EUROPEAN COMMITTEE OF SOCIAL RIGHTS
COMITE EUROPEEN DES DROITS SOCIAUX

Case Document No.3

European Bureau for Conscientious Objection (EBCO) v. Greece
Complaint No. 242/2024

RESPONSE FROM EBCO TO THE GOVERNMENT'S SUBMISSIONS ON THE MERITS

Registered at the Secretariat on 11 May 2026

European Bureau for Conscientious Objection

Collective Complaint No. 242/2024

European Bureau for Conscientious Objection (EBCO) v. Greece

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Response of EBCO to the Submissions by the Greek Government on the merits of the Collective Complaint No. 242/2024

11 May 2026

Complainant:

European Bureau for Conscientious Objection

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A. Introduction

1. On 30 June 2024, the European Bureau for Conscientious Objection (hereinafter "EBCO" or "the Complainant") submitted a Collective Complaint (hereinafter "the Complaint") to the European Committee of Social Rights of the Council of Europe (hereinafter "the Committee") concerning violations of the (Revised) European Social Charter (hereinafter "the Charter") in the case of conscientious objectors to military service (hereinafter "conscientious objectors") in Greece. The Complaint was registered on the 1st of July 2024.

2. On 20 January 2026, the Committee unanimously declared the Complaint admissible.

3. On the 1st of April 2026 the Committee provided EBCO with the submissions of the Greek Government (hereinafter "Government's Submissions" and "the Government") on the merits of the Complaint. The Committee invited EBCO to submit a response to the Government's Submissions by 13 May 2026.

4. EBCO has reviewed the Government's Submissions and respectfully submits its comments in response. In its Response, EBCO addresses the merits of the Complaint only to the extent that is necessary in order to respond to the Government's Submissions and clarify the situation. The details and main arguments of EBCO concerning the Complaint are set out in the Complaint itself. Accordingly, EBCO respectfully requests the Committee to read this Response in conjunction with the Complaint.

5. EBCO's Response, besides this introduction, has four main parts. The first part concerns the response to specific Government's Submissions. The second part is updated information reflecting a deterioration of the situation and the discrimination faced by conscientious objectors in Greece following the submission of the Complaint. The third part is a compilation of minimum measures that the Government could and should have taken in order to address the violations of the Charter. The last part contains the Complainant's concluding remarks.

B. Response to specific Government's Submissions.

6. Regarding the part of Government's Submissions concerning "alleged violation of article 30 of the Revised European Social Charter" (Government's Submissions para. 7), EBCO wishes to respectfully observe that the government dedicates most of this paragraph in the description of provisions which are already cited in brief in the Complaint, specifically in the second sentence of paragraph 74 ("In 2019, an amendment of the legislation extended a provision concerning the coverage of certain travel expenses of conscripts to conscientious objectors too.[1]") However, the

[1] [Note in the original] Law 4609/2019, art. 23, para. 8.

Government's Submissions fail to respond to the main argument of paragraph 74 of the Complaint, which is that despite the above cited provisions, "the coverage of other travel expenses is still denied to conscientious objectors, despite being granted to conscripts. Specifically, conscripts are entitled once during their military service to travel for free to any destination, with any means of transportation apart from air travel, if they have leave of more than 4 days[2]." This is denied to conscientious objectors.

7. The last part of Government's Submissions regarding "alleged violation of article 30 of the Revised European Social Charter" (Government's Submissions para. 7), which concerns the provisions for buying-off or buying out part of the (military or alternative) service after certain age, merits a more detailed examination because rather than being an example of equality, it is in fact yet another example of blatant discrimination, which directly affects economic and social rights of conscientious objectors in Greece. Greek legislation provides the opportunity to both conscripts and conscientious objectors to military service, after a certain age, to serve only a part of the military or alternative service (a minimum of 20 days) and buy out the rest. This is discriminatory for people of lower income, but it also results in discrimination against conscientious objectors. In the Government's Submissions it is explicitly admitted that "there is no difference between conscientious objectors who fulfill alternative service obligations and soldiers who fulfill military service obligations as regards […] the amount set to buy off each month of service." It is exactly this provision which results in further financial burden for conscientious objectors and in discrimination in comparison with conscripts performing and buying out military service. According to the law, the amount of money required in order to buy out a month of alternative service cannot be less than the amount of money required to buy out a month of military service,[3] and it has always (since 2011 when the possibility for buying out was extended to conscientious objectors too) been set to be equal. However, as the cost for a month of alternative service is equal to the cost for a month of military service and conscientious objectors are required to buy out months of *alternative* service, which is usually *3 months longer*, (with the exception of one category of reduced service which is 2 months longer) this means that conscientious objectors are required to pay a *significantly greater* amount of money in order to buy out the same obligation or duty. Specifically, by the time the Complaint was submitted in 2024, the amount of money required to buy out a month of alternative service was equal to the amount of money required to buy out a month of military service, i.e. €810.[4] Consequently, conscientious objectors to military service, by that time (and still today and until the end of 2030 – see relevant part about reform in the legislation, in this Response, para. 45) were required to pay (up to) 3 (months more) x €810 = €2,430 more than conscripts buying out *the same* obligation to the State or the Nation.

[2] [Note in the original] Joint Ministerial Decision of the Ministers of National Defence and of Finance Φ. 800/23/88906/Σ.15217/11.8.2021, published in Government Gazette, Vol. B, 6003, 20 December 2021, art. 1, para. 3.
[3] Currently in Law 5265/2026, art. 240, para. 34.
[4] Joint Ministerial Decision of the Minister of Finance and the Minister of National Defence No Φ. 429.1/ 19/281812/4-3-2011 (Government Gazette vol. B 517/5-4-2011), article 1, para. 1.

8. The above explained discrimination is not merely an observation of the Complainant. Such discrimination has been previously highlighted by the Greek Ombudsman,[5] the Greek National Commission for Human Rights (GNCHR),[6] Amnesty International[7] and, most importantly, by the UN Special Rapporteur on freedom of religion or belief, who noted that "an additional financial burden is placed upon COs due to […] the higher costs associated with buying out time of alternative service as compared to buying out time serving in the armed forces. This has not been addressed thus far."[8] It is possible also that when the UN Human Rights Committee refers to the "cost" of alternative service,[9] is referring, *inter alia*, to this issue, especially insofar this issue has been pointed out to the Human Rights Committee by civil society organisations.[10]

9. It is worth noting also that such discrimination particularly affects conscientious objectors to military service of lower income, which are either required to pay

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[5] Συνήγορος του Πολίτη, «Ο Συνήγορος του Πολίτη για την άρση του προστίμου ανυποταξίας», Press Release of 2 February 2016. See the phrase "την εξίσωση του ποσού εξαγοράς της εναλλακτικής υπηρεσίας" ["equalising the amount of buy-out of alternative service"]. Archived at: https://web.archive.org/web/20201027144458/https://www.synigoros.gr/resources/160202-dt.pdf
Συνήγορος του Πολίτη, Ειδική Έκθεση «Ο θεσμός της εναλλακτικής πολιτικής-κοινωνικής υπηρεσίας. Προτάσεις αναμόρφωσης.» (1999), κεφ. 2. «Η διάρκεια της Ε.Π.Κ.Υ.» https://www.synigoros.gr/el/category/eidikes-ek8eseis/post/eidikh-ek8esh-or-o-8esmos-ths-enallaktikhs-politikhs-koinwnikhs-yphresias-protaseis-anamorfwshs

[6] GNCHR, Input to the OHCHR quadrennial analytical report 2022 on conscientious objection to military service, 21 March 2022, pp. 19-20. https://www.nchr.gr/images/English_Site/ANTIRRISIES/GNCHR_input_to_OHCHR_report_2022_on_Conscientious_Objectors.pdf
GNCHR, Submission to the quadrennial analytical report 2017 on conscientious objection to military service of the UN High Commissioner of Human Rights (February 2017), pp. 10-11. http://www.nchr.gr/images/pdf/apofaseis/antirisies_suneidisis/Submission%20of%20the%20GNCHR%20to%20the%20quadrennial%20analytical%20report%202017.pdf
GNCHR submission regarding the continuous violation of Article 1§2 of the European Social Charter in the case of alternative service for conscientious objectors in Greece (11.11.2016), chapter. «Multiple discriminations in the case of conscientious objectors who are above 35 years of age», p. 5-6. https://www.nchr.gr/images/pdf/apofaseis/ellinikes_ektheseis_en_ell_org/CoE/GNCHR_submission_ECSR_NOVEMBER.pdf#_blank

[7] Amnesty International, Greece: Observations on the right to conscientious objection - "serious violations of Greece's obligations towards conscientious objectors remain unaddressed in proposed bill despite some positive steps", 20 March 2019, Index number: EUR 25/0088/2019, p. 3, Chapter 4. "Buying off alternative service". https://www.amnesty.org/en/documents/eur25/0088/2019/en/

[8] UN Special Rapporteur on freedom of religion or belief, OL GRC 3/2019, 11 July 2019, p. 3. https://spcommreports.ohchr.org/TMResultsBase/DownLoadPublicCommunicationFile?gId=24700

[9] UN Human Rights Committee, Concluding observations on the third periodic report of Greece, (CCPR/C/GRC/CO/3), 28 November 2024, para. 29. Available at: https://docs.un.org/CCPR/C/GRC/CO/3
UN Human Rights Committee, Concluding observations on the second periodic report of Greece, (CCPR/C/GRC/CO/2), 3 December 2015, para. 38. Available at https://undocs.org/CCPR/C/GRC/CO/2

[10] Amnesty International, "Greece, Submission to the UN Human Rights Committee 142nd Session, 14 October-7 November 2024", 16 September 2024, pp. 12-13. Available at: https://www.amnesty.org/en/documents/eur25/8525/2024/en/
Connection e.V., "Submission to the 142nd Session of the Human Rights Committee, Greece, Conscientious objection to military service and related issues", updated September 2024, p. 12. Available at: https://tbinternet.ohchr.org/_layouts/15/treatybodyexternal/Download.aspx?symbolno=INT%2FCCPR%2FCSS%2FGRC%2F59913&Lang=en

amounts of money which are a much higher percentage of their income, or they are not able to pay such amounts at all and are simply deprived of this opportunity to buy out the alternative service, and therefore, they have to serve many months more, and up to 15 months of alternative service (or even more in certain cases – see relevant part about the duration of alternative service in this Response, para. 25) in comparison with conscripts of the same age who can only serve an actual period of only 20 days of military service. This is an example of *intersectional discrimination*, with persons being discriminated both because of their income, as well as because of their religious or other beliefs.

