

**Third party intervention
by the Commissioner for Human Rights
of the Council of Europe**

under Article 36, paragraph 3, of the European Convention on Human Rights

**Application no. 7311/22
Nikoleta ZERELIGA and Others against Greece**

Introduction

1. On 7 May 2026, the Council of Europe Commissioner for Human Rights (hereinafter the Commissioner) informed the European Court of Human Rights (hereinafter the Court) of his decision to intervene as a third party in the Court's proceedings, in accordance with Article 36, paragraph 3 of the European Convention on Human Rights (hereinafter the Convention), and to submit written comments concerning the case of *Nikoleta Zereliga and Others against Greece*. This case was lodged by five Greek citizens of Roma origin. It concerns alleged interference with the applicants' rights under Articles 6 and 8 of the Convention and Article 14 read in conjunction with Article 8 of the Convention, following the administrative protocol issued on 29 October 2019 which aimed at their eviction from the informal settlement built on State-owned land without a legal title in which they have been residing for approximately 25 years.
2. According to his mandate, the Commissioner fosters the effective observance of human rights; assists member states in the implementation of Council of Europe human rights instruments, in particular the Convention; identifies possible shortcomings in the law and practice concerning human rights; and provides advice and information regarding the protection of human rights across the region.¹ As stated by the Explanatory Report to Protocol No. 14 to the Convention, the Commissioner's experience may help enlighten the Court on certain questions, particularly in cases that highlight structural or systemic weaknesses in the respondent or other High Contracting Parties.²
3. The protection of the human rights of Roma and Travellers is a priority issue for the Commissioner, which he has addressed extensively during his country visits and thematic work. Throughout Europe, the Commissioner has found a general shortcoming in the implementation of the human rights of Roma and Travellers, who continue to experience widespread discrimination and severe violations of their rights in all areas, including education, health, employment and housing. In October 2025, he published a book, entitled "The Unheard 12 Million," based on his travels and personal encounters, with the aim of bringing home the dire reality of their experiences through first-hand accounts and direct quotes from Roma and Travellers, reinforced by narrative photography.³
4. The present intervention is based on the Commissioner's memorandum on the human rights of Roma in Greece following his country visit in February 2025,⁴ his preceding engagements with the Roma communities living on the outskirts of Thessaloniki, including in the area of Tsairia, during a mission conducted on 28-29 June 2024,⁵ and his observations on relevant developments since then. The Commissioner sees this case against the background of persisting obstacles and structural problems undermining the full and equal enjoyment of human rights by Roma communities in Greece.
5. Section I of the present written submission addresses the general housing situation of Roma in Greece. Section II explores issues pertaining to antigypsyism and various forms of discrimination experienced by Roma in Greece, including in the housing sector. Section III adds observations related to the situation prevailing in the area of Tsairia. These sections are followed by the Commissioner's conclusions.

I. The general housing situation of Roma in Greece

6. The Commissioner's February 2025 visit to Greece (Athens) and his June 2024 mission to Thessaloniki formed part of a series of engagements taking place in the context of his priority work on the human rights of Roma and Travellers across Council of Europe member states. They provided the Commissioner with an opportunity to observe and discuss, *inter alia*, issues related to Roma's access to adequate housing and related essential services as well as the widespread antigypsyism and discrimination the communities face in their daily lives.

¹ [Resolution \(99\)50](#) on the Council of Europe Commissioner for Human Rights, adopted by the Committee of Ministers on 7 May 1999.

² [Explanatory Report to Protocol No. 14](#) to the Convention, 13 May 2004, para. 87.

³ See Council of Europe Commissioner for Human Rights, [The Unheard 12 Million](#), 1 October 2025.

⁴ Council of Europe Commissioner for Human Rights, [Memorandum](#) of the human rights of Roma in Greece, 16 May 2025.

⁵ See Council of Europe Commissioner for Human Rights, [End-of-mission statement](#): Commissioner O'Flaherty raises alarm on LGBTI rights, pledges to partner with Roma, 2 July 2024.

