

M. Nicolas SIGALAS
Ambassador Extraordinary and
Plenipotentiary
Permanent Representative of Greece
to the Council of Europe

Ref ► CINGO/Pres/Greece

Strasbourg, 23 June 2026

Dear Ambassador,

As you know, the Conference of INGOs through its periodic country visits and its Expert Council on NGO Law follows the evolution of the civic space and legal framework related to Freedom of Association in Council of Europe member States. The Expert Council carries out thematic and country studies on specific aspects of NGO legislation and its implementation that seem to pose problems of conformity with international standards, notably the European Convention on Human Rights and [Recommendation \(2007\)14](#) on the legal status of NGOs in Europe. Its work covers the 46 member countries of the Council of Europe and Belarus.

In the implementation of its mandate, the Expert Council has issued several opinions on NGO legislation in Greece.¹ These have focused on adopted and planned legislative provisions and ministerial decisions pertaining to the registration, certification and ability to operate without being criminalised, and/or subjected to harsh penalties, of Greek and foreign nongovernmental organizations (NGOs) engaged in activities related to asylum, migration, and social inclusion. These opinions concluded that many aspects of the provisions were incompatible with freedom of association among other rights and freedoms. These concerns about the position of such NGOs were also echoed in the recent [report](#) of the visit to Greece by the Conference of INGOs last November.

We now write in relation to the Ministerial Decision (MD) No. 82876 on the Establishment of the "Register of Greek and Foreign Non-Governmental Organizations (NGOs)" and the "Register of Members of Non-Governmental Organizations (NGOs)" that are active in carrying out activities of a social and humanitarian nature, or international protection, or related to migration or social integration, which we understand was adopted on 8 May and published in the Official Gazette on 11 May 2026. This MD determines the terms and conditions for the registration of eligible Greek

¹ See: Expert Council on NGO Law, Opinion on the Compatibility with European Standards of Recent and Planned Amendments to the Greek Legislation on NGO Registration, [CONF/EXP\(2020\)4](#) (2 July 2020); Addendum to the Opinion on the Compatibility with European standards of recent and planned amendments to the Greek legislation on NGO registration, [CONF/EXP\(2020\)5](#) (23 November 2020); Opinion on the Law of Greece "Law on the Promotion of Legal Migration Policies," [CONF/EXP\(2026\)3](#) (18 March 2026).

and international voluntary organizations and civil society organizations in the “Register of Greek and Foreign Non-Governmental Organizations (NGOs).”

We note that many of the concerns that we have raised previously regarding the NGO register have not been addressed with this new MD.

Thus, while the stated aims of ensuring NGO transparency and safeguarding vulnerable refugees and asylum seekers are legitimate, the means adopted in the MD impede NGOs carrying out vital work in this sector from registering or maintaining their registration on the NGO Register. As registering in the NGO Register is a condition precedent for NGOs to operate in the service of international protection, migration and social integration in Greece, to cooperate with public authorities, to receive state or EU funding or operate in any manner whatsoever inside facilities of the Ministry of Migration and Asylum,² the MD maintains a system in which legitimate NGO activity is severely curtailed.

Moreover, the MD maintains the requirement that NGOs must register all of their members, staff and partners on the NGO Registry regardless of whether the individuals concerned are seeking to operate within Ministry of Migration and Asylum facilities. Registration is a necessary condition for “their activity within the Greek territory and for their cooperation with public bodies.”³

Crucially, in this connection, the MD requires managers, legal representatives and members of the NGO to submit a copy of their criminal record and a solemn declaration that no criminal prosecution has been launched against them for any felony and that no final conviction has been delivered against them for a broad range of listed misdemeanours, including slanderous defamation and illegal trafficking of third-country nationals.⁴ This information must be updated annually, failing which the organisation may be removed from the NGO Registry.

Furthermore, the inclusion of slanderous defamation in the list of misdemeanour offences that can lead to de-registration is problematic for the exercise of the right to freedom of expression under Article 10 of the European Convention. This is particularly so given the criminalisation of individuals who have advocated on behalf of refugees and migrants in Greece,⁵ and the finding in the *Katrami v Greece*⁶ set of cases - which remains pending before the Council of Europe Committee of Ministers - that the applicants’ freedom of expression was violated on account of their convictions for insult, defamation, or malicious defamation.

Indeed, as regards the status of general measures for the execution of those cases, it has been noted that:

“It appears from the European Court’s judgments [...] that the national case-law in freedom of expression cases has not been aligned with the Court’s case-law despite the dissemination measures taken [...]. Thus, further measures seem to be warranted in order

² Art. 1(2)(a) and 1(3) of the MD.

³ Art. 1(3) of the MD.

⁴ Art. 2(e) of the MD.

⁵ FIDH, Urgent Appeal: Greece: Continued judicial harassment against migrants’ rights defender Panayote Dimitras (23 January 2025), <https://www.fidh.org/en/issues/human-rights-defenders/greece-continued-judicial-harassment-against-migrants-rights-defender>.

⁶ *Katrami v. Greece*, App No 19331/05 (6 December 2007)

in pursuit of the stipulated aims cannot be considered strictly necessary or proportionate in a democratic society.

Having regard to the foregoing, we sincerely hope that Greece will reconsider these aspects of the MD and thereby fulfil its commitment to freedom of association under Article 11 of the European Convention on Human Rights and thereby ensure that NGOs undertaking vital work in the field of migration in Greece remain free to pursue their objectives and are not subject to undue direction, control or restriction by public authorities.

We would welcome the opportunity to discuss these matters further and look forward to your early reply.

Yours sincerely,

Gerhard Ermischer
President of the Conference of INGOS



Jeremy McBride
President of the Expert Council of NGO
Law of the Council of Europe

