



RECORDING MECHANISM OF INCIDENTS OF INFORMAL FORCED RETURNS

ANNUAL REPORT 2024





Recording Mechanism of Informal Forced Returns Incidents



Neofytou Vamva 6 (3rd floor) 10674, Athens



210 723 3224



recordingmechanism@nchr.gr



<https://nchr.gr/index.php/mixanismos-katagrafis.html>

Author: Ilias I. Tsampardoukas, Lawyer/Supervisor of the Recording Mechanism of Incidents of Informal Forced Returns

Translation in English: Kalliopi Diavati, Official Translator, Greek National Commission for Human Rights (GNCHR)

Design - printing - binding: DIATYPOS Graphic Arts, diatypas@otenet.gr

The text of this publication **may** be reproduced free of charge in any form or medium, provided that it is reproduced in an accurate and non-misleading manner. It is necessary to mention the copyright of the Recording Mechanism of Incidents of Informal Forced Returns and the title of the publication. If third-party material is included, permission must be sought from the relevant copyright holder.

For further **information**, please contact recordingmechanism@nchr.gr

This report was printed in June 2025 in 50 Greek and 50 English copies and is also available on the website of the Recording Mechanism of Informal Forced Returns: <https://nchr.gr/en/recording-mechanism.html>

The **Greek National Commission for Human Rights (GNCHR)** is the independent advisory body to the Greek State on matters pertaining to the protection of human rights, and the National Human Rights Institution (NHRI) in Greece. It was established by Law 2667/1998, in accordance with the *Paris Principles adopted by the UN General Assembly Resolution no. 48/134 “National Institutions for the Promotion and Protection of Human Rights” (NHRIs)* of 20 December 1993. The GNCHR has acquired legal personality, functional, administrative and financial independence, under the provisions of Law 4780/2021, amending its founding legislation. Since 2001, the GNCHR, was accredited as an A status NHRI, (full compliance, in accordance with the UN Paris Principles) by the competent GANHRI Sub – Committee on Accreditation, in recognition of its substantial independence and effective fulfilment of its role.



GLOSSARY	4
PREAMBLE	8
SUMMARY	13
CHAPTER 1. GENERAL CHARACTERISTICS OF THE RECORDINGS	16
CHAPTER 2. SPECIFIC CHARACTERISTICS OF THE RECORDINGS	21
I. MORPHOLOGY OF THE RECORDED INCIDENTS	21
A. DATA RELATING TO THE DETECTION.	21
i) Topography of the detection	22
ii) Demography of the detected alleged victims	22
iii) Characteristics of the detectors	24
B. DATA ON THE INFORMAL DETENTION	29
i) Topography of informal detention	31
ii) Demography of alleged victims under detention	31
iii) Time duration of informal detention	32
iv) Characteristics of the guards	33
C. DATA ON THE ACT OF PHYSICAL REMOVAL	36
i) Topography of physical removal	36
ii) Demography of Alleged Victims Subjected to Physical Removal	37
iii) Characteristics of the removers	38
iv) Means and modes of physical removal	43
v) Incidents of Convergent Removal	45
II. INDICATORS OF INFORMALITY	48
III. TREATMENT OF THE ALLEGED VICTIMS	51
IV. SUPPORTING EVIDENCE	54
V. LEGAL ACTIONS TAKEN BY THE ALLEGED VICTIMS	55
CHAPTER 3. ADDITIONAL INFORMATION	57
I. DECISIONS ON INTERIM MEASURES (R39) INDICATED BY THE EUROPEAN COURT OF HUMAN RIGHTS (ECTHR)	57
II. TESTIMONIES RECEIVED BY CHILDREN	59
CHAPTER 4. CONCLUSION	61
CHAPTER 5. RECOMMENDATIONS	68
ANNEX – FRAMEWORKS OF THE RECORDING MECHANISM	73
I. FOUNDING FRAMEWORK	73
II. OPERATIONAL FRAMEWORK	77
III. METHODOLOGICAL FRAMEWORK	79
A. DEFINITION OF AN IFR INCIDENT	80
B. PERSONAL INTERVIEW	81
C. CONSENT	81
D. COMMON IFR INCIDENT RECORDING FORM	81
E. QUALITY CONTROL OF RECORDINGS	82



GLOSSARY

Asylum seeker: Any person who is outside their country of origin, or, in the case of a stateless person, outside their former habitual residence, and who is seeking international protection in another country.

Beneficiary of international protection status: A person who has been granted any form of international protection.

Beneficiary of subsidiary protection status: According to Directive 2011/95/EU, a third-country national or stateless person who does not qualify as a refugee under the 1951 Geneva Convention on the Status of Refugees, but for whom there are substantial grounds to believe that, if returned to their country of origin, or, in the case of a stateless person, to their previous habitual residence, they would face a real risk of serious harm. Such harm includes the death penalty or execution, torture or inhuman or degrading treatment or punishment, or a serious and personal threat to life or physical integrity due to indiscriminate violence in situations of international or internal armed conflict. The person is unable or, due to this risk, unwilling to seek protection from that country. .

Convergent removal: Incidents in which alleged victims or groups of alleged victims are detected at different locations and times, or under differing circumstances, or are subjected to informal detention in distinct places, prior to being ultimately brought together and collectively subjected to a large-scale operation of physical removal. Convergent removal demonstrates the coordination of multiple operational stages and the interconnection of various sites and mechanisms, providing further evidence of an organised operational plan.

Co-operating Agency: A national or international entity with expertise in a field relevant to the interests or operational needs of the Recording Mechanism. Such an entity participates as a cooperating agency in accordance with the provisions set out in the Founding Act of the Recording Mechanism, providing Members with technical assistance, support, advice, or expertise in its area of specialization.

Country of entry: The last reported country in which the alleged victim was located prior to entering Greek territory.

Country of return: The first reported country in which the alleged victim was located during or immediately after their removal from Greek territory to a third country.

Detection: The term refers to the moment or process during which individuals or groups (third-country nationals or stateless persons) are identified by uniformed or non-uniformed actors within Greek territory, without any formal procedures for identification, registration, or referral to the competent authorities. Detection constitutes the initial stage of an IFR incident, which, depending on the circumstances, may lead either to immediate physical removal from Greek territory or be followed by informal detention.

Indicators of informality: These are indicators reflecting the actions of alleged perpetrators in relation to the identification of alleged victims, verification and recording of personal information, collection of biometric data (photos and fingerprints), administrative handling of asylum applications, and access to legal remedies for those seeking to challenge the legality of their removal. Deficiencies in any of these procedures serve to attribute an irregular (informal) character to IFR incidents.



Indirect testimony: Testimony concerning an IFR incident, recorded by the Recording Mechanism from a third person when the victim is unable, due to force majeure or vulnerability, to provide their own account. The third person must be in a position to be aware of, or reasonably expected to know, what happened to the victim, and their testimony should ideally be corroborated by that of another victim involved in the same IFR incident.

Informal detention: The term refers to situations in which individuals, upon being detected, are deprived of their liberty or freedom of movement and are either transferred to, or held under supervision in, confinement facilities without undergoing formal registration, administrative detention, or identification procedures. Informal detention may coincide in time and place with detection and/or physical removal; however, in certain incidents, it appears as a distinct intermediate stage, supported by separate operational infrastructure (e.g., the use of buildings, transfers, etc.). The defining characteristic of all forms of informal detention is the absence of a legal basis and of judicial or administrative oversight.

Informal Forced Return incident (IFR incident): The informal deportation, removal, pushback, or return of third-country nationals, including asylum seekers and holders of legal residence titles in Greece, carried out summarily and outside the legal framework. These actions occur without individual assessment of international protection or other needs, and without the possibility of recourse to legal remedies, potentially resulting in a direct or indirect breach of the principle of non-refoulement as stipulated in Article 3 of the Geneva Convention, Article 3 of the International Convention against Torture, Article 3 of the European Convention on Human Rights, or under principles of customary international law (**See: Indicators of informality**).

International protection status: The status granted to recognized refugees under the 1951 Geneva Convention relating to the Status of Refugees, or the subsidiary protection status granted to beneficiaries under Directive 2011/95/EU of the European Parliament and of the Council of 13 December 2011.

Interpreter: A person with knowledge of the languages understood by both the recording officer and the alleged victim, who provides language mediation during the recording of an IFR incident, ensuring two-way communication and mutual understanding between the officer and the victim.

Member of the Recording Mechanism: A Civil Society Organisation (CSO) active in the field of human rights or migration and refugee protection, legally established and operating in Greece, with the purpose of providing free services to third-country nationals or stateless persons based on the principles of equal treatment, freedom of religion, and neutrality. A CSO becomes a Member of the Recording Mechanism according to the conditions and procedures set out in its Founding Act, undertaking the obligation to pursue the objectives of the Mechanism, apply its methodology, and record testimonies of informal forced return incidents.

