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## **COMMISSION STAFF WORKING DOCUMENT**

### **2025 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**

#### **2025 Rule of Law Report The rule of law situation in the European Union**

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## **ABSTRACT**

In Greece, following a recent reform, the judiciary is being involved in appointments to the highest positions in the court system. Initiatives to restore public trust in the justice system are put forward by the judiciary. The decision to launch disciplinary proceedings against judges on grounds resulting from the content of their decisions gave rise to a debate within the magistracy. Major reforms related to rule of law are being undertaken in dialogue with the Commission and financed under the Recovery and Resilience Facility and supported by the Technical Support instrument. The implementation of the new judicial map in civil and criminal justice, and projects to improve the level of digitalisation are advancing well. Efforts to promote the use of alternative dispute resolution, including plans to revise existing legislation, are welcomed by businesses. The length of court proceedings still raises serious challenges and, although initial signals from the implementation of recent reforms are encouraging, it is still early to assess results.

A new National Anti-Corruption Action Plan is being developed, and the National Transparency Authority has a new Management Board. Organisational changes in the police force were made to better combat organised crime and improve disciplinary procedures. An interoperable common case management system is in preparation as efforts to improve the track record of prosecutions and final judgments in corruption cases, including in high-level cases continue. A reorganisation of the police aims to strengthen integrity. The law on asset declarations was revised to facilitate the process of submission and verification of interest declarations. Amendments to the rules on political party funding provide clearer grounds for reimbursement or suspension of state funding. The effective implementation and enforcement of the rules on lobbying has improved but further measures are needed. Efforts to mitigate corruption risks in public procurement and improve licensing procedures are seen as positive developments by businesses.

Resources of the media regulator have been strengthened as the number of employees has increased but concerns remain regarding its independence, and funding. The new appointment procedures of administrative bodies introduce positive changes, while concerns about the legislative framework and political independence of the public service media persist. Transparency of media ownership is strengthened by the continued operation of the Registry for Print Media and the Registry for Electronic Press. A new law strengthening publicity and transparency in the printed and electronic press, reinforcing editorial independence and institutional safeguards regarding state advertising, byline journalism and copyright protection was adopted in June 2025. The legal framework concerning the right of access to documents has been improved significantly, while challenges remain in its implementation. There have been several positive developments in the landscape for journalist safety, although challenges remain on the ground. Efforts building on measures taken in previous years amount to important steps concerning legislative and non-legislative safeguards to improve the protection of journalists, in particular as regards abusive lawsuits.

The positive trend of avoiding expedited legislative procedures continues and the statutory timeframe for public consultations is being observed, while participation and transparency in the law-making process could be further improved. Efforts are under way to ensure that the judiciary is more involved in overseeing the immunity regime for members of the Government. Previously identified challenges regarding the appointment of members of independent authorities established by the Constitution remain. Progress with the judicial investigation following the Pylos shipwreck is a positive development to start addressing deficiencies in investigating incidents of alleged misconduct involving law enforcement officers. Engagement with civil society organisations is not yet placed on a regular and sustained basis.

## **RECOMMENDATIONS**

Overall, concerning the recommendations in the 2024 Rule of Law Report, Greece has made:

- Some further progress on continuing efforts to establish a robust track record of prosecutions and final judgments in corruption cases, including high-level corruption.
- Significant progress on further advancing with the process of adopting legislative and non-legislative safeguards to improve the protection of journalists, in particular as regards abusive lawsuits against journalists and their safety, in line with the adopted Memorandum of Understanding and taking into account European standards on the protection of journalists.
- Some further progress on stepping up the efforts to ensure the effective and timely consultation in practice of stakeholders on draft legislation, including by observing the statutory timeframe for public consultation.
- Limited progress on the evaluation of the existing legal framework for the registration of civil society organisations and the establishment of a structured dialogue.

On this basis, and considering other developments that took place in the period of reference, in addition to recalling the relevant commitments made under the Recovery and Resilience Plan, and the relevant country-specific recommendations under the European Semester, 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.
- Improve the lobbying framework, including by reviewing the definition of a lobbyist and ensuring effective implementation.
- 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.
- Develop a regular and sustained structured dialogue with civil society organisations, and simplify registration requirements for civil society organisations in view of maintaining an open framework for them to operate.

## I. JUSTICE SYSTEM<sup>1</sup>

### Independence

**The level of perceived judicial independence in Greece is now low among the general public and continues to be average among companies.** Overall, 38% of the general population and 49% of companies perceive the level of independence of courts and judges to be ‘fairly or very good’ in 2025<sup>2</sup>. The perceived judicial independence among the general public has slightly decreased in comparison with 2024 (40%) and has significantly decreased in comparison with 2021 (55%). The perceived judicial independence among companies has slightly increased in comparison with 2024 (48%) and is lower than in 2021 (60%). Justice stakeholders consider that public perceptions are affected by several high-profile cases and agree that restoring trust in the judicial system and improving perceptions should be a priority<sup>3</sup>.

**Following a recent reform, the judiciary is being involved for the first time in appointments to the highest positions in the court system.** In May 2025, the new provision foreseeing the involvement of the administrative plenaries of the three highest courts in the appointment procedure of their Presidents and Vice-Presidents<sup>4</sup> was further amended following a proposal submitted by the Supreme Court and the Council of State regarding mainly the voting process<sup>5</sup>. In June 2025, the administrative plenary of the Supreme Court submitted to the Government its non-binding opinion for the appointment of its new president, vice-presidents and the Prosecutor General<sup>6</sup>. A wide range of justice stakeholders have welcomed the reform. Some consider that the involvement of the judiciary could be further strengthened, for instance by introducing an obligation to choose a candidate only from among the shortlisted candidates put forward by the judiciary<sup>7</sup>. Such a further reform would require constitutional revision<sup>8</sup>. The Government has already announced its intention

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

<sup>2</sup> Figures 50 and 52, 2025 EU Justice Scoreboard and Figures 51 and 53, 2023 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%).

<sup>3</sup> Country visit Greece, Ministry of Justice, Prosecutors, Supreme Court, Court of Audit, Associations of judges and Athens Bar Association.

<sup>4</sup> This reform fully implemented previous recommendations addressed to Greece to involve the judiciary in appointments to the highest positions in the judiciary. 2024 Rule of Law Report, Greece, pp. 3-4.

<sup>5</sup> The amendment introduces limitations to the pool of candidates linked to seniority and a minimum number of votes that could be casted per judge. It also extends the scope of the reform to the appointment of the General Commissioner of the State. Law 5197/2025, Article 36.

<sup>6</sup> Supreme Court (2025b). The next steps include a non-binding opinion by the Conference of Presidents of Parliament and a proposal by the Minister of Justice before the final decision is taken by the Council of Ministers.

<sup>7</sup> Country visit Greece, Court of Audit, Prosecutors, Athens Bar Association, Association of Judges and Prosecutors and the Association of Judges of the Court of Audit. The Association of Administrative Judges referred to a system where appointments are decided by Parliament based on a list of candidates selected by a body, which also includes judges in its composition. The Association of Judges of the Council of State also welcomed the reform and underlined the need for the executive to follow in practice the opinions of the judiciary, Association of Judges of the Council of State (2025), written input, p. 2.

<sup>8</sup> Constitution of Greece, Article 90 para 5. See also 2023 Rule of Law Report, Greece, p. 4.

to include this in the forthcoming revision of the Constitution, scheduled to begin later this year, as part of the efforts to restore public trust in the judiciary<sup>9</sup>.

**Initiatives aiming to restore public trust in the justice system are put forward by the judiciary.** In April 2025, the Association of Judges and Prosecutors put forward to representatives of all political parties their proposals aiming to reinforce the independence of the judiciary, including a proposal for a post-retirement cooling off period<sup>10</sup>. According to judges' associations and the Bar, the introduction of a rule preventing judges from holding public positions during a period of three years after their retirement could strike a fair balance, allowing the public sector to benefit from judges' status and experience, while avoiding perceptions of interdependence with the executive<sup>11</sup>. Representatives of the Supreme Court and the Council of State consider that the existing guarantees of independence and the high ethical standards inherent to judicial functions render the introduction of a cooling-off period unnecessary<sup>12</sup>. The Government is reflecting on a legislative framework to allow for post-retirement activities for judges based on objective, transparent criteria<sup>13</sup>.

**The decision to launch disciplinary proceedings against judges on grounds resulting from the content of their decisions gave rise to a debate within the magistracy.** In March 2025, controversy arose when the President of the Supreme Court ordered the Inspection Board to assess the possible disciplinary liability of members of the judiciary because of their decision not to impose procedural coercion measures to the accused in an ongoing criminal case. Disciplinary liability of a judge resulting from a judicial decision must be seen as an exceptional measure, given its potential consequences for judicial independence. Associations of judges and the Bar reacted by reiterating that judicial decisions, even if they contain legal or factual errors, are only subject to legal remedies and cannot result in disciplinary action against the judge who took them<sup>14</sup>. The Supreme Court rejected the criticism, noting that judges' freedom of opinion does not mean that they are not subject to any control<sup>15</sup>.

## Quality

**The implementation of the new judicial map in civil and criminal justice is advancing well.** The consolidation of the first degree of jurisdiction with the merging of the magistrate's

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<sup>9</sup> Country visit Greece, Ministry of Justice.

