

Mr Nicolas SIGALAS
Ambassador Extraordinary and
Plenipotentiary, Permanent
Representative of Greece to the Council
of Europe

Ref ► CINGO/Pres/Greece

Strasbourg, 5 September 2025

Dear Ambassador,

As you know, the Conference of INGOs through its Expert Council on NGO Law, follow the evolution of the legal framework related to Freedom of Association in Council of Europe member States.

Our international and national partners have drawn our attention to recent statements by the Minister of Migration and Asylum commenting adversely on NGOs that legally represent the asylum seekers affected by the suspension of the right to asylum in court proceedings and suggesting that they will be subjected to an administrative audit.

This is particularly concerning as these statements follow the interim measures issued by the European Court of Human Rights to secure the right of eight asylum-seekers to remain in Greece until the examination of their suspension applications at the administrative courts is completed.

The right to legal representation is fundamental to the rule of law and is safeguarded by the right to an effective remedy under Article 13 of the European Convention on Human Rights where rights under it are at risk. Moreover, the Guidelines on protecting NGO Work in Support of Refugees and Other Migrants provide that NGOs should not be prohibited or prevented from submitting complaints or bringing proceedings under national and international procedures with respect to the rights and treatment of refugees and other migrant.

The comments of the Minister also object to the NGOs taking positions contrary to the official migration policy of the government. However, it should be borne in mind that Recommendation [CM/Rec\(2007\)14](#) of the Committee of Ministers to member States on the legal status of non-governmental organisations in Europe specifically provides that NGOs should be free to undertake advocacy on issues of public debate, regardless of whether the position taken is in accord with government policy.

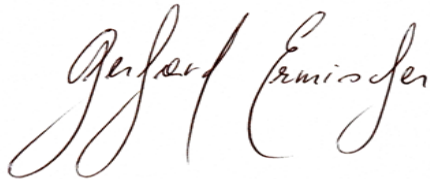
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Taking action against NGOs for the provision of legal representation and their advocacy on matters of migration policy is entirely incompatible with European standards.

Having regard to the foregoing, we sincerely hope that the regrettable comments of the Minister are not followed up by any concrete measures against NGOs and that Greece continues to fulfil its commitment under Recommendation CM/Rec(2007)14 to ensure that NGOs remain free to pursue their objectives and are not subject to direction by public authorities.

With best regards,

Gerhard Ermischer
President of the Conference of INGOs

A handwritten signature in dark ink, appearing to read 'Gerhard Ermischer', written in a cursive style.

Jeremy McBride
President of the Expert Council on NGO
Law

A handwritten signature in dark ink, appearing to read 'M. Jeremy McBride', written in a cursive style.