Observer of the Recording Mechanism: A civil society organization or entity active in the field of human rights or migration and refugee protection, or whose objectives or activities include human rights protection, which participates as an Observer in the Recording Mechanism. Observer status is acquired in accordance with the provisions set out in the Founding Act of the Recording Mechanism.

Perpetrators in uniform: Persons involved in an IFR operation who wear a uniform or clothing displaying identical symbols or insignia. Such clothing may resemble the official uniforms of law enforcement or security agencies, including the Hellenic Police, the Hellenic Coast Guard, the Hellenic Army, or FRONTEX.



Perpetrators out of uniform: Persons involved in an IFR operation who wear ordinary civilian clothing, without any identical symbols or insignia. These individuals may act independently or in coordination with security forces, and may include members of security forces, such as police officers in civilian clothing.

Physical removal: The stage in which alleged victims, under coercion and without any formal administrative or judicial procedure by a competent authority, are transferred across the border outside Greek territory—either via the Evros River or by sea. Physical removal represents the operational escalation of an IFR incident.

Recording cycle: The period during which the Recording Mechanism conducts recording proceedings for IFR incidents. Each recording cycle is annual, beginning on 1 January and ending on 31 December of the same calendar year. The findings from each cycle are presented and analysed in the relevant annual report of the Recording Mechanism, which is published after the conclusion of the cycle.

Recording Form: The standardized form used by accredited recording officers to document the testimonies of victims of IFR incidents.

Recording of an IFR incident: The documentation of a victim's testimony regarding an IFR incident, conducted in accordance with the standards and methodological tools established by the Recording Mechanism. Recordings are carried out by accredited recording officers, with the assistance of an interpreter when necessary to ensure mutual understanding and only following the informed and explicit consent of the victim for both the recording and the processing of their personal data.

Recording officer: An individual accredited by a Member of the Recording Mechanism, responsible for recording IFR incidents in accordance with the methodology of the Recording Mechanism.

6

Recording range: The time period during which IFR incidents recorded by the Recording Mechanism in a given recording cycle took place. The recording range is determined at the beginning of each cycle. For the 2024 recording cycle, the range covers three years; that is, incidents that occurred between 1 January 2022 and 31 December 2024 were recorded.

Refugee: Under the 1951 Convention Relating to the Status of Refugees, any person who, owing to a well-founded fear of persecution for reasons of race, religion, nationality, membership of a particular social group, or political opinion, is outside the country of their nationality and is unable, or owing to such fear, unwilling to avail themselves of the protection of that country; or, if stateless and outside their former habitual residence as a result of such events, is unable, or owing to such fear, unwilling to return

Registered asylum seeker: An asylum seeker who has undergone the registration procedure for their application for international protection.

Rejected asylum seeker: A person who has lodged an asylum application for which a final rejection decision has been issued by the competent authorities.

Stateless person: A person who is not considered a national by any state under the operation of its law, either because they never acquired a nationality or because their nationality has been revoked.

Successive detention: The term refers to the practice whereby alleged victims, following their detection, are transferred successively to two or more different places of detention before reaching the location of their physical removal from the country. These transfers are reported to occur without



any formal administrative procedures for registration or identification, and without notification or judicial/administrative oversight. The occurrence of successive detention demonstrates the complexity and organisational structure of the operations, indicating the presence of planning, role allocation, and coordination across different locations and means.

Third-country national: A person who holds the nationality of a country other than Greece, either by birth or by naturalisation.

Victim: A third-country national or stateless person alleged to have been subjected to an IFR incident originating from Greek territory, either directly to their country of origin, in the case of stateless persons to their former habitual residence, or to a third country.



PREAMBLE

Informal Forced Returns (IFRs) of third-country nationals, commonly referred to in public discourse, among other terms, as "pushbacks", constitute one of the starkest contradictions of contemporary human rights policy. These are covert operations by design and intent, yet they are frequently conducted openly, at times in broad daylight, often in the presence of eyewitnesses. This paradox lies at the heart of the difficulty of preventing and investigating incidents and, ultimately, ensuring that those responsible are held accountable and that alleged victims are provided with redress.

IFRs are summary removals of third-country nationals from the territory of a state without proper legal procedures, often involving the use of violence and in violation of international and European human rights law. However, IFRs are not only violations of human rights, but also specific state practices with recurring patterns; detection of third-country nationals; denial of access to asylum procedures; informal detention without safeguards, for the purpose of collective removal without registration, documentation or identification.

The operational footprint and geographic scope of IFR incidents are striking. Victims are detected on land or at sea, not only in border areas but sometimes in the hinterland or on islands following their arrival there. They may be informally detained in designated facilities or on boats, their personal belongings may be seized, they are often abused, and then transferred to border areas where they are collectively removed. Adding to this picture is the large number of perpetrators involved, both uniformed and non-uniformed actors in certain areas, and the degree of close coordination between them across the stages of an IFR operation.

These operations are carried out openly, at all times of the day, in places often presenting characteristics of police stations or detention centres, using vessels resembling those of the Hellenic Coast Guard, vehicles in many cases with characteristics of police vehicles, as well as unmarked vehicles and trucks. Witnesses may include law enforcement officers, fishermen, residents, tourists, journalists, and employees or members of civil society organisations. Yet, when it comes to accountability, the lack of political will, the absence of official recognition, the complexity of the phenomenon, the lack of a clear legal framework, the potential complicity or fear of witnesses are all factors that interact, rendering the investigation exceptionally challenging.

Theoretically, such acts should provoke public outcry and mobilize the justice system to conduct institutional investigations, ensure accountability, determine responsibility, and provide redress for victims. In practice, however, they are often shrouded in silence, persistently and systematically denied, or obscured by bureaucratic vagueness and deliberate conceptual confusion. Although these incidents are documented by civil



society organisations and journalists, and reported by local communities and victims themselves, IFR operations remain a well-kept secret that surprisingly everyone knows.

It is this premeditated visibility that renders IFRs particularly dangerous. The fact that they occur in plain sight creates, almost subconsciously, a false sense of normality. Their frequency, repetitiveness, and the silence surrounding them make them part of "normality" and, possibly, border management policy. Rarely, in expressing latent candour, state narratives present IFRs as a necessary exercise of sovereignty and crisis management.

What enables the perpetuation of this paradox is the absence of official recognition and meaningful investigation. Despite growing references and acknowledgements in reports by international organizations and media outlets, and despite official complaints lodged by victims before the authorities, IFRs, where they are subject to disciplinary or criminal investigation, often end up in case closures. In any case, based on the information available, no criminal investigation has so far led to the identification of possible suspects or to the bringing of criminal charges against them. Unless an institutional body assumes responsibility for thoroughly investigating these allegations, seemingly the current practice will be continued.

The point that IFRs are covert operations conducted in broad daylight is not a mere observation. It is almost turning into a political, legal, and moral failure. Their exposure is not only about the facts; it is about the courage to establish the truth, to document it, and to demand justice.

The role of independent monitoring mechanisms, such as the Recording Mechanism of Incidents of Informal Forced Return of the Greek National Commission for Human Rights (GNCHR), is to disrupt this paradox; to collect and record evidence demonstrating the existence of a systematic violation that, while occurring in plain sight, is methodically concealed through denial, diffusion of responsibility, and normalisation of impunity. By recording testimonies and providing thorough documentation, conducting comparative pattern analysis, and publicly presenting findings, the Recording Mechanism seeks to break this vicious cycle of *visible invisibility* and to refocus public discourse on the foundational principles of the rule of law and human rights protection.

In this context, and with a view to more clearly capturing the features of IFR operations, in 2024 the Recording Mechanism revised its Recording Form, the tool with which the testimonies of alleged victims are recorded in a standardised way. The experience gained from the previous two recording cycles (2022 and 2023) highlighted the need to revise the Form with a view to enhancing the accuracy, comparability, and clarity of the data collected. The new Recording Form depicts with greater precision the stages of an IFR



incident (detection, informal detention, physical removal), avoiding overlaps and ambiguities.

In the same context, the indicators of informality included in the Recording Form were revised in order to capture the informal nature of the returns and the treatment of the alleged victims with greater clarity. The indicators of informality, indicators showing that legal return procedures for third-country nationals were not followed, were amended to more precisely reflect the factual circumstances and avoid confusion with indicators pertaining to treatment.

More specifically, the Recording Mechanism decided to remove the *deprivation of documents* and *seizure of personal belongings* from the informality indicators, as these are primarily signs of ill-treatment of alleged victims rather than typical infringements of return procedures. Conversely, a new indicator has been added, referred to as *request for identity documents from the authorities* with the aim to record whether there has been even a pretext of formal compliance with the procedure for verifying the identity of third-country nationals. All other indicators, such as *possession* and *disclosure of identity documents*, *expression of intent to seek asylum*, *provision of information about rights*, *photographing*, *fingerprinting*, and *provision or signing of documents*, remained unchanged.

