



HELLENIC REPUBLIC
GREEK NATIONAL COMMISSION FOR HUMAN RIGHTS

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The European Court of Human Rights
Third Section

Athens, 28 March 2024

R.N.: 240

RE: Written submission to the European Court of Human Rights (Third Section) made by the Greek National Commission for Human Rights as a third party, in relation to Applications nos. 15067/21 - G.R.J. v. Greece, and 15783/21 - A.E. v. Greece

On 20 February 2024, the President of the Third Section invited the Greek National Commission for Human Rights to intervene, according to Article 36 § 2 of the Convention and Rule 44 § 3 (a) of the Rules of Court, in relation to Applications nos. 15067/21 – G.R.J. v. Greece, and 15783/21 – A.E. v. Greece, and answer the question:

Has there been a systematic practice of refoulement of foreign nationals by the Greek authorities to Türkiye at land and sea borders?

Our answer has as follows:

A. The Greek National Commission for Human Rights & the Recording Mechanism of Informal Forced Returns: Operational scope & competence.

- (1) The Greek National Commission for Human Rights (hereinafter: GNCHR) was established by Law 2667/1998 as the independent advisory body to the Greek State on human rights issues, in accordance with the *Paris Principles* adopted by the United Nations General Assembly Resolution A/RES/48/134, 20.12.1993, and is the National Institution for the protection and promotion of Human Rights (NHRI) in Greece. The founding legislation of the GNCHR was amended by Law 4780/2021, under which the GNCHR has acquired legal personality, institutional independence as well as functional, administrative, and financial autonomy. Since 2001, the GNCHR is accredited by the competent GANHRI Sub-Committee on Accreditation as an A status NHRI, in full compliance with the UN Paris Principles, in recognition of its full independence and effective fulfilment of its role.
- (2) According to Law 4780/2021, the mission of the GNCHR includes the constant monitoring of developments regarding human rights protection; the continuous updating and promotion of the relevant research; the maintenance of permanent contacts and co-operation with international organizations, such as the United Nations, the Council of Europe, OSCE, other National Human Rights Institutions as well as with national or international Non-Governmental



Organisations; and the formulation of proposals in the field of human rights policy.

- (3) Since its establishment, the GNCHR has attached particular importance to the continued respect of human rights of refugees and migrants residing in Greece. Already in 2018, the GNCHR, taking into account complaints on incidents of informal forced returns (hereinafter IFRs) from Greek territory to third countries brought up by several of its civil society organisations members, including the Hellenic League for Human Rights (HLHR)¹ and the Greek Council for Refugees (GCR),² discussed the subject in its Plenary and issued a first *Statement*³ and subsequently a second *Statement*,⁴ calling on the Greek authorities to respect the principle of non-refoulement and to thoroughly investigate the relevant complaints.
- (4) In 2019, the GNCHR in its *Reference Report on the Refugee and Migration Issue (Part A)*,⁵ called on the Greek authorities to take all appropriate measures to ensure compliance with the principle of non-refoulement; ensure unimpeded, early and effective access to International Protection Procedures for all the third-country nationals arriving informally, without any discrimination based on race, religion, nationality, membership of a social group or political opinion; and ensure the immediate and thorough investigation of all complaints of informal forced returns in the region of Evros River. A more comprehensive assessment of the situation of refugees and migrants and the protection of their respective rights was presented by GNCHR in the updated *Report on the Refugee and Migration Issues (Part B)* in September 2020.⁶ In July 2021, in its *Report on the State of Migrants' Rights at Borders*⁷ the GNCHR highlighted specific issues related to the situation of migrants and respect for their rights at the borders, including allegations concerning IFRs and reported use of

¹ See: HLHR, *Complaint on refoulements from the region of Evros River*, 6 February 2018, available only in Greek at: <http://tinyurl.com/mrxptdjz>, and HLHR Press Release, *More refoulements of Turkish asylum seekers in Evros*, 06.06.2017, available at: <http://tinyurl.com/5n7hczc>.

² GCR, *Reports of systematic pushbacks in the Evros region*, 20.02.2018, available at: <http://tinyurl.com/389ajczc>, and GCR Press Release, *GCR submits complaints after refugees' allegations of pushbacks at the region of Evros*, 19.06.2019, available only in Greek at: <http://tinyurl.com/44varks2>.