7. According to the latest update of Roma settlements and population mapping published in 2025 by the General Secretariat of Social Solidarity and Fight Against Poverty, the total population of Roma in Greece amounted to 116,090, including 99,130 who were living in 349 settlements, while 16,960 Roma people were registered as living in 104 “scattered households”.⁶ These settlements are classified by the Greek authorities into three types:
 - Type I: Makeshift huts or shacks that lack basic infrastructure, such as running water, electricity, sewage systems, waste disposal, and access to public transportation. These settlements are typically located in isolated or environmentally hazardous areas, such as near industrial toxic waste sites or dumps.
 - Type II: Settlements consisting of a mix of shacks and prefabricated houses, with partial access to basic infrastructure, including running water, electricity, and sewage systems. These are often used as permanent residences and are usually situated near regular settlements.
 - Type III: Generally impoverished urban neighbourhoods that comprise houses, apartments, and prefabricated houses.
8. During the Commissioner’s June 2024 mission to Thessaloniki and February 2025 visit to Athens, several interlocutors emphasised that the official figures, which do not come from a census but are based on reports by the municipalities, may not accurately represent the situation, partly because some municipalities are reportedly reluctant to acknowledge the presence of Roma communities within their jurisdictions.⁷ The Commissioner was also told that widespread antigypsyism discourages many Roma from self-identifying as such. Some civil society organisations and international bodies estimate that there are approximately 265,000 Roma living in Greece,⁸ a wide majority of whom encounter serious difficulties in accessing adequate housing and related essential services.
9. The Commissioner and members of his delegation visited three Type I Roma settlements: i) the Tsairia settlement, near Thessaloniki airport, where 30–40 families have lived for over 25 years in extremely precarious conditions, residing in shacks without access to water, electricity, waste collection, public transport, or access roads; ii) the Agia Sofia settlement, also in the Thessaloniki area, in which around 3,500 Roma live in a mix of shacks, temporary housing, and some sturdier buildings, with no supporting infrastructure except an inadequate kindergarten; iii) the Halandri settlement, Athens, where about 250 people, including 110 children, live in overcrowded shacks built from salvaged materials, lacking formal connection to water, electricity, or sanitation. The Commissioner also visited the Dendropotamos neighbourhood (Type III), an impoverished urban area on Thessaloniki’s outskirts inhabited almost exclusively by Roma. Although material conditions were better than in Type I settlements, the neighbourhood remains isolated from the city and segregated due to surrounding infrastructure.
10. The Commissioner acknowledges Greece’s efforts to improve the human rights situation of Roma communities, notably through the National Strategy and Action Plan for the Social Inclusion of Roma (2021–2030). This comprehensive framework addresses key challenges faced by the Roma population, including discrimination, poverty, social exclusion, and, importantly, inadequate living conditions and restricted access to essential services.
11. A central aspect of the Strategy is the right to adequate housing, particularly through its commitment to ensuring equal access to fundamental services such as education, healthcare, and social care. The Legislative Framework for the Temporary Relocation of Special Social Groups places the responsibility on municipalities with Type I Roma settlements to ensure that residents have access to basic goods and services, and that proper living conditions are maintained. In cases of extreme deprivation, municipalities must arrange for the relocation of Roma residents and implement measures to guarantee improved housing, with the ultimate goal of achieving full social inclusion. Municipalities prepare and submit proposals for housing interventions, which are then assessed by

⁶ See General Secretariat for Social Solidarity and Fight against Poverty of Greece, [Registration of Roma population and settlement areas](#), 24 September 2025 (in Greek).

⁷ The Municipalities play an instrumental role in the registration exercise conducted by the General Secretariat for Social Solidarity and Fight against Poverty, which is based on a questionnaire completed by the relevant municipal officials (Social Service, Community Center, Roma Branch, Mayor’s Office) and approved by the Municipal Authority before being submitted to the General Secretariat for Social Solidarity and Combating Poverty. See General Secretariat for Social Solidarity and Fight against Poverty of Greece, [Registration of Roma population and settlement areas](#), section on methodology, p.7.