In parallel, all indicators related to the treatment of alleged victims, previously scattered throughout the Recording Form, were consolidated into a single and standalone section. This makes it possible to more systematically capture various forms of ill-treatment, such as the use of violence, threats, deprivation of basic necessities (water, food, medicine), and life-endangering practices, thus enhancing the Recording Mechanism's ability to highlight repetitive patterns, compare incidents, and document the impact of these operations with greater clarity.

With these changes, the Recording Form is not only more user-friendly for the recording officers but is also enhanced as a tool for accurately recording testimonies.

Finally, as part of the ongoing improvement of its tools, the Recording Mechanism has taken steps to develop a specialised methodology for recording testimonies from children and other vulnerable persons. This decision is based on the understanding that individuals with specific vulnerability profiles require *adapted approaches*, both in terms of conditions and interview techniques. The methodology and tools shall incorporate child-friendly principles and shall integrate approved standards for the protection and participation of children in recording procedures, with particular emphasis on informed consent, non-traumatisation, and privacy protection.

The ongoing re-evaluation and periodic upgrade of the Recording Mechanism's tools with a view to ensuring the best possible documentation is not only of research or technical

importance. In 2024, the Greek National Commission for Human Rights (GNCHR), drawing on the findings of the Recording Mechanism, submitted a substantive and well-documented third-party intervention before the European Court of Human Rights (ECtHR), following an invitation by the Court. The third-party intervention in the cases of *A.R.E. v. Greece* (no. 15783/21)¹ and *G.R.J. v. Greece* (no. 15067/21)² marked not only the institutional evolution of the Recording Mechanism as an independent documentation tool, but also the affirmation of the GNCHR's role as an independent and reliable body that substantively contributes to the documentation of human rights violations, acting in support of international judicial bodies as the national human rights institution of Greece.

The above intervention was entirely grounded in the findings of the Recording Mechanism's annual reports, which are themselves based on direct interviews with alleged victims of IFR incidents. These interviews are conducted by civil society organisations using a rigorous methodological approach and a standardized Recording Form. The data, drawn directly from the alleged victims and verified by an independent National Human Rights Institution, namely the GNCHR, provided the Court with evidence of a reliability and credibility that is difficult to contest.

The significance of this intervention was also highlighted by the Court's own judgement, which not only made extensive reference to the evidence and observations submitted by the GNCHR, but also relied on them in concluding that these cases raise serious concerns regarding the effectiveness of national IFR incidents investigation mechanisms, as well as the existence of repetitive, identical practices that may constitute violations of the principle of non-refoulement.

The judgements of the European Court of Human Rights (ECtHR) in the cases of *A.R.E. v. Greece* (application no. 15783/21) and *G.R.J. v. Greece* (application no. 15067/21), following the rejection of the Greek Government's request for referral of the former case to the Grand Chamber and the expiration of the relevant time-limit in the latter, have become final.

This constitutes a moment of an important institutional development: on the one hand, the contribution of a National Human Rights Institution to strengthening accountability through credible documentation is acknowledged; on the other, there is an explicit recognition of the importance of independent recording and monitoring mechanisms, which can function as links between alleged victims of violations, civil society, and international rights protection bodies.

¹ See: ECtHR - *A.R.E. v. Greece* (no. 15783/21), available at: <https://tinyurl.com/4wt272ef>.

² See: ECtHR - *G.R.J. v. Greece* (no. 15067/21), available at: <https://tinyurl.com/38w8hys2>.



The intervention of the GNCHR in the cases *A.R.E. v. Greece* (no. 15783/21) and *G.R.J. v. Greece* (no. 15067/21) was more than just a one-time contribution. It rather serves as a model of institutional action, combining field-based data with systematic methodology. It is a confirmation that protecting human rights is not just abstract rhetoric, but a matter of timely recording, ensuring institutional consistency, and demanding accountability at all levels.

Ilias I. Tsampardoukas
June 2025, Athens



SUMMARY

This third Annual Report of the Recording Mechanism reflects its methodological maturity and affirms the continuation of its work on a solid operational basis.

During the recording cycle of 2024, the Recording Mechanism recorded 52 incidents of alleged IFRs, receiving 61 personal testimonies, of which 60 were provided by alleged victims and one by an eyewitness.

The incidents are distributed chronologically as follows: 4 in 2022, 15 in 2023, and 33 in 2024. Geographically, the incidents are divided into 35 that took place in the Evros region and 17 that took place at sea. This geographical differentiation highlights two distinct operational centers and models; incidents in Evros are characterized by a series of actions extending from the Evros border to the hinterland, whereas maritime incidents are primarily marked by measures aimed at preventing the alleged victims from disembarking onto the islands' territory.

The total number of the alleged victims in the 52 incidents is estimated at a minimum of 1,517 individuals, including at least 300 women, 225 children, and 133 people with special needs.

Of the 45 alleged victims whose testimonies were recorded by the Recording Mechanism, 24 belonged to vulnerable groups, highlighting the disproportionate impact of alleged IFRs on individuals with heightened protection needs, including victims of torture or sexual violence, single-parent families, persons with serious medical conditions, persons with disabilities, and individuals with mental health disorders.

Of particular concern is the finding that 40 out of the 45 recorded alleged victims stated that they were never registered or identified by the Greek authorities, despite being found within Greek territory or under Greek jurisdiction. This observation indicates a serious breach of obligations under national, European, and international law, particularly the obligation to provide access to the asylum procedure.

The seriousness of the situation is further heightened by the fact that among the alleged victims are three recognised refugees and one registered asylum seeker, which reveals the removal of persons with a legally guaranteed protection status, in violation of Article 33 of the Geneva Convention, Article 3 of the ECHR, the EU Charter of Fundamental Rights as well as relevant EU directives concerning reception conditions and asylum procedures.

Additionally, 11 of the alleged victims were Turkish nationals. Their forced return to Türkiye, without access to the asylum procedure or an individualised risk assessment, constitutes a sufficiently serious breach of the principle of non-refoulement, in light of



the widely documented risks of persecution and torture in the country of origin for individuals engaged in unionist or oppositional political activity.³

An analysis of incidents of detection and informal detention in the area of Evros indicates the existence of operational standards that extend beyond cross-border prevention since they involve actions carried out within the mainland. Incidents of convergent removal were identified, in which victims were apprehended at different times and locations, placed in informal detention in separate facilities, and subsequently transferred to a single location where a joint removal operation was carried out. This practice adds yet another layer of coordination and gradual execution to a multi-level operational framework.

Informal detention as an intermediary stage between detection and physical removal was documented in 15 incidents in the area of Evros and in 1 maritime incident. The detention places included facilities with characteristics of Police Stations, Pre-Removal Detention Centres for Foreign Nationals, unidentified buildings, vehicles, and vessels. In these incidents, the minimum estimated number of detainees is 905 persons (874 in Evros and 31 at sea), among whom a significant proportion were women, children, and people with special needs.

In incidents occurred exclusively in Evros, the phenomenon of *successive detention* was recorded. In these incidents, the alleged victims were successively transferred to multiple detention facilities where they were informally placed under detention, before arriving at the point of their physical removal from the country. This practice appears to serve operational needs related to the geographical distance between the point of initial detection and the final point of physical removal. The use of detention facilities in sequence, introduces an additional layer of complexity to the operational planning and execution of IFR incidents.

Informal detention was carried out either by uniformed guards bearing characteristics of Police personnel, or by non-uniformed individuals with military-style characteristics (e.g. hoods, firearms, radio equipment) and in coordination with the authorities. The coordinated presence of both uniformed and non-uniformed individuals, combined with the use of various languages (Greek, English, Turkish, Farsi, Arabic, Urdu), gives the impression of a well-organised network, covering a wide range of roles.

The act of physical removal is based on consistent operational patterns; in the area of Evros, the prevailing method of physical removal involves transferring alleged victims to the Turkish side of the river using boats or pushing them into the river so that they are

³ See: Freedom House: Freedom in the World 2025 - Türkiye, 2025 <https://tinyurl.com/mr5kebx>.

forced to swim to the Turkish side, while at sea, people are abandoned in non-self-propelled or unseaworthy vessels, with deliberate destruction of their equipment and other life-threatening practices. The involvement of uniformed removers is widespread, primarily individuals displaying characteristics of Coast Guard personnel at sea, and of police or military personnel in Evros, while the presence of non-uniformed individuals in Evros appears to act as an intermediary, allowing for the distancing or diffusion of responsibility.