10. The above-described discrimination constitutes a violation of **Article E**, in conjunction with either **Article 30**, insofar a conscientious objector of low income might need to pay a high percentage or even the whole of such income in order to buy out the alternative service, or **Article 1, paragraph 2**, insofar a conscientious objector who cannot afford to pay the discriminatory (higher) cost for buying out is forced to serve an alternative service (up to 15 months, or even more in certain cases) which is not merely 1.5 times, but rather *many times* the actual military service that conscripts of the same age may serve, i.e. only 20 days, and therefore this disproportionately inflicts on his right to earn his living in an occupation freely entered upon.

11. Moreover, the Government, following the submission of the Complaint, instead of addressing this intersectional discrimination, and in complete disregard of the above cited observations and recommendations by domestic and international human rights bodies, mandates and organisations, proceeded in legislative amendments which further exacerbate the discrimination faced by conscientious objectors, as far as it concerns this particular issue of buying out service, and which are explained in detail in the relevant part about the deterioration of the situation and the discrimination following the submission of the Complaint (in this document of Response, para. 45).

12. Most importantly, the part of Government's Submissions concerning "alleged violation of article 30 of the Revised European Social Charter" (Government's Submissions para. 7), fails to respond to the main relevant arguments of the Complaint (e.g. paras. 31, 44-53, 56, 72, but also 73-78)

13. In the part of Government's Submissions concerning "the alleged violation of article 31 of the Revised European Social Charter" (Government's Submissions para. 8), the Government merely confirms the situation as it is already described in the Complaint (paras. 23-24, 31, 34-35). The Government does not provide any response whatsoever to EBCO's arguments for the violation of **Article 31**, neither in the case of those conscientious objectors who are provided housing in inadequate places, including inside hospitals (Complaint para. 39), without provisions specifying, for example, a minimum size for the room or a minimum space per person (Complaint para. 36), nor in the case of conscientious objectors who are provided an amount of money (€223.53 per month) which is completely insufficient in order to cover their needs in housing, especially during an acute housing crisis (Complaint paras. 54-55), taking into

consideration also the need to cover bills, food, part of the expenses for medicine, certain travel expenses, etc.

14. In order to better explain the discrepancy between the "wage" provided to conscientious objectors and the real needs of people currently living and working in Greece, EBCO, referring to what is already submitted in para. 51 of the Complaint, wishes to provide just one example where a municipality, in this case of the island of Astypalaia, has decided to reimburse a doctor-paediatrician, for the month of October 2025, with the amounts of €300 for housing (out of €400 of real expenses according to receipts submitted) and of €300 for food (out of €363.12 of real expenses according to receipts submitted).[11] Which means a sum of €600 only for food and housing, which is in addition to the wage.

15. In the part of Government's Submissions concerning "alleged violation of article 16 of the Revised European Social Charter, on the right of the family to social, legal and economic protection, that the families of conscientious objectors are not adequately protected" (Government's Submissions para. 9), firstly it is admitted that "those who are recognized as conscientious objectors perform alternative service in Bodies of the Public Sector by providing services of general interest at areas outside the region of their residence". Implicitly, it is admitted that there is no differentiation in cases they have family and children. However, it is noted that: "After five (5) months [instead of seven (7) as was the case in the past], they may request to be assigned to another Body, provided that the applicants face family, financial and social problems.". This sentence, besides repeating information which had been already cited in the Complaint (e.g. paras. 67-68), does not claim neither that the re-appointment will be surely granted, nor that it will be at the place of residence, or even somewhere inside the entire region of residence, and therefore implicitly confirms what the Complainant has argued in para. 69 of the Complaint.

16. In the same paragraph 9 of the Government's Submissions, it is also stated that: "It should also be noted that several categories of civil servants (for example, teachers, judges, etc) have the obligation to provide services outside their place of residence and are required to offer their services throughout the country.". What is omitted in this part is that the wage of civil servants is multiple times greater than the "wage" of conscientious objectors to military service (see Complaint paras. 47-48, and the relevant part about the minimum wage in this document of Response, para. 39), and therefore are in a better position to cover the needs of their families, as well as that in certain areas additional amounts are provided to civil servants for food and housing (Complaint para. 51). It is also omitted that for civil servants in general, the family status is a factor which is taken into consideration in appointment and various kinds of transfers of civil servants.[12]

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[11] Municipality of Astypalaia, Decision No. 315/15-12/2025. Available in Greek at: https://diavgeia.gov.gr/doc/%CE%A17%CE%A9%CE%9F%CE%A9%CE%A8%CE%A7-9%CE%97%CE%99?inline=true

[12] E.g. Law 3528/2007 (as it stands today), Art. 65, para. 2, Art. 66, para. 3, Art. 67, para. 3. Available in Greek at: https://archive.raptarchis.gov.gr/wp-content/uploads/2026/03/%CE%9C%CE%AC%CF%81%CF%84%CE%B9%CE%BF%CF%82-

17. In paragraph 9 of Government's Submissions, it is also stated that "Furthermore, in addition to the entitlement to two (2) days of absence for every month of service, provision is also made to grant conscientious objectors five (5) days' parental leave for each child, for the protection of family institution." Providing a parental leave of 5 days, only once during the alternative service, a part of which most probably will be needed to be spent travelling to the place of residence of the family, and having no other relevant provisions, cannot be considered as appropriate social, legal and economic protection of the family within the meaning of **Article 16**. The Government's Submissions do not provide an explanation, for example, about:
    - Why even parents are not allowed by law to be transferred after 5 months, to the place of residence or even within the entire region of residence. (Complaint para. 72, especially (b) and (c))
    - How a conscientious objector receiving only food and housing but no amount of money whatsoever can sustain not only himself but also his family, or how a conscientious objector who does not receive food and housing and only receives an amount of money (€223.53 per month), which is well below the subsistence level for one person, can sustain not only himself but also his family.
    - Why parents do not receive additional amounts of money (**Art. 16**), and especially since this is contrary to what it is provided to conscripts who are parents (**Art. 16 in conjunction with Art. E**). (Complaint paras. 40-42, 57-62)

18. In addition to the above, and all the relevant facts and arguments in the Complaint concerning violations of Article 16 in itself and in conjunction with Article E, EBCO wishes to point out an *additional provision* which inflicts on the protection of the family (**Article 16**) in conjunction with **Article E** about discrimination. A conscript is entitled to deferment of enlistment for military service if by the date when he is supposed to be enlisted, he has a brother who is already serving the military service or has a brother who is scheduled to be enlisted simultaneously. The duration of the deferment is equal to the duration of the (remaining or entire, respectively) military service which is provided by law in the case of the brother.[13] This means that the conscript is not obliged to enlist until his brother is released from military service. Obviously, the purpose of this provision is to protect a family, including, for example, the parents of the conscripts, by not having two (or more) sons performing military service simultaneously. However, in case the brother is a conscientious objector performing alternative service, the duration of the deferment (which he is providing to his brother) is only equal to the duration of military service he would perform if he was not a conscientious objector.[14] This means that a conscript is forced to be enlisted

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[13] Law 5265/2026, art. 191.

[14] Law 5265/2026, art. 229, para. 6.

before the end of the (longer) alternative service of his conscientious objector brother, and that the brothers will spend some time (up to 3 months) serving simultaneously. The above-described provisions were valid when the Complaint was submitted and unfortunately, despite a legislative reform in January 2026, they are maintained in the current legislation. This provision is an example illustrating how a conscript and an entire family are, in a way, "punished" and face discrimination just because one son of the family happens to be a conscientious objector to military service. These provisions cannot be considered as being in compliance with **Article 16** in conjunction with **Article E** about discrimination of the Charter.

19. The above-described discrimination concerning deferment because of a serving brother is not merely an observation of the Complainant. Such discrimination has been pointed out already since 1999 by the Greek Ombudsman.[15]

20. As far as it concerns the part of Government's Submissions concerning "the alleged violation of article 1 para. 2 of the Revised European Social Charter, on the right of the worker to earn his living in an occupation freely entered upon" (Government's Submissions para. 10), EBCO wishes to respectfully make the following remarks. Firstly, ECBO raised the issue of the significantly longer duration of alternative service, primarily as one out of many factors aggravating the situation and the discrimination (Complaint, Part 3.4, para. 73). As stated in the Complaint: "The additional time of 3 or 2 months aggravates the already problematic situation for conscientious objectors, while the chances of coping with the harsh financial conditions of the alternative service with savings secured before starting the service are further reduced."

21. As far as it concerns the specific violation of **Article 1, paragraph 2** of the Charter, the Complainant has raised this issue not for all categories of service, but for a specific category of reduced service, for which the alternative service is 5 months instead of 3 months of military service, which means 1.67 times (67%) longer, and thus greater than the threshold of 1.5 times (50%), as it has been repeatedly explained by EBCO, the Greek National Commission for Human Rights, and Amnesty International and has been noted by the Committee. (Complaint para. 73). In its Submissions the Government confirms the duration of military and alternative service for all categories of full and reduced service (Government's Submissions para. 10(d)),

[15] Συνήγορος του Πολίτη, Ειδική Έκθεση «Ο θεσμός της εναλλακτικής πολιτικής-κοινωνικής υπηρεσίας. Προτάσεις αναμόρφωσης.» (1999), Μέρος Ι. Η προτεινόμενη μεταρρύθμιση του θεσμού, Κεφάλαιο 2 Η διάρκεια της Ε.Π.Κ.Υ., α. Το ζήτημα, iii. Το ζήτημα της χορήγησης αναβολής, λόγω υπηρετούντος αδελφού κατά το άρθρο 21 παρ.8 του ν.2510/1997, για όλη τη διάρκεια της Ε.Π.Κ.Υ. και όχι μόνο, όπως συμβαίνει σήμερα, για χρόνο ίσο προς εκείνο της θητείας στις Ένοπλες Δυνάμεις. [Greek Ombudsman, Special Report "The institution of alternative civilian-social service. Proposals of reformation." (1999). Part 1. The proposed reform of the institution. Chapter 2. The duration of alternative civilian-social service. a. The issue. iii. The issue of provision of deferment due to a serving brother according to the article 21 para. 8 of law 2510/1998, for the entire period of the alternative civilian-social-service and not only, as it happens today, for a period of time equal to that of service in the armed forces.] Available in Greek at: https://www.synigoros.gr/el/category/eidikes-ek8eseis/post/eidikh-ek8esh-or-o-8esmos-ths-enallaktikhs-politikhs-koinwnikhs-yphresias-protaseis-anamorfwshs

as it had been reported by the Complainant. This includes the category of reduced service about which the Complainant has raised the issue of violation of **Article 1 paragraph 2** of the Charter, for which the Government explicitly confirms: "Five (5) months, for those who would be discharged from the Armed Forces if they had fulfilled their military service obligation after completion of three (3) months of actual military service.". Furthermore, the Government itself admits that "pursuant to paragraph 2 of Article 1 of the European Social Charter, as interpreted by the European Committee of Social Rights, alternative service should not exceed the duration of military service by more than one and a half (1.5) times (50% increase)". Considering that 5 months is 1.67 longer than 3 months, the Government implicitly admits that there is violation of **Article 1, paragraph 2**, of the Charter in the specific case of the said category of reduced service.