⁸ See, among others, Minority Rights Group, [Roma in Greece](#); ECRI [report](#) on Greece (sixth monitoring cycle), June 2022.

a specialist Technical Support Team and approved by an inter-ministerial committee, resulting in targeted actions to improve or relocate settlements as required.

12. The Commissioner notes a recent government initiative, with a dedicated budget of €15 million, aimed at supporting temporary relocation and upgrading infrastructure for Roma communities. This includes the creation of organised relocation sites and the expansion of vital infrastructure such as sewage, water, and transport networks to enhance living conditions.⁹ The Greek authorities also underlined that Roma, as Greek citizens, are entitled to access to general housing programmes.¹⁰
13. Despite these welcome efforts, the Commissioner observes that many obstacles continue to hinder the Roma communities' full enjoyment of their right to private and family life and home. Particularly, Roma communities remaining in settlements continue to live in poor material conditions, especially in Type I settlements, where shacks or makeshift houses are often overcrowded, heated with coal stoves exposing their inhabitants to air pollution and safety risks, and not connected to water, sanitation and electricity grids. The lack of waste collection and of access to public transportation, as well as the presence in the vicinity of infrastructures causing various forms of nuisance and exposing residents to risks to their safety and health are also common features.
14. These substandard conditions not only affect the right to adequate housing but also access to a range of other essential services, such as employment, education and healthcare.¹¹ As of May 2025, Greek authorities indicated that only 85 out of 142 municipalities with Roma populations had submitted Local Action Plans for social inclusion—plans which are intended to be developed and implemented in cooperation with local stakeholders, including Roma organisations.¹² Several interlocutors also drew the Commissioner's attention to the fact that the mere submission of a Local Action Plan does not always result in tangible or timely improvements on the ground, often due to a lack of political will.¹³
15. The Commissioner further remarks that, even in municipalities committed to respecting and fulfilling the human rights of the Roma population, the measures adopted by local authorities are frequently insufficient or not fully adapted to ensure adequate housing. For example, in Halandri, local authorities informed the Commissioner that the 'rent subsidy' mechanism, supported by the municipality of Halandri and the region of Attica, has not led to the full inclusion of relocated families, partly because of the programme's limited duration and the absence of accompanying support measures, as well as inadequate funding to incentivise voluntary relocation.
16. The Commissioner notes that the habitations making up Roma settlements may constitute a "home" in the meaning of the Convention provided that sufficient and continuous links with the specific place where they have been established exist.¹⁴ This appeared to be the case in all the sites that the Commissioner visited in 2024 and 2025, where a decades-old community life is present.¹⁵ The Commissioner was informed that the majority of the Roma settlements in Greece are inhabited by the same Roma families for years, often for generations. This is confirmed by a study mapping the socio-economic situation of the Roma in Greece, published by the General Secretariat for Social Solidarity and Fight against Poverty in June 2025: of the respondents, 76% declared that they had lived in the same accommodation for more than six years, while 12% stated that they had stayed there for 3–5 years; even smaller percentages (9% and 2%) stated stays of 1–3 years and 4–12

⁹ *Ibid.*

¹⁰ Several interlocutors of the Commissioner stressed that this access remains, however, largely theoretical, due to the discrimination communities face. See below, Section II.

¹¹ The Commissioner received, for example, testimonies that the combination of muddy conditions and lack of proper water supply to settlements creates obstacles to accessing education. A woman explained, for example, that, when the children get muddy due to the rain and the absence of proper roads in the settlement, the lack of water supply makes it hard to wash them and their clothes adequately in order to go to school. See the [Memorandum](#) of the Council of Europe Commissioner for Human Rights on the human rights of Roma in Greece, 16 May 2025.

