period. The Court of Audit, in turn, advocates for a four-year restriction, a view also shared by the Bar Associations¹¹.

Reforming the Code of Lawyers remains a priority for the legal profession. The working group established by the Ministry of Justice in 2024 continues its work, focusing on the traineeship of law graduates, the examination system for trainee lawyers, and measures to improve the efficiency and quality of legal practice¹². For lawyers, reforms are felt to be urgently needed, focusing on compensation, employment rights, and updated professional and ethical standards, while ensuring that admission, career progression and disciplinary matters remain exclusively under the control of Bar Associations¹³. The Association of judges and prosecutors proposed amending the legal framework to provide sanctions for lawyer misconduct during court hearings¹⁴. The proposal was met with strong opposition from lawyers, who consider that such a move would transfer disciplinary proceedings from Bar Association bodies to the courts, thereby violating the principle of professional self-regulation¹⁵.

Quality

Major projects to improve the level of digitalisation of the justice system are advancing well. As reflected in the 2026 EU Justice Scoreboard, there is further progress in certain areas, including digital-ready procedural rules and the use of digital technology by courts and prosecution services, while some shortcomings remain¹⁶. Greece is undertaking a comprehensive digital transformation of its justice system through major projects funded by the Recovery and Resilience Facility with full implementation targeted by the end of 2026¹⁷. The Integrated Case Management System for Civil and Criminal Justice is already deployed in all prosecutors' offices and criminal courts and the vast majority of civil courts (96%). A key reform is the electronic case file, enabling electronic filing and organisation of case documents, full access to case materials, electronic submissions, and certificate issuance. Full rollout across all branches of justice is expected by the end of 2026¹⁸. The Integrated Case Management System for Administrative Justice is due to become fully operational by

⁹ Greek Government (2026b), p. 6.

¹⁰ Country visit, Greece, Judicial associations, Council of State and Court of Audit.

¹¹ CCBE (2026), written input, p. 110.

¹² The working group, established by the Ministry of Justice, is composed of judges, lawyers, notaries and judicial officers. Greek Government (2026a), written input, p. 21. 2024 Rule of Law Report, Greece, p. 8.

¹³ CCBE (2026), written input, p. 125; Plenary of Bar Associations (2026b).

¹⁴ Association of judges and prosecutors (2025b) and (2025c); EAJ (2026).

¹⁵ CCBE (2026), written input, pp. 15 and 111.

¹⁶ Figures 40 and 41, 2026 EU Justice Scoreboard; 2026 European Semester, Greece, pp. 4 and 71.

¹⁷ Greek Government (2026a) and (2026c), written input, pp. 32-36. According to the Government, 28 out of 39 reform and investment milestones related to the rule of law and the acceleration of justice had been fully implemented in May 2026, with the remaining ones expected to be delivered on time.

¹⁸ From January 2026, cadastral case documents are submitted electronically, with extension to all ordinary proceedings in April 2026.

September 2026, covering the entire administrative court process. The Court of Audit is developing a virtual assistant judge to be integrated into its already fully operational case management system (since September 2025)¹⁹. Judicial statistics collection continues to improve while remaining incomplete²⁰. Access to case law via court websites is progressing, though still dependent on anonymisation, which is expected to be automated soon²¹. The digitalisation of the notary profession is advancing well²².

Efforts to promote the use of alternative dispute resolution continue. A draft Code of Alternative Dispute Resolution has been submitted for the Government's approval²³. Other measures include integrating mediation and other dispute resolution methods into law school curricula and mandatory training for judges, alongside digital upgrades to mediation centres and the establishment of arbitration committees at the Chambers of Commerce in Volos and Athens²⁴. Business representatives strongly support efforts to promote alternative dispute resolution²⁵. Its use - which is voluntary - remains limited, notably in administrative disputes, indicating a potential area for providing further incentives²⁶.

Recruitment of prosecutors and court support staff alongside improvements in building infrastructure aim to address shortcomings. The Government is taking measures to address the shortage of prosecutors, a challenge exacerbated by recent judicial reforms, to meet the growing demands of first-instance courts and to align Greece with the EU average ratio of prosecutors per capita²⁷. Measures include creating 50 new prosecutorial positions and accelerating the training and deployment of new prosecutors²⁸. Judges' associations have demanded measures to restore pay levels, pointing to the rapid rise in living costs and the need for salaries proportionate to the judicial function²⁹. Support staff remains insufficient, including assistant judges, scientific staff and IT specialists³⁰. Incentives are provided to help fill positions in challenging areas, where understaffing is common. Additional positions for judicial clerks were established at the Council of State and the Court of Audit. In parallel, a comprehensive programme financed through the Recovery and Resilience Facility and national funds is underway to renovate court infrastructure³¹.

¹⁹ The virtual assistant will categorise and group pending court cases, address legal questions, search for relevant case law through interactive dialogue with users, and draft court decision templates.

²⁰ CCBE (2026), written input, p. 121; Civil Society (2026b), p. 6. Country visit, Prosecutors. See also Pillar II on the establishment of a Digital Register for corruption cases.

²¹ ENCJ (2026), written input, p. 26.

²² Country visit Greece, Association of Notaries.

²³ Greek Government (2026c).

²⁴ Greek Government (2026a and 2026b), pp. 41 and 7 respectively.

²⁵ Country visit Greece, Business associations.

²⁶ Figure 27, 2026 EU Justice Scoreboard.

²⁷ The new judicial map and changes to criminal procedure have increased single-judge formations, thereby raising the demand for prosecutorial resources to support additional hearings. Greek Government (2026a), written input, pp. 36 and 44. In Greece, there are six prosecutors per 100 000 inhabitants (EU average 14.5).

²⁸ Prosecutors welcomed the new prosecutorial positions but noted that implementation requires time. Country visit Greece, Prosecutors.

²⁹ Judicial associations (2025).

³⁰ While Greece has the highest number of judges per inhabitants in the EU (Figure 36, 2026 EU Justice Scoreboard), the judge-to-court-staff ratio (1:1.2) remains below the EU average (1:3). Association of Administrative Judges (2026), written input, p. 1; Country visit, Judicial associations, Greek Bar Associations and Business associations. 2024 Rule of Law Report, Greece, p. 7. General Commissioner of the ordinary administrative courts (2026), p. 31.

³¹ Greek Government (2026a), written input, p. 39.

The implementation of the judicial map in administrative justice is ongoing and there are plans to revise the Code of Administrative Procedure. The consolidation of administrative courts, with the establishment of telematics offices in areas where courts will be abolished is expected to be completed by September 2026³². Administrative judges voiced concerns about a possible restriction to access to the courts³³. Proposed amendments to the Code of Administrative Procedure introduce a front-loaded system where a judge rapporteur ensures that cases are fully prepared before hearings³⁴. Following concerns raised by both judges and lawyers, arguing that the reforms could overburden parties with strict procedural obligations and judges with administrative tasks due to understaffing, the Ministry of Justice established a working group, with the participation of judges' associations and lawyers, to finalise the reforms³⁵.

Efficiency

Reforms show promising results in improving judicial efficiency, as the length of proceedings has slightly decreased, but still remains a serious challenge, notably in civil justice. In 2024, the disposition time in litigious civil and commercial cases at first instance courts slightly decreased to 737 days (compared to 771 days in 2023) though it remained the longest in the EU. The clearance rate for these cases dropped significantly to 81% (92% in 2022)³⁶. Length of court proceedings remains an issue for business development³⁷. At the same time, the first statistical data from the three largest courts, following the implementation of the new judicial map for civil and criminal justice³⁸, indicate a substantial improvement in both disposition times and clearance rates. Specifically, the estimated time for a final decision by the Athens Court of First Instance has decreased to 513 days (1 422 days prior to the reform), while its clearance rate has increased to 100.8% (from 87.5%)³⁹. All justice stakeholders agree that the new judicial map is already yielding positive results, and if these trends continue, it will mark significant progress in the administration of justice⁴⁰. For administrative cases, the disposition time at first instance courts remains stable at 445 days in 2024 (439 days in 2023) with their clearance rate remaining among the highest of the EU (112%, compared to 121% in 2023). The length of proceedings before the Council of State has improved, with the disposition time decreasing to 966 days in 2024 (from 1 239 days in 2023). Judges attribute this improvement in part to the transfer of certain categories of cases from the Council of State to ordinary administrative courts⁴¹.

Efforts to decongest civil courts and reduce delays include transferring non-litigious cases to lawyers and notaries, the digital publication of wills and revisions to the Code

³² 2023 Rule of Law Report, Greece, pp. 7-8. Under the previous system, judges travelled from neighbouring prefectures to hold court sessions on designated days each month at temporary 'transitional' court locations. These court seats will now be replaced by permanent telematics offices-remote hubs for virtual hearings.

³³ Association of Administrative Judges and Centre for European Constitutional Law (2026), written inputs, pp. 3-4 and 12 respectively.

³⁴ General Commissioner of the ordinary administrative courts (2026), pp. 72-78.

³⁵ Greek Government (2026b), pp. 7-8. Country visit Greece, Greek Bar Associations.

³⁶ 2026 EU Justice Scoreboard, Figures 5 and 10.

³⁷ 2026 European Semester, Greece, pp. 4, 13, 14 and 71.