³ GNCHR, *Statement on the allegations of irregular push backs in Evros*, July 2017, available only in Greek at: <http://tinyurl.com/9jydemtu>.

⁴ GNCHR, *Statement on complaints regarding informal pushbacks at the region of Evros*, 29.11.2018, available at: <http://tinyurl.com/5e2u7ymu>.

⁵ GNCHR, *Reference Report on the Refugee and Migrant Issue, Part A Refugees*, September 2019, available only in Greek at: <http://tinyurl.com/5dczaj2b>. A summary and the Key Recommendations of this Report are available in English at: <http://tinyurl.com/mrxnr97y>.

⁶ GNCHR, *Reference Report on the Refugee and Migrant Issue, Part B*, September 2020, available at: <http://tinyurl.com/283r8h4b>.

⁷ GNCHR, *National Report on the Situation of Human Rights of Migrants at the Borders*, July 2021, available at: <http://tinyurl.com/2nb94ucr>.



violence; as well as to the application and enforcement of required accountability measures for alleged violations.

- (5) In addition, the GNCHR closely monitors and takes into consideration the reports issued by international organisations, such as the United Nations High Commissioner for Refugees⁸ (UNHCR) and the International Organisation for Migration⁹ (IOM), as well as those of international,¹⁰ European,¹¹ and national human rights institutions,¹² which converge on a gradual but steady consolidation of the characteristics of the alleged IFRs.

⁸ UNCHR Press Release: *UNHCR deeply concerned at reports of informal forced returns from Greece to Turkey*, June 2017, available at: <http://tinyurl.com/33nn69yn>. UNCHR Press Release: *UNHCR calls on Greece to investigate pushbacks at sea and land borders with Turkey*, June 2020, available at: <http://tinyurl.com/ye29f93k>. UNCHR Press Release: *UNHCR concerned by pushback reports, calls for protection of refugees and asylum-seekers*, August 2020, available at: <http://tinyurl.com/tk7d3j9f>. UNHCR Press Release: *UNHCR warns asylum under attack at Europe's borders, urges end to pushbacks and violence against refugees*, January 2021, available at: <http://tinyurl.com/vzw5a2xe>.

⁹ IOM Press Release: *IOM Alarmed over Reports of Pushbacks from Greece at EU Border with Turkey*, June 2020, available at: <http://tinyurl.com/ycxmzktn>. IOM Press Release: *IOM Concerned about Increasing Deaths on Greece-Turkey Border*, February 2022, available at: <http://tinyurl.com/3c6y3rnd>. IOM Press Release: *More than 5,000 Deaths Recorded on European Migration Routes since 2021*, October 2022, available at: <http://tinyurl.com/56wve4k5>.

¹⁰ UN Committee Against Torture, *CAT/C/GRC/CO/7: Concluding observations on the seventh periodic report of Greece*, September 2019, available at: <http://tinyurl.com/ms9x8atu>. UN Working Group on Arbitrary Detention: *Preliminary Findings from its visit to Greece (2 - 13 December 2019)*, December 2019, available at: <http://tinyurl.com/3ap6jh66>. UN Special Rapporteur on the Human Rights of Migrants, *Report on means to address the human rights impact of pushbacks of migrants on land and at sea*, May 2021, available at: <http://tinyurl.com/4ahad4cd>.

¹¹ Commissioner for Human Rights of the Council of Europe, *Report of the Commissioner after her visit to Greece on 25-29 June 2018*, November 2018, available at: <http://tinyurl.com/y8wufvnn>. Statement by the Commissioner for Human Rights of the Council of Europe, *Time to immediately act and to address humanitarian and protection needs of people trapped between Turkey and Greece*, 03.03.2020, available at: <http://tinyurl.com/58u8jih8n>. Commissioner for Human Rights of the Council of Europe, *Letter by the Commissioner to the Ministers of Citizen's Protection, of Migration and Asylum, and of Shipping and Island Policy of Greece*, May 2021, available at: <https://rm.coe.int/0900001680a256ad>. European Committee for the Prevention of Torture and Inhuman or Degrading Treatment or Punishment (CPT), *Report to the Greek Government on the visit to Greece carried out by the CPT from 10 to 19 April 2018*, February 2019, available at: <https://rm.coe.int/0900001680930c9a>. European Committee for the Prevention of Torture and Inhuman or Degrading Treatment or Punishment (CPT), *Report to the Greek Government on the visit to Greece carried out by the European Committee for the Prevention of Torture and Inhuman or Degrading Treatment or Punishment (CPT) from 13 to 17 March 2020*, November 2020, available at: <https://rm.coe.int/0900001680a06a86>.