¹² See General Secretariat for Social Solidarity and Fight against Poverty of Greece, [Observations](#) on the Memorandum of the Council of Europe Commissioner's Visit to Greece (3–7 February 2025) concerning the Human Rights Situation of Roma, May 2025, *op.cit.*

¹³ See the [Memorandum](#) of the Council of Europe Commissioner for Human Rights on the human rights of Roma in Greece, 16 May 2025, para 25.

¹⁴ European Court of Human Rights, [Winterstein and Others v. France](#), no 27013/07, § 141, 17 October 2013.

¹⁵ For at least 20 years in 'Agia Sofia', 55 years in [Halandri](#), more than 70 years in [Dendropotamos](#); more than 30 years in Tsairia, which was visited by members of the Commissioner's Office.

months, respectively.¹⁶ Therefore, the Commissioner considers that in the overwhelming majority of cases in Greece, the eviction of a Roma settlement interferes with the right to respect for home of their residents.

17. The Commissioner observes that authorities often argue that evictions take place in the interest of Roma living in unhealthy conditions. However, he notes that Roma communities remain in such substandard conditions for extended periods due to the lack of alternative solutions.¹⁷ This observation is corroborated by the testimonies received by the Commissioner during his 2024 mission and 2025 visit to Greece, where he was informed that those who had attempted to find a new home outside their settlement continued to face discriminatory attitudes that hindered their access to the housing market in practice, despite the fact that they are, in theory, entitled to access the general housing programme and social benefits like all Greek citizens. Moreover, once evicted, they are often not offered adequate alternative housing solutions, meaning that the initial problem of their unhealthy living conditions is not resolved. The Commissioner notes in this respect that evictions are an ineffective means of combating social exclusion and substandard housing conditions if they are not coupled with adequate socio-economic protection measures, such as the provision of alternative accommodation, preventing homelessness, and measures to combat antigypsyism in the housing sector and other areas of life.
18. The Commissioner notes that, when assessing compliance with the right to respect for one's home, the Court takes into account an occupant's vulnerability. In several judgments, the Court emphasised the vulnerability of Roma and Travellers¹⁸ and took into account the efforts made by the local authority to secure alternative accommodation.¹⁹
19. The Commissioner observes that, in its 2019 Conclusions on Greece, the European Committee of Social Rights (ECSR) found that the situation prevailing in Greece was not in conformity with Article 16 of the European Social Rights Charter (hereinafter the Charter), having regard *inter alia* to the fact that many forced evictions of Roma had taken place without specifying in advance a suitable place to install a safe and legal settlement.²⁰ The ECSR further considered that the situation was not in conformity with the Charter on the ground that Greece had neither demonstrated that there was adequate legal protection for persons threatened by eviction, nor proved that there were sufficient procedures in place to ensure that evictions of Roma are carried out in conditions respecting the dignity of the persons concerned. Forced evictions of Roma settlements in Greece have been also criticised by the United Nations Human Rights Committee in two decisions.²¹ More recently, ECRI recommended "that the Greek authorities ensure that Roma are not evicted illegally without proper notice or opportunity for rehousing in decent accommodation and, in this context, enjoy effective access to adequate legal aid."²²

II. Antigypsyism and various forms of discrimination experienced by the Roma in Greece

20. The survey "Discrimination in the EU", conducted as part of the European Commission's Special Eurobarometer 535 (2023), reported that 86% of respondents in Greece consider discrimination against Roma to be widespread (+21 percentage points above the EU average).²³ 68% believe that being Roma constitutes a negative factor in hiring decisions (+26 percentage points above the EU average).

¹⁶ General Secretariat for Social Solidarity and Fight against Poverty of Greece, [Study](#) mapping the socio-economic situation of the Roma in Greece, June 2025 (in Greek), p.26.

¹⁷ General Secretariat for Social Solidarity and Fight against Poverty of Greece, [Study](#) mapping the socio-economic situation of the Roma in Greece, June 2025 (in Greek), p.26.