Finally, the analysis of treatment indicators reveals patterns of systematic, multifaceted violence and, frequently, degrading or inhumane treatment, emphasising not only removal from the territory, but also the preventive, punitive, or humiliating treatment of those attempting to enter or remain in the country. The following incidents were recorded: 47 incidents of destruction or seizure of personal belongings; 39 incidents of physical violence; 42 incidents of psychological violence or threats; 10 incidents of sexual violence, including 1 case of rape; 31 incidents of degrading treatment; 35 incidents involving life-endangering practices; 2 deaths; 3 incidents involving family separation.

The systematic nature, the repetitiveness and geographical distribution of the incidents recorded reveal that these practices are not random or isolated incidents. Rather, they form a pattern of organised and structural violations of human rights and of the principle of non-refoulement.

The Report concludes with recommendations to the Greek State, including the ratification of Protocol No. 4 to the European Convention on Human Rights (ECHR), which stress the urgent need for independent, effective, and specialised investigations, aimed at ensuring accountability, redress for victims, punishment of perpetrators, and the State's compliance with its international obligations.



CHAPTER 1. General Characteristics of the Recordings

This report is the third annual report of the recording Mechanism. It further builds on the data presented and analysed in the Annual Report 2022⁴ and the Annual Report 2023⁵ of the Recording Mechanism. As in the previous annual reports, data derive from recorded incidents of IFRs, collected during an annual recording cycle (2024) which, however, covers incidents occurring over a three-year period (2022–2024).

The Annual Report 2024 covers 52 incidents, which according to the alleged victims' testimonies, occurred in the period between January 2022 and December 2024. In relation to these incidents, the Recording Mechanism has recorded 61 testimonies by conducting personal interviews with 44 individuals alleging to be victims of IFRs from the Greek territory and one individual alleging to have been an eyewitness⁶ to such an incident.

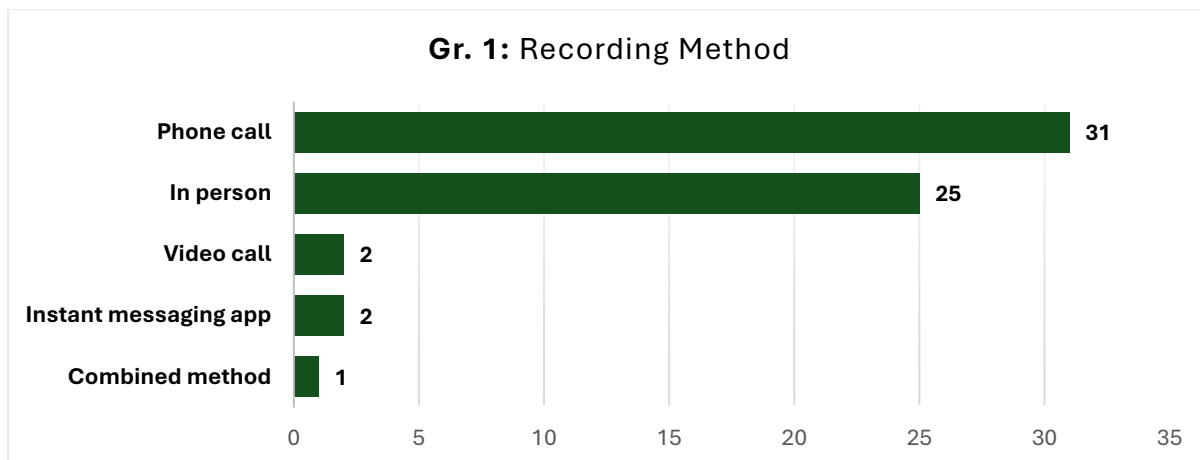
The interviews were conducted by accredited Recording Officers in 25 cases exclusively in-person with the alleged victims, in 31 cases exclusively via telephone, in 2 cases exclusively through video call, and in 2 cases via a messaging application.⁷ In 1 case, a mixed method was employed (see *Graph 1*).

⁴ See: Recording Mechanism - 2022 Annual Report available here: <https://tinyurl.com/mtsj2yva>.

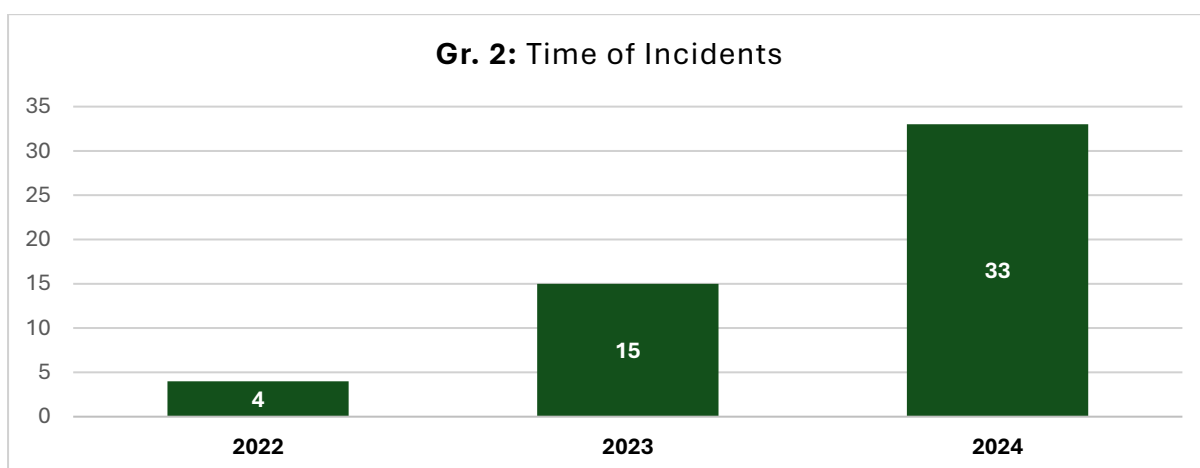
⁵ See: Recording Mechanism - 2023 Annual Report available here: <https://tinyurl.com/mr4ftfp>.

⁶ This testimony was recorded as an exception to the basic methodological rule of the recording Mechanism, according to which testimonies are collected through personal interviews with the alleged victims. The flexibility of the Mechanism's methodology permits, under strict conditions, the recording of third parties testimonies, in cases where this is imposed by reasons of *force majeure* and the reliability of the information is safeguarded. In the present case, all the conditions provided for were met cumulatively: (a) the alleged victim was unable to take part in the interview herself due to her detention in L-type prisons in his country of origin, (b) the individual who gave the testimony — the son of the alleged victim — was able to substantiate his knowledge of the events, having been subsequently informed by the victim herself, and (c) the testimony was corroborated by the direct testimony of another alleged victim involved in the same incident, as the interviewee was himself also a victim of the same act. This particular recording highlights the operational adaptability of the Mechanism, aimed at ensuring documentation even in cases of limited access to the victims themselves.

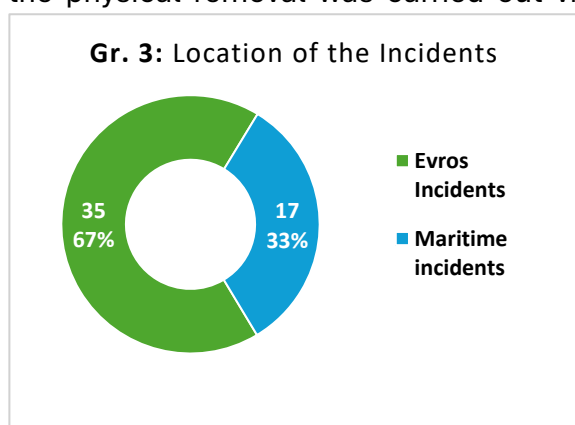
⁷ In-person interviews with the alleged victim are the preferred method for recording testimonies. Where this is not possible, such as when the victim has been returned to the country of entry or origin, or has left Greece, alternative methods are used to collect the testimony.



More specifically, out of the 52 incidents recorded by the Recording Mechanism, 4 occurred in 2022, according to the testimonies of the alleged victims, 15 in 2023 and 33 in 2024 (see *Graph 2*).



Of the 52 incidents recorded by the Recording Mechanism, 35 constitute incidents where the physical removal was carried out via the sole land border between Greece and Türkiye, which is the Evros River, while 17 constitute maritime incidents where the physical removal was carried out at sea (see *Graph 3*).