¹² Greek Ombudsman, *Interim Report on the alleged pushbacks to Turkey of foreign nationals who had arrived in Greece seeking international protection*, January 2021, available at: <http://tinyurl.com/4h645y6e>. National Mechanism for the Investigation of Arbitrary Incidents (EMIDIPA), *Annual Report 2021*, June 2022, available at: <http://tinyurl.com/4ab2r26d>, and *Annual Report 2022*, October 2023, available at: <http://tinyurl.com/mrxwbhvj>.



- (6) In 2020, and pursuant to its institutional role as the bridge between the State and the Civil Society in general, the GNCHR established the Recording Mechanism of Incidents of Informal Forced Returns (hereinafter: Recording Mechanism),¹³ building on the experience acquired from the establishment and operation of the Racist Violence Recording Network (RVRN) for over a decade,¹⁴ which is universally acknowledged as a best practice in this field.
- (7) The membership of the Recording Mechanism is comprised by Civil Society Organizations (CSOs), that have legal personality and representation in Greece and are active in the field, offering legal, medical, psychosocial, or other services to third country nationals.¹⁵ The UNHCR Representation in Greece participates in this initiative as a Co-operating Agency, offering expertise and technical support.
- (8) The objective of the Recording Mechanism is to monitor, record and highlight the phenomenon of IFRs of third-country nationals from Greece to other countries. It aims to foster and consolidate respect for the principle of non-refoulement, as well as to ensure adequate guarantees and compliance with legal procedures, thus further increasing accountability for reported human rights violations alleged to have occurred during IFRs of third-country nationals, from Greece to other countries.¹⁶
- (9) The Recording Mechanism applies a standardised, transparent, and scientific methodology,¹⁷ in order to record testimonies by third-country nationals or stateless persons, regardless of their legal status in Greece, i.e. regardless of whether they are irregular migrants, registered or unregistered asylum seekers or recognised refugees, who allege to have been victims of IFRs from the Greek territory either directly to their country of origin (or former habitual residence for stateless persons) or to a third country.

¹³ The relevant decision was unanimously adopted at the GNCHR Plenary meeting of 09.07.2020.

¹⁴ The Racist Violence Recording Network (RVRN) is a joint initiative of the Greek National Commission for Human Rights (GNCHR) and the Representation of the United Nations High Commissioner for Refugees in Greece (UNHCR) operating along with non-Governmental Organisations and stakeholders. Click here for more information: <https://rvrn.org/en/>

¹⁵ The organizations that have acquired Membership Status to the Recording Mechanism, according to the terms of its Founding Act, are the Greek Council for Refugees (GCR), the Hellenic League for Human Rights (HLHR), the Network for Children's Rights, the Medical Intervention (MedIn), Metadrasi - Action for Migration and Development, the Transgender Support Association, Refugee Support Aegean (RSA), HIAS – Greece, the Legal Centre Lesbos, the Danish Refugee Council – Greece, Equal Rights Beyond Borders, and the International Rescue Committee – Greece.

¹⁶ For more information, see: <https://nchr.gr/en/recording-mechanism.html>.

¹⁷ See Annex B.



- (10) The Interim Report of the Recording Mechanism was presented at a widely attended press conference, held at the premises of GNCHR in January 2023.¹⁸ The President of GNCHR and the Supervisor of the Recording Mechanism presented the operational scope, mode of operation and methodology of the Recording Mechanism along with a summary of findings related to the recordings of the year 2022. Other participants to the presentation panel included the Director of the European Union Agency for Fundamental Rights (FRA) through a video recording; the Representative of the UN High Commissioner for Refugees in Greece (UNHCR); the Head and Regional Response Coordinator of the International Organisation for Migration in Greece (IOM); and the Deputy Fundamental Rights Officer of the European Border and Coast Guard Agency (Frontex).
- (11) The Ministry of Migration and Asylum issued a statement welcoming the creation of the Recording Mechanism and underlining the need for such a reliable procedure for the recording of alleged IFR incidents.¹⁹ The European Commission in its 2023 Rule of Law Report 2023 and in the country chapter for Greece made reference to the Recording Mechanism, describing it as a positive development aiming to boost accountability for reported human rights violations alleged to have occurred during informal forced returns of third-country nationals from Greece to other countries.²⁰ The creation of the Recording Mechanism have been pointed out as a good transparency practice for reported complaints by the EU Agency for Fundamental Rights (FRA) in its overview report on *Asylum and Migration: Progress achieved and remaining challenges*.²¹