22. However, instead of explicitly admitting the obvious violation for the said category of reduced service and addressing it, the Government opts to focus on another category, that of full service, (for which EBCO has not alleged that there is a violation of Article 1, paragraph 2, of the Charter), and for which the Government explicitly emphasises the ratio. ("The current 15-month duration of alternative service is 1.25 times longer than the 12-month military obligation." Government's Submissions para. 10(f)) However, the Government avoids explicitly citing what is the ratio or percentage of increase in the case of the category for which the Complainant has raised the issue of violation, because it would be even more obvious that it is 1.67 times (67%) longer.

23. Furthermore, the Government itself states that: "a significantly longer (e.g., 1.7 or 1.75 times longer) or even double duration of alternative service compared to military service could constitute prohibited discrimination against conscientious objectors." (Government's Submissions para. 10(g)). However, the Government does not explain why a ratio of 1.7 would constitute discrimination but a ratio of 1.67 does not, especially insofar the threshold established by the Committee is 1.5 times and not 1.7 times.

24. While the violation of Article 1, paragraph 2., is self-evident in the case of the specific category of reduced alternative service which is 1.67 times longer than the equivalent category of military service, EBCO wishes to add some further information and observations about the issue of duration of alternative service. Firstly, the Complainant wishes to point out that, according to the information provided by the Government itself (Governments' Submissions para. 10(d)), all the 3 categories of *reduced* alternative service are, in terms of *ratio* to the equivalent military one, greater and therefore, in the opinion of EBCO, more punitive and discriminatory than the full alternative service. While the Government states that the full alternative service is 1.25 times (i.e. 25% longer) than the full military service, however in the cases of the 3 categories of reduced service it is (a) 33% longer (12 months of alternative service instead of 9 months of military service), (b) 50% longer (9 months instead of 6), and (c) 67% longer (5 months instead of 3), always compared to the equivalent category of reduced military service. This is not reasonable. Supposedly, each category of

reduced (alternative or military) service addresses the needs of a vulnerable group. It is not reasonable that the more vulnerable a group of conscientious objectors is, the more punitive and discriminatory the ratio of alternative service in comparison with the equivalent military service becomes. One would rather expect that the more vulnerable a group of conscientious objectors is, not only the shorter the duration of alternative service will be in absolute terms (as it is indeed), but also in terms of ratio of alternative to the military service. In any case, one would expect that the ratio of alternative to the military service, (which is the factor that the Committee itself has adopted as criterion in order to examine whether provisions of the Charter are violated) would be at least the same for the vulnerable groups of conscientious objectors as it is for those conscientious objectors who are not vulnerable, i.e. 1.25 (or 25% increase). Moreover, taking into consideration, without entering into too many details, that most of the reasons and relevant criteria for belonging to a category of reduced military (and consequently reduced alternative) service are related to the *family* status (e.g. number of brothers), including cases of vulnerability of family members (disabilities, age of parents, etc.), the above-described increasingly punitive and discriminatory ratio of alternative to military service (1.33, 1.5, 1.67), or otherwise said, the increasingly punitive and discriminatory percentage of increase of alternative service in comparison with military service (33%, 50%, 67%), as long as a conscientious objector becomes more vulnerable in terms of (mainly) *family* status, must rather be considered as an **additional violation of Article 16 in conjunction with Article E of the Charter**.

25. Furthermore, the duration of all categories of full and reduced alternative service is not necessarily only the one provided in Governments' Submissions para. 10(d). It can be extended under certain circumstances. According to the legislation as it was when the Complaint was submitted, and still is under the current legislation, the duration of alternative service is extended: (a) when conscientious objectors participate in a strike, in which case a period of time equal to the period of time of the strike is added to the duration of alternative service, (b) when conscientious objectors are punished, during alternative service, because of violation of the provisions for granting leave, with sanctions similar to those valid for employees of the institution to which they are appointed, in which case a period of time which is *twice* the days of unjustifiable leave is added to the duration of alternative service.[16] This means, for example, that if there is a strike (or multiple strikes) of two weeks (in total) in the institution a conscientious objector is appointed to (or the broader sector of such institution) and the conscientious objector participates in such strike(s), the duration of his alternative service will be extended by two weeks. The problem becomes greater in the case of "unjustifiable leave" and occasionally is directly related with the problems, i.e. the harsh financial conditions the conscientious objectors are facing and the violations included in the Complaint, as it is illustrated in the following case already reported by EBCO in its Annual Report for 2024: "A conscientious objector has been punished with extension of the duration of the already punitive alternative civilian service for "unjustifiable absence". The conscientious objector, who was serving at the General Hospital of Chalkida, had requested some days or weeks of

[16] Currently in Law 5265/2026, article 229, para. 8.

(additional) leave, in order to be able to work and cope with the extremely punitive financial conditions of the alternative civilian service. The conscientious objector had asked for an "unpaid leave" equivalent to the one provided to public employees, and to perform these days or weeks as additional time at the end of the period of his service. His request was firmly substantiated, based on a provision of the law which equates conscientious objectors with the public employees of the same institution on certain issues. However, both the administration of the General Hospital of Chalkida, as well the Recruitment Agency of Attica, denied granting such an "unpaid leave". Furthermore, despite the pressing need for leave in order to work and earn the necessary income to be able to conclude the punitive alternative civilian service, they considered his absence as "unjustifiable". Subsequently, making use of a provision of the law concerning "unjustifiable absence", they punished the conscientious objector by requesting to perform an additional time *twice the time* he was absent. In addition to that, the initial calculation of the required additional time, by the General Hospital of Chalkida, did not include holidays, but rather only working days, thus extending even further the actual duration of the alternative service. Finally, following, inter alia, a complaint of the conscientious objector to the Greek Ombudsman, the Recruitment Agency of Attica insisted on considering the absence as "unjustifiable" and on the requirement to perform an additional time *twice the time* he was absent, and only accepted that the calculation of the additional time should have included holidays."[17]

26. Concerning the duration of military service (Governments' Submissions para. 10(d)), EBCO wishes also to recall a fact which is omitted by the Government, and which is described in brief in the Complaint (para. 71). Conscripts performing the entire period of their military service (after training) in certain eastern border areas and certain military units, are provided with a reduction of 3 months of military service (9 months instead of 12 months), or in the case of the first category of reduced military service, with a reduction of 1 month of military service (8 months instead of 9). Nevertheless, there is no equivalent provision for reduction of the length of alternative service for those conscientious objectors performing the entire period of alternative service in the same or any other border areas or in any other areas or in specific institutions or bodies, where the alternative service might be more onerous. The above provisions were maintained and further extended, as far as it concerns an additional factor, the age, in the new legislation (see relevant part of this document of Response, para. 46).

27. Furthermore, the Government's Submissions claims that "our country has established a difference of only three (3) months in the duration of military and alternative service, in compliance with its international obligations arising from the European Convention on Human Rights, the European Social Charter and relevant UN instruments." As far as it concerns the European Social Charter, the Complainant and others, i.e., the Greek National Commission for Human Rights, and Amnesty

[17] EBCO, *Annual Report. Conscientious Objection to Military Service in Europe 2024*, Brussels, 5th June 2025, p. 71. https://ebco-beoc.org/sites/ebco-beoc.org/files/2025-06-05-EBCO_Annual_Report_2024.pdf

International, have repeatedly explained why, at least in the case of a specific category of reduced service, the current provisions do not comply with the Charter, and this has been noted by the Committee. (Complaint para. 73). In any case, the Committee will decide upon this issue in the context of the Complaint. As for the European Convention on Human Rights, while the European Court of Human Rights has not examined so far the specific case of Greece, nevertheless it should be noted that, in the context of another State, it appears to have adopted the position of the Committee about the threshold of 1.5 times [up to 50% increase].[18] Therefore, the provisions concerning, at least, the said category of reduced service are not in compliance with the European Convention of Human Rights either. But *most importantly*, as far as it concerns "UN instruments", it has already been officially established that the duration of alternative service does not comply with the International Covenant on Civil and Political Rights, specifically articles 18 (concerning freedom of thought, conscience and religion) and 26 (about discrimination). What is omitted in the Government's Submissions is that in 2024, (some months *after* the Complaint was submitted), the UN Human Rights Committee, after examining the current situation in Greece, in its Concluding Observations has reiterated its concerns about, *inter alia*, "the length of alternative service for conscientious objectors, which is longer than military service", has referred, *inter alia*, to articles 18 and 26 of ICCPR, and has reiterated its recommendations that: "The State party should ensure that its legislation recognizing the right to conscientious objection to military service encompasses an alternative to military service that is accessible to all conscientious objectors and is not punitive or discriminatory in terms of its nature, cost or duration".[19] It is worth noting that the Human Rights Committee has referred to the length of alternative service *in general*, not only regarding some specific category, for example the category of reduced service which is 1.67 times the equivalent category of military service. It is also worth noting that the duration of alternative and equivalent military service for certain categories of reduced service, (namely the one which is 9 months of alternative service instead of 6 months of military service and the one which is 5 months of alternative service instead of 3 months of military service), is exactly the same as it was in 2015, when the UN Human Rights Committee had again expressed similar concerns,[20] which were echoed by successive UN Special Rapporteurs on freedom of religion or belief.[21] Therefore, at least as far as it concerns the "UN instruments", it cannot be claimed that the duration of alternative service is in compliance with them.