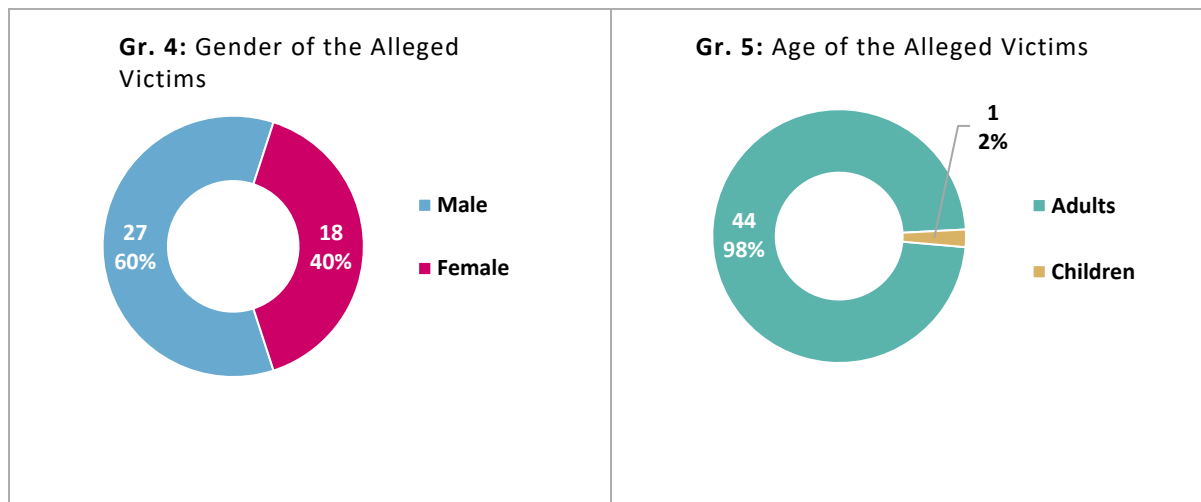


Of the 45 alleged victims in total, 27 are male and 18 are female (see *Graph 4*).

Of the 45 alleged victims whose testimony was recorded by the Recording Mechanism in accordance with its Methodology,⁸ 44

⁸ See below, Annex, Section. III, p. 79 et seq.

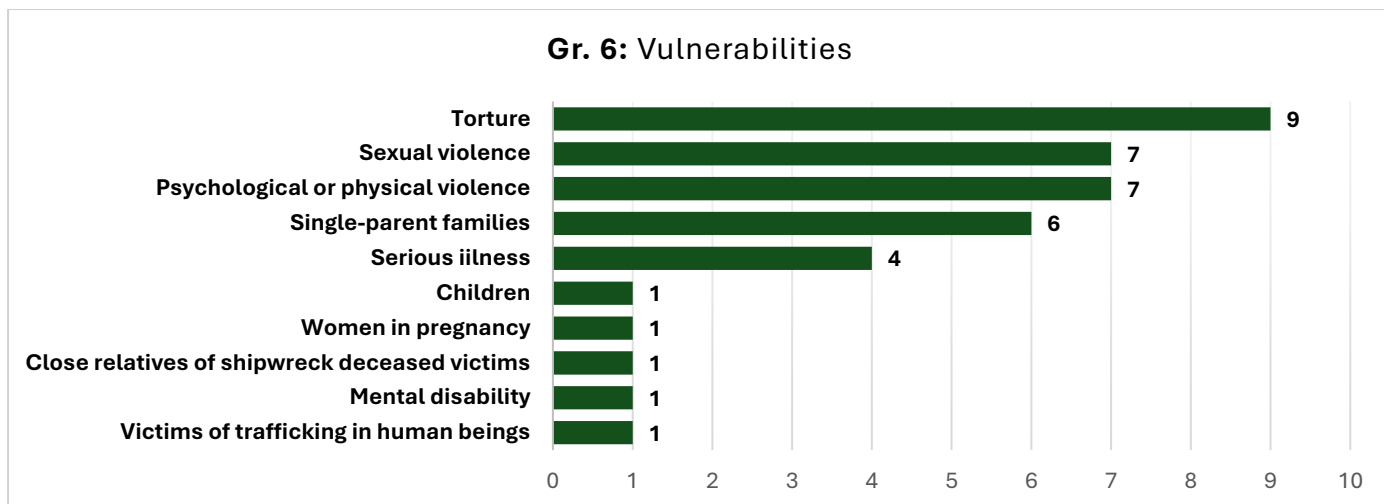
were adults at the time of the recording, while 1 alleged victim was a minor at the time of recording (see *Graph 5*).



During the interviews 24 out of the 37 alleged victims were identified as persons with vulnerabilities.⁹ No vulnerability was recorded with regard to 21 alleged victims.

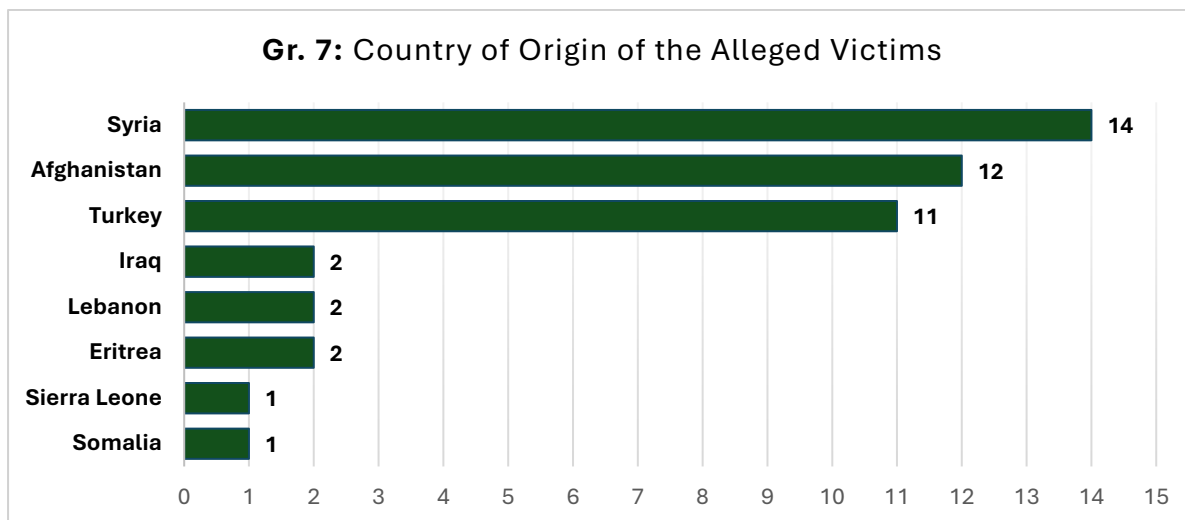
More specifically, among the alleged victims whose testimonies were recorded by the Recording Mechanism, there are included 9 victims of torture, 7 victims of sexual violence, 7 victims of other forms of serious physical and/or psychological violence, 6 single parents with minor children (single-parent families), 4 persons with major diseases, 1 child, 1 woman in pregnancy, 1 person who is a close relative of victims of a shipwreck, 1 person with a mental health condition, and 1 victim of trafficking in human beings (see *Graph 6*).

⁹ The Recording Mechanism shall record as identified vulnerable persons, those falling into the following categories: minors (companied or unaccompanied), close relatives of shipwreck deceased victims (parents, siblings, children and spouses), persons who have a physical, mental or intellectual disability, elderly people, women in pregnancy, single-parent families with minor children, victims of trafficking in human beings, persons with major diseases, persons who have been subjected to torture, persons who have been subjected to rape or other serious forms of sexual violence, persons who have been subjected, to other serious forms of psychological or physical violence such as victims of female genital mutilation (FGM), and LGBTQ+ persons. It should be noted that vulnerability is identified at the time of the recording of the testimony and in many cases more than one state of vulnerability coexist in the same person.



In 51 incidents Türkiye is referred to as the country of entry, while in 1 incident the alleged victim failed to identify the country of entry. In all 51 incidents where the act of physical removal was completed, Türkiye was reported as the country of return.¹⁰

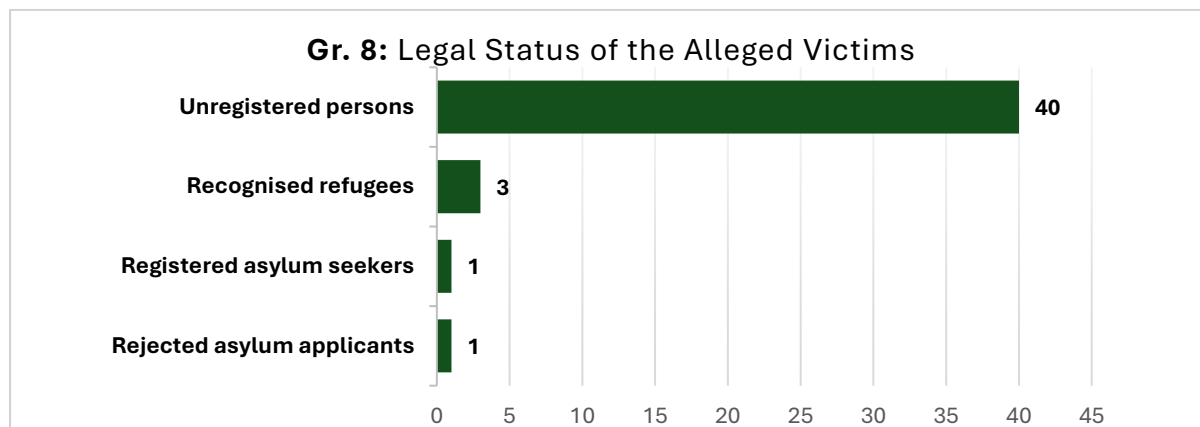
The majority of the alleged victims reported Syria as their country of origin. More specifically, 14 alleged victims have been reported as citizens of Syria, 12 as citizens of Afghanistan, 11 of Türkiye, 2 of Iraq, 2 of Lebanon, 2 of Eritrea, 1 has been reported as citizen of Sierra Leone and 1 of Somalia (see *Graph 7*).