¹⁸ European Court of Human Rights, [Connors v. the United Kingdom](#), no. 66746/01, § 84, 27 May 2004.

¹⁹ European Court of Human Rights, [Faulkner and McDonagh v. Ireland](#) (dec.), §§ 110-113, 8 March 2022.

²⁰ In this connection, the Committee referred to its decisions in [European Roma Rights Centre v. Greece](#), Complaint No. 15/2003, decision on the merits of 8 December 2004, and [International Centre for the Legal Protection of Human Rights \(INTERIGHTS\) v. Greece](#), Complaint No. 49/2008, decision on the merits of 11 December 2009, where it found a violation of Article 16 in respect of the situation of Roma precisely on this particular ground.

²¹ UN Human Rights Committee, [Georgopoulos and others v. Greece](#), communication No. 1799/2008, 29 July 2010; ['I Elpidia' — The Cultural Association of Greek Gypsies from Halandri and Suburbs, and Stylianos Kalamiotis v. Greece](#), communication No. 2242/2013, 3 November 2016.

²² ECRI [report](#) on Greece (sixth monitoring cycle), June 2022, p.20.

²³ <https://europa.eu/eurobarometer/api/deliverable/download/file?deliverableId=90262>

21. According to the 2024 survey conducted by the European Union Fundamental Rights Agency (FRA), 42% of Roma in Greece say they were discriminated against in the year before the survey, while 39% of them experienced hate-motivated harassment.²⁴ 61% of Roma felt discriminated against when looking for work compared to 24% in 2016, while 27% felt discriminated at work. 28% of Roma felt discriminated against when looking for housing, while 15% felt discriminated against when accessing healthcare. The survey showed that only 2% of young Roma in Greece have completed at least upper-secondary education. This compares to 96% of the general population. 57% of Roma children in Greece attend a school where all or most pupils are Roma.
22. The FRA 2024 Roma survey also notes that no Roma reported discrimination to an official body.²⁵ During the period May-September 2024, the Roma Human Rights Advocacy and Defense Observatory collected 914 reports of discrimination against Roma in Greece relating to access to services, infrastructure, employment and education.²⁶ It noted that most complainants did not proceed with formal complaints, preferring instead to report incidents to Roma organisations due to a lack of trust in public authorities and limited awareness of the relevant complaint procedures.²⁷
23. The 2024 Special Report on Equal Treatment issued by the Greek Ombudsperson highlighted critical issues concerning the implementation of the principle of equal treatment, including in the area of housing.²⁸ It found that housing policy remains an area of intense exclusion, identifying the practice of imposing excessive fines for unauthorised constructions in Roma settlements, without provision of alternative housing, to constitute “a form of institutional violence that perpetuates marginalisation and ignores the constitutional requirements for a dignified life”.
24. The National Strategy and Action Plan (2021–2030) acknowledges that Roma are subject to multiple forms of social exclusion in the areas of housing, employment, health and education. The third pillar is dedicated to preventing and combating discrimination and stereotypes against Roma, pursuing various objectives, including ensuring the possibility for Roma to complain about discriminatory treatment, and raising awareness about diversity and Roma culture. The Commissioner also notes the recent adoption of the National Action Plan against Racism and Intolerance (NAPAR) 2026-2029, in which Roma, among other specific groups, are identified as disproportionately affected by incidents of racist violence, intolerance, hate speech and multiple forms of discrimination.²⁹ The Action Plan foresees specific actions aimed at combating discrimination against Roma, such as the designing and implementing of targeted awareness campaigns for the prevention of discrimination, with an emphasis on, among others, the protection of Roma, as well as horizontal public information interventions aimed at the general population in order to highlight multiple forms of discrimination and strengthen social dialogue.³⁰
25. While engaging with the communities during his June 2024 mission to Thessaloniki and February 2025 visit to Greece, the Commissioner was told of diverse experiences of discrimination lived by the Roma children, young people, women and men with whom he met. These range from young Roma’s inability to access paid work once their ethnicity was known by the employer, to Roma hiding their identity in healthcare settings for fear of being discriminated against or mistreated. A young girl from the Tsairia settlement informed the Commissioner’s Office about her first days at the new primary school in Heraklion Lagkada, recounting that, after her arrival in school, none of the non-Roma pupils came to school the following days, as a sign of protest against the presence of Roma children.³¹
26. In relation to access to adequate housing, according to several interlocutors, turning to the regular housing market is in practice very difficult for Roma due to discrimination.³² As underlined by the