³⁸ 2025 Rule of Law Report, Greece, p. 5. The consolidation of the first degree of jurisdiction with the merging of the magistrate's courts and the courts of first instance doubled the number of first-instance judges to 2100.

³⁹ Greek Government (2026a), written input, p. 26.

⁴⁰ Country visit Greece, Supreme Court, Association of Judges and Prosecutors and Greek Bar Associations; Centre for European Constitutional Law (2026), written input, p. 12.

⁴¹ Country visit Greece, Council of State; Greek Government (2026c).

of Civil Procedure. Justice stakeholders have consistently praised the transfer of judicial, non-litigious, functions to lawyers and notaries, including the recognition of associations, notices of mortgages and inheritance certificates⁴². These cases are now handled in a timely manner, freeing up resources within the judicial system. This transfer extends to payment orders as of May 2026, with lawyers and notaries ready to take on further non-judicial responsibilities. Since November 2025, all wills are published digitally via the register of wills platform⁴³. Notaries ensure quick certificate issuance and validation of wills, thus eliminating the previous time-consuming court process. Further efficiency gains are expected from establishing specialised criminal divisions at the Athens and Thessaloniki Courts of Appeal⁴⁴. Business representatives consider that the specialisation of judges in competition and fiscal law could improve efficiency⁴⁵. New provisions of the Code of Civil Procedure impose strict limits on hearing postponements and deadlines for issuing judgments with sanctions for non-compliance⁴⁶. The introduction of annual caseload caps addresses judges' long-standing request for a more balanced case allocation to prevent individual overload⁴⁷. Judges, however, caution that delays rarely stem from individual performance alone, warning that an overemphasis on speed – particularly if linked to salary penalties – risks compromising judicial independence and the quality of rulings, while structural issues such as understaffing as regards support staff and administrative bottlenecks remain unresolved⁴⁸.

Steps are being taken to address the issue of low compensation for judicial delays. In August 2025, the European Court of Human Rights found that the compensation scheme for judicial delays was generally ineffective, as the amounts awarded by Greek courts fell consistently below European standards⁴⁹. In response, the Government established a working group to reform the compensation framework and propose legislative amendments, aiming to align Greek compensation criteria with EU standards and ensure fairer redress for those affected by delays⁵⁰. The review of the compensation system also addresses a long-standing request from the Bar⁵¹.

II. ANTI-CORRUPTION FRAMEWORK

The perception among experts, citizens and business executives is that the level of corruption in the public sector is relatively high. In the 2025 Corruption Perceptions Index by Transparency International, Greece scores 50/100 and ranks 21st in the European Union and 56th globally⁵². This perception has been relatively stable over the past five years⁵³. The

⁴² CCBE (2026), Greece, p. 120; Country visit Greece, Association of Notaries, Greek Bar Associations, Supreme Court and Association of Judges and Prosecutors. 2025 Rule of Law Report, Greece, p. 6.

⁴³ The digital platform is managed by the Association of Notaries of the Courts of Appeal of Athens, Piraeus, the Aegean and the Dodecanese, under the supervision of the Ministry of Justice. During a first phase, the new rules only apply to demises after 1 November 2025. From 16 September 2026, notaries will handle all cases, no matter the date of passings. Country visit, Greece, Association of Notaries.

⁴⁴ Greek Government (2026a), written input, p. 50. Judges are assigned to these divisions on an exclusive basis for a fixed term, renewable, based on objective criteria linked to experience and performance.

⁴⁵ Country visit Greece, Business associations.

⁴⁶ Greek Government (2026a), written input, pp. 43, 46-47.

⁴⁷ A maximum number of case files is assigned to each judge; for civil court judges, the limits are 150 cases per year at first instance and 70 cases per year on appeal.

⁴⁸ Association of Administrative Judges (2026), written input, p. 1; Country visit, Judicial associations.

⁴⁹ Judgment of the ECtHR, application 34012/20, *Vervele v. Greece*.

⁵⁰ Greek Government (2026b), pp. 44-45.

⁵¹ Country visit Greece, Greek Bar Associations.

⁵² The level of perceived corruption is categorised as follows: low (above 79); relatively low (between 79-60), relatively high (between 59-50), high (below 50).

2026 Special Eurobarometer on Corruption shows that 99% of respondents consider corruption widespread in their country (EU average 71%) and 68% of respondents feel personally affected by corruption in their daily lives (EU average 30%). As regards businesses, 95% of companies in Greece consider that corruption is widespread (EU average 65%) and 79% consider that corruption is a problem when doing business (EU average 37%). Furthermore, 23% of respondents find that there are enough successful prosecutions to deter people from corrupt practices (EU average 38%), while 20% of companies believe that people and businesses caught for bribing a senior official are appropriately punished (EU average 31%)⁵⁴.

The National Anti-Corruption Action Plan (NACAP) 2022-2025 was successfully implemented and a new plan is being finalised. In April 2026, the National Transparency Authority (NTA) published the final implementation report stating that over 80% of the Action Plan's actions were successfully implemented⁵⁵, with 18 incomplete or ongoing actions transferred to the new Action Plan⁵⁶. According to the final report, the 2022-2025 NACAP achieved strong, well-coordinated progress with high implementation and institutional improvements, particularly in digitalisation and control mechanisms. It was occasionally limited by delays, resource constraints and weak stakeholder engagement⁵⁷. The public consultation on the new NACAP 2026–2030, which was launched in March 2026, was completed on 14 April 2026.⁵⁸ It is envisaged to contain over 180 actions from all high-risk areas, to be implemented by all Ministries⁵⁹. The new Governor of the NTA was appointed in August 2025, and recruitment for inspectors-auditors and administrative staff continued at both central and regional level. In total, 374 positions are occupied (up from 364 in 2024) out of a total of 503 posts⁶⁰: 83 more inspector-auditor posts need to be filled. Civil society organisations expressed doubts whether the NTA is sufficiently staffed to cope with the increasing workload, which amounted to almost 5 000 reports in 2025⁶¹.

While the number of prosecutions and final judgments in corruption cases, including high-level corruption, remains limited, the legal framework is in place and implementing rules are being finalised for a digital registry that will allow a comprehensive monitoring and tracking of corruption cases⁶². Investigations on corruption offences by the Financial Police Division in 2025 decreased slightly, from 112 cases in 2024 to 105 in 2025⁶³. The data provided by the Economic Crime Public Prosecutor's Office show that prosecution was initiated in 18 cases in 2025 (compared to 10 in 2024 and 9 in 2023), with new cases amounting to 137 in 2025 (compared to 133 in 2024

⁵³ In 2021, the score was 49, while, in 2025, the score is 50. The score significantly increases/decreases when it changes more than five points; improves/deteriorates (changes between 4-5 points) and is relatively stable (changes from 1-3 points) in the last five years.

⁵⁴ Data from Special Eurobarometer 573 (2026) and Flash Eurobarometer 582 (2026).

⁵⁵ NTA (2026b), p. 4.

⁵⁶ Country visit Greece, NTA.

⁵⁷ NTA (2026b), pp. 1-6.

⁵⁸ Greek Government (2026c), p. 14.

⁵⁹ NTA (2026a), p. 2.

⁶⁰ Greek Government (2026a), written input, p. 54.

⁶¹ Country visit Greece, Civil Society Organisations.

⁶² The 2025 Rule of Law report recommended Greece to “continue efforts to establish a robust track record of prosecutions and final judgments in corruption cases, including high-level corruption.” 2025 Rule of Law Report, Greece, p. 2. Some progress was previously assessed on this recommendation in 2025, 2024 and 2023.

⁶³ Hellenic Police (2026), written input, p. 1.

and 144 in 2023)⁶⁴. Four foreign bribery cases⁶⁵ are still in the investigation phase⁶⁶ and to date, there has been no conviction for foreign bribery in Greece. Civil society expressed concerns about the limited number of final judgments in complex or high-level corruption cases, as well as the length of proceedings⁶⁷. While the legal framework on the unified registry for the monitoring of corruption cases has been adopted⁶⁸, work on the registry continues with a view to full operationalisation, expected on 1 January 2027⁶⁹. The registry will function as a single nationwide digital system of structured data and information on corruption cases covering all procedural stages⁷⁰. The registry aims to introduce, inter alia, a unified mechanism for case traceability, real time updating of procedural developments, and the systematic identification of delays, thereby enhancing the completeness, consistency and usability of the relevant data⁷¹. The authorities expect the new digital system to enable them to trace corruption cases across all procedural stages, address previously identified data fragmentation and enhance monitoring. Cooperation between the European Public Prosecutor's Office (EPPO), the police and the national prosecution offices remains broadly effective. The number of European delegated prosecutors has risen from seven in 2023 to thirteen in 2026⁷². In April 2026, Parliament lifted the immunity of 13 Members of Parliament in response to requests by the EPPO, allowing prosecuting authorities to proceed with the relevant cases⁷³. Overall, the legal framework for a digital register of corruption cases has been set up and the register is expected to be operational in the coming months; however, as the number of prosecutions and final judgments in corruption cases, including high-level corruption, remains low, there has been limited progress on this recommendation.