Out of the total 45 alleged victims, 40 claimed that despite having been detected by the Greek authorities, they were never subjected to registration and identification procedures (*unregistered* persons). Among the 45 alleged victims are included three

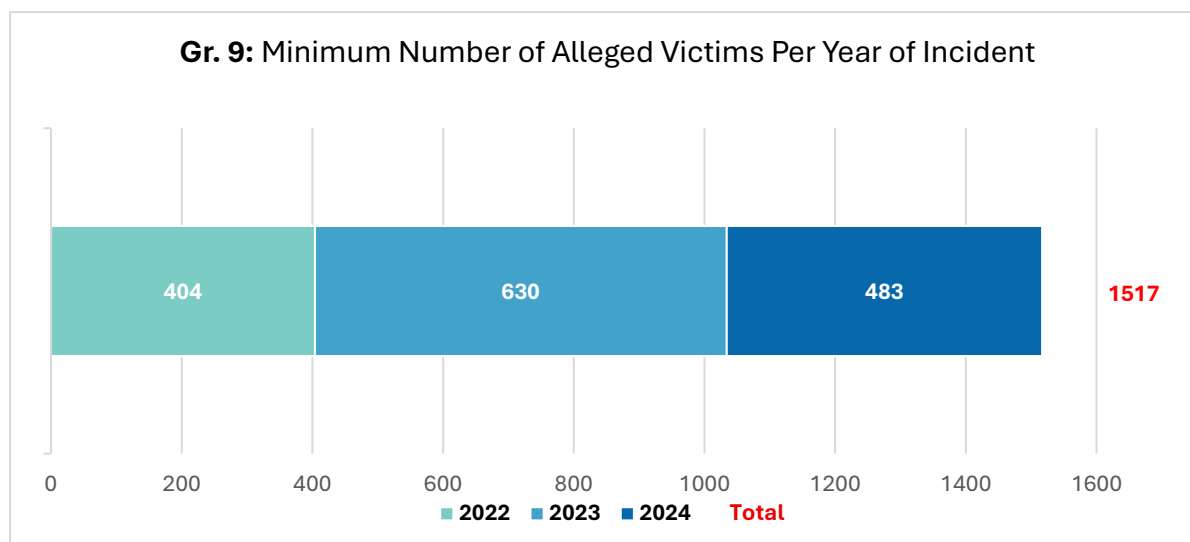
¹⁰ In an incident that took place at sea, it is recorded that although the act of physical removal from Greek territorial waters had been completed, the perpetrators engaged in the removal ultimately proceeded to collect the removed persons, since an immediate and serious life-threatening situation to the alleged victims was identified.

individuals who have been granted refugee status in Greece, 1 who is a registered applicant for international protection, and 1 applicant whose request for international protection had been rejected by the competent authorities (see *Graph 8*).



Finally, according to testimonies, the number of the alleged victims involved in 45 incidents recorded for the period 2022 - 2024, amounts to a *minimum* of 1517 persons (see *Graph 9*), including at least 300 women and 225 children.¹¹ Additionally, according to testimonies, the total number of the detected persons included 133 persons with special needs, such as persons with health problems, elderly people, people with disabilities and other.

20



¹¹ During an interview to record testimony about an IFR incident, the alleged victim is asked to estimate, as an order of magnitude, the number of persons who were returned with them and their response is recorded in a special field on the Incident Recording Form. The minimum number of 1517 persons is the sum of the minimum number of persons being returned with the alleged victims involved in the 52 recorded incidents, according to the relevant testimonies.

CHAPTER 2. SPECIFIC CHARACTERISTICS OF THE RECORDINGS

I. Morphology of the Recorded Incidents

This section analyses the morphology of IFR incidents, including their geographical distribution, the physical infrastructure and means used during their implementation (such as buildings, transport, logistics, tactics, and technology), the operational characteristics, and the profiles of the people involved (perpetrators and victims).

For clarity, the recorded incidents are classified based on the topography of the physical removal into two categories: **Evros incidents** and **maritime incidents**.

Evros incidents refer to cases where physical removal occurred via the Evros River or the land borders between Greece and Türkiye in the Evros regional unit. A total of 35 incidents were recorded, with detection of the alleged victims taking place either at border-area points (25 incidents) or in the hinterland (10 incidents).

Maritime incidents involve physical removal across the sea borders between Greece and Türkiye in the Eastern Aegean. Seventeen incidents were recorded, with detection occurring at sea, either in open waters or near the coasts of Greek islands (14 incidents) or on the territory of Greek islands (3 incidents).

21

A. Data relating to the detection.

Detection constitutes the initial chronological stage of an IFR incident. During this stage, individuals or groups of third-country nationals or stateless persons are identified by uniformed or non-uniformed perpetrators, either within Greek territory or outside it, such as in international waters, provided their actions are attributable to the Greek State, as in the boarding of alleged victims on vessels displaying Hellenic Coast Guard insignia. This process occurs outside the formal legal and administrative framework for undocumented third-country nationals, as it does not involve official registration, identification, or referral to competent authorities. The morphological characteristics of the detection stage vary according to the spatial and operational context. However, the absence of safeguards and the non-activation of institutionalized procedures are consistent features in all cases.

i) Topography of the detection

- Approximately two-thirds of the recorded incidents occurred in the area of **Evros**, while the remaining one-third were **maritime incidents**.
- Regarding the recorded **incidents of Evros**, there is an observed increase in the number of cases where the alleged victims were detected in the hinterland, i.e., at a considerable distance from the Evros border area.
- For the recorded **maritime incidents**, a decrease is noted in the number of cases where the alleged victims were detected on the territory of Greek islands.

Of the 25 incidents in which detection occurred in the **Evros** border area: 3 took place in the riparian zone of the Evros River; 18 in outdoor or forested areas near settlements such as Nea Vyssa, Dilofo, Soufli, Kastanies, Orestiada, Praggi, and Marasia; 1 at the Fylakio Reception and Identification Centre; 1 on a bus heading to the hinterland; 2 within the urban or residential fabric of towns or villages in the wider border area (specifically, 1 in Marasia and 1 in another settlement not clearly identified by the alleged victim).

Among the 10 incidents where detection occurred in the hinterland: 6 took place within the urban fabric of Thessaloniki; 1 in Komotini; 1 in the town of Polykastro (Kilkis); 1 in the village of Diavata (Thessaloniki); and 1 on a street near Alexandroupolis.

Of the 14 **maritime incidents**, detection occurred reportedly as follows: near the coast of Kos (1 incident), near the coast of Lesbos (6 incidents), near the coast of Samos (2 incidents), near the coast of Chios (1 incident), in open waters near Rhodes (1 incident), in open waters near Samos (1 incident), and in open waters at an unknown location (2 incidents).