²⁴ FRA, Rights of Roma and Travellers in 13 European countries - Perspectives from the Roma Survey 2024, Country data: [Greece](#), 02 October 2025.

²⁵ Ibid.

²⁶ National [Action Plan](#) against Racism and Intolerance 2026, p.50. The project “Operation of an observatory for the protection of human rights of Roma and strengthening local communities and relevant stakeholders – ROM” is implemented within the framework of the Active Citizens Fund programme. Equal Society is the coordinating partner, while the Panhellenic Confederation of Greek Roma-“ELLAN PASSE” and the Association of Greek Roma Mediators are partners.

²⁷ Ibid.

²⁸ Special Report on Equal Treatment 2024, The Greek Ombudsman [Συμβόγιος του Πολίτη](#)

²⁹ National [Action Plan](#) against Racism and Intolerance 2026-2029, p.1.

³⁰ Ibid. p. 73.

³¹ Commissioner for Human Rights, Michael O’Flaherty, [The Unheard 12 Million](#), 1 October 2025, p.30.

³² See above, Section I, § 17.

European Commission against Racism and Intolerance (ECRI), “landlords are reportedly reluctant to rent flats to Roma and because of negative attitudes towards Roma prevailing in large parts of Greece, local authorities allegedly have a favourable attitude towards evictions.”³³ In this respect, communities in the settlement of Halandri, in Athens, told the Commissioner about the reluctance of non-Roma landlords to rent houses and apartments to Roma families. The Commissioner was also informed that the municipality of Halandri launched an initiative to relocate 156 Roma families from two settlements. Some of the Roma who moved into flats in nearby neighbourhoods, supported by the municipality, faced racism from non-Roma neighbours, who collected signatures calling for their eviction.³⁴

27. Equally concerning is the use of harmful and stereotypical terms and hate speech employed by national authorities³⁵ and media³⁶, criminalising and stigmatising entire Roma communities. For example, a video, widely circulated online, captured the mayor of Perama verbally assaulting and threatening a Roma woman and her children before spraying them with water in May 2024. A complaint was lodged with the Greek Ombudsman by three NGOs concerning this incident.³⁷ In June 2025, several NGOs lodged a complaint against a member of the European Parliament for repeated anti-Roma statements.³⁸
28. Moreover, during his visit to Athens, the Commissioner was informed about repeated reports of police raids in Roma settlements and of communities’ complaints of being the targets of ill-treatment. In Halandri, a Roma woman informed the Commissioner that she keeps receipts for every purchase to prevent the police from seizing her belongings, suspecting they may not belong to her. She described a raid in which authorities tried to confiscate her husband’s musical instrument – his livelihood – and her daughter’s wedding dowry. During the raid, tear gas was reportedly thrown into their home, despite the presence of children and elderly persons.
29. The Commissioner was also recently informed about policing practices, within the framework of police operation “ENTOS”, reportedly entailing heavily armed police deployment directed toward specific living areas long associated with Greece’s Roma population.³⁹ These practices raise concerns of ethnic profiling, and are highly stigmatising, reinforcing prejudice and deepening marginalisation. They also fuel fear among the communities and undermine trust. These practices occur within a context of persistent cases of police violence against Roma in Greece, echoing multiple reports issued by civil society organisations and international human rights mechanisms over many years, as well as the case-law of the Court, which go beyond a series of isolated incidents and reflect deeply embedded racism.⁴⁰

III. Observations on the informal settlement located in the area of Tsairia

30. On 28 June 2024, on the occasion of the Commissioner’s mission to Thessaloniki, members of his Office, accompanied by a photographer and a writer, visited the Tsairia settlement. They had the opportunity to talk at length with the residents about their living conditions, as well as the difficulties they face in their daily lives because of their Roma origin, and to document their conditions through photographs and the collection of testimonies.⁴¹
31. This informal settlement is located near Thessaloniki’s international airport and is under the jurisdiction of the municipalities of Thermaikos and Thermi. It has been home to 30–40 families for

³³ ECRI [report](#) on Greece (sixth monitoring cycle), para 100.