<sup>10</sup> Association of Judges and prosecutors (2025a).

<sup>11</sup> The appointment, in October 2024, of a retired senior prosecutor as the head of the judicial police following a required two-year cooling off period was presented as setting a good precedent, Law 5049/2023, article 3 (3). Country visit Greece, Athens Bar Association, Court of Audit, Association of judges and prosecutors; Association of Administrative Judges, Association of Judges of the Court of Audit.

<sup>12</sup> Country visit Greece, Supreme Court and Council of State.

<sup>13</sup> Greek Government (2025a).

<sup>14</sup> Association of Judges and Prosecutors (2025a), Association of Administrative Judges (2025a), Association of Prosecutors (2025) and Association of Judges of the Council of State (2025a); Plenary of the Bar associations (2025). A similar decision of the President of the Supreme Court in June 2024 had also provoked similar reactions. Association of Judges and Prosecutors, Association of Prosecutors and Athens Bar association (2024).

<sup>15</sup> Supreme Court (2025a). In response, the Code of Criminal Procedure was amended to foresee the right of senior prosecutors to ask for the judicial review of decisions regarding coercive measures (Law 5197/2025, Article 58).

courts and the courts of first instance entered into force in September 2024<sup>16</sup>. A first set of necessary amendments to the Codes of Civil and Criminal Procedure and the Courts Code was adopted, while further legislative changes are expected, including in relation to the career of former magistrates and the process for their reclassification as judges. A survey conducted by the World Bank among members of the judiciary and court staff impacted by the new judicial map, as well as initial statistical data collected by the Government, already showed promising results of the reform<sup>17</sup>. Prosecutors noted that the increase in court hearings resulting from the merging of first instance courts requires an increase in the number of prosecutors<sup>18</sup>.

**Projects to improve the level of digitalisation are advancing.** In criminal proceedings, remote hearings of witnesses and the accused were introduced, while the public can monitor online the progress of cases. In December 2024, the first remote hearing took place in administrative justice. Major projects, funded by the Recovery and Resilience Facility, including the upgrading of case management systems in administrative, civil and criminal justice, are expected to be completed at the beginning of 2026 and to cover almost all workflows carried out by courts<sup>19</sup>. While lawyers recognise the progress made, they highlight that it is still limited to certain courts, and the parallel use of electronic and paper systems creates practical difficulties for practitioners. The application *e-pinakio*, which allows lawyers to monitor in real time the daily agenda of court hearings before civil, criminal and administrative courts, has become operational. The Bar welcomed this development which facilitates their work<sup>20</sup>. Access to case-law is also progressing. A majority of anonymised judgments of the highest courts are available on their respective websites<sup>21</sup>, but not yet the majority of those issued by ordinary courts<sup>22</sup>. Ongoing projects intend to digitalise access to the case-law of ordinary courts, and thus also address the shortcomings identified by the European Court of Human Rights in that respect<sup>23</sup>. The Court of Audit is developing an AI tool to assist judges in preparing draft decisions<sup>24</sup>. The digitalisation of the notary profession is at an adequate level and will further advance with the creation of the electronic registry of wills<sup>25</sup>.

**Efforts to promote the use of alternative dispute resolution, including plans to revise existing legislation, are welcomed by business stakeholders.** While there are already promising results from the use of mediation in family and inheritance disputes, more generally the efforts to promote the use of alternative dispute resolution tools and provide incentives have been rather limited<sup>26</sup>. The Government is moving forward with plans to revise the existing framework and adopt codified legislation for alternative dispute resolution,

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<sup>16</sup> 2024 Rule of Law Report, Greece, p. 7.

<sup>17</sup> Greek Government (2025), written input, pp. 16-20. The Greek Government estimates that the reform has already increased the productivity of courts. The first statistical data relating to the implementation of the judicial map are encouraging and confirm initial estimations, Greek Government (2025a).

<sup>18</sup> Country visit Greece, Prosecutors.

<sup>19</sup> Greek Government (2025), written input, pp. 34-39.

<sup>20</sup> Athens Bar Association (2025) and Country visit Greece; CCBE (2025), written input, p. 96.

<sup>21</sup> Council of State (2024); Greek Government (2025), written input, 26-28.

<sup>22</sup> 2025 EU Justice Scoreboard, Figure 47. Athens Bar Association (2025).

<sup>23</sup> Judgment of ECtHR, application 51774/17, *Tsiolis v. Greece*, paras 75-81 and 84-86.

<sup>24</sup> Country visit Greece, Court of Audit and Association of judges of the Court of Audit.

<sup>25</sup> The platform intends to speed up the procedure of publication of wills and contribute to the decongestion of courts. It is estimated that there are currently 40 000 requests for publication pending before the Athens courts. Country visit Greece, Athens Association of Notaries.

<sup>26</sup> 2024, 2025 EU Justice Scoreboards, Figures 28 and 26 respectively.

including judicial and extra-judicial mediation and arbitration, by September 2025. A special secretariat was established at the Ministry of Justice for this purpose<sup>27</sup>. Business representatives strongly support efforts to promote alternative dispute resolution<sup>28</sup>.

**The highest courts appointed spokespersons to ensure better communication with the public.** The Supreme Court, the Council of State and the Court of Audit designated judges in charge of communicating with the media and providing information on the Courts' activities and case-law, including on important cases<sup>29</sup>. The Council of State introduced as a good practice the issuing of statements by its President to announce important judgments of public interest and of publishing clear and reader-friendly information about these judgments in the form of questions and answers<sup>30</sup>.

## Efficiency

**The length of court proceedings still raises serious challenges and, although initial signals from the implementation of recent reforms are encouraging, it is still early to assess results.** The disposition time in litigious civil and commercial cases at first instance courts has further deteriorated, reaching 771 days in 2023 (compared to 746 days in 2022), the longest in the EU, while the clearance rate for litigious civil and commercial cases slightly decreased to 92% (93% in 2022), still remaining clearly below 100% and among the lowest of the EU. For administrative cases, the disposition time at first instance courts has further improved to 439 days in 2023 (464 days in 2022). In parallel, their clearance rate remains among the highest of the EU (121%, compared to 127% in 2022). On the contrary, proceedings before the Council of State remained very long, at 1 232 days in 2023 (1 239 days in 2022)<sup>31</sup>. All stakeholders consider the persisting delays in the administration of justice to be the biggest challenge for the judicial system<sup>32</sup>. The length of judicial proceedings is pivotal for the correct functioning of the economy and good performance in other dimensions<sup>33</sup>. 56.2% of companies in Greece consider lengthy judicial proceedings as a major obstacle to business growth<sup>34</sup>. There are positive signals from the implementation of several recent reforms, including the new procedure before the Council of State and the transfer of some categories of non-litigious cases from courts to lawyers, but more time is needed to measure their impact on the overall efficiency of justice. Lawyers and notaries noted that further categories of non-litigious cases could be transferred to them in order to further contribute to decongesting civil courts and improve their efficiency<sup>35</sup>. The planned revision of the Code of Civil Procedure is also expected to speed up the administration of justice and

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<sup>27</sup> Greek Government (2025), written input, pp. 50-51.

<sup>28</sup> Country visit Greece, business associations.

<sup>29</sup> Greek Government (2025), written input, pp. 25-26. Association of Judges of the Council of State (2025), written input, p. 1.

<sup>30</sup> Council of State (2025a, b).

<sup>31</sup> 2025 EU Justice Scoreboard, Figures 5, 7, 8, 10 and 11.

<sup>32</sup> Country visit Greece, Court of Audit, Supreme Court, Council of State, Associations of judges, Association of notaries, Athens Bar Association, Business Associations; National Human Rights Commission, Civil Society. Association of Judges of the Council of State (2025), written input, p.1.

<sup>33</sup> IMF (2025), Enhancing Judicial System Efficiency in Greece: Drivers and Economic Impact, p. 6; European Semester (2025) Greece, pp. 7, 10, 11 and SWD(2025)208, pp. 9 and 14.

<sup>34</sup> Hellenic Federation of Enterprises (SEV), 2025 Business Pulse. For medium enterprises the percentage reaches 80%.

<sup>35</sup> Country visit Greece, Association of notaries and Athens Bar Association.

in particular address existing delays in scheduling trial dates, an issue highlighted by all stakeholders<sup>36</sup>.

**Responsibility for establishing a penalty of salary reduction in case of unjustified delays was amended to ensure a more effective implementation.** A reduction of salary may be applied to judges who, due to their own fault, fail to fulfil their judicial duties. This includes repeated unjustified delays in drafting decisions and handling cases. The power to impose such decisions has been transferred from the presidents of the courts where these judges serve to the President of the Supreme Court for civil and criminal justice and to the General Commissioner of State for administrative justice. Judges concerned have a right to appeal within ten days before the competent Supreme Judicial Council<sup>37</sup>.