The police stepped up efforts to combat corruption, including internally, by implementing integrity measures and disciplinary proceedings. The Directorate of Ethics and Internal Control, set up in 2025, received a clearer mandate for internal control and disciplinary investigations, strengthening independence and procedural clarity. In 2025, 3 052 disciplinary proceedings were conducted, 100 police officers were temporarily suspended (compared to 87 in 2024) and 10 were dismissed. 1 579 complaints related to corruption offences were received, resulting in 140 arrests (compared to 1 312 and 187 respectively in 2024)⁷⁴. In addition, the new Directorate for Combating Organised Crime ensures a more interdisciplinary approach and intelligence-led policing regarding complex cases, which often

⁶⁴ According to the data provided by the Government, this makes up a total of 462 pending cases, representing a significant backlog. Greek Government (2026b), additional written input, annex, p. 2.

⁶⁵ The cases are dating from 2021, 2022, 2024 and 2025.

⁶⁶ Country visit Greece, Prosecutors.

⁶⁷ ENNHRI (2026), pp. 36-37.

⁶⁸ Law 5282/2026, Greek Government (2026b), p. 14 and annex on pillar II, p. 3.

⁶⁹ Joint ministerial declaration, JMD 39597/01.07.2026, GG B' 4189/ 09.07.2026.

⁷⁰ The oversight of the registry's operation is entrusted to a three-member committee of the Ministry of Justice, chaired by the Economic Crime Prosecutor. Greek Government (2026a), written input, p. 11.

⁷¹ Greek Government (2026c), pp. 13-14.

⁷² The Government considers having satisfied requests by the EPPO regarding staffing, financing and administrative support. Greek Government (2026c), p. 18.

⁷³ In other four cases, authorisation was not granted. The regime for parliamentary immunity protects MPs from prosecution only for actions tied to their duties. For unrelated offences investigations proceed without lifting immunity, but prosecution and trial require Parliament to lift it. Greek Government (2026b), p. 23. On the immunity for members of Government, see also Pillar IV. The EPPO reports that in some cases operational delays, under-resourcing, and the immunity enjoyed by members of Government have had an impact on the EPPO's and national prosecutors' ability to investigate and prosecute high-level corruption effectively. The decision of the Supreme Judicial Council of the Supreme Court to renew the term of office of three European Delegated Prosecutors for two years prompted reactions by the EPPO. EPPO (2026), written input, p. 19.

⁷⁴ Greek Government (2026c), p. 24.

involve corruption⁷⁵. The Directorate for Combating Organised Crime identified corruption as a key facilitator of organised crime, particularly in areas such as drug trafficking, smuggling, fuel and tobacco fraud, forged travel documents, cultural goods trafficking, financial crime, and weapons trafficking. Technological improvement, digitalisation, continuous staff training and international cooperation have been identified as key elements in resolving organised crime and corruption cases, which are becoming increasingly complex and require more resources⁷⁶.

The submission of asset declarations continues, including through a new electronic system, though delays in submissions and publications remain. Asset declarations must be submitted by several categories of obliged persons, including elected officials at all government levels and their spouses.⁷⁷ In 2025, the new electronic system ‘e-pothén’ was used by significantly more users compared to 2024⁷⁸ and almost one million obliged persons used it to submit their declarations⁷⁹. The NTA highlights the user-friendliness of the system, improved data accuracy, real-time cross-checking with other databases such as banking databases, and a sound risk analysis⁸⁰. Civil society organisations note that the deadline for the submission of asset declarations by public officials and other persons concerned for the financial year 2024 was extended, as in previous years⁸¹. The Parliament Committee for the Investigation of Declaration of Assets (CIDA) considers the delay in submissions was caused by the lack of familiarity with the new system⁸². There was also a delay in publication of asset declarations⁸³ by seven months, due to the need of manual cross-checks, data protection compliance checks and increased volume of spouse declarations⁸⁴. As regards gift disclosure, whereas gifts to Members of Cabinet are published, gifts to Members of Parliament are not disclosed in a publicly accessible register⁸⁵. The code of conduct for Members of Parliament has not yet been updated, as planned in the NACAP⁸⁶.

While implementation measures and awareness-raising activities are ongoing, no legislative changes have been introduced regarding the definition of lobbyists and the number of registered lobbyists remains low⁸⁷. The Greek Government has been working

⁷⁵ Country visit Greece, Hellenic Police.

⁷⁶ Country visit Greece, Hellenic Police.

⁷⁷ Country visit Greece, Parliament Committee for the Investigation of Declaration of Assets (CIDA).

⁷⁸ 1 284 901 users in 2025, compared to 521 484 in 2024. Country visit Greece, CIDA.

⁷⁹ Greek Government (2026c), p. 30.

⁸⁰ Country visit Greece, NTA. The Asset Declarations Audit Department of the Directorate of Economy and Development received 70 complaints and completed 26 audits in 2025. Greek Government (2026a), written input, pp. 64-65.

⁸¹ Civil Society (2026a), written input, p. 41.

⁸² In 2025, a total of 24 156 audits were carried out by the CIDA and the special audit bodies, as defined by asset declarations law 5026/2023. The Asset Declarations Audit Department of the Directorate of Economy and Development received 70 complaints and completed 26 audits in 2025, according to law 4622/2019. Greek Government (2026c), p. 25.

⁸³ According to the Government, certain delays in submissions and publications were reported especially during the transitional implementation phase. Greek Government (2026c), p. 11.

⁸⁴ Country visit Greece, CIDA. Declarations for 2023 and 2024 were only published in late September 2025. Such long delays make follow-up actions difficult and accountability mechanisms inefficient. Civil Society (2026a), written input, p. 41.

⁸⁵ Greek Government (2026a) and Civil Society (2026a), written inputs, pp. 65 and 44 respectively.

⁸⁶ NTA (2026a), pp. 3-4. Updating the Code of Conduct for MPs, as well as introducing an obligation to publish their register of gifts was also recommended to be included in the NACAP 2026-2030 by CSOs. Civil Society (2026a), written input, p. 40.

⁸⁷ The 2025 Rule of Law Report recommended Greece to “to improve the lobbying framework, including by reviewing the definition of a lobbyist and ensuring effective implementation.”

on raising awareness of the transparency obligations and the transparency register and training of government members, deputy ministers, and general and special secretaries of ministries and their offices⁸⁸. Since the register became operational in December 2022, entries have slightly increased, from 20 in July 2024 to 35 in March 2026. There are currently 320 institutional bodies registered (of which 280 have an active tenure), compared to 305 at the end of 2024. The narrow definition of a lobbyist, which does not cover in-house lobbyists, has not been amended⁸⁹. The Ministry of Interior has announced the intention to examine the extent and the depth of the amendment of the legislative scope. To this end it will organize a workshop and call for evidence in autumn 2026⁹⁰. Moreover, concerns have been raised by civil society organisations about the low number of declared meetings and informational inconsistencies between institutional stakeholders and lobbyists, as well as failure by some lobbyists to submit annual declarations. No inspections have been carried out and no sanctions imposed⁹¹. The 2025 Annual Report of the NTA on lobbying activities recorded in the Transparency Register has not yet been published⁹². Overall, while awareness-raising and institutional coordination efforts are being actively developed, no legislation expanding the definition of a lobbyist has been initiated. There has therefore been only limited progress on this recommendation.

Most political parties complied with the funding rules, while concerns remain regarding transparency and the implementation of the framework. In 2025, CIDA audited⁹³ 18 political parties, finding that most parties complied with financing rules⁹⁴. Nevertheless, eight violations have been detected⁹⁵, with penalties⁹⁶ imposed on six parties and warning letters sent to two⁹⁷. The audit of parties that participated in the June 2024 European Parliament elections did not identify any major violations. Civil society organisations report that shortcomings remain in both the legislative framework⁹⁸ and the practical implementation of political finance transparency rules, noting limited publication of relevant information by the competent authority, a lack of responses to information requests and complaints, and

⁸⁸ Training actions took place in the first half of 2026 under the framework of the “Leadership Academy” of the National Centre for Public Administration and Local Government, jointly with the NTA. Greek Government (2026a), written input, p. 12. Further implementation measures, including awareness-raising and institutional coordination, are being actively developed. Greek Government (2026c), p. 31.

⁸⁹ This was highlighted in the NTA’s February 2025 report on lobbying which recommended an extension of the scope of the law as regards the definition of ‘lobbyist’, in addition to a change in culture, a commitment to apply the rules by all parties involved and continuous monitoring and review of its procedures and regulations. 2025 Rule of Law Report, Greece and NTA (2026), written input, pp. 4-5.

⁹⁰ Greek Government (2026c), p. 28.

⁹¹ Civil Society (2025 and 2026a), pp. 39 and 39 respectively.

⁹² Law 4829/2021 requires the NTA to publish annual statistics and reports on registered lobbying activities.

⁹³ Referring to the fiscal year 2023.

⁹⁴ Law 5166/2024 clarifies that state funding for an electoral contest must be returned in case of non-participation in an election and will be suspended until certain criteria are met in cases where a party or coalition leader is convicted of a criminal offence. 2025 Rule of Law Report, Greece, p. 10.

⁹⁵ Greek Government (2026c), p. 28.

⁹⁶ Sanctions range from EUR 3 000 to 10 000, with additional penalties for certain more serious violations. Country visit Greece, CIDA.

⁹⁷ CIDA (2026), written input, p. 6.