B. GNCHR's response to question posed by the ECHR

- (12) In December 2023, the Recording Mechanism published its Annual Report for the year 2022.²² As per standard practice, prior to publication, its content was presented to the GNCHR's Plenary Meeting on 16.11.2023 and, following a discussion on its quantitative and qualitative findings, the Plenary confirmed

¹⁸ GNCHR Press Release: *Presentation of the Recording Mechanism of Incidents of Informal Forced Returns and its 1st Interim Report*, 24.01.2023, available at: <http://tinyurl.com/y3z2zhrw>. The Interim Report can be accessed through the website of GNCHR: <https://nchr.gr/en/reports.html>.

¹⁹ See: Ministry of Migration and Asylum Press Release, 24.01.2023, available only in Greek at: <http://tinyurl.com/4a42t29k>.

²⁰ EU Commission, *2023 Rule of Law Report - Country Chapter on the rule of law situation in Greece*, available at: <http://tinyurl.com/muyxw2a>.

²¹ FRA – EU Agency for Fundamental Rights: *Asylum and migration: Progress achieved and remaining challenges*, available at: <http://tinyurl.com/5f85uay9>.

²² GNCHR Press Release: *Release of the Annual Report 2022 of the Recording Mechanism of Incidents of Informal Forced Returns*, available at: <https://tinyurl.com/38mdffry>. The Annual Report 2022 can be accessed through the website of the GNCHR: <https://nchr.gr/en/reports.html>.



the conclusion²³ and recommendations²⁴ included therein. The Annual Report 2022 presents and analyses in full all the data deriving from the recordings made during the year 2022, a summary of which was included in the Interim Report. The information that follows is included in the published Annual Report 2022, with full numbers, charts and statistics.

- (13) During the year 2022, the Recording Mechanism recorded testimonies through personal interviews with 43 alleged victims about 50 IFR incidents, which according to the alleged victims occurred during the period between April 2020 and October 2022.
- (14) Most of the testimonies recorded by the Recording Mechanism indicate that the alleged victims have been detected near a border area, either in the land or at sea. However, there are alleged victims who have claimed to have been detected in the mainland, away from the border areas of the country; or in the territory of the Greek islands.
- (15) There are 31 incidents, that have reportedly taken place in the region of Evros river. These are 31 incidents, where the detection of the alleged victims occurred either in locations along the border region of river Evros, such as the riparian area or islets inside the riverbed or forested areas near settlements/villages/towns (Orestiada, Feres, Asproneri, Soufli, Didimotihio, Protoklisi, Himonio) of the wider border area (24 incidents); or within inland towns and cities, such as Thessaloniki or Alexandroupolis or Kavala (7 incidents) and the physical removal was carried out through the only territorial border between Greece and Turkey, namely the Evros river.
- (16) There are 19 incidents, that have reportedly taken place at sea. These are 19 incidents where the detection of the alleged victims occurred either at sea areas close to the shores of Greek islands, such as Lesvos, Kos, Chios, Samos, Crete, and Kasos (13 incidents); or on Greek islands such as Kos, Lesvos, and Rhodes (6 incidents), and the alleged physical removal was carried out across the Greek-Turkish sea borders.
- (17) According to these testimonies, it is estimated that at least 2,157 persons may be recorded in the total number of the alleged victims, including at least 214 women, 205 children, and 103 persons with special needs, such as persons with medical problems, elderly, people with disabilities, women in pregnancy, unaccompanied minors etc.²⁵
- (18) The countries of origin of the alleged victims are listed among the countries, whose nationals are granted international protection status in Greece and the

²³ See in detail Annual Report 2022, Chapter 6, pp 50-51.

²⁴ See in detail Annual Report 2022, Chapter 7, pp 51-53.

²⁵ See in detail Annex A.