³⁴ Commissioner for Human Rights, Michael O’Flaherty, [The Unheard 12 Million](#), 1 October 2025, p. 16.

³⁵ In an [interview](#) of 24 July 2025, the Minister of Citizen Protection Michalis Chrysochoidis said, for example, that “70%-75% of crime comes from the Roma,” and added the following: “I am not saying this for racist or prejudice reasons. Quite the opposite, I love their children and these people, but the profession they do must be changed: thefts, burglaries, frauds, electricity thefts, etc.”

³⁶ Council of Europe, [Study on portrayal of Roma in the written press in Bulgaria, Greece, Italy and Romania](#); [Study on the Portrayal of Roma in TV Broadcasting in Bulgaria, Greece, Italy and Romania](#) 2024.

³⁷ In a letter addressed to the applicants on 31 July 2025, the Greek Ombudsman recalled the obligation of the administrative bodies of the Greek State, including elected administrative officials, to exercise their administrative duties in an impartial and neutral manner towards all citizens, and to show due respect in the exercise of their duties, irrespective of the social status and racial or ethnic origin of those persons.

³⁸ Greek Helsinki Monitor activity [report](#) (April – August 2025).

³⁹ ERRC, [Drones, Dogs, and Dawn Raids: The Police War on Greece’s Roma](#), 26 May 2026.

⁴⁰ For further information, see the Commissioner for Human Rights’ Memorandum on the human rights of Roma in Greece, June 2025, paras 31-41.

⁴¹ Testimonies and photographs from the Tsairia settlement are included in the Commissioner for Human Rights’ book [The Unheard 12 Million](#), 2025.

over 25 years, establishing a decades-old community life. Housing conditions in the settlement are very poor: Roma families live in makeshift houses made of salvaged materials that are not connected to water, sanitation or electricity grids. There is no proper access road to the settlement and residents have no direct access to public transport. The residents explained to the Commissioner's Office that, in order to obtain power, even temporarily, they are forced to climb public utility poles, thereby risking electric shock or a fatal fall and exposing themselves to fines for making these makeshift connections. Due to the lack of a water supply, residents have to carry heavy jugs of water when they are unable to collect clean water from the nearby dog shelter, for which they are grateful to the shelter's owner.