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[18] ECtHR, *Adyan and others v. Armenia*, para. 70. http://hudoc.echr.coe.int/eng?i=001-177429

[19] UN Human Rights Committee, Concluding observations on the third periodic report of Greece, (CCPR/C/GRC/CO/3), 28 November 2024, paras. 28-29. Available at: https://docs.un.org/CCPR/C/GRC/CO/3

[20] UN Human Rights Committee, Concluding observations on the second periodic report of Greece, (CCPR/C/GRC/CO/2), 3 December 2015, paras. 37-38. Available at: https://undocs.org/CCPR/C/GRC/CO/2

[21] UN Special Rapporteur on freedom of religion or belief, Communication GRC 3/2016, 31 October 2016, p. 6. https://spcommreports.ohchr.org/TMResultsBase/DownLoadPublicCommunicationFile?gId=22834 UN Special Rapporteur on freedom of religion or belief, Communication GRC 3/2019, 11 July 2019, p. 5. https://spcommreports.ohchr.org/TMResultsBase/DownLoadPublicCommunicationFile?gId=24700

28. As for the part of Government's Submissions concerning "*the alleged violation of Article 11 of the Revised European Social Charter*, concerning the right to protection of health" (Government's Submissions para. 11), EBCO wishes to respectfully observe that the Government dedicates most of this part to confirming information already provided in the Complaint (e.g. paras. 23-24, 35). It is worth stressing though the sentence "If the conscientious objector voluntarily chooses not to make use of the appropriate accommodation and food offered by the Body, that person cannot claim payment from the Body." This confirms what is written in the Complaint, that "in principle, it is not up to the conscientious objectors to decide whether they will receive the "wage", or they will receive food and housing" (Complaint para. 38) and means that if the conditions regarding accommodation and food (for which EBCO reiterates its arguments that there are no adequate standards – Complaint para. 36), are not satisfactory and the conscientious objector cannot live under such conditions and moves elsewhere, he does not even receive the inadequate "wage" of €223.53. This becomes even more important in the case of appointment into hospitals. The Complainant wishes to reiterate that the issue of violation of **Article 11** of the Charter was raised in the Complaint in conjunction with **Article 31** because hospitals not only are inadequate to host persons, and especially for long periods of time, (because hospitals are not designed to be residences), but in addition to that, they pose health risks. Forcing conscientious objectors to stay inside hospitals not only for their working hours, but also for, effectively, the rest of their time, because it is the place of accommodation, significantly increases the actual time spent inside hospitals, and therefore increases the health risks, i.e. the risk for hospital-acquired infections. Which becomes even more serious in times of epidemic or pandemic. The Government essentially admits that even in the case of appointment to hospitals, and even in periods of epidemic or pandemic, in those cases where accommodation and food is supposedly provided by the hospital, if a conscientious objector wishes to find accommodation outside the hospital in order to reduce the time he spends inside the hospital, and the risks for his health, he is not given the "wage", and he has to finance accommodation and perhaps food, by himself. Otherwise, if he cannot afford this, he stays inside the hospital, with increased health risks.

29. The only relevant argument, somehow related specifically to **Article 11** of the Charter, which is provided in paragraph 11 of the Government's Submissions is that "soldiers performing military service are also assigned to military hospitals to cover relevant service needs". Firstly, EBCO wishes to emphasise that the reason for raising an issue of violation of **Article 11** (in conjunction with **Article 31**) was not that conscientious objectors are merely "assigned" or appointed to public hospitals, but the fact that in addition to spending working hours inside hospitals, they are effectively *forced to spend their entire days and nights* inside the hospitals. Secondly, Government's Submissions merely argue that "soldiers performing military service are also assigned to military hospitals", but they are not clear about whether soldiers are provided *accommodation inside* the military hospitals. Thirdly, even if soldiers were forced to stay inside military hospitals, this would merely mean that, as far as it concerns this particular issue, there wouldn't be a different treatment, which would

perhaps mean that the element of conjunction with **Article E** would not necessarily apply in this particular case. But this would not necessarily mean that forcing conscientious objectors (or even conscripted soldiers too) to stay inside hospitals, even in times of epidemic or pandemic, or under the conditions that will be described below, would be in conformity with **Article 11** in itself.

30. Most importantly, the Complainant, in order to explain the severity of the issue, wishes to provide some further information about the scale of the problem of health-acquired infections specifically in Greece. In April 2024, on the request of the national authorities, the European Centre for Disease Prevention and Control (ECDC) conducted a country visit in Greece. As cited in the Summary of its report: "The findings of this visit show that the AMR [antimicrobial resistance] and healthcare-associated infection situation of the country remains highly concerning due to the high levels of multidrug-resistant organisms (MDROs) and their frequent transmission to newly admitted patients. Surveillance systems document extremely high rates of resistance to last-resort antibiotics used to treat severe and life-threatening infections in hospitalised patients. In the hospitals we visited, there was worrying evidence of uncontrolled spread of various multidrug-resistant (MDR) and extensively drug-resistant (XDR) bacteria, including MDR and/or XDR *Klebsiella pneumoniae*, *Acinetobacter baumannii*, and *Pseudomonas aeruginosa*. In addition, although *Candida auris* was only recently introduced in hospitals in Greece, it has rapidly disseminated throughout the healthcare system, with hundreds of cases in the affected hospitals within less than five years. The high number of patients infected or colonised with MDROs who require the application of enhanced infection prevention and control (IPC) measures overwhelms healthcare staff, which results in further transmission of these MDROs. This situation represents a serious threat to patient safety. At worst it could impact the ability of hospitals in Greece to provide high-quality patient care. The current levels of AMR also pose a major burden on the healthcare system and consume resources that could otherwise be invested into improving staffing levels and IPC measures. At the same time, the current low staffing levels and the lack of resources for IPC contribute to worsening transmission of MDROs resulting in a downward spiral of less resources and increased transmission. Infections with MDROs result in increased morbidity and mortality of patients and prolonged patient stays 'blocking' hospital beds. In addition, the required isolation precautions complicate medical care and rehabilitation, thus further harming the affected patients. Several policies to control AMR were implemented since the previous ECDC visit. […] However, while having a positive impact on the respective hospital or specific area of intervention, these disjointed initiatives fail to address the extent of the alarming public health crisis caused by AMR in the country. Only an urgent nationally coordinated effort, mobilising all levels with strong political commitment, leadership, and coordination under the framework of a public health situation of the highest national priority could bring all actors together under a common approach. This approach, powered by the rapid implementation of control measures and funding matching the level of the current public health crisis caused by

AMR in hospitals would impact the transmission of MDROs and its significant adverse consequences for patients and the healthcare system in Greece."[22]

31. Among the notable recommendations made by ECDC is "Increasing the number of single rooms. While understanding that this is a major undertaking, unless improved isolation facilities are constructed in hospitals, it is difficult to envisage major inroads to address the current AMR situation.".[23] This recommendation indicates how patients are squashed into hospital rooms (and the same applies for conscientious objectors), as well as the need for isolation inside hospitals. Worth noting is also the recommendation of: "Considering establishing separate post-acute care entities to avoid prolonged patient stays in ICUs and acute care wards."[24] Such recommendation, on the one hand, confirms the need to address prolonged patient stays, especially in certain hospitals and wards. On the other hand, it indicates the need to address overcrowded hospitals, but rather the Government is worsening the situation by allowing hospitals to host conscientious objectors within them.

32. In 2024 and 2025, several media reported that the number of patients dying each year in Greece because of hospital-acquired infections is (estimated to be) 2,000 to 3,000,[25] out of a total of 35,000 in the entire Europe.[26] According to reports, based on official data of 2023, healthcare-associated infections in Greece are double the average of European Union ones.[27]

33. All the above data confirm that Greece is (in the words of ECDC) in an "alarming public health crisis", and therefore forcing conscientious objectors not just to work but to *stay* inside hospitals which are in such conditions, (while the State could easily provide alternatives for their accommodation) does not meet the requirement "to take appropriate measures […] to remove as far as possible the causes of ill-health […] and prevent as far as possible epidemic, endemic and other diseases" of **Article 11**.

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[22] European Centre for Disease Prevention and Control. *ECDC country visit to Greece to discuss antimicrobial resistance issues, 15–19 April 2024*. Stockholm: ECDC; 2024, p. 1. https://www.ecdc.europa.eu/sites/default/files/documents/AMR_country_visit_report_Greece.pdf
[23] Ibid., p. 11.
[24] Ibid., p. 12.
[25] Γιάννης Δεβετζόγλου, «Σοκ με 3.000 νεκρούς από μικρόβια που κολλάνε σε νοσοκομεία του ΕΣΥ κάθε χρόνο», *News 24/7*, 12 Δεκεμβρίου 2024. [Giannis Devetzoglou, "Shock with 3,000 people dead because of germs acquired in NHS's [National Health System] hospitals every year", *News 24/7*, 12 December 2024.] Available in Greek at: https://www.news247.gr/ygeia/sok-me-3-000-nekrous-apo-mikrovia-pou-kollane-se-nosokomeia-tou-esi-kathe-xrono/
«Ενδονοσοκομειακές λοιμώξεις / Περίπου 3.000 νεκροί τον χρόνο στην Ελλάδα», *TVXS*, 13 Δεκεμβρίου 2024. ["Hospital-acquired infections / About 3,000 people dead every year in Greece", *TVXS*, 13 December 2024]. Available in Greek at: https://tvxs.gr/news/ellada/endonosokomeiakes-loimoxeis-peripoy-3-000-nekroi-ton-chrono-stin-ellada/
[26] Γιώργος Σακκάς, «Ενδονοσοκομειακές λοιμώξεις: Η «αδήλωτη» αιτία θανάτου που προκαλεί εκατοντάδες απώλειες», *Το Βήμα*, 7 Απριλίου 2025. [Georgios Sakkas, "Hospital-acquired infections: The "undeclared" cause of death causes hundreds of losses", *To Vima*, 7 April 2025.] Available in Greek at: https://www.tovima.gr/2025/04/07/health/endonosokomeiakes-loimokseis-i-adiloti-aitia-thanatou-pou-prokalei-ekatontades-apoleies/
[27] Ibid.

34. EBCO wishes to point out also that in order to examine such violation of **Article 11** in the case of conscientious objectors performing alternative service in Greece, an additional factor already described in para. 33 of the Complaint should be taken into consideration, i.e., the fact that conscientious objectors are not fully (100%) covered / reimbursed for the medicines they might need. Which means that, insofar they do not receive any amounts of money whatsoever when provided food and housing (or they receive an entirely insufficient amount of €223.53 per month if they are not provided food and housing) for long periods of up to 15 months (or even more), they are not provided with the means to adequately address their needs in medicines. The fact that the other employees are not fully (100%) covered / reimbursed either cannot be an excuse, insofar employees receive a much higher wage than the "wage" of the conscientious objectors and therefore are in a far better position to address the need to pay their share of expenses for their medicines.