## **II. ANTI-CORRUPTION FRAMEWORK**

**The perception among experts, citizens and business executives is that the level of corruption in the public sector is high.** In the 2024 Corruption Perceptions Index by Transparency International, Greece scores 49/100 and ranks 21<sup>st</sup> in the European Union and 59<sup>th</sup> globally<sup>38</sup>. This perception has been relatively stable over the past five years<sup>39</sup>. The 2025 Special Eurobarometer on Corruption shows that 97% of respondents consider corruption widespread in their country (EU average 69%) and 66% of respondents feel personally affected by corruption in their daily lives (EU average 30%). As regards businesses, 97% of companies consider that corruption is widespread (EU average 63%) and 75% consider that corruption is a problem when doing business (EU average 35%). Furthermore, 33% of respondents find that there are enough successful prosecutions to deter people from corrupt practices (EU average 36%), while 24% of companies believe that people and businesses caught for bribing a senior official are appropriately punished (EU average 33%)<sup>40</sup>.

**A new National Anti-Corruption Action Plan (NACAP) is being developed.** The National Transparency Authority (NTA) has begun preparations for a new NACAP covering 2026–2029. It has carried out a survey involving citizens, public servants, auditors, academics and policy representatives and is working on a comprehensive mapping of corruption risks, which it expects to finalise by the end of June 2025. It will also engage in an *ex post* external evaluation of the current NACAP (2022–2025). A small number of actions relating to ongoing projects financed under the Recovery and Resilience Plan may be rolled over from the current Action Plan to the new one. The new Action Plan is expected to be in place in the first half of 2026 following Ministerial Council approval<sup>41</sup>.

**A new Management Board was appointed to the National Transparency Authority.** The NTA's new Management Board, made up of the President and four Members, was established in September 2024. A new Governor is expected to be appointed by the end of the

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<sup>36</sup> Country visit Greece, Supreme Court, Athens Bar Association and Association of Judges and prosecutors. IMF (2025), p. 19.

<sup>37</sup> Article 50 of Law 4938/2022. Greek Government (2025), written input, p. 23.

<sup>38</sup> 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).

<sup>39</sup> In 2020 the score was 50, while in 2024, the score is 49. The score significantly increases/decreases when it changes more than five points; improves/deteriorates (changes between 4-5 points); is relatively stable (changes from 1-3 points) in the last five years.

<sup>40</sup> Data from Special Eurobarometer 561 (2025) and Flash Eurobarometer 557 (2025).

<sup>41</sup> Greek Government (2025), written input p.61; Country visit, Greece, NTA.

summer 2025<sup>42</sup>. Recruitment for inspectors-auditors and administrative staff continued at both central and regional level. More posts are expected to be taken up during 2025 to fill the vacant posts (139 compared to 122 in March 2024 out of a total of 503 posts)<sup>43</sup>. To attract more staff, a flexible framework is already in place for mobility of inspectors-auditors carried out exclusively by the NTA, with secondments through a single decision of the Governor. The NTA is still looking for new premises that can house all its staff together at one location, which is important to improve coordination and efficiency<sup>44</sup>.

**An interoperable common case management system is in preparation as efforts to improve the track record of prosecutions and final judgments in corruption cases, including in high-level corruption cases, continues<sup>45</sup>.** Investigations on corruption offences by the Financial Police Division in 2024 increased slightly to 112 compared to 2023 (106 cases). The data provided by the Economic Crime Public Prosecutor's Office show that it handled fewer corruption offences (bribery, misappropriation and embezzlement) in 2024 than in 2023 (71 compared to 157). Official aggregated statistics show that the number of ongoing and concluded prosecutions and the number of convictions for corruption offences, including at high-level, in 2024 was slightly lower than in 2023<sup>46</sup>. Two foreign bribery cases are still at the preliminary investigation phase<sup>47</sup>. The Government is in the process of developing an interoperable common corruption case management register enabling all competent authorities to centrally record and track corruption cases from the start of an investigation to the sentencing, thereby gaining a complete picture of the timelines and state of play of these cases. The authorities consider that this will improve the reliability of data and should help in tackling corruption cases more efficiently. The system's legal and technical specifications are being drafted and a tender is expected to be given by the end of 2025 and developed in 2026<sup>48</sup>. In addition, in 2025 the Criminal Code was amended to include a distinct 'obstruction of justice' offence and expand the 'favourable measures' (mitigating circumstances) for offenders who cooperate with the authorities and help uncover

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<sup>42</sup> National Transparency Authority (2025). The new Management Board was approved by the Parliament's Institutions and Transparency Committee and established by the Government on 30 September 2024. Greek Government and CSOs (2025), written and additional input, p. 59 and p. 3 respectively. Country visit, Greece, Ministry of Interior and NTA.

<sup>43</sup> On 13 June 2025 the final results for the 53 positions for secondments of Inspectors-Auditors were published.

<sup>44</sup> The NTA is currently operating out of five buildings across Athens. The occupancy rate for inspectors-auditors is at 74% (238 out of 320 posts). A call for the recruitment of 53 inspectors-auditors published in July 2024 is still ongoing. Thirteen administrative staff are expected to be recruited in 2025. A request to cover 27 posts via secondment/mobility of civil servants is expected to be concluded in 2025. Greek Government (2025), written input, p. 55. Country visit, Greece, Ministry of Interior and the NTA.

<sup>45</sup> The 2024 Rule of Law Report recommended to Greece to "continue efforts to establish a robust track record of prosecutions and final judgments in corruption cases, including high-level corruption".

<sup>46</sup> In 2024, there were no *concluded* prosecutions for bribery of political officials (same as 2023), judges (1 case in 2023) or employees of international organisations (2 cases in 2023). *Ongoing* prosecutions included 1 case for bribery of political officials (same as 2023), 1 for bribery of judges (2 in 2023) and 2 for bribery of employees of international organisations (4 in 2023). At appeals court level, there were no convictions for bribery of national public officials compared to 4 in 2023. There were 2 acquittals for bribery of judges and employees of international organisations (none in 2023). Greek Government (2025), written input, Annex I.

<sup>47</sup> Country visit, Greece, Ministry of Justice. On 21 November 2024, the NTA, together with the Diplomatic Academy of the Ministry of Foreign Affairs, organised an online webinar on the OCED Anti-Bribery Convention that analysed the main points of the OECD Convention and provided an overview of national initiatives for its effective implementation.

<sup>48</sup> Greek Government (2025), written input, p. 54 and Country visit Greece, Ministry of Justice and additional written input, pp. 17-23.

complex corruption and organised crime offences<sup>49</sup>. The authorities expect that these recent developments should contribute to an improved track record. Cooperation between the EPPO and the police and the national prosecution offices is overall satisfactory<sup>50</sup>. Considering these developments, there has been some further progress in the implementation of the recommendation made in the 2024 Rule of Law Report.

**A reorganisation of the police aims to strengthen integrity and improve disciplinary procedures.** In March 2025, a law was adopted to reorganise the Hellenic Police Corps<sup>51</sup>. A new Directorate of Ethics and Internal Control aims to strengthen integrity, professionalism and accountability in policing, streamline the management of complaints against the police and strengthen the independence of internal audits. In addition, in November 2024, the rules on disciplinary procedures in the police were simplified, speeding-up their administration and facilitating the dismissal or suspension of officials from active service for serious disciplinary or criminal offences. In 2024, 87 police officers were suspended from service, a significant increase of 174% from the 32 cases in 2023<sup>52</sup>. In addition, guidelines outlining the procedures for the handling of corruption incidents and integrity within the Police are currently under review and will be incorporated into police ethics courses<sup>53</sup>. The reorganisation also incorporated police dealing with corruption in a new Directorate for Combating Organised Crime to enable a more strategic approach to combating organised crime.

**A revised law on asset declarations aims to facilitate the process of submission and verification of declarations.** A revised law on asset declarations entered into force in August 2024<sup>54</sup>. It aims to strengthen transparency, improve compliance, and simplify and streamline the process of asset declaration and financial oversight by digitalisation of the submission process, automatic filling, transfer and extraction of the data, and greater interoperability of the electronic platform ('e-pothen'). The new system is designed to enable the authorities to uncover discrepancies, unexplained wealth and hidden assets more quickly and efficiently. The law expands the scope of persons covered, the scope of the assets and interests to be declared both in Greece and held abroad and introduces administrative sanctions for non-compliance by financial institutions<sup>55</sup>. As the Parliament Committee for the Investigation of Declarations of Assets (CIDA) is also tasked with supervising and coordinating the other

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<sup>49</sup> The Criminal Code was changed through Law 5172/2025 and Law 5187/2025. In addition, the authorities are preparing an extension of the protections under Law 4990/2022 to persons reporting or disclosing information in the field of cryptocurrency markets. Ministry of Justice and Ministry of Interior (2025), additional written input, pp. 30 and p. 1 respectively.

<sup>50</sup> EPPO (2025a), written input, p. 16. In 2024, EPPO investigated 7 corruption cases in Greece that amount to 4.67% of EPPO cases in Greece. EPPO (2025), p. 35.

<sup>51</sup> Law No. 5187/2025; Presidential Decree 29/2024.

<sup>52</sup> The changes to the Disciplinary Regulations were made through Presidential Decree 61/2024 of 5 November 2024. The Chief of Police issued detailed guidelines on the proper implementation of the new disciplinary rules on 10 November 2024. Greek Government (2025), written input, pp. 58 and 63. Also Country visit Greece, Ministry of Citizen Protection, Hellenic Police, and Internal Affairs Unit of Law Enforcement Bodies.

<sup>53</sup> Ministry of Citizen protection and Hellenic Police (2025), additional written input, p.2.