⁹⁸ In their joint contributions to the 2023, 2024, 2025 and 2026 Rule of Law Reports, civil society organisations reiterated their misgivings about the adequacy of the legislative framework adopted in 2022 (PD 15/2022), notably regarding the use of special bank accounts and the transparency, accountability and objectivity of the audit mechanism. Civil Society (2023), p. 16.

concerns regarding the effective monitoring and enforcement of legal obligations related to the publication of political parties' financial statements⁹⁹.

The number of whistleblower reports remained stable. The Government stated that the number of reported cases, as well as their quality are increasing¹⁰⁰. In 2025, 74 whistleblower reports (82 in 2024) were submitted to the National Transparency Authority NTA, acting as the external reporting channel, of which four are being investigated and three have been forwarded to the competent authorities for a follow-up (five and two respectively in 2024)¹⁰¹. In addition, the NTA organised a number of training sessions for local government officials and the healthcare sector on the role of officers who receive and follow-up on whistleblower reports¹⁰². Civil society notes a lack of information on the website of the relevant authorities about internal reporting channels and reporting officers¹⁰³.

Recent reforms aim to address structural inefficiencies, enhance centralisation and strengthen transparency and efficiency in public procurement to reduce corruption risks. Businesses' attitudes towards corruption in the EU show that 45% of companies in Greece (EU average 30%) think that corruption has prevented them from winning a public tender in practice in the last three years. 23% of businesses perceive the level of independence of the public procurement review body (Single Independent Public Procurement Authority) as very or fairly good, which has significantly decreased in comparison with 2025 (39%)¹⁰⁴. The Single Market and Competitiveness Scoreboard on access to public procurement in Greece reports 58% of single bids for 2025 (EU average 27%). Public procurement and major infrastructure projects remain vulnerable to corruption¹⁰⁵. The Hellenic Single Public Procurement Authority (HSPPA) reported receiving mainly complaints relating to direct award of contracts without appropriate market research¹⁰⁶. The new Law 5218/2025 reforms the legal framework for public procurement with the aim of strengthening transparency, integrity and procedural efficiency by establishing a system of training and certification for civil servants handling public procurement. Additionally, the staff of the HSPPA was increased to reduce the length of proceedings and accelerate the examination of pre-contractual remedies¹⁰⁷. The Code of Conduct for Public Procurement Professionals has been published¹⁰⁸. Moreover, a Register of Public Procurement Professionals has been established, aiming to strengthen the professionalisation, integrity and accountability of officials involved in public procurement procedures¹⁰⁹. The functioning of the Integrated Licencing and Inspections Management System, which standardises and digitalises licencing processes and actions serving citizens, businesses and the public administration, is perceived positively by businesses, despite some

⁹⁹ Civil Society (2026a), written input, p. 42.

¹⁰⁰ Greek Government (2026b), additional written input, p. 16.

¹⁰¹ NTA (2026a), pp. 6-7; 2024 Annual Report, NTA, p. 20.

¹⁰² Greek Government (2026), written input, p. 87.

¹⁰³ Civil Liberties Union for Europe (2026), p. 17.

¹⁰⁴ Figure 59, 2026 EU Justice Scoreboard.

¹⁰⁵ Country visit Greece, Hellenic Police; Greek Government (2026b), additional written input, p. 27.

¹⁰⁶ This concerned in particular public tenders on clothes and footwear for the military, deliveries of perishable goods to hospitals and public street lighting. Country visit Greece, HSPPA.

¹⁰⁷ Greek Government (2026a), written input, p. 69.

¹⁰⁸ It is conceived as non-binding guidance that complements existing procurement legislation and integrity rules, helping practitioners interpret legal obligations and handle ethical dilemmas. The initiative was developed with support from the EU Technical Support Instrument (TSI). Country visit Greece, NTA.

¹⁰⁹ Registered officials are required to submit asset and interest declarations, declare any conflicts of interest, and comply with safeguards ensuring impartiality and independence. Greek Government (2026a), written input, pp. 69-70.

weaknesses, in particular lacking interoperability with other systems such as urban and road planning¹¹⁰. Beside public procurement, local government, social security and benefits, healthcare and EU funds are reported as the sectors most vulnerable to corruption risks¹¹¹.

III. MEDIA PLURALISM AND MEDIA FREEDOM

Strengthening of funding, staff and supervising role of the media regulator continues, including through new legislation, while adapting to the regulator's new competences. A new law has been adopted which further strengthens the mandate and resources of the National Council for Radio and Television (NCRTV), with a view to aligning with the European Media Freedom Act (EMFA)¹¹². In addition, in June 2026 a new law on licensing of free-to-air terrestrial digital television with regional scope was adopted by Parliament that is also intended to increase the national regulator's financial and human resources. A similar draft on the licensing of radio stations is to follow in the coming months and is regarded as a positive development for regional media and competitiveness across the media sector¹¹³. While there are still some vacancies, in 2025, new employees with various profiles joined NCRTV,¹¹⁴. In the meantime, NCRTV continues its internal reorganisation to accommodate new competences¹¹⁵ and notes the importance of successfully adapting its regulatory activities to the increasing digitalisation of the audiovisual media market¹¹⁶. Prior to the introduction of measures in 2026, the Media Pluralism Monitor (MPM) maintained its previous assessment of the independence and effectiveness of the Media Authority as high risk.¹¹⁷

For the first time, a self-regulatory body for the media sector is provided for by law. With a view to aligning with the EMFA, a new law provides for the establishment of the Hellenic Media Council, an independent self-regulatory body, with the participation of journalists, media owners, academics and civil society, and the State providing legal recognition and institutional space in line with the principle of self-regulation¹¹⁸. Yearly financial support to this structure is also provided, to be determined by an upcoming Ministerial decision. The Council is intended to promote public dialogue on issues relating to media freedom and strengthen media pluralism and editorial independence. Stakeholders welcomed this development and its potential impact to help address issues of transparency, trustworthiness and accuracy in the media sector and providing a forum for exchange between media service providers and journalists' unions, 4¹¹⁹. Moreover, in 2025, financial support measures were launched by the Government, notably to local and regional media, and a long-term State aid plan is being implemented to support the sector's digital transition¹²⁰.

¹¹⁰ Country visit Greece, business associations.

¹¹¹ Country visit Greece, NTA.

¹¹² Law 5253/2025; Greek Government (2026a), written input, pp. 90-93; European Media Freedom Act.

¹¹³ Greek Government (2026a), written input, pp. 90-93; Country visit Greece, Private Broadcasters.

¹¹⁴ NCRTV (2026), p. 1; Greek Government (2026a), written input, pp. 90-93.

¹¹⁵ Notably under Law 4779/2021 transposing the Audiovisual Media Services Directive, Law 5099/2024 implementing the Digital Services Act and Law 5253/2025 partially implementing the European Media Freedom Act.

¹¹⁶ NCRTV (2026), p. 3.

¹¹⁷ Media Pluralism Monitor (2026), p. 17.

¹¹⁸ Law 5253/2025; Greek Government (2026a), written input, pp. 92-93.

¹¹⁹ Country visit Greece, journalists.

¹²⁰ Greek Government (2026a), written input, pp. 37-38. The scheme, established by Joint Ministerial Decision E/1815/22.05.2026, has been approved by the European Commission.

A new law modernises and strengthens public service media’s governance, while concerns regarding political independence remain. A newly adopted law includes organisational changes in the administration and performance incentives for staff of the Hellenic Radio and Television Corporation (ERT), with a view to aligning with the EMFA. It also establishes a three months’ deadline for the submission of ERT’s annual report on the use of financial resources¹²¹. Stakeholders nevertheless continue to report concerns relating to the public service media’s independence, notably in view of the decreasing political or investigative content of public interest and of incidents of staff dismissal or programming discontinuation, exacerbated by precarious working conditions¹²². Concerns persist also with regard to leeway for appointments based on political considerations and the fact that ERT continues to be subject to the oversight by the General Secretariat for Communication and Media, placed under the responsibility of the Deputy Minister to the Prime Minister and Government Spokesperson¹²³. According to the Government the oversight is limited to institutional and administrative matters¹²⁴. The MPM has maintained its previous risk score of high risk with regard to the independence of public service media¹²⁵.

Transparency of state advertising is further improved with the adoption of new legislation, and funding measures to support the media sector are planned or have been adopted. With a view to aligning with the EMFA and in addition to the existing legal framework¹²⁶ which only allows media appearing in the Registry for Print Media (MET) and the Registry for Electronic Press (MHT) to be eligible for state advertising, a new law now requires all public sector bodies to disclose the expenditure allocated for state advertising, as well as the publication of an annual report on the allocation of state advertising expenditure by the national media regulator¹²⁷. The public “e-Pasithea” system provides full, real-time public access to every item of state advertising expenditure, and publishing obligations are extended to advertising planning for public bodies as well as to all amounts received in state advertising by media outlets¹²⁸. Furthermore, the adopted new law on licensing of free-to-air terrestrial digital television with regional scope also provides transparent and objective criteria with regard to eligibility for state advertising, including media concentration limits¹²⁹. The same legislative initiative also provides for the establishment of a unified National Media Ownership Database, consolidating information currently maintained in separate registries. Some stakeholders nevertheless note that the lack of transparency of state advertising and the dependency of some media outlets are problems still affecting media pluralism and editorial independence, namely during pre-election periods¹³⁰. The 2026 MPM notes the update of the legal framework and has maintained its medium to low-risk score for this area¹³¹. It continues to note high levels of media concentration as a problem in Greece, despite the new media

¹²¹ Law 5253/2025; Greek Government (2026a), written input, p. 95.