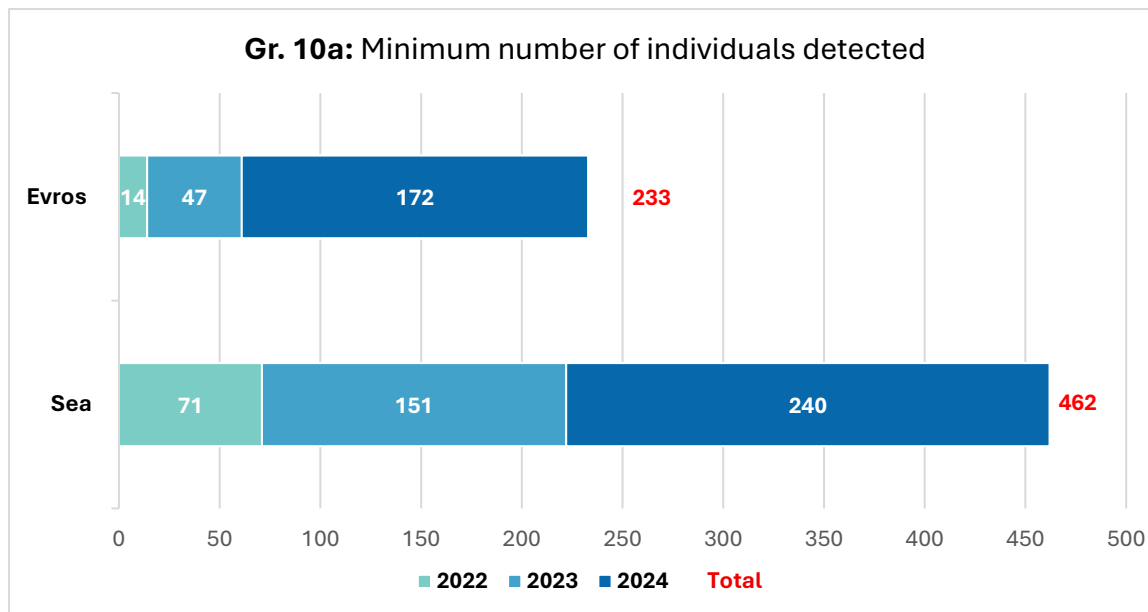
Among the 3 incidents where detection took place on the territory of a Greek island, 2 occurred reportedly on Lesbos and 1 on Samos.

ii) Demography of the detected alleged victims

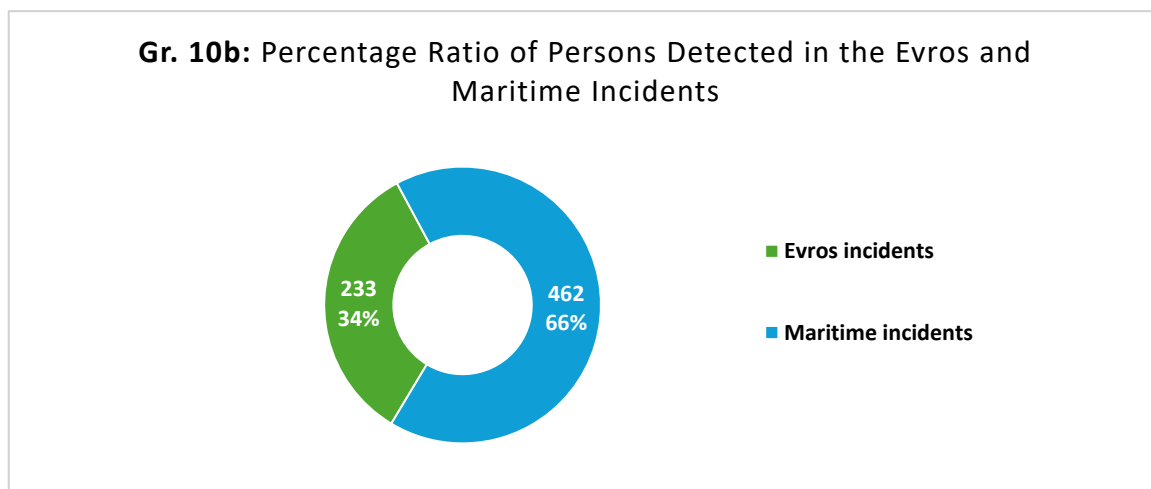
- Although **maritime incidents** represent only one-third of all recorded incidents, they account for approximately two-thirds of the total number of individuals detected.

According to the testimonies regarding the 35 incidents in the **Evros area** recorded between 2022 and 2024, at least 233 individuals were detected (see *Graph 10a*), including a minimum of 64 women and 85 children. Among them, 32 persons had special needs, such as health issues, disabilities, or advanced age.

For the 17 **maritime incidents** recorded during the same period, testimonies indicate that at least 462 individuals were detected, including a minimum of 106 women and 87 children. Among these, 53 individuals had special needs, including health problems, disabilities, or advanced age.



A comparison of the minimum number of persons detected in Evros and maritime incidents shows that approximately two-thirds of those detected originated from maritime incidents (see *Graph 10b*), even though these incidents account for only one-third of the total 52 recorded incidents (see *Graph 3* above).



iii) Characteristics of the detectors

- According to recorded testimonies, in the recorded **Evros incidents**, the detectors were mainly uniformed, although in a significant number of cases (approximately 40%) non-uniformed detectors, acting independently or in mixed groups with uniformed personnel, were operating in coordination with the Greek authorities. The alleged victims reported that the detectors had the characteristics of Police Officers (60%) and Military personnel (40%).
- In the recorded **maritime incidents**, there was much less involvement of non-uniformed detectors (24%) compared to the predominant involvement of uniformed detectors (76%), who reportedly had the characteristics of Coast Guard personnel.
- The alleged victims' estimated level of coordination between non-uniformed detectors and the authorities is particularly high in the recorded **Evros incidents** (79%).
- In all testimonies regarding the recorded **maritime incidents**, it is estimated that non-uniformed detectors operated in coordination with the authorities (100%). In two cases, it is reasonable to assume that the non-uniformed individuals were Police officers in one incident and Coast Guard personnel in the other
- In the recorded **Evros incidents**, it was reported that detectors used dogs and drones.
- In some recorded **Evros incidents**, detectors were reported to speak languages other than Greek and English, including languages spoken by the alleged victims, such as Turkish, Arabic, and Farsi. In the recorded **maritime incidents**, only Greek and English were reported as spoken languages by the detectors.

24

In 21 incidents that occurred in **Evros**, it is reported that the alleged victims were detected solely by groups of detectors in uniform, in 5 incidents that the detection was carried out solely by groups of individuals in civilian clothing (detectors out of uniform), and in 9 incidents, that the detection was carried out by mixed groups of detectors, i.e. groups that included both individuals in and out of uniform (see *Graph 11a*).

In 18 incidents that occurred in the geographical area of **Evros**, the alleged victims reported that the uniformed detectors had the characteristics of Police officers and in 12 incidents, that they had the characteristics of Army personnel (see *Graph 12a*).

In 14 testimonies about incidents that occurred in the geographical area of **Evros**, involving detectors in uniform, it was reported that the uniforms were blue in colour; in 8 incidents, the uniforms were described as green or khaki; and in 3 incidents, the uniforms were of black colour. Moreover, in 10 testimonies the alleged victims reported that there were distinctive insignias on the detectors' clothing, like the word "*Police*", rank insignias (stars for example), national emblems, etc. In 9 testimonies, it was reported that the

uniformed detectors were wearing full-face hoods; in 6 testimonies, that the detectors were wearing bulletproof vests; in 13 testimonies, that they were in possession of radio transceivers; in 11 testimonies, that they were carrying handcuffs; in 1 testimony, that they were wearing helmets; in 1 testimony, that they were accompanied by a trained dog; and in 1 testimony, that a drone was used. In 31 testimonies, it was reported that they were carrying weapons, including rifles, handguns, batons, and knives (see *Graph 13a*).¹²

In 11 out of the 14 incidents where the detection was made in the area of **Evros**, the alleged victims reported that non-uniformed individuals were involved in the operation, probably acting in coordination with the authorities. The coordination of the non-uniformed detectors with the authorities is assumed by reports from the alleged victims involved in 8 incidents where the detection was made by a mixed group of detectors, in 1 incident because the uniformed individuals identified themselves as Police officers to the alleged victims, and in 2 incidents because there was a relevant notification by the authorities. In 2 incidents, the alleged victims responded that they couldn't have been aware of this information (see *Graph 14a*).

In 14 testimonies, it was reported that the non-uniformed detectors were wearing full-face hoods; in 5 testimonies, it was stated that they were using radio transceivers; whereas in 16 testimonies, it was reported that they were carrying weapons, such as handguns and batons (see *Graph 15a*).

In 29 testimonies relating to incidents that occurred in the area of **Evros**, the alleged victims identified that the uniformed detectors were speaking Greek. In 17 testimonies, English was identified as the spoken language; in 3 testimonies, Turkish was identified; and in 1 case, the victim was unable to identify any of the languages spoken by the uniformed detectors. In 10 testimonies concerning incidents that occurred in the area of Evros, the alleged victims identified Greek as the spoken language by the detectors. In 6 testimonies, English was identified as the spoken language; in 4 testimonies, Turkish was identified; in 4 Arabic, in 3 Farsi, and in 1 testimony, the victim was unable to identify any of the languages spoken by the uniformed detectors. *Graph 16a*).

In 13 **maritime incidents** the alleged victims reported that the detection was carried out exclusively by groups of uniformed individuals, in 3 incidents, that the detection was carried out exclusively by a group of non-uniformed individuals and in 1 incident, that the detection was carried out by a mixed group of persons, namely by a group of detectors in and out of uniform operating on a Coast Guard vessel (see *Graph 11b*).