<sup>54</sup> Law 5130/2024. Two ministerial decisions providing instructions on implementation for persons covered and on the interoperability of financial institutions were issued the following October Law 5130/2024. Decision GG B' 5919/23.10.2024 and Decision GG B' 5921/23.10.2024. Greek Government (2025), written input, p. 69.

<sup>55</sup> At the end of 2024, 340,000 declarations had been submitted making up 60% of the total number of liable persons. An open tender to upgrade the 'e-pothen' was published in December 2024. Greek Government, written input, pp. 62, 69 and 87. Country visit Greece, Ministry of Justice, Parliament Audit Committee and NTA. See also Committee for the Investigation of Declaration of Assets (2025), pp. 8-12.

bodies involved in auditing asset declarations, it has requested more resources<sup>56</sup>. In 2024, the Court of Audit issued six rulings and had nine pending applications for unjustified assets, including concerning a former mayor and a former member of parliament<sup>57</sup>.

**The effective implementation and enforcement of the rules on lobbying has improved but further measures are needed.** Since the transparency register became operational in December 2022, entries in it have only increased modestly, from 20 in July 2024 to 39 as of April 2025, of which 33 lobbyists are active (compared to 17 on 31 December 2023) and 318 institutional bodies (of which 278 have an active tenure). Annual declarations of lobbyists and public officials were only published for the first time in mid-2024 and do not seem to cover all those obliged to submit a report<sup>58</sup>. Civil society organisations have also raised other shortcomings about the enforcement of the lobbying rules<sup>59</sup>. Acknowledging the NTA's outreach efforts, there is still room for increasing awareness about the law, even among public officials. There is increasing understanding, including amongst the authorities, that the law should not only cover lobbying carried out by professional lobbyists (on behalf of third parties) but also by 'in-house' lobbyists. This was specifically 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<sup>60</sup>. The authorities have indicated openness to reassess the situation, possibly leading to a review of the legal framework<sup>61</sup>.

**Amendments to the rules on political party funding provide clearer grounds for reimbursement or suspension of state funds.** In December 2024, amendments were made to the law on electoral state funding of political parties and party coalitions<sup>62</sup>. These changes clarify that state funding for an electoral contest must be returned in case of non-participation in an election and that state funding will be suspended until certain criteria are met in cases where a party or coalition leader is convicted of a criminal offence. The objective is to enhance the integrity of political parties and ensure proper use of public funds. This has already been put into practice with a decision to suspend a substantial amount of funds to a

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<sup>56</sup> Besides CIDA, the Anti-Money Laundering Authority, the NTA, and the Internal Affairs Service of the Security Forces are responsible for auditing the asset declarations of persons falling within the scope of their mandate. CIDA is also responsible for auditing political party finances and coordinates and supervises the other auditing bodies and only has 20 members of staff. It is dealing with a 7% to 10% increase in audits. High-risk verifications amounted to 5% (4% in 2023). 109 (out of 9 532) cases of misconducts sent to the prosecutor concerned politically exposed persons or persons with top executive functions. Greek Government (2025), written input, p. 87. Country visit, Greece, CIDA.

<sup>57</sup> Greek Government (2025), written input, Annex 1, Table C. Country visit Greece, Court of Audit.

<sup>58</sup> Law 4829/2021 obliges high-level officials with executive and legislative functions to declare their contacts with lobbyists while registered interest representatives must submit annual declarations for general activities and for lobbying activities targeting the legislature and executive.

<sup>59</sup> As well as concerns on the low number of registrations and number of annual declarations posted, they complain about the lack of detail about the objectives of the contacts made and a general lack of awareness about the law. Vouliwatch (2024), Civil Society Report (2025), written and additional input, pp. 35-36 and p. 1 respectively.

<sup>60</sup> NTA (2025b), p.16. Vouliwatch continues to advocate for a legislative change. Civil Society Report (2025), written and additional input, pp. 35-36 and p. 1, respectively. Country visit Greece, Ministry of Interior, NTA, and Civil Society.

<sup>61</sup> The authorities suggested that this might be linked to the expected transposition of the proposed EU directive on interest representation carried out on behalf of third countries. Country visit, Greece, Ministry of Interior and NTA.

<sup>62</sup> Law 5166/2024.

beneficiary political party late last year<sup>63</sup>. In 2024, CIDA reported a continued improvement in the level of compliance with the rules on political party financing, similarly to the previous year. It found no substantive violations of the relevant legislation in its audits of the parties that participated in the two elections in 2023<sup>64</sup>. The audit of parties that participated in the June 2024 European Parliament elections is not yet finalised.

**Efforts to mitigate corruption risks in public procurement and improve licencing procedures for businesses continued.** Businesses' attitudes towards corruption in the EU show that 48% of companies in Greece (EU average 25%) think that corruption has prevented them from winning a public tender or a public procurement contract in practice in the last three years<sup>65</sup>. The Single Market and Competitiveness Scoreboard on access to public procurement in Greece reports 49% of single bids for 2023 (EU average 29%). Public procurement is seen to be particularly vulnerable to corruption, collusion and conflicts of interest, which, when combined with delays in the approval of licenses or permits, may act as a disincentive to participate. 39% of companies perceive the level of independence of the public procurement review body (Single Independent Public Procurement Authority) as very or fairly good<sup>66</sup>. The Hellenic Single Public Procurement Authority (HSPPA) reported receiving complaints relating to collusion, conflicts of interest and other practices that undermine competition<sup>67</sup>. The authorities have taken various measures to mitigate these risks in 2024. The NTA issued a Code of Conduct for Integrity Advisors<sup>68</sup> and finalised a Public Procurement Risk Management Framework and a comprehensive Risk Registry that will feed into a new code of conduct being drafted for officials working in procurement units<sup>69</sup>. In January 2025, it published a new Code of Conduct for Seconded Officials and Special Advisers serving in private offices and the Presidency of the Government<sup>70</sup>. The Hellenic Competition Commission issued a Guide for Contracting Authorities on Detecting and Preventing Collusive Practices in Public Procurement Procedures. It also introduced a dedicated digital whistleblowing system specifically designed for contracting authorities to

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<sup>63</sup> Decisions to suspend state funding and financial support are taken by an absolute majority of the total number of Members of Parliament and transmitted to the Chairman of the Parliamentary Ethics Committee. Court of Audit (2024), p. 92. Also, Country visit Greece, Court of Audit and CIDA.

<sup>64</sup> Greek Government (2025), written input, pp. 70 and 86. Country visit Greece, CIDA.

<sup>65</sup> Flash Eurobarometer 557 on Businesses' attitudes towards corruption in the EU (2025). This is 23 percentage points above the EU average.

<sup>66</sup> Figure 59, 2025 EU Justice Scoreboard.

<sup>67</sup> Based on around 100 complaints in 2024, the HSPPA detected violations of procurement legislation such as direct awards, negotiated procedure without prior publication, or the successive extension of a contract to a specific operator. Concerns covered sectors including health, civil protection port services and water supply, including some projects co-financed by EU funds and reported to the EPPO. HSPPA (2025), written input, pp. 9-10 and 12 and Country visit Greece, HSPPA.

<sup>68</sup> According to their Code of Conduct, the Integrity Advisor's mission is to ensure a coherent framework for the effective protection of employees who identify, suffer the consequences of or wish to report integrity breaches, as well as to provide support, information and advice on ethics and integrity issues in their workplace. The NTA issued a Practical Guide for Integrity Advisors in December 2024. Greek Government (2025), written input, p. 66.

<sup>69</sup> This project was developed by the NTA, HSPPA and the Ministry of Development (General Secretariat of Commerce) in cooperation with OECD and funded by the EU Technical Support Instrument. 2024 Rule of Law Report, Greece, p. 18.

<sup>70</sup> Greek Government (2025), written input, pp. 65-67. A Code of Conduct for Internal Auditors and 54 codes of conduct for sports federations were also issued. In its 2024 report (base year 2023), the Court of Audit highlighted that apart from the 2022 Code of Ethical and Professional Conduct for Public Sector Employees, most ministries do not have specific codes of conduct and continue to exhibit weak or inadequate anti-fraud and corruption systems. Court of Audit (2024), pp. 91-92.

report bid rigging in public procurement procedures<sup>71</sup>. An Integrated Licencing and Inspections Management System (ILIMS) was introduced to standardise and digitalise licencing processes and actions serving citizens, businesses and the public administration. This should ensure more transparent and efficient communication between the competent authorities and economic operators which would also help to detect and reduce potential corruption practices. The ILIMS became operational on 5 February 2025 and so far, 30 000 licencing actions have been finalised, mostly by businesses. Businesses consider this to be a positive development<sup>72</sup>.