35. As far as it concerns the part of the Government's Submissions which is supposed to concern "the allegation of violation of Article E of the Revised European Social Charter, read in conjunction with Articles 16, 30, and 31, concerning non-discrimination", (Government's Submissions para. 12), EBCO respectfully observes that most of the elements in this paragraph are unrelated to the Complaint. The Complainant refrains from extensively elaborating on issues unrelated to the Complaint, but wishes to only briefly point out that:
    a. It is not accurate that the "alternative service system is clearly and adequately distinguished from the military system, so that the army is not actively involved in the supervision of the relevant civil public interest bodies" (Government's Submissions para. 12(b)). The alternative service remains under the supervision of the military, contrary to the recommendations of the Ombudsman, already since 1999, to establish a civilian body for this purpose, a "Council of Alternative Civilian-Social Service" belonging to a Secretariat outside the Ministry of National Defence.[28] A recommendation which has been recently reiterated in brief in the comments about the draft law which resulted in law 5265/2026.[29] Relevant recommendations have been expressed also by the Greek National Commission for Human Rights which has repeatedly asked for the alternative service to be under the supervision of the Ministry of Interior and the Ministry of Health,[30]

[28] Συνήγορος του Πολίτη, Ειδική Έκθεση «Ο Θεσμός της Εναλλακτικής Πολιτικής – Κοινωνικής Υπηρεσίας, Προτάσεις Αναμόρφωσης», (1999). Μέρος Ι. Η προτεινόμενη μεταρρύθμιση του θεσμού, Κεφάλαιο 1. Η Νέα Εποπτεύουσα Αρχή. [Greek Ombudsman, Special Report "The institution of alternative civilian-social service. Proposals of reformation." (1999). Part 1. The proposed reform of the institution. Chapter 1. The new Supervising Authority.] Available in Greek at: https://www.synigoros.gr/el/category/eidikes-ek8eseis/post/eidikh-ek8esh-or-o-8esmos-ths-enallaktikhs-politikhs-koinwnikhs-yphresias-protaseis-anamorfwshs

[29] Greek Ombudsman, Comments on the draft law, p. 5. Available in Greek at: https://www.synigoros.gr/el/category/default/post/parathrhseis-or-sxedio-nomoy-xarths-metabashs-twn-enoplwn-dynamewn-sth-nea-epoxh

[30] E.g. in the most recent submission of the GNCHR to the Parliament concerning the draft law of the Ministry of National Defence, 19 December 2025, p. 10. Available in Greek at: https://www.nchr.gr/images/pdf/apofaseis/antirisies_suneidisis/__19122025.pdf

and Amnesty International which has asked for the administration of alternative service to be strictly under non-military authorities.[31]

b. While it is true that officially recognised conscientious objectors, i.e., those who have been granted conscientious objector status, "do not fall under the jurisdiction of military courts" (Government's Submissions para. 12(b)), as long as they perform the (punitive and discriminatory) alternative service, nevertheless, if they are unable to perform or conclude such punitive and discriminatory alternative service, and they are declared insubordinate, their conscientious objector status is revoked, and they are repeatedly prosecuted and punished by *military courts*, (which constitutes an additional violation of the right to fair trial according to the ECtHR jurisprudence in cases of conscientious objectors in Turkey[32]) as it is already described in detail in the Complaint (paras. 25-27).

c. It is not accurate that "The provisions in force concerning conscientious objectors ensure the establishment of a sufficiently effective and accessible procedure followed for a person to be classified as a conscientious objector" (Government's Submissions para. 12(b)). Both the procedure in general, the fact that the decision is taken by the Minister of National Defence, as well as specifically the composition of the five-membered (Special) Committee (Government's Submissions para. 12(c)) fail to implement the repeated recommendations of the UN Human Rights Committee,[33] the mandate of the UN Special Rapporteur on freedom of religion or relief,[34] the

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[31] Διεθνής Αμνηστία, "Ελλάδα: Νέος νόμος για την αντίρρηση συνείδησης – Νέα χαμένη ευκαιρία;", Δημόσια Δήλωση, 13 Σεπτεμβρίου 2010, παράγραφος 1. [Amnesty International, "Greece: New law about conscientious objection – New missed opportunity?", 13 September 2010, para. 1.] Available in Greek at: https://www.amnesty.gr/news/press/article/5839/ellada-neos-nomos-gia-tin-antirrisi-syneidisis-nea-hameni-eykairia)

[32] E.g. ECtHR, Case of Erçep v. Turkey (Application No. 43965/04), 22 November 2011. Available in French at: https://hudoc.echr.coe.int/eng?i=001-107532
ECtHR, Case of Feti Demirtaş v. Turkey (Application No. 5260/07), 17 January 2011. Available in French at: https://hudoc.echr.coe.int/eng?i=001-108617
ECtHR, Case of Savda v Turkey (Application No. 42730/05), 12 June 2012. Available in French at: https://hudoc.echr.coe.int/eng?i=001-111414
ECtHR, Case of Buldu and others v. Turkey (Application No. 14017/08), 3 June 2014. Available in French at: https://hudoc.echr.coe.int/eng?i=001-144352

[33] UN Human Rights Committee, Concluding observations on the second periodic report of Greece, (CCPR/C/GRC/CO/2), 3 December 2015, paras. 37-38. https://undocs.org/CCPR/C/GRC/CO/2
UN Human Rights Committee, Concluding observations on the third periodic report of Greece, (CCPR/C/GRC/CO/3), 28 November 2024, paras. 28-29. https://docs.un.org/CCPR/C/GRC/CO/3

[34] UN Economic and Social Council, Commission on human rights, Civil and political rights, including the question of religious intolerance, Addendum, Summary of cases transmitted to Governments and replies received, E/CN.4/2006/5/Add.1, 27 March 2006, para. 139. Available at: https://undocs.org/E/CN.4/2006/5/Add.1
UN Special Rapporteur on freedom of religion or belief, Communication GRC 3/2016, 31 October 2016, p. 6. https://spcommreports.ohchr.org/TMResultsBase/DownLoadPublicCommunicationFile?gId=22834
UN Special Rapporteur on freedom of religion or belief, Communication GRC 3/2019, 11 July 2019, p. 5. https://spcommreports.ohchr.org/TMResultsBase/DownLoadPublicCommunicationFile?gId=24700

Commissioner for Human Rights of the Council of Europe,[35] the Greek National Commission for Human Rights,[36] and have been pointed out by the OHCHR,[37] the Greek Ombudsman,[38] and others.

d. The reason the Complainant has briefly commented on the above issues, despite *not* being part of the Complaint, is in order to demonstrate that the violations of the Charter described in the Complaint and in this document of Response, and a number of other elements which do not form part of the Complaint, are parts of the same deliberate State policy of punishment, discrimination, disincentives, dissuasion of people from declaring their conscientious objection to military service and reduction of the number of applications for alternative service.

36. As far as it concerns certain elements in para. 12 of the Government's Submissions which could indeed be considered as directly or indirectly related to the Complaint, EBCO wishes to comment the following:

a. In practice it is not entirely accurate that conscientious objectors who perform alternative service "are treated as employees of the Body" (Government's Submissions para. 12(b)), as they are often denied the rights of employees. See for example the case described in this Response, para. 25, where a conscientious objector requested some days or weeks of (additional) leave, *as an "unpaid leave" equivalently to employees*, only in order to be able to work and cope with the extremely punitive financial conditions of the alternative service, but was not granted such leave, and was subsequently punished for "unjustifiable leave" (despite his absence being entirely justifiable considering the punitive and discriminatory conditions of the alternative service in conjunction with the current economic conditions in Greece), and the duration of alternative service in his case was extended for a period twice the days of absence.

b. As far as it concerns the allegation that "the alternative service performed by conscientious objectors does not entail any restrictions

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[35] Report by Mr. Alvaro Gil-Robles, Commissioner for Human Rights, on his visit to the Hellenic Republic, 2-5 June 2002, CommDH(2002)5, para. 18. https://rm.coe.int/CoERMPublicCommonSearchServices/DisplayDCTMContent?documentId=09000016806db86f

[36] E.g. in the most recent submission of the GNCHR to the Parliament concerning the draft law of the Ministry of National Defence, 19 December 2025, p. 9. Available in Greek at: https://www.nchr.gr/images/pdf/apofaseis/antirisies_suneidisis/__19122025.pdf

[37] OHCHR, (A/HRC/41/23), 24 May 2019, paras. 7, 36 (note 47), 38 (note 49), and *especially* 41. https://undocs.org/A/HRC/41/23

[38] Συνήγορος του Πολίτη, Ειδική Έκθεση 2013, «Καταπολέμηση των διακρίσεων», σελ. 110. [Ombudsman, Special Report 2013, "Combating discrimination", p. 110.] Available in Greek at https://www.synigoros.gr/el/category/eidikes-ek8eseis/post/eidikh-ek8esh-2013-or-o-synhgoros-toy-polith-foreas-prow8hshs-ths-arxhs-ths-ishs-metaxeirishs
See also in Greek Ombudsman, Comments on the draft law, p. 5. Available in Greek at: https://www.synigoros.gr/el/category/default/post/parathrhseis-or-sxedio-nomoy-xarths-metabashs-twn-enoplwn-dynamewn-sth-nea-epoxh

on their subsequent occupational employment" (Government's Submissions para. 12(b)), EBCO points out that the current legislative provisions concerning the certificates of military status, in the case of conscientious objectors, which are contrary to the decision of the Hellenic Data Protection Authority, as it has been pointed out also by the Greek Ombudsman (see in detail in the relevant part for the deterioration of the legislation in this Response, paras. 47-48), not only inflict on their right to protection of their personal data, by revealing that they are conscientious objectors to military service, but also render conscientious objectors vulnerable to discrimination, especially in terms of employment.