EU at a significant rate (Syria, Palestine, Turkey, Afghanistan, Iraq, Iran, Somalia, Cameroon, Mali and Democratic Republic of Congo).²⁶

- (19) The majority of the alleged victims are unregistered asylum seekers, who reported that their personal data have never been recorded by the Greek Authorities and that they were informally and forcibly returned to Turkey. The cases of 6 Turkish nationals unregistered asylum seekers, who reported that they had left their country of origin because they were at risk of being persecuted due to their political convictions and came to Greece in order to apply for asylum, is of particular importance.²⁷ These persons allegedly have been victims of IFRs directly to their country of origin (Turkey), where they had been subjected or were at risk of being subjected to persecution, allegedly without any assessment of their international protection needs arising from the risk of being persecuted in Turkey. These incidents might constitute a direct violation of the principle of non-refoulement, which is the cornerstone of international protection for asylum seekers and refugees.
- (20) There are also 5 alleged victims who reported that, before their removal from Greece, they had lodged an application for asylum to the competent Greek Authorities, application which was still pending. They are asylum seekers coming from Syria, Iraq, and Turkey, who allege that they have been informally forced returned to Turkey, despite the fact that their application for asylum in Greece was pending, in other words while they were lawfully residing in the country. In these cases, the procedure of adjudicating their asylum applications might have been unlawfully terminated and these applicants might have been deprived both of their right to reside in Greece and of a possible positive outcome of their applications.
- (21) Among the alleged victims are included 5 refugees recognised in Greece, coming from Syria and Palestine. These persons allege that they have been victims of IFRs to Turkey, even though they had been granted international protection status by the competent Authorities in Greece. In these cases, recognised refugees have been allegedly deprived of their international protection status, granted to them by Greece.
- (22) All testimonies recorded by the Recording Mechanism present a repeatable pattern, through which the organised nature and the operational characteristics of the IFRs become conspicuous. These characteristics fall within two pivots, that often interact with each other.

²⁶ See: Ministry of Migration and Asylum, *Consolidated Reports*, <https://migration.gov.gr/en/statistika/>, and EUAA, *Latest Asylum Trends*, <https://euaa.europa.eu/latest-asylum-trends-asylum>.

²⁷ According to the EUAA Latest Asylum Trends published in October 2022, the number of asylum applications lodged in the EU countries by Turkish nationals, ranked Turkey in the 3rd place in the list of countries with the highest number of asylum seekers in the EU countries, after Syria and Afghanistan.



- (23) One pivot is *gradualness* – a gradual, step-by-step implementation procedure. As it follows from the testimonies, the implementation (*modus operandi*) of IFRs presents an image of alternation of stages, during which the locations change, and the alleged victims are often mixed with larger groups while transferred from the detection locations to the places of detention and subsequently to the starting points of their physical removal. Moreover, when transitioning from one stage to another, the alleged perpetrators either alternate one another or meet and become parts of larger groups of alleged perpetrators. In particular, the largest number of testimonies report that the alleged victims are initially detected by a group of people in or out of uniform (detection stage); subsequently, in most cases, they are taken to a facility where they are kept under guard (detention or restriction on freedom of movement stage); and finally they are transferred either from the detection location or the place of detention/restriction of their freedom of movement, to the starting point of physical removal, where the IFR operation is completed (physical removal stage).
- (24) The detection stage is a necessary condition for the implementation of an IFR, but it is not a sufficient one. This is the less linked stage to the chain of acts comprising an IFR incident and it cannot be assumed in all cases, that the persons implementing it (the detectors) are fully aware of the stages that follow. This is less likely to be the case in incidents, during which the alleged victims are transferred to a detention facility; and more likely, in those incidents during which the alleged victims, after their detection, are transferred directly to the points of their physical removal. However, whether or not the detectors are aware of all the IFR stages or of how deeply they are involved into it, an IFR cannot be implemented unless detection of the alleged victims has taken place.
- (25) The informal detention or restriction on freedom of movement is implied in every IFR incident. Once the groups of the alleged victims are detected, they are not allowed to move freely and are taken forcibly, either directly to the point where their physical removal is carried out; or to places of detention/restriction on freedom of movement, where they are kept informally until their physical removal, in the absence of any identification procedure or registration of their personal data. In those cases, where the informal detention/restriction on freedom of movement is implemented as an intermediate stage between the stages of detection and physical removal, the operational scope and depth of the IFR incidents become discernible, as for the implementation of this stage heavy infrastructure is required, that includes means of transport, detention places and facilities, properly trained personnel, material and technical means like weapons, communications devices, restraining equipment etc. Additionally, in cases where the detention period lasts for hours or even days, water and food provision is required for those



informally detained, which is carried out, as indicated by some testimonies, by sharing the water and food supplies in the possession of the alleged victims prior to the detection stage. At this stage, the composition of the detected group of alleged victims usually changes, as they mix with the broader population of the detention place.