### **III. MEDIA PLURALISM AND MEDIA FREEDOM**

**Resources of the media regulator have been strengthened as the number of employees has increased but concerns remain regarding its independence and funding.** Additional positions have been filled at the end of 2024 for the National Council for Radio and Television (NCRTV), and more are expected to be filled at the end of the first semester of 2025<sup>73</sup>, which is a welcomed development. Challenges persist in relation to its operational independence and efficiency, the adequacy of its funding and the scope of its competences<sup>74</sup>. The Council of State is expected to rule on the legality of the new composition of the NCRTV<sup>75</sup>. The NCRTV notes that its dependence on ministerial approval for various regulatory and personnel matters hinders its capacity to effectively regulate the national audiovisual sector. Existing initiatives such as the “Code of Conduct” have been unable to take effect, as the necessary action by the Ministry has been outstanding since last year, with no administrative or legal remedy to expedite the process<sup>76</sup>. The 2025 Media Pluralism Monitor (MPM) maintains its previous assessment of the independence and effectiveness of the Media Authority as high risk<sup>77</sup>. Strengthening of the NCRTV is planned through the implementation of the law currently being developed to ensure compliance with the European Media Freedom Act<sup>78</sup>.

**The new appointment procedures of administrative bodies introduce positive changes, while concerns about the legislative framework and political independence of the public service media persist.** The selection process applicable to the CEO and Board Members of the Hellenic Radio and Television Corporation (ERT) introduced by the Law on selection of administrations of public bodies has been welcomed as more transparent and meritocratic, but as reported by stakeholders, it does not fully safeguard ERT’s autonomy since there is still significant leeway for appointments based on political considerations<sup>79</sup>. The procedure for the selection is supervised by the Supreme Council for Civil Personnel Selection and includes

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<sup>71</sup> Greek Government (2025), written input, p. 80.

<sup>72</sup> Greek Government (2025), written input, p. 91. Country visit, Hellenic Single Public Procurement Authority, the NTA and business associations.

<sup>73</sup> Country visit Greece, NCRTV.

<sup>74</sup> Country visit Greece, ERT and journalists’ associations.

<sup>75</sup> Country visit Greece, NCRTV. See also 2024 Rule of Law Report, Greece, pp. 19, 26-27 and below, Pillar IV on independent authorities.

<sup>76</sup> Country visit Greece, NCRTV and ERT. According to the Government, the extended timeline on the adoption of the Code aimed to ensuring the optimal outcome, including a thorough public consultation process; Greek Government (2025a).

<sup>77</sup> Media Pluralism Monitor (2025), p. 15.

<sup>78</sup> Greek Government (2025a).

<sup>79</sup> Law 5062/2023; Country visit Greece, ERT and journalists’ unions; International Press Institute (2025), written input, pp. 14-15; 2024 International Press Institute (2024) Media Capture Monitoring Report Greece, pp. 4, 12.

consultation with the Parliament’s cross-party Committee on Institutions and Transparency<sup>80</sup>. However, it is the Deputy Minister to the Prime Minister who proposes one of the three pre-selected candidates. Also, some selection procedures for Board Members have prioritised experience in the broadcasting sector, while others have been criticised as prioritising political affiliations<sup>81</sup>. Moreover, ERT continues to be subject to administrative oversight by the General Secretariat for Communication and Media, which some stakeholders criticise as the latter is placed under the responsibility of the Office of the Prime Minister<sup>82</sup>. The current framework provides that Board Members can only be dismissed for performance-related reasons stipulated in their “performance contract”<sup>83</sup>. The 2025 Media Pluralism Monitor has highlighted a continued lack of safeguards against dismissal of Board Members and politically motivated replacements and has adjusted its risk score from medium to high risk with regard to the independence of public service media<sup>84</sup>.

**Transparency of media ownership is strengthened by the continued operation of the Registry for Print Media (MET) and the Registry for Electronic Press (MHT).** The legal framework in place<sup>85</sup>, which entails that only media appearing in the registers are eligible to benefit from state advertising, as well as media legislation containing specific ownership limitations to prevent horizontal concentration in the media market<sup>86</sup>, are positive developments for the improvement of transparency of media ownership. The operation of the current system of audits based on random sampling, including on-site audits following complaints<sup>87</sup>, reinforces the reliability of both registries. The 2025 Media Pluralism Monitor (MPM) has maintained its medium to low-risk score for this area<sup>88</sup>.

**In June 2025, a new law was adopted to strengthen publicity and transparency in the printed and electronic press and reinforce editorial independence and institutional safeguards regarding state advertising, byline journalism and copyright protection<sup>89</sup>.** The law was adopted with the objective to align national legislation with the European Media Freedom Act. It further streamlines the operation of the two Registries for Print Media and Electronic Press, aiming to reduce administrative burden, simplify registration and renewal procedures, and ensure credibility and transparency in the printed and electronic press. The law also expands existing provisions to include electronic press with digital audio files like podcasts and clarifies the conditions for registration, including journalist-signed articles and circulation proof. Additionally, it extends deadlines for registration applications, allows for faster reapplication after rejection, reinforces checks on registered media, and amends existing provisions related to newspaper registration and sanction procedures. According to the Government, the most important regulatory amendments introduced by the new law include the obligation of signed articles from journalists both offline and online, the

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<sup>80</sup> The Chair of the Board and the CEO of ERT were appointed pursuant to the new selection procedure in September 2024 and February 2025 respectively. Greek Government (2025a).

<sup>81</sup> Country visit Greece, ERT and journalists’ unions; International Press Institute (2025), written input, p. 14-15; International Press Institute (2024), p. 15.

<sup>82</sup> International Press Institute (2024), p. 15. See also, 2024 Rule of Law Report, Greece, pp 20-21.

<sup>83</sup> According to the Government, there have been no arbitrary dismissals of Board members. The appointments of Board Members in 2024 were made following the expiry of the term of office of the previous members. Greek Government (2025a).

<sup>84</sup> Media Pluralism Monitor (2025), p. 28.

<sup>85</sup> Law 5005/2022.

<sup>86</sup> Laws 3592/2007 and 2328/1995.

<sup>87</sup> Country visit Greece, GS Media and Communication.

<sup>88</sup> Media Pluralism Monitor (2025), Greece, p. 18.

<sup>89</sup> Law 5212/2025; Greek Government (2025a).

clarification of definitions and the substantial increase of audits, administrative audits and on-site audits.

**The legal framework concerning the right of access to documents has been improved significantly, while challenges remain with its implementation.** Stakeholders have continuously highlighted persistent delays, unresponsiveness or refusals in response to requests for information or access to documents<sup>90</sup>. The Code of Administrative Procedure was amended to strengthen the public's right to access administrative documents by clarifying that they can be requested either anonymously or with identification by any individual or legal entity, both in person and electronically, and without the previous prerequisite of "reasonable interest", unless the document contains personal data<sup>91</sup>. Following amendment of the law, the necessary secondary legislation was adopted, and a circular was communicated to the administrative authorities giving guidance on the provisions. However, stakeholders indicate that the law's implementation is so far compromised by a lack of awareness by public authorities about the applicable legal obligations and their scope. The 2025 Media Pluralism Monitor notes overall alignment with international standards<sup>92</sup>.

**There have been several positive developments in the landscape for journalist safety, although challenges remain on the ground.** Since the publication of the 2024 Rule of Law Report, there have been several cases of attacks, particularly threats and verbal and physical aggression during demonstrations, including by police forces, reported and condemned by different journalists' associations. The 2025 Media Pluralism Monitor considers that the reported incidents indicate a systemic problem and has adjusted its score of the area "journalistic profession, its standard and protection" from medium to high risk<sup>93</sup>. The Council of Europe's Platform to promote the protection of journalism and safety of journalists registered three alerts in 2024 and one alert in 2025 relating to the physical integrity and safety of journalists, to the alleged use of spyware against journalists, to impunity in the case of an assassinated journalist and to the lack of adequate protection against defamation and insult<sup>94</sup>. The Mapping Media Freedom platform registered six new alerts<sup>95</sup> since the publication of the 2024 Rule of Law Report relating to physical assaults, intimidation and obstruction or restriction of access to information. In July 2024, two suspects for the murder in April 2021 of the journalist Giorgos Karaivaz were acquitted, and the investigation remains open<sup>96</sup>. The judicial investigation cleared all Greek state agencies and officials in the case of responsibility for the use of Predator spyware<sup>97</sup>. The presidential decree aiming at safeguarding the privacy of communications against software tracking has not yet been

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<sup>90</sup> Country visit Greece, journalists' union and Foreign Press Association; Civil Society Report (2025), pp. 49-50; Civil Liberties Union for Europe (2025), p. 79.

<sup>91</sup> Law 5143/2024, adopted on 9 October 2024 and in force as of 1 January 2025, amends Art. 5 of the Code of Administrative Procedure, which regulates the right of interested parties to have access to administrative documents created by public services. Greek Government (2025), written input, p. 107.

<sup>92</sup> Country visit Greece, journalists' unions and Foreign Press Association; Media Pluralism Monitor (2025), p. 13.

<sup>93</sup> Media Pluralism Monitor (2025), p. 14.

<sup>94</sup> Council of Europe Platform to promote the protection of journalism and safety of journalists (2024-2025). Greece has replied to all alerts.

<sup>95</sup> European Centre for Press and Media Freedom Mapping Media Freedom (2024-2025).

<sup>96</sup> Country visit Greece, Ministry of Justice.