c. Most importantly, it is not true that "the proportional application of beneficial provisions is provided both for those serving in the military to fulfill their military obligation and for conscientious objectors performing alternative service". EBCO, both in the Complaint and in this Response, has sufficiently substantiated a great number of *discriminatory* provisions for conscientious objectors (and their families) in comparison with the provisions for conscripts (and their families), such as, for example:
    i. the fact that conscientious objectors do not receive any amount whatsoever in addition to food and accommodation / housing (or in addition to the amount provided instead of food and accommodation / housing), contrary to conscripts who receive amounts of money in addition to food and accommodation;
    ii. the lack of provisions for amounts depending on the number of children of conscientious objectors, contrary to conscripts;
    iii. the discrimination as for the location of service, i.e., the explicit prohibition to perform alternative service in the (entire) region of residence, and for the entire period of alternative service, since there is no such explicit prohibition for conscripts;
    iv. the increasingly punitive and discriminatory ratio of alternative to military service in the case of the categories of reduced service;
    v. the lack of any provisions whatsoever for reduction of the duration of alternative service depending on the area / location, the institution or body, and the age, contrary to equivalent provisions for reduction of the duration of military service depending on the area / location, the military unit and the age;
    vi. the lack of coverage of travel expenses for leave in the case of conscientious objectors, contrary to conscripts.
    vii. the inability to vote at the place of service, contrary to conscripts.
    viii. the discrimination against conscientious objectors as for fares, committed by private companies of various means of transportation, and the lack of action by the Government to

address such discrimination, despite the existing anti-discrimination / equal treatment legislation.

ix. the discrimination in the tax Law 5073/2023, (Government Gazette Vol. A 204, 11 December 2023), art. 15.

x. the additional travel expenses for certain conscientious objectors when they are summoned, as applicants for conscientious objector status, to in-person examination by a Special Committee in the premises of the Ministry of National Defence, which are not covered by the State.

xi. the significantly higher cost for buying out alternative service, in comparison to the cost for buying out military service, despite being the same obligation to the State or the Nation.

xii. the discrimination concerning the deferment because of serving brother.

C. Updated information reflecting a deterioration of the situation and the discrimination faced by conscientious objectors in Greece following the submission of the Complaint

37. This part of the Complainant's Response is intended to provide updated information reflecting a deterioration of the situation and the discrimination faced by conscientious objectors in Greece following the submission of the Complaint. Such deterioration, on the one hand, is due to the deterioration of the economic situation in Greece, according to official data, in conjunction with the unwillingness of the Government to take any appropriate measures whatsoever to protect conscientious objectors to military service and their families, and on the other hand is due to specific amendments in the legislation which either directly affect economic and social rights of conscientious objectors and exacerbate the discrimination against them, or indirectly affect the situation described in the Complaint.

C1. Deterioration of the economic situation

38. First and foremost, the deterioration of the economic situation is reflected in the official data about poverty. In the Complaint, EBCO has substantiated that there is a great gap between the "wage" of conscientious objectors and the threshold of poverty, which is significantly increased year by year (Complaint para. 52). This has been confirmed in the following years. In the Complaint it was cited that, according to official data from the Hellenic Statistical Authority published in 2024, (2023 Survey on Income and Living Conditions, income reference period: 2022), the threshold of poverty for a household of a single person was set to €6,030 annually, which was equivalent to €502.5 monthly, which was more than double the "wage" of conscientious objectors (€223.53). The following year, in April 2025, the Hellenic Statistical Authority published data (2024 Survey on Income and Living Conditions, income reference period: 2023) according to which the poverty threshold for a single

person reached €6,510 annually,[39] which is equivalent to €542.5 monthly. This year, in March 2026, the Hellenic Statistical Authority published data (2025 Survey on Income and Living Conditions, income reference period: 2024) according to which the poverty threshold for a single person reached €7,020,[40] which is equivalent to €585 monthly. However, the monthly "wage" that only some of the conscientious objectors performing alternative service receive, remained the same (for more than 20 years, since 2005) to €223.53, which means that the gap between such "wage" and the poverty threshold indeed continued to increase.

39. Furthermore, the gap between the "wage" of conscientious objectors and the minimum wage also continued to increase. In the Complaint it was cited that as of 1 April 2024, the statutory minimum wage was set at €830.00 (Complaint para. 48). Two years later, and as of 1 April 2026, the statutory minimum wage has been set at €920.00.[41]

40. The increase of the minimum wage indicates also that the Government fully understands the need to increase the minimum wage in order for workers to cope with the financial conditions, however the Government fails to take equivalent measures to protect conscientious objectors.

41. Another factor which should be taken into consideration when examining the ability of conscientious objectors, especially of lower income, to cope with the harsh financial conditions is the treatment of unemployed conscientious objectors. According to information that only recently reached EBCO, the Public Employment Service (DYPA) informed a conscientious objector who was unemployed that since the date of initiation of alternative service he is considered unable to search for employment, and therefore he lost the status of unemployed person and was removed

[39] Hellenic Statistical Authority, Risk of poverty or social exclusion – 2024 Survey on Income and Living Conditions (Income reference period: 2023), 16 April 2025, p. 10, Table 6. Available in: https://www.statistics.gr/en/statistics?p_p_id=documents_WAR_publicationsportlet_INSTANCE_qDQ8fBKKo4lN&p_p_lifecycle=2&p_p_state=normal&p_p_mode=view&p_p_cacheability=cacheLevelPage&p_p_col_id=column-2&p_p_col_count=4&p_p_col_pos=1&_documents_WAR_publicationsportlet_INSTANCE_qDQ8fBKKo4lN_javax.faces.resource=document&_documents_WAR_publicationsportlet_INSTANCE_qDQ8fBKKo4lN_ln=downloadResources&_documents_WAR_publicationsportlet_INSTANCE_qDQ8fBKKo4lN_documentID=575546&_documents_WAR_publicationsportlet_INSTANCE_qDQ8fBKKo4lN_locale=en

[40] Hellenic Statistical Authority, Risk of poverty or social exclusion – 2025 Survey on Income and Living Conditions (Income reference period: 2024), 19 March 2026, p. 10, Table 6. Available in: https://www.statistics.gr/en/statistics?p_p_id=documents_WAR_publicationsportlet_INSTANCE_qDQ8fBKKo4lN&p_p_lifecycle=2&p_p_state=normal&p_p_mode=view&p_p_cacheability=cacheLevelPage&p_p_col_id=column-2&p_p_col_count=4&p_p_col_pos=1&_documents_WAR_publicationsportlet_INSTANCE_qDQ8fBKKo4lN_javax.faces.resource=document&_documents_WAR_publicationsportlet_INSTANCE_qDQ8fBKKo4lN_ln=downloadResources&_documents_WAR_publicationsportlet_INSTANCE_qDQ8fBKKo4lN_documentID=591528&_documents_WAR_publicationsportlet_INSTANCE_qDQ8fBKKo4lN_locale=en

[41] Joint Ministerial Decision 8934/27-3-2026 (Government Gazette vol. B 1759/27-3-2026). See also: Athens-Macedonian News Agency, "New minimum wage enters into force; set at 920 euros", 1 April 2026. https://www.amna.gr/en/article/982152/New-minimum-wage-enters-into-force-set-at-920-euros

from the Record of Unemployed Persons. It is not clear to the Complainant when exactly the authorities adopted such position or interpretation of the legislation. In any case, this also indicates that the State itself considers that a conscientious objector to military service is unable to work while performing alternative service, however expects from the conscientious objector to sustain himself (and his family) for up to 15 months (or more, in certain cases), either by receiving food and housing but no amount of money whatsoever, or by receiving a "wage" which is less than half the threshold of poverty for a single person.

C2. Amendments in the legislation which directly affect the economic and social rights of conscientious objectors and the discrimination they face

42. In the Complaint it was explained that conscripts performing military service, *in addition to food and housing*, were entitled to a monthly amount of money according to their family status, rank and family income (Complaint para. 29), while conscientious objectors were not receiving such amounts, neither in the case of receiving food and housing / accommodation, nor in the case of receiving "their equivalent in cash" (phrase quoted form Government's Submissions para. 11(a)). In October 2025, the Minister of National Economy and Finance and the Minister of National Defence issued a joint ministerial decision, annulling the previous ministerial decision cited in the Complaint (note 49) and setting new monthly amounts provided to conscripts performing the military service or reserve service, which entered into force on the 1st of January 2026.[42] While the various categories are not exactly the same with the previous ones, nevertheless it is obvious that there is a significant (although not necessarily sufficient to ensure decent living for conscripts and their families) increase to the relevant amounts in comparison to the ones cited in the Complaint. The main categories and the relevant amounts concerning the basic compulsory military service are the following:
    a. Unwed or married conscripts without children: €50.
    b. Unwed or married conscripts without children serving in certain border areas: €100
    c. Married or unwed conscripts with children as follows:
        i. With one child: €150.
        ii. With two children: €200.
    d. Unwed conscripts:
        i. Who are children of families with 4 or more children: €150.
        ii. Who are orphaned as for one of the parents: €150.
        iii. Who are orphaned as for both parents: €200.
    e. Conscripts who pertain to more than one of the above categories, receive the amount concerning the category which provides the higher amount.
    f. Conscripts who, by the time this decision entered into force, were receiving higher amounts than the ones set in this decision continue to

[42] Joint Ministerial Decision No Φ.840/5/131016/Σ.18850/10-10-2025 (Government Gazette vol. B 5516/15-10-2025)

receive such higher amounts until the end or the interruption of fulfilment of their military obligations.

43. The above-described decision and increase of the amounts provided to conscripts performing military service, in addition to food and accommodation, *exacerbates the discrimination* against conscientious objectors who do not receive such amounts. Furthermore, it indicates that the Government was fully aware of the urgent need to increase such amounts which are provided in addition to food and accommodation, and was able to provide such increase, but on the one hand continues to refuse to provide such amounts to conscientious objectors (neither to those receiving food and housing / accommodation, nor to those receiving "their equivalent in cash"), and on the other hand refuses to provide any adjustment, i.e., increase, whatsoever to the amount which is provided to certain conscientious objectors instead of food and housing, i.e., the "wage".

44. In the context of a new law,[43] enacted on 10 January 2026, which replaces a wide range of military legislation, including the one about conscription, several amended provisions explicitly concerning conscientious objectors, others implicitly concerning some of them, and others omitting them, have resulted in the deterioration of the overall legislative framework for conscientious objectors and the discrimination they face. Some part of such deterioration directly concerns economic and social rights of conscientious objectors, and some other part indirectly affects the situation as it had been described in the Complaint.