32. The Commissioner's Office was also informed that, in case of an emergency, ambulances cannot reach the Tsairia settlement. Residents must drive those requiring emergency care along muddy, potholed paths to a supermarket car park 1.5 km away for transfer to an ambulance. Furthermore, the lack of access to public transport means parents have to drive their children to and from school during working hours. The residents of Tsairia also explained that they had to struggle against prejudices to get their children accepted in the local schools. They also reported repeated police operations in the settlement, fuelling an environment of fear.⁴²
33. The Commissioner's Office was made aware that 300–400 people lived in the settlement before 2019. According to residents, the newly elected mayor at that time assured them that prefabricated houses would be installed to improve their living conditions and ordered the demolition of around half of the makeshift dwellings. However, the Commissioner's Office was told that the prefabricated houses were never delivered, and no other alternative solution was provided. Some families remained in the settlement because they had nowhere else to go, while others left. Among the latter, some families tried to rent homes in the city, but landlords refused to rent to them. Sixteen families legally purchased a plot of land in the village of Heraklion Lagkada, installing caravans before building adequate houses. They enrolled their children at the local school, where they faced hostility on account of their Roma ethnicity. Shortly after this incident attracted media attention, the families' caravans were set on fire while the children were at school, and the adults were at work. The Commissioner was told that no investigations were carried out to ensure accountability. The families eventually decided to return to Tsairia.⁴³
34. The Commissioner's Office was informed that the communities were ready to relocate in order to enjoy better living conditions in desegregated areas closer to the city. However, despite having consistently expressed their willingness to engage with the local authorities to find an adequate solution, no consultations or any other form of effective communication were put in place by the authorities.
35. The Commissioner recalls that, in February 2022, the Court issued an interim measure in the present case, and decided, in the absence of sufficient official assurances regarding alternative housing for the applicants and their minor children, to extend it several times until it was lifted in May 2025. During their visit to the settlement, the Commissioner's Office was informed that neither the local nor national authorities had taken action by that point.⁴⁴ This left the Roma communities in a legal limbo, causing them constant anxiety since an administrative eviction protocol was issued in October 2019.
36. The Commissioner recalls that the Court noted that, in assessing the proportionality of an eviction, the affected persons' vulnerability as a group must be considered, together with the length of their residence and the links developed by a community with a given location. Furthermore, the principle of non-discrimination must be respected at all stages of the eviction process. The Commissioner further notes the Court's well established case law that once an eviction order has been issued it amounts to an interference with one's right to respect for home, irrespective of whether it has been

⁴² For recent occurrences, see ERRC, [Operation ENTOS: Full Raid Data Log](#), 2026, *op.cit.* The Tsairia settlement is referred to as "the settlement of Peraia," named after a small town adjacent to the camp.

⁴³ One of them told the following to the Commissioner's Office: "I was born here; I served in the army; I pay taxes. Why should my children and I have to suffer so much racism?"

⁴⁴ The local authorities were not available to meet with the Commissioner on the occasion of his mission to Thessaloniki. He understands that the Municipality of Thermaikos, which issued the Protocol of Administrative Eviction, did not submit a Local Action Plan for Roma inclusion, equality and participation to the National Roma Contact Point, even though such planning is an enabling condition for access to funding available under the Ministry of Interior programme "Temporary Relocation, Development, Replacement, and/or Expansion of Infrastructure Networks to Improve Living Conditions for Specific Social Groups (Roma)."

carried out.⁴⁵ He observes that the insecurity resulting from the issuance of an eviction order, and the associated fear of losing one's home, affects the right to respect for home and generates anxiety.

37. The status of some of the communities' members as parents of minors is also a relevant factor. The distress caused by the fear of eviction is compounded by the risk of disruption to schooling, healthcare, and employment. The Commissioner is not aware of any measures taken by the authorities to mitigate such anxiety in the face of the potential loss of housing and the risk of homelessness. This situation should be viewed in the broader context of the widespread antigypsyism and discrimination faced by Roma communities in Greece, including with regard to access to adequate housing (as addressed in Section II), as well as the poverty experienced by many Roma, which further limits their ability to secure a new home.

Conclusion

38. In the present written submission, the Commissioner puts before the Court information on the basis of which it may consider that:

- The inadequate housing conditions prevailing in informal Roma settlements in Greece result from the absence of, or insufficient, efforts by the relevant authorities to provide a solution. This situation is compounded by antigypsyism embedded in society, which undermines progress towards the full and equal enjoyment of human rights by Roma communities.
- The risk of eviction faced by communities in informal settlements, which constitute a "home" within the meaning of the Convention, without the availability of alternative accommodation, appears to disproportionately interfere with right to respect for home, particularly in view of the vulnerability of the communities concerned.
- An eviction, as well the risk thereof, may jeopardise the enjoyment of interrelated rights as well as access to other essential services.

⁴⁵ E.g. European Court of Human Rights, [Gladysheva v. Russia](#), no. 7097/10, § 91, 6 December 2011; [Čosić v. Croatia](#), no. 28261/06, § 22, 15 January 2009.