<sup>97</sup> 2024 Rule of Law Report, Greece, pp. 28-29. In July 2024, the General Prosecutor of the Supreme Court issued a statement on the outcome of the judicial investigation into the alleged use of spyware. Both the statement and the outcome of the investigations were subject to strong criticism by journalists, legal scholars and CSOs. Civil Society Report (2025), pp. 15-18.

adopted<sup>98</sup>. In May 2024, journalists' unions and the Government signed a generally welcomed collective labour agreement for journalists employed by the State and public media which institutionalises working conditions including safeguards on editorial independence, protection against arbitrary dismissal or employer pressure as well enhanced protection for women journalists against harassment<sup>99</sup>. While journalists' associations welcomed the agreement, they still voice concerns regarding the overall framework and work conditions for privately or independently employed journalists<sup>100</sup>. Moreover, the Government has put in place different implementing measures, such as the adoption of a National Plan for Public Assemblies, in January 2021, that includes specific guidelines on protecting journalists covering demonstrations, or the establishment, in January 2023, of the International Training Centre for the Safety of Journalists providing relevant training to media professionals<sup>101</sup>. In July 2024, a legislative provision was adopted with the intention to prevent direct broadcasting of trials to an indefinite number of persons without permission of the court, parties or prosecutors<sup>102</sup>, which was perceived by journalists as a restriction to journalistic coverage of trials by prohibiting full or partial broadcast by any technical means. Journalists' associations report that the law has created legal uncertainty, as it seems to have been inconsistently applied by courts and impair their ability to report effectively<sup>103</sup>.

**Efforts building on measures taken in previous years amount to important steps concerning legislative and non-legislative safeguards to improve the protection of journalists, in particular as regards abusive lawsuits<sup>104</sup>.** To address the issues identified as regards SLAPPs<sup>105</sup>, special drafting committees and a national expert group were set up to work on the transposition of the anti-SLAPP Directive with the objective to expand the safeguards provided by the Directive also to domestic cases, following the Anti-SLAPP Recommendation<sup>106</sup>. These developments and the upgrade of operations, introduced in May 2025, of the SLAPPs Observatory of the Panhellenic Federation of Journalists Associations (POESY) to monitor corresponding incidents are perceived positively by stakeholders<sup>107</sup>. The Task Force on Ensuring the Protection, Safety and Empowerment of Journalists and other Media Professionals continues its work<sup>108</sup>, with some journalists' associations viewing it as a productive platform for engagement while others criticise it as being bureaucratic in nature<sup>109</sup>. Positive developments have been previously reported regarding journalists' safety such as the abolition of the criminalisation of simple defamation and a new law aiming to

<sup>98</sup> Foreseen in Article 13 of Law 5002/2022. Country visit Greece, GS Media and Communication. Until its adoption, the general prohibition on the use of surveillance software established by Article 12 remains in force and is punishable by severe prison sentences ranging from 2 to 5 years.

<sup>99</sup> Country visit Greece, GS Media and Communication. This agreement follows different measures adopted by the government to support the private media sector in previous reporting periods such as the EDOEAP program.

<sup>100</sup> Country visit Greece, journalists' unions.

<sup>101</sup> Greek Government (2025a).

<sup>102</sup> Article 31 of Law 5119/2024; Greek Government, written input.

<sup>103</sup> Country visit Greece, journalists' unions; Civil Society Report and RSF, written inputs, pp. 48 and 15-16 respectively; Panhellenic Federation of Journalists' Associations (2025).

<sup>104</sup> The 2024 Rule of Law Report recommended to Greece to further advance with the process of adopting legislative and non-legislative safeguards to improve the protection of journalists, in particular as regards abusive lawsuits against journalists and their safety, in line with the adopted Memorandum of Understanding and taking into account European standards on the protection of journalists.

<sup>105</sup> Country visit, Greece, journalists' associations.

<sup>106</sup> Country visit Greece, GS Media and Communication.

<sup>107</sup> Country visit Greece, journalists' unions.

<sup>108</sup> Country visit Greece, GS Media and Communication. Greek Government (2025), written input, p. 104-105.

<sup>109</sup> Country visit Greece, journalists' unions.

combat violence in the context of sport events that includes specific provisions for the protection of journalists, both adopted in February 2024.<sup>110</sup> The 2025 Media Pluralism Monitor concludes nonetheless that a significant alteration in the protection for journalists in Greece has not yet been felt<sup>111</sup>. Considering the above, there has been significant progress on the implementation of the recommendation made in the 2024 Rule of Law Report.

#### **IV. OTHER INSTITUTIONAL ISSUES RELATED TO CHECKS AND BALANCES**

**The positive trend of avoiding expedited legislative procedures for the adoption of legislation continues and the statutory timeframe for public consultations is being observed, while participation and transparency in the law-making process could be further improved<sup>112</sup>.** Draft bills are systematically submitted to public consultation and the two weeks statutory period for public consultation is being observed<sup>113</sup>. Also, the number of draft bills submitted to Parliament almost immediately after the end of the public consultation has drastically dropped<sup>114</sup>. The percentage of additional provisions contained in the final text of legislation without having been submitted to public consultation remained limited in the reporting period<sup>115</sup>. However, most of these additional provisions are submitted to Parliament as amendments the day before the voting of the draft in Plenary and are often unrelated to the subject matter of the law<sup>116</sup>. Independent authorities, justice stakeholders and business associations highlight the persistent need for early engagement of interested parties in the law-making process ahead of public consultations<sup>117</sup>. The National Human Rights Commission referred to its involvement in the transposition of EU legislation on improving gender balance among directors of listed companies as a positive example of early engagement<sup>118</sup>. The OECD linked the need to ensure timely consultation of stakeholders on draft legislation with improving the business environment and addressed a corresponding recommendation to Greece<sup>119</sup>. In an effort to strengthen the social dialogue and participatory democracy in the law-making process, as of December 2024, all draft bills are submitted to

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<sup>110</sup> 2024 Rule of Law Report, Greece, pp 21-23. Law 5090/2024 and Law 5085/2024.

<sup>111</sup> Media Pluralism Monitor (2025), p. 25.

<sup>112</sup> The 2024 Rule of Law Report recommended to Greece to “step up the efforts to ensure the effective and timely consultation in practice of stakeholders on draft legislation, including by observing the statutory timeframe for public consultation”.

<sup>113</sup> Greek Government (2025), written input, pp. 114-115. Data available in the portal [opengov.gr](https://opengov.gr).

<sup>114</sup> During the reporting period only 3 draft bills were submitted to Parliament the same or the following day after the public consultation ended (compared to 28 during the previous reporting period).

<sup>115</sup> 16.5% of the articles included in the published law were not submitted for public consultation (15.3%, in 2023). See also, KEFIM (2024), p.3. According to the Government, in 2024, the percentage of articles opened to public consultation as part of the published draft in relation to the total articles submitted to Parliament reached 91,4% and the percentage in relation to the total articles published reached 82.5%. Greek Government (2025), p.115.

<sup>116</sup> During the reporting period, 44 (out of 48) amendments were submitted the day before the discussion in the Plenary. According to the Government, the prevailing parliamentary practice allows the submission of amendments up until the adoption of the daily agenda. The average number of provisions per amendment remained rather stable to 4.5 (4 between July 2023 and June 2024). See also 2024 Rule of Law Report, Greece, pp. 25-26; Civil Society Report (2025), pp. 54-55. OECD (2024), Economic Surveys: Greece 2024, p.15; European Semester, 2025 Country Report Greece, Annex 6 and GRECO (2024), Fifth Evaluation Round, Compliance Report on Greece, paras 28-31. According to the Government, in the current legislative period, which started in July 2023, the number of provisions per amendment is constantly decreasing, currently reaching a historic low of 3.7 and the number of amendments overall has reached a historic low of 0.8 per draft bill. Greek Government (2025), p.114.

<sup>117</sup> Country visit, Ombudsperson, NCHR, Athens Bar Association, Judges associations, Business associations.

<sup>118</sup> ENNHRI (2025), Greece, pp. 216-217.

<sup>119</sup> OECD (2024), p.13.

the Economic and Social Council<sup>120</sup> for its opinion in parallel with the public consultation and so far, the Economic and Social Council has issued 13 opinions. The opinions of the Economic and Social Council are incorporated into the regulatory impact analysis and submitted together with the draft law to the Parliament<sup>121</sup>. Plans to propose legislation implementing the right of 500 000 citizens to introduce draft bills (citizens' legislative initiative) could further improve public participation in decision-making<sup>122</sup>. There has therefore been overall some further progress on the implementation of the recommendation made in previous reports.

**Less than a third of companies surveyed in Greece express confidence in the effectiveness of investment protection.** 28% of companies are very or fairly confident that investments are protected by law and courts<sup>123</sup>. The main reason among companies for their lack of confidence is the frequent changes in legislation or concerns about quality of the law-making process (58%)<sup>124</sup>. Fast changing legislation is frequently quoted as a key challenge for doing business in the country, because it increases uncertainty which makes it more difficult for potential investors to make informed decisions<sup>125</sup>. It is also a challenge for citizens as well as the judiciary and lawyers<sup>126</sup>. For the Government, the current constitutional structure leaves limited leeway for regulating through implementing acts, which means that changes in primary legislation are partly inevitable to meet the constantly evolving needs of modern social and economic realities<sup>127</sup>. As regards authorities relevant for economic operators, 41% of companies perceive the level of independence of the national competition authority as very or fairly good<sup>128</sup>. A number of judicial mechanisms are in place to ensure the implementation of administrative court judgments, including fines for responsible officials, the possibility to issue binding orders to perform or refrain from the administrative act, and to award direct and consequential damages and compensation<sup>129</sup>.