¹²² Country visit Greece, journalists; International Press Institute (2026), p. 15; Civil Society (2026a), pp. 47-49; ENNHRI (2026), p. 38.

¹²³ 2025 Rule of Law Report, Greece, p. 13.

¹²⁴ Greek Government (2026c).

¹²⁵ Media Pluralism Monitor (2026), p. 34.

¹²⁶ Law 5005/2022.

¹²⁷ Law 5253/2025; Greek Government (2026a), written input, pp. 93-94.

¹²⁸ Greek Government (2026c).

¹²⁹ Country visit Greece, Secretariat General for Communication and Media.

¹³⁰ Country visit Greece, journalists; International Press Institute (2026), pp. 18-19.

¹³¹ Media Pluralism Monitor (2026), Greece, pp. 32-33.

concentration limits foreseen in the new legislation on licensing of free-to-air terrestrial digital television.¹³²

New requirements relating to the legal framework on access to information as amended last year start being applied. New requirements have been introduced by Ministerial Decision regarding the filing of non-anonymous requests for access to documents in view of further amending the legal framework following the update of the Code of Administrative Procedure whereby it was clarified that documents can be requested either anonymously or with identification by any individual or legal entity unless the document contains personal data¹³³. Stakeholders consider such requirements, notably a certified digital signature, to be disproportionate¹³⁴. Moreover, stakeholders continue to indicate that there is a lack of awareness by public authorities about the applicable legal obligations and their scope. While the Government does not yet have aggregated data on such requests, it has asked all relevant public entities to gather such data by early July 2026¹³⁵. The 2026 MPM notes that “the right to information is legally protected, but challenges persist in balancing transparency with privacy and security considerations, particularly in the digital environment¹³⁶.”

As provided by law, a national action plan is in preparation to address threats to the safety of journalists. A newly adopted law establishes new competences for the Task Force on Safety of Journalists on the Protection, Safety and Empowerment of Journalists and Media Professionals, and mandates the adoption of a National Action Plan for the Safety of Journalists whose public consultation was launched on 24 June 2026¹³⁷. The draft Action Plan, currently under discussion in view of adoption in September 2026, aims to holistically address threats to the safety of journalists, strengthening their protection on the field. It further aims to strengthen the institutional response to such threats by recording incidents, developing early warning and supporting mechanisms, carrying out educational actions, and fostering cross-sectorial cooperation and coordination with EU mechanisms and institutions. In 2025, a new course on freedom of expression and the safety of journalists was introduced into the training programme of the Hellenic Police Academy and consultations are ongoing regarding the regular funding and sustainability of the International Training Center for the Safety of Journalists and Media Professionals¹³⁸. In June 2026, a proposal to enshrine in the Constitution the protection of journalists and their editorial independence was submitted by the ruling majority to the Parliament¹³⁹. A new collective labour agreement for journalists in

¹³² Media Pluralism Monitor (2026), p. 30.

¹³³ Article 1 of Ministerial Decision 8229/2025.

¹³⁴ Civil Society(2026a), pp. 54-55.

¹³⁵ Country visit Greece, Secretariat General for Communication and Media; Greek Government (2026a), written input, p. 38.

¹³⁶ Media Pluralism Monitor (2026), Greece, p. 7.

¹³⁷ Law 5253/2025; Greek Government (2026a and 2026b), pp. 99-103 and 34-37 respectively. The nationwide consultation cycle will bring together representatives of public authorities, journalists’ associations, academia, international organisations and civil society. The Task Force on the Safety of Journalists is in its fourth year of operation and has been recognised by the OSCE as a good practice.

¹³⁸ Greek Government (2026a), written input, pp. 34-37. The Centre has developed an innovative training model that brings together journalists and police officers in a structured learning environment, with the aim of enhancing journalist safety, improving communication during crises and strengthening respect for press freedom and human rights.

¹³⁹ The proposal includes amendments to Articles 14 and 15 of the Constitution, concerning the modernisation and rationalisation of the framework applicable to the press, television, radio and the internet. It takes into account the evolution of the contemporary media environment, including digital and electronic media. In particular, the proposal expressly refers to the protection of journalists and seeks to strengthen their safeguards also vis-à-vis their employers. Greek Government (2026c).

the public sector is expected to be signed within June 2026, introducing additional safeguards relevant to the safety of journalists¹⁴⁰. Further measures have been taken to address the economic pressures affecting the media sector and support employment, in particular an amount of up to EUR 16.8 million through the 2026 annual support programme. The 2026 MPM maintains its previous score of the area “journalistic profession, its standard and protection” as high risk¹⁴¹. The Council of Europe’s Platform to promote the protection of journalism and safety of journalists registered three alerts since the publication of the 2025 Rule of Law Report relating to the physical integrity and safety of journalists¹⁴². The Mapping Media Freedom platform registered twelve new alerts¹⁴³ since the publication of the 2025 Rule of Law Report relating to physical assaults or threats, legal intimidation and obstruction of access. Stakeholders continue to report incidents of attacks and threats against journalists¹⁴⁴, as well as difficulties accessing key sites, such as migration camps, for the purposes of investigative reporting and the absence of a collective agreement across the sector contributing to precarity of working conditions and salaries¹⁴⁵.

Additional measures have been taken to improve the safety and protection of journalists, in particular as regards abusive lawsuits¹⁴⁶. Stakeholders reported new cases that according to them qualify as SLAPPs and underlined the need to have adequate legislation in place¹⁴⁷. Draft legislation transposing the anti-SLAPP Directive was put to public consultation in July 2026, with adoption scheduled for the same month. According to the Government, the draft law proposes procedural safeguards for early dismissal of abusive proceedings in both cross-border and domestic cases¹⁴⁸. The Committee set up to work on the draft law has received proposals from representatives of ERT and the Panhellenic Federation of Journalists' Unions (POESY). Furthermore, a newly adopted law provides state funding to the SLAPPs Observatory of POESY¹⁴⁹. Overall, in addition to the measures adopted in previous years, there has been some further progress on the implementation of the recommendation.

¹⁴⁰ These include, in particular, provision for a certification scheme for the training of journalists for assignments in conflict / war zones, delivered by the International Centre for the Protection and Training of Journalists. Greek Government (2026c).

¹⁴¹ Media Pluralism Monitor (2026), Greece, p. 16.

¹⁴² Council of Europe Platform to promote the protection of journalism and safety of journalists (2025-2026). Greece has replied to all alerts. In general, according to the Government, Greece has answered 80% of all alerts registered since 2015.

¹⁴³ European Centre for Press and Media Freedom Mapping Media Freedom (2024-2025).

¹⁴⁴ Civil Society (2026a), pp. 50-52; Reporters without Borders (2026), written input, p. 17; Human Rights Watch (2026), p. 1; ENNHRI (2026), p. 36. Country visit Greece, journalists.

¹⁴⁵ Country visit Greece, journalists.

¹⁴⁶ The 2025 Rule of Law Report recommended to Greece to “continue ongoing efforts to strengthen legislative and non-legislative safeguards to improve the safety and protection of journalists, in particular as regards abusive lawsuits, in line with the adopted Memorandum of Understanding and taking into account European standards on the protection of journalists”. Significant progress was previously assessed on this recommendation in 2025 and some progress in 2024 and 2023.

¹⁴⁷ Country visit Greece, journalists; Civil Society(2026a), pp. 52-54; Reporters without Borders (2026), p. 18; International Press Institute (2026), p. 22; ENNHRI (2026), p. 16.

¹⁴⁸ Greek Government (2026a and 2026b), pp. 105-106 and 31-34; Human Rights Watch (2026), p. 2.

¹⁴⁹ Law 5253/2025; Greek Government (2026), p. 106; 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’).

IV. OTHER INSTITUTIONAL ISSUES RELATED TO CHECKS AND BALANCES

The process of constitutional revision has started, touching upon a range of rule of law issues. In February 2026, the Government officially announced the launch of the constitutional revision process and opened a public and political dialogue on the proposed amendments. In June 2026, the proposal by the ruling majority was formally submitted to Parliament¹⁵⁰, followed by the establishment of a cross-party constitutional revision committee, tasked with examining the proposed amendments within a two-month deadline¹⁵¹. The proposal consists of a package of reforms covering approximately 30 constitutional provisions, with the overarching objective of strengthening democratic institutions, the rule of law, and the effectiveness of public governance. Core issues under discussion include judicial independence, the protection of journalists, the regime for the prosecution of members of the Government and the principles of better regulation. The final vote on the constitutional amendments falls with the next Parliament¹⁵².

The quality of the legislative process shows improvements, yet challenges persist, including the frequent legislative changes. All draft laws in the reporting period were adopted through the ordinary legislative procedure without recourse to expedited procedures. Public consultation for draft laws was systematically conducted within the statutory two-week period¹⁵³. The percentage of additional provisions included in the final text of legislation without prior public consultation continued to decrease in 2025¹⁵⁴. At the same time, additional provisions are still being introduced in Parliament as amendments on the day before the Plenary vote and are often unrelated to the subject matter of the law¹⁵⁵. While regulatory impact assessments (RIAs) are systematically carried out for primary legislation, their analysis focuses predominantly on fiscal aspects¹⁵⁶. The OECD and national stakeholders consider that RIAs do not adequately assess the potential costs and benefits for businesses and citizens, do not provide sufficiently clear guidance on implementation, and that this contributes to frequent post-adoption amendments¹⁵⁷. The Economic and Social Council noted that for certain draft laws, public consultations were launched without accompanying RIAs, arguing that this hinders the proper and timely assessment of proposed measures¹⁵⁸. Stakeholders, including independent authorities, justice professionals, and business representatives, continue to stress the need for early engagement of interested parties

¹⁵⁰ Greek Government (2026c).