- (26) The act of physical removal from the Greek territory marks the operational escalation of an IFR incident. In most cases where the alleged victims were detected at various locations within the territory, and in most instances informally detained/restricted in movement, they were subsequently transferred to other locations within the territory from which the act of physical removal took place, often in large groups with a different composition from the time of detection. Other incidents are denser, as the act of physical removal followed immediately after the detection of the alleged victims.
- (27) The second pivot is *geographical diversification*. The geographical specificities of the regions, where the IFRs are being carried out, have an impact on the modus operandi of the actors involved. This is clearly demonstrated in the changeover from the operational characteristics of the incidents carried out through the Evros river, to the operational characteristics of the incidents carried out at sea. Testimonies in relation to incidents, where the physical removal was carried out through the Evros river, indicate involvement of persons out of uniform to a much larger extent, in comparison with testimonies for incidents where the physical removal was carried out at sea. Similarly, all testimonies in relation to incidents carried out through the Evros river reported that some of the perpetrators involved were speaking some of the alleged victims' native languages, which is not the case at all, as far as incidents carried out at sea are concerned.
- (28) *Geographical diversification* is demonstrated, as well, in incidents where detection happened at sea or very near the Evros river region, when compared with incidents where detection happened in the mainland or on an island. In the incidents falling under the first category, the geographical diversification usually has an effect on the pivot of gradualness, since, according to some testimonies, the stage of detention/removal on freedom of movement was skipped and the IFR was carried out immediately after detection, probably due to proximity to the border line. This had several consequences, like for example that the circle of persons who carried out the alleged IFRs and the operational footprint were smaller as they were carried out in a shorter period of time and with the use of fewer material means. For these incidents to be implemented, no use of detention facilities, means of transport, water or food supplies etc. were required.
- (29) Use of violence is not a necessary condition for the implementation of an IFR incident. However, it is observed as an overarching element in every IFR incident, since it is used as a means of compulsion or coercion, involving



recourse to threats, infliction of physical pain and subjection to inhuman or degrading treatment for the purpose of implementing successfully all the stages of an IFR incident.

- (30) The pattern is completed by the legal treatment of the alleged victims, which includes the acts, or mainly the omissions, concerning the identification of the alleged victims and the verification of their personal information, the registration of their personal and other biometric data (photos and fingerprints), the administrative handling of their asylum applications etc., which attribute to the incidents of forced returns their irregular (informal) character.
- (31) In the majority of testimonies, it was reported by the alleged victims that they fully and successfully expressed their will to apply for international protection. However, no registration of their applications was carried out, nor any other procedure was followed to identify them, like recording of their personal data or capturing of biometric data (fingerprinting, photography etc.), nor did they report to have been provided with any information about their rights by the competent authorities in a language they could understand.²⁸
- (32) As it is indicated by such information, the alleged IFRs are carried out by mobilizing human resources, infrastructure and facilities, heavy vehicles or watercrafts and other material and technical means. On the basis of the information recorded by the Recording Mechanism during 2022, it is indicated that the alleged IFRs do not constitute an occasional and *irregular* phenomenon. On the contrary, it is indicated by testimonies that they have developed the pattern of a systematic and *organised* operation.
- (33) The testimonies recorded by the Recording Mechanism during the year 2023, which are still in the processing stage, and the findings stemming from them to be published soon in the Annual Report 2023, confirm the same *modus operandi* as that depicted by the Recording Mechanism in its Annual Report 2022 and summarised herein. Once published, we would be happy to share the full Report with the Court.

The Greek National Commission for Human Rights remains at the disposal of the European Court for Human Rights, should any further clarification or additional information is required.

Sincerely yours,


Professor Maria Gavouneli
President

²⁸ See in detail Annual Report 2022, Chapter 4 (IV), pp. 39-41.