45. One of the provisions directly affecting economic and social rights of conscientious objectors is the one about the possibility to buy out service after a certain age. As it has already been explained in this document, as conscientious objectors are required to buy out months of alternative service which is usually 3 months longer than the military service (with the exception of one category of reduced alternative service which is 2 months longer), and with each month of alternative service costing the same as a month of military service, they are required to pay a much higher total amount for buying out the same obligation to the State or the Nation. Until now they are required to pay (up to) 3 (months more) x €810 = €2,430 more than conscripts buying out military service. The Government, instead of addressing this intersectional discrimination, particularly affecting conscientious objectors of lower income, and in complete disregard of the previously cited observations and recommendations by domestic and international human rights bodies, mandates and organisations, proceeded in legislative amendments which further exacerbate such discrimination. According to the new law, from 2031, the amount for buying out a month of military or alternative service will be raised to €1,500.[44] This exacerbates the discrimination both against people of lower income (further restricting the possibility for buying out service only to people of higher income), as well as the discrimination against conscientious objectors, and therefore particularly exacerbates the intersectional discrimination against conscientious objectors of lower income. This is because

[43] Law 5265/2026 (Government Gazette vol. A 3/10-1-2026)
[44] Law 5265/2026, art. 223, art. 230 and art. 242, para. 16.

conscientious objectors, from 2031, will be required to pay (up to) 3 (months more) x €1500 = €4,500 more than conscripts, for buying out the same obligation.

46. Another provision which further extends discrimination against conscientious objectors is related to the length of service. As it has already been cited in the Complaint (para. 71) and in this Response (para. 26), conscripts performing the entire period of their military service (after training) in certain eastern border areas and certain military units, are provided with a reduction of 3 months of military service (9 months instead of 12 months), or in the case of the first category of reduced military service, with a (further) reduction of 1 month of military service (8 months instead of 9). Nevertheless, there is no equivalent provision for reduction of the length of alternative service for those conscientious objectors performing the entire period of alternative service in the same or any other border areas or in any other areas or specific institutions or bodies, where the alternative service might be more onerous. The above provisions for conscripts were maintained and further extended, as far as it concerns an additional factor, essentially the age, in the new legislation. Specifically, the new law provides the relevant reduction of military service (9 instead of 12, and 8 instead of 9 months) for an additional category, those conscripts who enlist before their class is called up, or who enlist by the first time their class is called up.[45] No equivalent provisions exist for conscientious objectors. This means, for example, that a conscript who will enlist at the age of 18, and was supposed to serve 12 months, will now serve only 9 months of military service, while a conscientious objector of the same age and family status will serve 15 months. This means that for conscientious objectors who are 18 years of age when they perform the alternative service, the additional time of (full) alternative service is in fact 67% in comparison to the military service for conscripts of the same age, or a ratio of alternative to military service of 1.67, which constitutes violation of **Article 1, paragraph 2,** of the Charter.

47. Another problematic provision in the new law, which potentially affects the rights of conscientious objectors under **Article E** about discrimination, especially in conjunction with the right to work (**Article 1**), after they have performed alternative service, is the one concerning the certificate of military status. In 2022, the Hellenic Data Protection Authority found that the certificate of military status should not reveal that someone has performed alternative service (which virtually means revealing that someone is a conscientious objector), but only that he does not have military duties anymore.[46] This is important because if it is revealed that someone is a conscientious objector, this makes him vulnerable to discrimination – for example in terms of employment, especially in the private sector. The same authority issued a similar decision for those who have been granted medical exemption.[47] This should not be revealed either. What should be cited is merely that they don't have military duties. Before that, the Greek Ombudsman too had taken similar positions. As pointed by the Ombudsman, insofar the alternative service applies only to conscientious objectors,

[45] Law 5265/2026, art. 246, para. 1(b) and para. 2.
[46] Hellenic Data Protection Authority, Decision 3/2022, 13 January 2022, Available in Greek at: https://www.dpa.gr/sites/default/files/2022-01/3_2022%20anonym.pdf
[47] Hellenic Data Protection Authority, Decision 2/2022, 13 January 2022, Available in Greek at: https://www.dpa.gr/sites/default/files/2022-01/2_2022%20anonym.pdf

this indirectly leads to the disclosure of religious or other beliefs which led to conscientious objection, and it is a violation of the right to freedom of thought, conscience and religion, which includes the right of a person not to reveal one's religion. The Ombudsman makes also reference to laws and regulations about personal data protection, including the Regulation (EU) 2016/679 about the protection when processing personal data, which requires that "Personal data shall be: […] (c) adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed ('data minimisation')".[48] According to the analysis of the Ombudsman, if the purpose of the military status certificate is to certify that the person has no military duties pending, then the reference to the manner, the time and the place where someone has fulfilled such duties is unnecessary for the purpose and therefore it is illegal. Furthermore, as pointed out by the Ombudsman, in their reports the conscientious objectors complain that such certificate may lead to unfavourable treatment in labour market. The Ombudsman recognises that the reference to further (unnecessary) data indeed renders such persons vulnerable to discrimination in terms of employment and that this is not only related to religious beliefs but also to other fields of discrimination such as on grounds of disability or chronic condition, which can be inferred by the detailed reference to the manner someone has fulfilled or even has been exempted from military duties.[49]

48. Despite the above cited decisions of the Hellenic Data Protection Authority and despite the fact that they were highlighted by the Greek Ombudsman in the comments about the draft law[50] and even highlighted by the Scientific Service of the Greek Parliament,[51] the new law provides that the certificate will indicate that someone has served alternative service,[52] i.e., that he is a conscientious objector, thus rendering conscientious objectors vulnerable to discrimination, especially in terms of employment.

C3. Amendments in the legislation which indirectly affect the situation described in the Complaint

[48] Regulation (EU) 2016/679 of the European Parliament and of the Council, of 27 April 2016, on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation), Chapter II Principles, Article 5 Principles relating to processing of personal data, para 1 (c). Available at: https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:32016R0679&from=EL#d1e1797-1-1

[49] WRI, "War Resisters' International input for Anti-Discrimination Law Guide", 15 December 2020, p. 11. It refers to a letter of the Greek Ombudsman to the Hellenic National Defence General Staff, dated 9 November 2018. Available at: https://wri-irg.org/sites/default/files/public_files/2021-01/wri_input_for_anti-discrimination_law_guide.pdf
See also in War Resisters' International, Conscientious Objection to Military Service 2017-2022, 22 March 2022, pp. 2-3. Available at: https://www.ohchr.org/sites/default/files/2022-05/WRI-HRC50.pdf

[50] Greek Ombudsman, Comments on the draft law, p. 6. Available in Greek at: https://www.synigoros.gr/el/category/default/post/parathrhseis-or-sxedio-nomoy-xarths-metabashs-twn-enoplwn-dynamewn-sth-nea-epoxh

[51] Scientific Service of the Greek Parliament, Report on the draft law, p. 38, para. 26. Available in Greek at: https://www.hellenicparliament.gr/UserFiles/7b24652e-78eb-4807-9d68-e9a5d4576eff/13166405.pdf

[52] Law 5265/2026, art. 238, paras. 3-4.

49. As it has been described in the Complaint (paras. 25-27), those conscientious objectors who cannot afford to perform, and therefore do not initiate the alternative service, or those who refuse to submit themselves to such a punitive and discriminatory regime, as well as those who have started to perform the alternative service but cannot afford to conclude it, are facing severe legal and economic consequences. Furthermore, such regime of severe penal and economic sanctions is meant to force conscientious objectors to "accept" the punitive and discriminatory alternative service. Such regime has been deteriorated following the enactment of the new legislation (law 5265/2026).

50. Specifically, a previous provision[53] stipulating that those convicted for refusing military service after serving a prison term equal to, or greater than, the duration of alternative service are exempted from further call-ups for military service was abolished.[54] This is a reform completely opposite to the recommendations to stop repeated prosecutions and punishment of conscientious objectors in violation of the *ne bis in idem* principle (Complaint para. 27), that went ahead despite the intervention of the Greek National Commission for Human Rights.[55]

51. Another provision for cessation of prosecutions, expungement of criminal records and lifting legal repercussions for those declared insubordinate who subsequently transition to an exemption status (e.g. due to disability, as fathers of three or more children) was similarly abolished.[56]

52. In general, numerous new stricter provisions, *inter alia*, for those declared insubordinate, those residing abroad, medical exemptions on psychiatric grounds etc., could indirectly affect many conscientious objectors to military service.

D. Minimum measures that the Government could and should have taken in order to address the violations of the Charter

53. In order to better explain the violations of the Charter in the case of conscientious objectors in Greece, EBCO wishes to provide a list of minimum measures which the Government could and should have taken in order to address such violations.

D1. Concerning the case of those conscientious objectors performing alternative service who are only provided with food and housing

[53] Law 3421/2025, art. 65, para. 1.
[54] Law 5265/2026, art. 243.
[55] Greek National Commission for Human Rights, Comments on the draft law, pp. 11-12. Available in Greek at: https://nchr.gr/images/pdf/apofaseis/antirisies_suneidisis/__19122025.pdf
[56] Law 5265/2026, art. 181, para. 4. Compare to Law 3421/2005 as it was standing, art. 13, para. 9.

54. In order to address the violation of **Article 30** in the case of those conscientious objectors performing alternative service who are (only) provided with food and housing, the Government should have provided a *sufficient monthly amount of money in order to cover the rest of their needs* besides food and housing.

55. In order to address the violation of **Article 31**, as well as **Article 30**, the Government should have ensured the provision of adequate housing and food, including through:
    a. an amendment of the current minimum conditions and the establishment of adequate standards for housing, including, but not limited to, a minimum size of the residence / room or the adequate space per person.
    b. the establishment of procedures to evaluate such places before appointing conscientious objectors, as the Ombudsman had suggested.
    c. the end of the practice of providing accommodation inside hospitals. (see also below)
    d. an amendment of the current minimum conditions and the establishment of adequate standards for food, including standards of quantity for each meal and provisions ensuring that the meals are compatible with the religious and/or ideological-philosophical beliefs of the conscientious objectors (e.g. vegetarians, vegans).
    e. the formalisation of the above into law, rather than a circular which is by nature non-binding.

56. In order to address the violation of **Article 11**, in conjunction with **Article 31**, the Government should have ended the practice of providing accommodation inside hospitals, and should have provided instead *either adequate housing outside the hospitals or an adequate "wage"*.

57. In order to address the violation of **Article 16**, the Government, (in addition to food and housing, and to a sufficient monthly amount of money in order to cover the rest of their needs besides food and housing), should have also provided *additional amounts of money according to the family status of conscientious objectors*.