¹⁵¹ Several proposals by different parties were also submitted in parallel, as well as alternative amendments, mainly through the parliamentary committee.

¹⁵² The current Parliament must approve the provisions to be revised in two separate plenary votes and the next Parliament, following general elections, completes the revision process. Article 110 of the Greek Constitution.

¹⁵³ 36 out of 40 public consultations (opengov.gr); Greek Government (2026a), written input, pp. 111-117.

¹⁵⁴ In the reporting period, 9% of the articles included in the published law were not submitted for public consultation (16.5% for 2024; 34% for the period 2020-2022). The Economic and Social Council proposed an additional consultation period when a bill submitted to Parliament differs from the version previously subject to public consultation. Economic and Social Council (2025b), p. 6.

¹⁵⁵ During the reporting period, 29 (out of 36) amendments were submitted the day before the discussion in the Plenary (44 out of 48 in the 2025 Report). The average number of provisions per amendment dropped to 4 (4.5 between July 2024 and June 2025). See also, Plenary of Bar Associations (2026a); KEFIM (2026a and 2026b) and Civil Society (2026a), pp. 61-62.

¹⁵⁶ European Semester 2026, Greece, pp. 12 and 67-68.

¹⁵⁷ OECD (2025), pp. 152-153; Greek Government (2026b), p. 11; ENNRHI (2026), p. 31.

¹⁵⁸ Often lacking such an analysis for most of the consultation period. Economic and Social Council (2025a), pp. 7-8. Civil Society (2026a), p. 59.

in the law-making process¹⁵⁹. Efforts to promote the systematic codification of legislation are ongoing¹⁶⁰. However, the quality of legislation is adversely affected by the frequent legislative changes, often within very short time frames from enactment or prior amendment¹⁶¹. Fast-changing legislation is frequently quoted as a key challenge for doing business in the country and is the main reason for companies' lack of confidence in investment protection¹⁶². Judges, lawyers and notaries have also expressed concerns about consecutive changes in legislation, particularly procedural rules, as they affect legal certainty and undermine the stability, clarity and consistency of the legal framework¹⁶³. Delays remain in making available to the public the National Codification Portal, a database designed to provide free, consolidated, and up-to-date access to legislation¹⁶⁴. A proposal to include the principles of good legislation, including public consultation and ex post evaluation, in the Constitution has been submitted in the context of the ongoing constitutional revision¹⁶⁵.

Less than a third of companies surveyed in Greece express confidence in the effectiveness of investment protection. 25% of companies are very or fairly confident that investments are protected by law and courts, a figure which has slightly decreased in comparison with 2025 (28%). One of the main reasons among companies for their lack of confidence is concerns about quality, efficiency or independence of justice (38%). As regards authorities relevant for economic operators, 24% of companies perceive the level of independence of the national competition authority as very or fairly good, a figure which has significantly decreased in comparison with 2025 (41%)¹⁶⁶. The Council of State has jurisdiction in several business-related cases, including in cases related to public procurement, public concessions, public contracts and economic regulation. A number of judicial mechanisms to improve efficiency are available in these cases, including the possibility to apply interim measures, joint examination of similar cases, the consolidation of multiple appeals¹⁶⁷.

Reforms seek to target the administration's delays in enforcing final judgments. The current remedy before the three-member compliance committees¹⁶⁸ was considered ineffective by the European Court of Human Rights, as it lacks mechanisms to expedite

¹⁵⁹ Country visit Greece, Ombudsman, DPA, NCHR, Greek Bar Associations, Judicial associations and Business associations.

¹⁶⁰ Greek Government (2026a), written input, pp. 113-114.

¹⁶¹ At least 15 laws enacted in 2025 included provisions amending legislation adopted the same year. Since July 2025, the Code of Civil Procedure has been modified several times with further extensive changes introduced in February 2026 to correct shortcomings and supplement the provisions of Law 5221/2025.

¹⁶² Figure 53, 2026 EU Justice Scoreboard. 40% of the surveyed investors referred to frequent changes in legislation (58% in 2025).

¹⁶³ Country visit Greece, Supreme Court, Council of State, Judicial associations, Greek Bar Associations and Association of Notaries.

¹⁶⁴ The portal was set to launch by early 2025, but its development has faced technical difficulties due to the large, fragmented body of laws, and the need to ensure that the texts are accurate and up to date; Greek Government (2026b), additional input, pp. 40-4; 2024 Rule of Law Report, Greece, p. 25.

¹⁶⁵ Greek Government (2026c).

¹⁶⁶ Figures 52, 53 and 60, 2026 EU Justice Scoreboard.

¹⁶⁷ Figures 66 and 67, 2026 EU Justice Scoreboard. The data presented reflects exclusively the mechanisms in place at the level of the highest administrative jurisdictions; the same or other mechanisms may be in place at lower instance administrative courts.

¹⁶⁸ Law 3068/2002. A three-member council in the issuing jurisdiction reviews, upon request by the affected party, if the administration has complied with the judicial decision and, if not, sets a deadline for compliance.

execution when authorities refuse to comply with final judgments¹⁶⁹. In response, the Government has prepared draft legislation to reform the procedure. Key elements include the participation of the administration in the proceedings before the compliance committee, binding decisions specifying the required actions and the responsible bodies, daily penalties for non-compliance and interim measures until full enforcement. An internal monitoring mechanism was also established in April 2026 tasking internal audit units with tracking implementation, identifying systemic failures, and triggering disciplinary proceedings¹⁷⁰.

The immunity regime for members of Government remains debated, with broad agreement on the need for reform. Under the Constitution, the power to investigate and prosecute former or incumbent ministers rests solely with Parliament, effectively excluding such cases from the mandate of criminal justice authorities. Following the reform during the 2019 constitutional revision¹⁷¹, the constitutional framework governing the criminal liability of members of Government is currently the subject of further revision proposals aimed at strengthening accountability mechanisms, ensuring equal treatment under the law and helping restore public trust in institutions and the justice system. Revising Article 86 of the Constitution is considered a priority and there is a common understanding among stakeholders that the requirement for parliamentary approval before prosecuting ministers should be abolished¹⁷². National prosecutors and the EPPO cite the existing legal framework on ministerial immunity as an institutional challenge to their work¹⁷³. The ruling majority has proposed to transfer the investigation of alleged offences by ministers from Parliament to the ordinary judiciary, while Parliament would retain the power to decide, by absolute majority, whether to prosecute a minister or former minister for offences committed in the exercise of official duties¹⁷⁴.

Judicial scrutiny of certain aspects of the use of spyware continues. In February 2026, the first instance court of Athens delivered convictions against four individuals connected to the marketing of the Predator software for misdemeanour offences, including breaches of communication privacy and unauthorised data access¹⁷⁵. The court also transmitted the records of the proceedings for further investigations into broader offences and the possible involvement of additional persons. The decision was widely welcomed by stakeholders as a

¹⁶⁹ *Kanellopoulos v. Greece*, application 11325/06 (leading case under supervision at the Committee of Ministers of the Council of Europe); *Meletiou and Others v. Greece*, application 28737/23 and *Dervisis and Others v. Greece*, application 55398/20.

¹⁷⁰ Internal audit units under Law 4975/2021 are independent bodies within public entities that assess the legality, efficiency and transparency of their operations.

¹⁷¹ The reform abolished the special short statute of limitations for ministers' criminal liability, aligning prosecution deadlines with the ordinary criminal law, while retaining Parliament's role in investigating and authorising prosecution.

¹⁷² Country visit Greece, Ministry of Justice, Greek Bar Associations, Judicial associations, Court of Audit and Civil Society Organisations; Greek Government (2026a), written input, pp. 136.

¹⁷³ Country visit Greece, prosecutors; Greek Government (2026b), p. 23; EPPO (2026), written input, p. 19. European Chief Public Prosecutor, press conference, Athens, October 2025. In late July 2025, following the transfer of information by the European Public Prosecutor's Office (EPPO), Parliament rejected proposals to initiate a formal investigation into two former ministers for alleged criminal offences related to the misuse of EU agricultural funds. In April 2026, another transfer of cases relating to agricultural subsidies included information on two former Members of Government, with the Parliament rejecting in May 2026 requests for a parliamentary investigation into possible criminal liability.

¹⁷⁴ Greek Government (2026c).

