

**HELLENIC REPUBLIC**  
**GREEK NATIONAL COMMISSION FOR HUMAN RIGHTS**

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<p><b>Comments on the Report to be Submitted by Greece under article 9 paragraph 1 of the International Convention for the Elimination of All Forms of Racial Discrimination</b></p>
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The report is well substantiated and drafted in accordance with the guidelines issued by CERD. The Report illustrates, as expected, the important positive steps that Greece has taken the past few years to combat racial discrimination. The NCHR has repeatedly dealt with questions falling within the scope of the UN Convention by submitting recommendations to the Government. The NCHR based on its previous decisions and factual information, taking also into consideration the practice of the Committee, drafted several comments which could be used to enrich the Greek Report.

The comments of the NCHR focused on the following issues:

- a) the demographic composition of Greece;
- b) the new anti-discriminatory legislation (the NCHR underlined the weaknesses of the new legislation and repeated the measures that need to be taken to strengthen the legal framework);
- c) minority issues, especially in the light of judgments of the ECtHR versus Greece;
- d) Roma issues (current problems and required initiatives);
- e) rights of immigrants (weaknesses of the new immigration law, political rights);
- f) questions of human trafficking;
- g) refugees and asylum seekers issues (significant problems in the asylum procedure;

- h) police brutality;
- i) detention conditions;
- j) religious freedom;
- k) right to citizenship (problems arising from the abrogation of former article 19 of the Code of Citizenship);
- l) freedom to assembly;
- m) right to education (in relation to refugees and immigrants);
- n) implementation mechanisms of the new anti-discriminatory legislation (weaknesses of the system, insufficient dissemination);
- o) media (prejudice against certain vulnerable groups).

14 February 2008