58. In order to address, at least, the violation of **Article E**, in conjunction with **Articles 30** and **16**, the Government should have provided as a minimum *the same amounts of money already provided to conscripts* (in addition to food and housing), according to their family status, and *equivalent personal items (or an additional equivalent amount of money instead of the items).*

D2. Concerning the case of those conscientious objectors performing alternative service who are provided with a monthly "wage" instead of food and housing

59. In order to address the violations of **Articles 30**, **31** and **16**, and taking into consideration that conscientious objectors who are not provided with food and housing have to sustain themselves (and their families) in the same economic environment as any other citizen, including the current cost-of-living and housing

crises, *the Government should have provided the conscientious objectors the minimum wage*. In order to understand the absolute feasibility of this measure, it is worth noting that the current minimum wage is €920.00, which is €696.47 higher than the current monthly "wage" of €223.53 provided to the conscientious objectors. According to official statistics provided to EBCO, the total number of conscientious objectors recognised in 2025, including following administrative appeal, is 115. This means that for these newly recognised conscientious objectors, even in the extreme scenario in which all those conscientious objectors would receive "wage" and nobody would be provided food and housing, the additional amount to the State budget would have been only €696.47 x 115 = €80,094.05 per month, (or otherwise €961,128.6 per year). An insignificant amount taking into consideration that "State Budget expenditures for the period of January 2026 amounted to 3,851 million Euros, 1,709 million Euros lower than the target (5,560 million Euros), which is included in the 2026 Budget introductory report."[57]

60. In any case, in order to address at least the violation of **Article 30**, the Government should have provided at least *a "wage" equal to the threshold of poverty*. According to the most recent data provided, the threshold of poverty for a household of a single person is set to €7,020 annually[58] corresponding to €585 per month. In this case, the difference with the current "wage" provided to conscientious objectors is €585 – €223.53 = €361.47. This means that, even in the extreme scenario in which all conscientious objectors would receive "wage" and nobody would be provided food and housing, the additional amount to the State budget would have been only €361.47 x 115 = €41,569.05 per month (or €498,828.6 per year).

61. In order to address or at least mitigate solely the violation of **Article 31**, the Government, as a minimum, should have taken *measures to make prices of housing accessible to conscientious objectors*, for example by providing additional amounts of money specifically for housing, especially in areas of high prices, or state-rented housing for the conscientious objectors, or by subsidising owners to house conscientious objectors for free or at lower prices.

62. In order to address solely the violation of **Article 16**, the Government should have at least provided *additional and sufficient amounts of money per child*.

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[57] Hellenic Republic, Ministry of Economy and Finance, "State Budget Execution for the period of January 2026", 25 February 2026. https://minfin.gov.gr/en/state-budget-execution-for-the-period-of-january-2026/

[58] Hellenic Statistical Authority, Risk of poverty or social exclusion – 2025 Survey on Income and Living Conditions (Income reference period: 2024), 19 March 2026, p. 10, Table 6. Available in: https://www.statistics.gr/en/statistics?p_p_id=documents_WAR_publicationsportlet_INSTANCE_qDQ8fBKKo4lN&p_p_lifecycle=2&p_p_state=normal&p_p_mode=view&p_p_cacheability=cacheLevelPage&p_p_col_id=column-2&p_p_col_count=4&p_p_col_pos=1&_documents_WAR_publicationsportlet_INSTANCE_qDQ8fBKKo4lN_javax.faces.resource=document&_documents_WAR_publicationsportlet_INSTANCE_qDQ8fBKKo4lN_ln=downloadResources&_documents_WAR_publicationsportlet_INSTANCE_qDQ8fBKKo4lN_documentID=591528&_documents_WAR_publicationsportlet_INSTANCE_qDQ8fBKKo4lN_locale=en

63. In order to address at least the violation of **Article E**, in conjunction with **Articles 30**, **31** and **16**, the Government should have at least provided conscientious objectors who receive a "wage" which is only instead of food and housing (see also in Government's Submissions para. 11(a) the phrase "accommodation and food or their equivalent in cash") with the *same amounts provided to conscripts* (in addition to food and housing), according to their family status.

D3. Concerning conscientious objectors performing alternative service in general

64. In order to address the violation of **Article 11** and mitigate the violations of **Article 30**, and as long as conscientious objectors are not provided with adequate amounts of money (both in the case of receiving food and housing with no amount of money whatsoever, as well as in the case of receiving a "wage"), the Government should have at least provided conscientious objectors with a full reimbursement of the cost *for their medicine*s.

65. In order to address the violation of **Article E** in conjunction with **Articles 30**, **31** and **16**, the Government should have*, inter alia,* removed from the legislation the explicit prohibition to perform alternative service in the (entire) region of residence, since there is no such explicit prohibition for conscripts, and in order to allow conscientious objectors to perform at least part of their alternative service in their region of residence. This measure would not have caused any additional cost to the State budget.

66. In order to address the violation of **Article 1, paragraph 2**, the Government should have reduced the duration of alternative service for the category of reduced service which currently is 5 months of alternative service, instead of 3 months of military service. This measure would not have caused any additional cost to the State budget.

67. In order to address the **additional violation of Article 16 in conjunction with article E,** described in this Response (para. 24), the Government should have at least established the same ratio of alternative service to military service, for all categories of full and reduced service. This means that, insofar the current ratio of full alternative service to full military service is 1.25 (or 25% increase), the ratio for all categories of reduced service, which are usually provided because of family status, should have been reduced to 1.25 too. This measure would not have caused any additional cost to the State budget.

68. Furthermore, as far as it concerns the duration of alternative service, in order to address a further aspect of discrimination, in violation of **Article E in conjunction with Article 1, paragraph 2**, the Government should have provided certain conscientious objectors with equivalent reduction of the duration of alternative service, depending on the area, the institution or body of alternative service, and the age, equivalently to the reduction of the duration of military service provided to conscripts serving in certain border areas, certain military units, and depending on age. This is because, just as military service is not equally onerous in all cases,

alternative service is not equally onerous in all cases either. This measure would not have caused any additional cost to the State budget.

69. In order to address the factors aggravating the financial difficulty or inability to sustain oneself, one's family, and to find adequate housing, which constitute also factors of discrimination, and therefore are in violation of **Article E**, in conjunction with **Articles 30**, **16** and **31**, which are described in paragraphs 74-78 of the Complaint, the Government should have:
    a. extended the coverage of travel expenses for leave to conscientious objectors, as it is already provided for conscripts. (Complaint para. 74)
    b. addressed the discrimination against conscientious objectors as for fares, committed by private companies of various means of transportation, by implementing the already existing relevant anti-discrimination and equal treatment legislation. (Complaint para. 75). This measure would not have caused any additional cost to the State budget.
    c. addressed the discrimination in case of elections, by extending the provision permitting to vote at the place of service, to conscientious objectors, as it is already provided for conscripts. (Complaint para. 76). This measure would not have caused any additional cost to the State budget.
    d. addressed the discrimination in the tax Law 5073/2023, (Government Gazette Vol. A 204, 11 December 2023), art. 15. (Complaint para. 77).
    e. taken appropriate measures to pre-emptively address any similar legislative problem in the future, for any kind of legislation, for example by introducing a general legislative provision that all provisions concerning conscripts are equivalently applied to conscientious objectors regardless of whether the latter are explicitly cited or not. This measure would not have caused any additional cost to the State budget.
    f. addressed the issue of additional travel expenses for certain conscientious objectors when they are summoned, as applicants for conscientious objector status, to in-person examination by a Special Committee in the premises of the Ministry of National Defence in Athens, preferably by a legislative provision permitting them to participate remotely (i.e., through internet) in the session, as it is already the case for the members of the Special Committee. This would not have caused any additional cost to the State budget. Otherwise, the Government should have at least introduced a legislative provision in order for such travel expenses to be covered by the State. (Complaint para. 78)

70. In order to address the violation of **Article 16** in conjunction with **Article E**, concerning the deferment because of serving brother, described in this document of Response (paras. 18-19), the Government should have amended the relevant provision for conscientious objectors, so that they would provide a deferment to their brothers

for the *entire* period of alternative service. This measure would not have caused any additional cost to the State budget.

71. In order to effectively protect conscientious objectors from discrimination, especially in terms of employment (**Article E**, especially in conjunction with **Article 1**), the Government should have respected and implemented the decisions of the Hellenic Data Protection Authority and relevant recommendations of the Greek Ombudsman about military certificates and should have ensured in the relevant provision of the legislation that military certificates do not reveal that someone has performed alternative service (which means revealing that someone is a conscientious objector), or that someone has been granted medical exemption, but only that such person does not have military duties any more. This measure would not have caused any additional cost to the State budget.

D4. Concerning conscientious objectors of certain age eligible to buy out part of the alternative service

72. In order to address the discrimination, in violation of **Article E**, in conjunction of **Article 30** or **Article 1, paragraph 2**, concerning the amount for buying out service, explained in this document of Response (paras. 7-11, 45), the Government should have equalised the total amount required for buying out alternative service with the equivalent total amount for buying out military service. This could have been achieved in practice, for example, by a provision in the legislation establishing that the calculation of the relevant amounts for conscientious objectors should be made on the basis of the months of military service they would have to buy out if they were performing military service.

73. In order to address the intersectional discrimination affecting conscientious objectors of lower income, as well as the discrimination against conscripts of lower income too, the Government should have set a *differentiated cost* for buying out both the alternative and the military service, *according to the income of the conscientious objector or the conscript* respectively.

E. Concluding Remarks

74. The Complainant opines of having sufficiently substantiated in the Complaint and this document of Response the violations of **Articles 1, 1 para. 2, 11, 16, 30**, **31**, in themselves, as well as in conjunction with **article E** of the Charter. Furthermore, the Complainant has demonstrated the deterioration of the situation and the discrimination, following the submission of the Complaint. The Complainant has also indicated the minimum measures which could and should have been taken by the Government in order to address the relevant violations of the Charter and has demonstrated the feasibility of such measures. Therefore, the Complainant respectfully calls the Committee to:

a. confirm that such violations of the Charter have occurred,
b. confirm that they continue to occur to date,
c. call the Government to bring legislation and practice concerning conscientious objectors to military service in line with the provisions of the Charter, by taking all the appropriate measures, along the lines of the minimum measures presented in this Response.

Signed by

Daniele Taurino

President of the European Bureau for Conscientious Objection



Theodoros Diamantidis

Secretary of the European Bureau for Conscientious Objection