¹⁷⁵ The court ruled that the Predator software was used in 87 substantiated cases to target individuals, including politicians, journalists, military personnel, and business leaders. 2025 Rule of Law Report, Greece, p. 14.

step forward¹⁷⁶. The defendants appealed, with the new trial scheduled for December 2026. In late April, the General Prosecutor of the Supreme Court, tasked with overseeing the most serious strands of the investigation, declined to reopen the case, considering that the evidence presented did not meet the threshold for new facts. The decision sparked concerns among journalists, victims, lawyers, opposition parties and civil society, including about a possible conflict of interest due to the General Prosecutor's previous role in overseeing the National Intelligence Service during part of the period under investigation¹⁷⁷. New requests to reopen the case have been submitted and certain subsidiary investigations are still continuing by lower prosecutors. Meanwhile, separate cases before the Council of State¹⁷⁸ and the European Court of Human Rights regarding transparency and state obligations remain ongoing¹⁷⁹.

New staff positions have been approved for the Constitutional Independent Authorities, while their key request for an autonomous staff recruitment system remains to be addressed. Prolonged delays in appointing members of Constitutional Independent Authorities persist due to lack of political consensus in the Conference of Presidents of Parliament, the competent body for their appointment¹⁸⁰. While mandate extensions have ensured operational continuity in many cases, recent resignations underscore their limitations, and the forthcoming constitutional revision invites discussion on reviewing mandate durations and/or introducing further anti-deadlock safeguards¹⁸¹. In July 2025, the Data Protection Authority (DPA) was granted the power to amend its organigram, and in October 2025 the Government approved several new staff positions for the Constitutional Independent Authorities¹⁸². While welcoming the additional posts, the DPA and the Ombudsperson stressed that reliance on centralised recruitment leads to rigid, excessively long procedures, leaving even long-approved posts unfilled, as prolonged hiring procedures deter qualified candidates¹⁸³. Their priority remains a self-managed, flexible and expedited recruitment system enabling them to recruit, allocate and prioritise staff according to their needs. As an equality body under EU law, the Ombudsman is also required to recruit its own staff¹⁸⁴. Other independent, primarily regulatory, administrative authorities already benefit from more flexible processes¹⁸⁵. The National Commission for Human Rights (NCHR) has submitted proposals to the Government aimed at strengthening its institutional capacity, including the allocation of additional staff and the provision of enhanced operational tools, to ensure the

¹⁷⁶ Civil Society (2026a); International Press Institute, RSF, CCBE, FRA (2026), written inputs, pp. 16-17, 19, 17, 122 and 106 respectively. Country visit Greece, journalists, Greek Bar Associations and NCHR.

¹⁷⁷ The Plenary of the Bar Associations called for the resignation of the General Prosecutor, Plenary of Bar Associations (2026c) and (2026d). Civil Society (2026c), pp. 2-3.

¹⁷⁸ The case concerns a journalist's request for disclosure of the reasons for his surveillance by the National Intelligence Service, with the Council of State ordering the submission of the interception file in May 2026.

¹⁷⁹ *Androulakis v. Greece*, no 20986/24 relating to the phone interception of a Greek Member of the European Parliament by the National Intelligence Service and its alleged refusal to disclose the reasons for the surveillance.

¹⁸⁰ The appointments of a new Ombudsperson, the President and three members of the Data Protection Authority (DPA) (expired in 2022), the President of the Authority for Communication Security and Privacy (ADAE), two Vice-Presidents and seven members of the Supreme Council for Civil Personnel Selection (ASEP) (expired in 2025). See also, 2025 Rule of Law Report, Greece, pp. 18-19.

¹⁸¹ The Head of ADAE resigned after the end of his mandate in July 2025 and the Head of DPA resigned in March 2025 after an extended mandate of almost nine years (instead of six). Venice Commission (2025).

¹⁸² DPA: 20 positions; Ombudsman: 1; ADAE: 8 and ASEP:30. Greek Government (2026a), p. 120.

¹⁸³ The Constitutional Independent Authorities recruit their staff through selection procedures organised by the ASEP. 2024 Rule of Law Report, Greece, pp. 26-27.

¹⁸⁴ The establishment of its own staff selection process is the only remaining arrangement for the Ombudsperson to be fully compliant with the Principles of the Venice Commission (CDL-AD(2019)005-e).

¹⁸⁵ Law 5043/2023 introduced exemptions from ASEP's standard recruitment procedures for several administrative authorities, with ASEP assuming a more limited role.

effectiveness of its work¹⁸⁶. The study on improving the institutional arrangements of all existing independent authorities, carried out by the OECD and funded under the European Commission's Technical Support Instrument, is currently being finalised¹⁸⁷.

Decisions to initiate criminal proceedings for two incidents involving law enforcement officers have been welcomed by stakeholders, while deficiencies remain in the investigation of alleged misconduct. In May 2026, the Prosecutor of the Court of Appeal of Piraeus ordered the criminal prosecution of the commander of the Hellenic Coast Guard vessel involved in a fatal incident back in 2023. This followed the decision to expand the indictment related to the Pylos shipwreck, in November 2025, adding criminal charges against four senior officers, including the Chief of the Hellenic Coast Guard¹⁸⁸. Stakeholders welcomed developments in these two cases, while raising concerns about the effectiveness of criminal investigations in other cases that were subsequently archived¹⁸⁹. In February 2026, the Ministry of Maritime Affairs and Insular Policy launched an administrative inquiry into the Pylos shipwreck to be carried out by the Chief of the Navy¹⁹⁰. Disciplinary proceedings into the incident have yet to be initiated, in line with repeated requests by the Ombudsperson¹⁹¹. In another recent case, the Ombudsperson reiterated the need for an independent, thorough and effective investigation, making concrete suggestions to this end¹⁹². More broadly, the Ombudsperson expressed concerns that all cases that his services referred to the competent authorities for further investigation due to identified shortcomings were ultimately archived¹⁹³. The Committee of Ministers of the Council of Europe continues to supervise the adoption of measures concerning the lack of effective investigation in the context of law enforcement¹⁹⁴. In March 2026, the Committee of Ministers expressed regret at the lack of progress in the conduct of targeted wide-scale training activities for prosecutors and judges, including of naval courts and urged the authorities to take further action¹⁹⁵. In May 2026, the National Transparency Authority was designated as the independent monitoring mechanism for fundamental rights during border screening and border asylum procedures¹⁹⁶. Also, a new disciplinary framework for the Coast Guard is being drafted, aiming to modernise its disciplinary system, including clearer offence classifications, updated procedural rules and new investigative mechanisms¹⁹⁷.

¹⁸⁶ The NCHR is the National Human Rights Institution, accredited with A status by the Global Alliance of Human Rights Institutions. As part of its re-accreditation process, the NCHR received recommendations to reinforce its independence, effectiveness, and alignment with international standards. The proposals submitted by the NCHR aim to comply fully with these recommendations. ENNHRI (2026), p. 5.

¹⁸⁷ Greek Government (2026c); 2025 Rule of Law Report, p. 19.

¹⁸⁸ Following an appeal by survivors. Civil Liberties Union for Europe (2026), p. 27; Civil Society (2026a), p. 21. In May 2025, criminal charges were brought against 17 members of the Hellenic Coast Guard.

¹⁸⁹ Civil Society (2026a) and (2026b), pp. 5-6.

¹⁹⁰ Greek Government (2026b), additional written input, p. 59.

¹⁹¹ The Ombudsperson found in February 2025 that the coast guard committed serious failures and referred the findings to the authorities for action. 2025 Rule of Law Report, Greece, p. 19. Greek Ombudsman (2026c).

¹⁹² Including that the preliminary investigation and collection of evidence is not carried out by officers of the bodies involved in the incident. Greek Ombudsman (2026a); NCHR (2026b); Greek Bar Associations (2026).

¹⁹³ Greek Ombudsman (2025) and (2026d); ENNHRI (2026), pp. 35-36.

¹⁹⁴ In the context of the execution of the *Sidiropoulos and Papakostas* and *Alkhatib and Others* groups of cases.

¹⁹⁵ Council of Europe: Committee of Ministers (2026).

¹⁹⁶ With a mandate to oversee compliance with fundamental-rights standards and examine allegations of violations. Article 39 of Law 5303/2026 was adopted to implement requirements stemming from the EU Pact on Migration and Asylum.

¹⁹⁷ Greek Government (2026a), written input, p. 136.

On 1 January 2026, Greece had 36 leading judgments of the European Court of Human Rights pending implementation, an increase of 6 compared to the previous year¹⁹⁸. At that time, Greece's rate of leading judgments from the past ten years that had been implemented was at 62% (compared to 66% in 2025; 38% remained pending), and the average time that the judgments had been pending implementation was 5 years and 2 months (compared to 6 years and 1 month in 2025)¹⁹⁹. The oldest leading judgment, pending implementation for 18 years, found violations of freedom of association²⁰⁰. As regards the respect of payment deadlines, on 31 December 2025 there were 19 cases in total awaiting confirmation of payments (compared to 7 in 2024)²⁰¹. On 17 June 2026, the number of leading judgments pending implementation had increased to 40²⁰².