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<sup>120</sup> The Economic and Social Council is a consultative body established in 1994, composed of employers, employees and other interested parties. Part of its mission is to formulate opinions on draft legislation.

<sup>121</sup> Greek Government (2025), additional input.

<sup>122</sup> Article 73 para. 6 of the Constitution. General Secretariat for Legal and Parliamentary Affairs (2025), written input, pp. 5-6.

<sup>123</sup> Figure 54, 2025 EU Justice Scoreboard.

<sup>124</sup> Figure 55, 2025 EU Justice Scoreboard. 58% of the surveyed investors referred to frequent changes in legislation (53% in 2024 and 2023). EIB Investment Survey 2024 Country Overview: Greece, p. 17. 90% of Greek companies are concerned about business regulations.

<sup>125</sup> European Semester (2025), Annex 6. For concerns regarding the law-making process see also the previous paragraph.

<sup>126</sup> Prosecutors and Association of Judges of the Council of State (2025), written inputs, pp. 1 and 5; Country visit, Greece, Athens Bar Association. Civil society also referred to frequent changes in legislation, often within a short period of time from its entry into force or its previous amendment. For instance, following the revision of the Codes on criminal law and criminal procedure in February 2024 (see 2024 Rule of Law Report, Greece, pp. 12-13), subsequent amendments were introduced by six different laws (Laws 5095/2024, 5108/2024, 5134/2024, 5149/2024, 5151/2024 and 5172/2025). Civil Society Report (2025), written input, pp. 56-57.

<sup>127</sup> General Secretariat for Legal and Parliamentary Affairs (2025), written input, pp. 1-2.

<sup>128</sup> The Hellenic Competition Commission is an independent authority which promotes and defends competition in all markets, serving the consumer as well as businesses. It is the primary competition body in Greece, exclusively responsible for the enforcement of national and EU competition rules. Figure 60, 2025 EU Justice Scoreboard.

<sup>129</sup> Figure 49, 2025 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. 2024 Rule of Law Report, Greece, p. 31.

**Efforts are under way to ensure that the judiciary is more involved in overseeing the immunity regime for members of the Government.** In April 2025, Parliament decided to directly refer a former deputy minister to the Judicial Council over allegations of breach of duty, without a preliminary investigation by a special parliamentary committee<sup>130</sup>. Parliament's decision was motivated by the need to entrust the full investigation to senior members of the judiciary and to reserve the same treatment to the former minister as to four private individuals already indicted for the same facts<sup>131</sup>. Although this decision generated intense discussions among political and legal experts, including as to its compliance with the Constitution, there is common understanding that the current regime needs to be evaluated in depth and revised<sup>132</sup>. The Government announced its intention for this issue to be covered in the forthcoming constitutional revision<sup>133</sup>. Stakeholders consider such a reform a necessary step in restoring citizens' trust in the institutions and the justice system<sup>134</sup>.

**Previously identified challenges regarding the appointment of members of Independent Authorities established by the Constitution remain.** Article 101A of the Constitution requires a qualified majority, including inter-party consensus, for the selection of the heads and members of these Independent Authorities<sup>135</sup>. In October 2024, the Conference of Presidents of Parliament did not reach the required qualified majority to elect a new Ombudsperson<sup>136</sup>, and there are prolonged delays in selecting new members of the Data Protection Authority. In November 2024, the Council of State rejected the applications for annulment submitted by the Bar against the decisions appointing new members of the National Council for Radio and Television (NCRTV) and the Authority for Communication Security and Privacy<sup>137</sup> for lack of legal standing<sup>138</sup>. However, the Council of State will eventually rule on the legality of the appointments, as several applications for annulment against fines imposed by the NCRTV are pending<sup>139</sup>. Independent authorities consider that the power to elect their members should be given to a parliamentary body with fixed composition, while it is important to maintain a qualified majority. They also confirm that

<sup>130</sup> The decision to initiate criminal proceedings against former and serving members of the Government is taken by Parliament. The case is then tried by a Special Court. A special Judicial Council decides on preliminary issues; one of its members is appointed as investigative magistrate with extensive investigative powers. All judges participating are chosen by lot from among the judges serving at the highest courts. See also, 2024 Rule of Law Report, Greece, p. 29.

<sup>131</sup> The former minister requested himself that his case be assessed by an independent judiciary rather than a parliamentary committee. Two other cases were submitted to Parliament regarding alleged involvement of active and/or former Members of the Government in criminal offences.

<sup>132</sup> See among others, Kathimerini (2025); Syntagma Watch (2025); ToVima (2025).

<sup>133</sup> General Secretariat for Legal and Parliamentary Affairs (2025), written input, p. 6.

<sup>134</sup> Country visit Greece, Court of Audit, Associations of judges, and Athens Bar Association.

<sup>135</sup> The five independent authorities established by the Constitution are the Data Protection Authority; the National Council for Radio and Television (NCRTV); the Hellenic Authority for Communication Security and Privacy (ADAE); the Supreme Council for Civil Personnel Selection; and the Ombudsperson.

<sup>136</sup> The term of office of the current Ombudsperson, which was set to end in June 2022, has been extended until the election of his/her successor, as provided by article 101A of the Constitution. This was the first attempt to appoint a new Ombudsperson.

<sup>137</sup> The main legal issue raised was whether the 3/5 majority required for the appointments of all members of the five independent authorities established by the Constitution was respected. See, in detail, 2024 Rule of Law Report, Greece, pp. 26-27.

<sup>138</sup> The Bar considered that the judgment undermined the role of lawyers in the system of checks and balances and submitted an application to the European Court of Human Rights. CCBE (2025), written input, p. 97.

<sup>139</sup> The main ground for annulment concerns the composition of the NCRTV and any decision will be relevant for all five independent authorities. Country visit, NCRTV.

previously reported challenges regarding their budget and human resources remain<sup>140</sup>, and continue referring to the need for uniformity in their legal framework. On the initiative of the Government, a study on improving the institutional arrangements of all existing independent authorities is being carried out by the OECD and funded under the European Commission's Technical Support Instrument<sup>141</sup>.

**Progress with the judicial investigation following the Pylos shipwreck is a positive development to start addressing deficiencies in investigating incidents of alleged misconduct involving law enforcement officers.** In January 2025, the European Court of Human Rights issued three judgments finding that the authorities had failed to conduct effective investigations into alleged violations of fundamental rights by law enforcement officers<sup>142</sup>. The ECtHR has raised serious doubts as to the effectiveness of criminal procedures in specific areas, referring to data submitted by the Government, which indicated that none of the cases in which criminal investigations were opened went beyond the preliminary investigation stage<sup>143</sup>. The UN Human Rights Committee recommended, in November 2024, that such allegations are promptly and thoroughly investigated by an independent authority<sup>144</sup>. In May 2025, criminal charges were brought by the Prosecutor of the Piraeus Naval Court against 17 members of the Hellenic Coast Guard, including senior officers, in the context of the judicial investigations into the Pylos shipwreck. Stakeholders considered it a significant development in the path towards justice and accountability<sup>145</sup>. In February 2025, the Ombudsperson concluded its investigation into the Pylos shipwreck, finding serious failures of the coast guard, and submitted his report to the competent authorities for the necessary follow-up<sup>146</sup>. Despite initial statements by the Government questioning the basis and the reasoning used by the Ombudsperson<sup>147</sup>, which caused reactions by national and international stakeholders<sup>148</sup>, the Government will decide on the appropriate follow-up pending legal advice from the Legal Council of State<sup>149</sup>. Discussions on preventing misconduct and improving the effectiveness of related investigations were held between the Department of Execution of Judgments of the ECtHR of the Council of Europe and the

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<sup>140</sup> 2024 Rule of Law Report, Greece, p. 26-27, Country visit Greece, Greek Ombudsman, NCRTV and NCHR. See also, the interventions of the Heads of DPA and ADAE during the Open discussion 'How independent are the Independent Authorities?', 11 March 2025.

<sup>141</sup> Greek government (2025), written input, p. 124. In Greece, there are currently 28 independent administrative authorities, covering a broad range of areas, including the five independent authorities established by the Constitution tasked to guarantee the respect of fundamental rights and values.

<sup>142</sup> Judgments of the ECtHR, applications 15783/21, *A.R.E v. Greece*, paras 191-201 and 304; 44758/20, *Panayotopoulos v. Greece*, para 118; and 22776/18 *Almukhlas et Al-Maliki v. Greece*, paras 96-104.

<sup>143</sup> *A.R.E v. Greece*, para 198. Greece requested the referral of the case to the Grand Chamber of the ECtHR. See also, EU Fundamental Rights Agency (FRA) (2024), Guidance on investigating alleged ill-treatment at borders, p. 20; CPT (2024), para 159; ENNHRI (2025), pp. 243-244; Ministry of Justice (2024); Ministry of Defence (2024).

<sup>144</sup> UN Human Rights Committee (2024), Concluding observations on the third periodic report of Greece, p. 16.

<sup>145</sup> Press Release by lawyers and organisations representing the survivors of the Pylos shipwreck, 23 May 2025.

<sup>146</sup> 2024 Rule of Law Report, Greece, pp. 27-28; Greek Ombudsman (2025).