There has been some further progress on developing a regular and sustained structured dialogue and on simplifying registration requirements for civil society organisations in view of maintaining an open framework for them to operate²⁰³. Structured dialogues should be regular, long-lasting and result-oriented in order to allow for effective engagement and participation of citizens and civil society organisations²⁰⁴. In May 2026, the Ministry of Asylum and Migration (MoMA) adopted a ministerial decision, which included a provision on structured dialogue with civil society organisations and committed to hold regular meetings at least twice a year²⁰⁵. The MoMA held a first meeting in June 2026, during which they presented the proposed timeline, structure, thematic pillars and collaborative tools to facilitate meaningful exchanges among participants. They have invited CSOs to provide their concrete proposals on the conduct of the dialogue in the coming months, ahead of a second meeting scheduled for the end of 2026. The Ministry of Interior plans to conduct an electronic survey to map the needs of CSOs and hold dedicated meetings²⁰⁶. The number and complexity of registration requirements for CSOs remains a challenge. In February 2026, MoMA amended the registration requirements for its two Registries, limiting mandatory registration to CSOs receiving state/EU funding or operating in its facilities²⁰⁷, but retained the requirement for all members, employees and associates of these CSOs to register. The list of criminal offenses preventing registration was expanded to include not only final convictions but also ongoing prosecutions of CSOs' legal representatives. A ministerial decision adopted in May 2026 introduced some positive changes, such as reducing documentation requirements and streamlining procedures by eliminating the need for a three-member committee's opinion. However, it also preserves a margin of administrative

¹⁹⁸ For an explanation of the supervision process, see the website of the Council of Europe.

¹⁹⁹ All figures calculated by the European Implementation Network (EIN) and based on the number of cases that are considered pending at the annual cut-off date of 1 January 2026. EIN (2026), written input, p. 4.

²⁰⁰ Judgment of the ECtHR, 35151/05, *Bekir-Ousta and Others v. Greece*, pending implementation since 2008. ABTTF (2026), written input, pp. 9, 12 and 26.

²⁰¹ Council of Europe (2026), p. 162.

²⁰² Data according to the online database of the Council of Europe (HUDOC).

²⁰³ The 2025 Rule of Law Report recommended to Greece to “develop a regular and sustained structured dialogue with CSOs and simplify registration requirements in view of maintaining an open framework for them to operate”. Limited progress was assessed on this recommendation in 2025 and some progress in 2024 and 2023.

²⁰⁴ European Commission Recommendation (EU) 2023/2836 of 12 December 2023 on promoting the engagement and effective participation of citizens and civil society organisations in public policy-making processes.

²⁰⁵ Ministerial decision 82876/2026; Greek Government (2026b), additional written input, pp. 50-51.

²⁰⁶ Greek Government (2026c).

²⁰⁷ The Registry of Greek and Foreign Non-Governmental Organisations (‘NGO Registry’) and the Registry of NGO Members. Law 5275/2026. Under the previous framework, the obligation to register applied to all CSOs active in the fields of international protection, migration, and social inclusion.

discretion, allowing the competent authority to refuse registration on the basis of broader evaluative considerations extending beyond the formal fulfilment of the prescribed legal requirements²⁰⁸. In parallel, the anticipated interoperable information system among the MoMA Registries and the Registries of the Ministry of Interior²⁰⁹ is expected to be completed in October 2026, to allow CSOs to submit data only once²¹⁰. Meanwhile, in January 2026, the Ministry of Interior created a new platform, the Observatory of CSOs and Other Non-Commercial Entities, to map CSOs and enhance visibility and engagement²¹¹. The existence of different registries creates logistical challenges, as all are maintained in parallel, requiring the creation of interoperability databases²¹². Stakeholders criticized the measures²¹³. Further delays in a long-pending case before the Council of State, challenging CSO registration requirements, with a new hearing held in late June 2026, impacts other court applications by CSOs²¹⁴. Overall, while the registration framework remains fragmented, some steps have been taken and the basis for a structured dialogue with CSOs has been laid. There has therefore been some further progress on the implementation of the recommendation.

Civil society organisations, particularly those active in migration and human rights, face an increasingly challenging environment. Civic space in Greece continues to be rated as “obstructed” by Civicus²¹⁵. In February 2026, CSO membership became an aggravating factor in certain migration-related offences, meaning that CSO members can face harsher penalties²¹⁶. The Minister of Migration can deregister a CSO after charges have been brought against one of its members, without awaiting a final court ruling. The Government maintains that the rules promote CSO accountability, while humanitarian actions are explicitly exempted²¹⁷. International organisations, including the United Nations and the Council of Europe, independent authorities and other stakeholders have been very critical²¹⁸. Civil society organisations warn that the law criminalises humanitarian work and creates a chilling effect²¹⁹. Several public statements by senior government officials targeting human rights

²⁰⁸ Ministerial decision 82876/2026, Article 3 para 4 c).

²⁰⁹ The Public Database and the Special Registry of the Ministry; registration is required to apply for state funding. 2023 Rule of Law Report, Greece, p. 27.

²¹⁰ Greek Government (2026b and 2026c), pp. 53-54.

²¹¹ Registration is free of charge and carried out electronically using the tax system credentials. Entities already in the two Registries of the Ministry of Interior are registered automatically. The Observatory will also function as the Registry of Non-Commercial Economic Activity, provided by Law 4919/2022.

²¹² There are more than eleven Registries managed by different ministries and additional ones held at local and regional level. 2025 Rule of Law Report, pp. 20-21.

²¹³ United Nations (2026); Council of Europe, Expert Council on NGO Law (2026); Greek Ombudsman (2026); NCHR (2026a); Economic and Social Council of Greece (2026).

²¹⁴ The case was first heard by the Plenary of the Council of State in December 2022, but a new hearing was scheduled after the case was assigned to a different judge rapporteur. The delay has stalled several pending applications against registration refusals, as their proceedings remain suspended until the Council of State rules on the legality of the legal framework. Civil Society (2026b), pp. 10-12.

²¹⁵ The score is 51/100. Rating by CIVICUS are on a five-category scale defined as: open, narrowed, obstructed, repressed and closed; Civicus (2026), Monitor tracking civic space-Greece.

²¹⁶ Articles 15 and 16 of Law 5275 /2026. Membership in a registered CSO increases the penalties for facilitating entry, stay, or exit of third-country nationals, withholding travel documents, or submitting false information, raising imprisonment from 1-2 years to up to 10 years, and can also trigger CSO deregistration.

²¹⁷ The aggravating factor is explained by the potential abuse or exploitation of one’s role as a CSO member, highlighting the contradiction between the criminal conduct and CSOs’ purpose of supporting international protection, migration, and social inclusion. Greek Government (2026b), additional written input, pp. 48-49.

²¹⁸ United Nations (2026); Council of Europe, Expert Council on NGO Law (2026); Greek Ombudsman (2026a); NCHR (2026a); Economic and Social Council of Greece (2026); FRA (2026) p. 98.

²¹⁹ HIAS Greece (2026); Civil Society (2026a), pp. 82-83.

defenders, legal practitioners, journalists and civil society organisations have prompted further reactions²²⁰.

The Council of State is engaging in awareness campaigns to instil a rule of law culture among young people. The Council of State hosts study visits for schools and universities, during which students observe trials and learn about the Court's history, functions and the broader institution of justice. Special mock trials are also organised for preschool children. In October 2025, the Council of State launched a cooperation with the Ministry of Education to explore integrating topics such as the justice system, rule of law principles and legal awareness into school curricula. The Council of State is developing educational materials for distribution to schools as part of this²²¹.

²²⁰ United Nations (2025); OHCHR (2026), FRA (2026) and Human Rights Watch (2026), written inputs, pp.6, 99-100,102, and 3 respectively; Council of Europe, Conference of INGOs (2025); Greek Bar Associations (2026); UNHCR/GNCHR (2025); ENNHRI (2026), pp. 14-16; Civil Society (2026a and 2026b), pp. 86-88 and 2 respectively, Civil Liberties Union for Europe (2026), p. 25; Vouliwatch (2026).

²²¹ Greek Government (2026a), written input, pp. 23-24.

Annex I: List of sources in alphabetical order*

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Annex II: Country visit to Greece

The Commission services held virtual meetings in March 2026 with:

- Association of Administrative Judges
- Association of Judges and Prosecutors
- Association of Judges of the Court of Audit
- Association of Notaries
- Committee of Parliament for the Investigation of Declarations of Assets (CIDA)
- Council of State
- Court of Audit
- Federation of Industries of Greece (SVE)
- Foreign Press Association Greece
- Greek Bar Associations
- Greek Council for Refugees
- Greek Ombudsman
- Hellenic Data Protection Authority
- Hellenic Federation of Enterprises (SEV)
- Hellenic League for Human Rights
- Hellenic Single Public Procurement Authority (HSPPA)
- HIAS Greece
- Homo Digitalis
- Ministry of Citizen Protection, Hellenic Police
- Journalists' Union of Athens Daily Newspaper (ESIEA)
- Ministry of Interior
- Ministry of Justice
- Ministry of Migration and Asylum
- National Association of National Private Broadcasters
- National Audiovisual Regulator
- National Commission for Human Rights (NCHR)
- National Transparency Authority
- Office of the Prosecutors to the Supreme Court and Office of the Prosecutor for Financial Crimes
- Panhellenic Federation of Journalists' Unions (POESY)
- Refugee Support Aegean
- Reporters United
- Secretariat General for Communication and Media
- Solomon
- Supreme Court
- Transparency International Greece
- Vouliwatch

* The Commission also met the following organisations in a number of horizontal meetings:

- Civil Liberties Union for Europe
- Civil Society Europe

- End FGM EU
- European Civic Forum
- European Partnership for Democracy
- Human Rights Watch
- ILGA-Europe
- International Federation for Human Rights
- Philea - Philanthropy Europe Association
- Transparency International EU