<sup>147</sup> Ministry of Maritime Affairs and Insular Policy, press release, 4 February 2025; Spokesperson, interview Skai radio, 4 February 2025; Deputy Minister for Migration and Asylum, Liberal, 9 February 2025.

<sup>148</sup> Council of Europe Commissioner for Human Rights (2025); NCHR (2025); Union of Staff members of the Office of the Greek Ombudsman, (2025); Civil Society Report (2025), additional written input, p. 2; ENNHRI (2025), p. 244.

<sup>149</sup> The legal opinion of the Legal Council of State was deemed necessary given the high rank positions of the officers involved and the need to avoid any potential conflicts of interest in the assignment of the administrative inquiry. Ministry of Justice (2025), written input, p. 35.

Government in April 2025<sup>150</sup>. Part of the efforts to improve the efficiency of disciplinary proceedings of the law enforcement officers include the reform of the police disciplinary law<sup>151</sup>.

**On 1 January 2025, Greece had 30 leading judgments of the European Court of Human Rights pending implementation, an increase of 2 compared to the previous year<sup>152</sup>.** At that time, Greece's rate of leading judgments from the past 10 years that had been implemented was at 66% (compared to 70% in 2024; 34% remained pending), and the average time that the judgments had been pending implementation was 6 years and 1 months (compared to 6 years and 7 months in 2024)<sup>153</sup>. The oldest leading judgment, pending implementation for 16 years, concerns the violations of the right to freedom of association due to the domestic courts' rulings not to register associations<sup>154</sup>. As regards the respect of payment deadlines, on 31 December 2024 there were 7 cases in total awaiting confirmation of payments (compared to 7 in 2023)<sup>155</sup>. On 16 June 2025, the number of leading judgments pending implementation had increased to 31<sup>156</sup>. A new ground for the reopening of proceedings was added in the Code of Civil Procedure, allowing the re-examination of a case following a judgment of the ECtHR finding a breach of the right to a fair trial or another right guaranteed by the European Convention of Human Rights<sup>157</sup>. The Government is also preparing draft legislation on state liability for acts of the judiciary to implement the Court's judgment in *Zoumboulidis v. Greece*<sup>158</sup>.

**There has been limited progress on the recommendation relating to the establishment of a structured dialogue with civil society organisations, while the evaluation of the existing registration regulatory framework was initiated<sup>159</sup>.** The civic space in Greece remains "obstructed"<sup>160</sup>. The registration framework remains complex and fragmented<sup>161</sup>. The UN Human Rights Committee in November 2024 expressed concerns about the stringent registration requirements imposed on civil society organisations (CSOs), in particular those working in the areas of migration and asylum, and called upon Greece to review its legislation<sup>162</sup>. The case before the Council of State challenging some aspects of the legality of the legislation on the registration of the CSOs active in the area of asylum, migration and

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<sup>150</sup> In the context of the enhanced supervision for the group of cases *Sidiropoulos and Papakostas v. Greece*.

<sup>151</sup> The presidential decree 61/2024 entered into force in November 2024, taking also into account relevant recommendations made by the Greek Ombudsperson. Ministry of Justice (2025), written input, pp. 39-40. See also, Pillar II above.

<sup>152</sup> For an explanation of the supervision process, see the [website](#) of the Council of Europe.

<sup>153</sup> 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 2025. EIN (2025), written input, p. 4.

<sup>154</sup> Judgment of the ECtHR, 35151/05, *Bekir-Ousta and Others v. Greece*, pending implementation since 2008.

<sup>155</sup> Council of Europe (2025), p. 156.

<sup>156</sup> Data according to the online database of the Council of Europe (HUDOC).

<sup>157</sup> Article 25 of Law 5130/24. Greek Government, written input, pp. 129-130.

<sup>158</sup> Judgment of the ECtHR, application 57246/21, *Zoumpoulidis v. Greece*.

<sup>159</sup> The 2024 Rule of Law Report recommended to Greece to "strengthen efforts to evaluate the current legal framework for the registration system for civil society organisations and assess whether there is a need to amend it, while moving forward with a structured dialogue with CSOs".

<sup>160</sup> Rating by CIVICUS; ratings are on a five-category scale defined as: open, narrowed, obstructed, repressed and closed (Civics (2025), Monitor tracking civic space-Greece).

<sup>161</sup> There are eleven Registries managed by different ministries, including the Public Database and the Special Registry of the Ministry of Interior and the Registries of Greek and Foreign Non-Governmental Organisations and NGO Members of the Ministry of Migration and Asylum; 2024 Rule of Law Report, pp. 31-32.

<sup>162</sup> UN Human Rights Committee (2024), p. 10; OHCHR (2025), written input, p. 7.

social inclusion remains pending for several years<sup>163</sup>. While the announced digital interoperability between the different registries is not yet in place, following an agreement between the Ministry of Interior and the Ministry of Migration and Asylum (MoMA) on the technical solution, the relevant tender is expected to be launched by the end of June 2025<sup>164</sup>. The MoMA intends to evaluate and revise the legal framework of its special registries by the end of 2025 with a view to simplifying procedures and reducing administrative burden<sup>165</sup>. For this purpose, and in view of placing its engagement with civil society on a more structured basis, the MoMA requested, in late May 2025, feedback from all registered CSOs through two targeted questionnaires<sup>166</sup>. Stakeholders noted that despite announcements about upcoming reforms, for now the rules governing registration remain unchanged<sup>167</sup>. In parallel, the Ministry of Interior is preparing draft legislation establishing an additional platform for the compulsory registration of all CSOs<sup>168</sup>. The purpose of the new platform, on which CSOs will need to register annually, is to carry out a complete mapping of CSOs activities<sup>169</sup>. The Government considers that a structured dialogue is established between registered CSOs and the MoMA, however so far only one meeting has taken place in November 2024. In this context, the MoMA plans to hold biannual meetings per thematic pillar<sup>170</sup>. CSOs have expressed criticism about the format and concerns about statements accusing CSOs of involvement in smuggling and embezzlements of funds<sup>171</sup>. The European Commission considers that structured dialogues must be regular, long-lasting and result-oriented<sup>172</sup>. In light of the above, there has been limited progress on the implementation of the recommendations made in previous reports.

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<sup>163</sup> 2024 Rule of Law Report, Country Chapter on the rule of law situation in Greece, p. 28.

<sup>164</sup> Greek Government (2025a).

<sup>165</sup> 2025 National Plan of Government Policy, pp. 198, 340-341; Country visit, MoMA.

<sup>166</sup> CSOs were asked to provide their views in relation to the registration and renewal procedures, the operation of the NGO Members Special Registry and the current legislative framework, The questionnaires also included questions on how to achieve better cooperation between all parties involved. 39 out of 92 registered CSOs provided their input. Greek Government (2025a).

<sup>167</sup> ENNHRI, Greece, p. 219; Civil Society Report (2025), pp. 64- 66.

<sup>168</sup> According to the Government, part of the proposals included in the draft bill respond to an Action Plan for Civil Society, prepared by the Bodossaki Foundation. The Plan provides an overview of the current state of civil society in Greece and makes recommendations for self-regulation and proposals for an effective Regulatory and Financial Framework. Bodossaki Foundation (2025).

<sup>169</sup> Greek Government (2025), written input, p. 137; Country visit, Ministry of Interior.

<sup>170</sup> The next meeting is scheduled to take place in September 2025 and focus on strengthening cooperation between the authorities and CSOs. Another meeting is set for March 2026. The choice of the subject matter of the discussions will depend on the outcome of the previous meeting. Greek Government (2025a).

<sup>171</sup> Civil Society Report (2025), additional written input, pp. 3-4, MoMA press release 16 April 2025; Joint letter by eight CSOs providing services to refugees and applicants for international protection on the Greek islands, 2 June 2025.

<sup>172</sup> 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.

## **Annex I: List of sources in alphabetical order\***

\* *The list of contributions received in the context of the consultation for the 2025 Rule of Law report can be found at [https://commission.europa.eu/publications/2025-rule-law-report-targeted-stakeholder-consultation\\_en](https://commission.europa.eu/publications/2025-rule-law-report-targeted-stakeholder-consultation_en).*

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## **Annex II: Country visit to Greece**

The Commission services held virtual meetings in March 2025 with:

- Association of Administrative Judges
- Association of Judges and Prosecutors
- Association of Judges of the Council of State
- 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 Ombudsperson
- Hellenic Broadcasting Corporation (ERT)
- Hellenic Confederation of Commerce & Entrepreneurship (ESEE)
- Hellenic Federation of Enterprises (SEV)
- Hellenic Single Public Procurement Authority (HSPPA)
- HIAS Greece
- Homo Digitalis
- Internal Affairs Unit of Law Enforcement Bodies, Ministry of Citizen Protection
- 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
- Secretariat General of Legal and Parliamentary Affairs
- Solomon
- Supreme Court
- Transparency International Greece
- Vouliwatch

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

- Amnesty International
- Araminta
- Civil Liberties Union for Europe
- Civil Society Europe
- European Civic Forum
- European Partnership for Democracy
- European Youth Forum
- International Commission of Jurists
- International Federation for Human Rights (FIDH)
- JEF Europe
- Philea – Philanthropy Europe Association
- Transparency International