¹² The accuracy of this information is only relative, as impressions and memory are highly influenced by factors such as the time and lighting conditions of the incident, the psychological state of the alleged victim, their age, visual capacity, level of observation, educational background, cultural environment, as well as their sex, sexual orientation, and gender identity. See: EUAA, EASO Practical Guide: Evidence Assessment, March 2015, p. 14 et seq. available here: <https://euaa.europa.eu/publications/practical-guide-evidence-assessment>

In 13 **maritime incidents** the alleged victims reported that the uniformed detectors bore characteristics of Coast Guard personnel, while in one incident the alleged victims were unable to specify the professional capacity of the uniformed detectors (see *Graph 12b*).

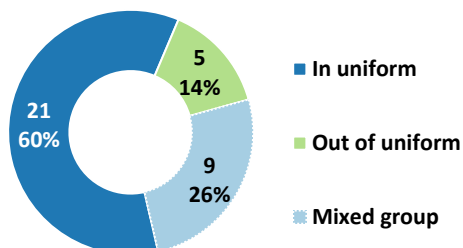
In 11 testimonies relating to **maritime incidents** involving uniformed detectors, it was reported that the uniforms were blue in colour; in 2 testimonies, they were described as green/khaki; and in 5 testimonies, they were described as black. Moreover, in 7 testimonies the alleged victims reported that there were distinctive insignias on the detectors' clothing, like the word "Police", national emblems, the Greek flag and similar markings. In 15 testimonies, it was reported that the uniformed individuals wore full-face hoods; in 2, that they carried handcuffs; in 1, that they wore bulletproof vests; in 1, that they used binoculars; and in 1, that they had flashlights in their possession. In 14 testimonies, it was reported that the uniformed detectors were armed, carrying weapons such as pistols, rifles, knives, batons, and tasers (see *Graph 13b*).

In 2 **maritime incidents** where non-uniformed detectors were involved, the alleged victims reported that the operation was probably carried out in coordination with the Authorities. The coordination between non-uniformed detectors and the Authorities is presumed by testimonies of the alleged victims on the following grounds: In 1 incident, detection was conducted at sea by non-uniformed detectors aboard vessels operating in close proximity to the shore, suggesting that the authorities would have been aware of their presence in the area; in another incident, the non-uniformed detectors handed over the alleged victims to removers bearing characteristics of Coast Guard personnel. Furthermore, in one incident, the use of a police vehicle by non-uniformed detectors to transport the alleged victims led to the assumption that they were members of the Police Force; in another incident involving a mixed group, it was estimated that the non-uniformed detectors were Coast Guard personnel, given that they operated jointly with uniformed persons bearing Coast Guard characteristics aboard a vessel belonging to the Hellenic Coast Guard (see *Graph 14b*).

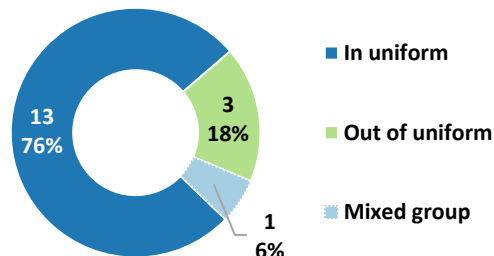
In 3 testimonies relating to **maritime incidents** non-uniformed detectors were reported to have worn full-face hoods, while in 6 testimonies, they were reported to have been armed with weapons such as handguns, batons, and sticks (see *Graph 15b*).

In 7 testimonies relating to **maritime incidents** the alleged victims identified that the uniformed detectors were speaking Greek. In 13 testimonies, English was identified as the spoken language; in 1 case, the victim was unable to identify any of the languages spoken by the uniformed detectors. According to 5 testimonies about **maritime incidents**, the non-uniformed detectors were speaking Greek, while according to 6 testimonies, English was the language spoken by the non-uniformed detectors (see *Graph 16b*).

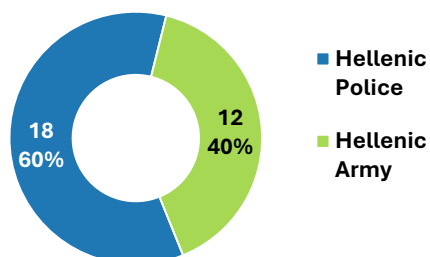
Gr. 11: Clothing of the detectors involved in the recorded **Evros incidents**.



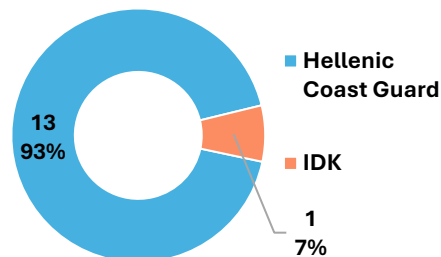
Gr. 11b: Clothing of the detectors involved in the recorded **maritime incidents**.



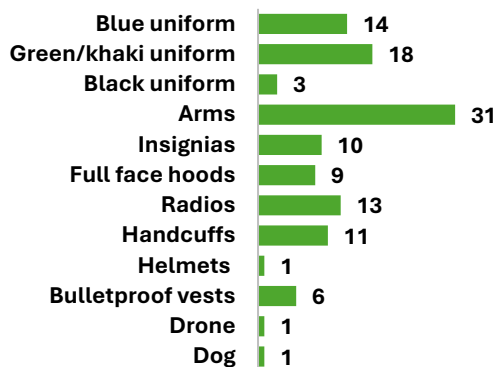
Gr. 12b: Presumed professional capacity of the uniformed detectors involved in the recorded **Evros incidents**.



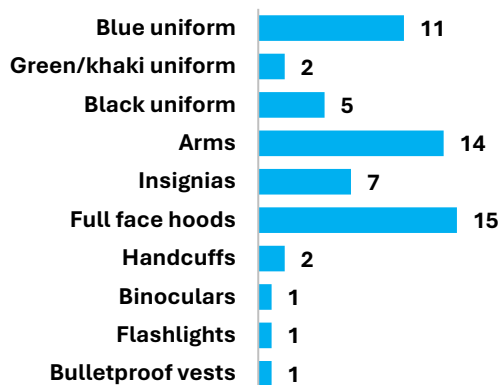
Gr. 12b: Presumed professional capacity of the uniformed detectors involved in the recorded **maritime incidents**.



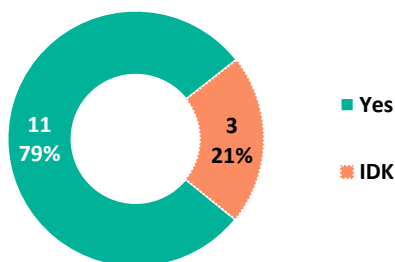
Gr. 13a: Equipment of the uniformed detectors in the recorded **Evros incidents**.



Gr. 13b: Equipment of the uniformed detectors in the **maritime incidents**.



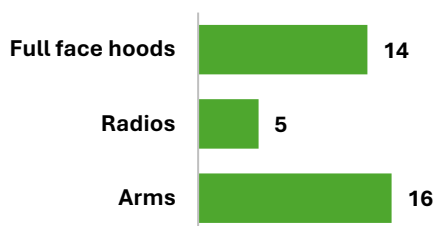
Gr. 14a: Coordination and/or association of the non-uniformed detectors involved in the recorded **Evros incidents** with state authorities.



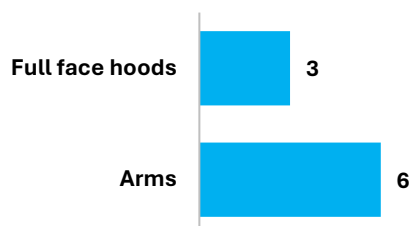
Gr. 14b: Coordination and/or association of the non-uniformed detectors involved in the recorded **maritime incidents** with state authorities.



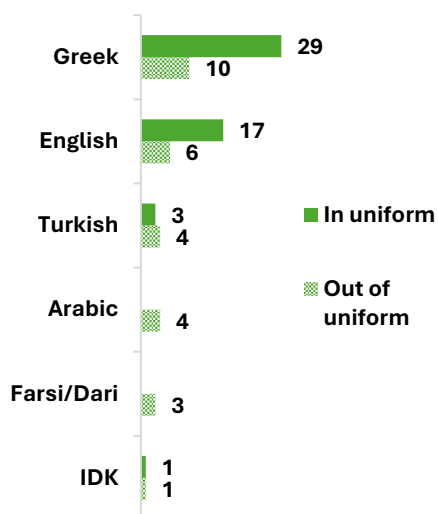
Gr. 15a: Equipment of the non-uniformed detectors involved in the recorded **Evros incidents**.



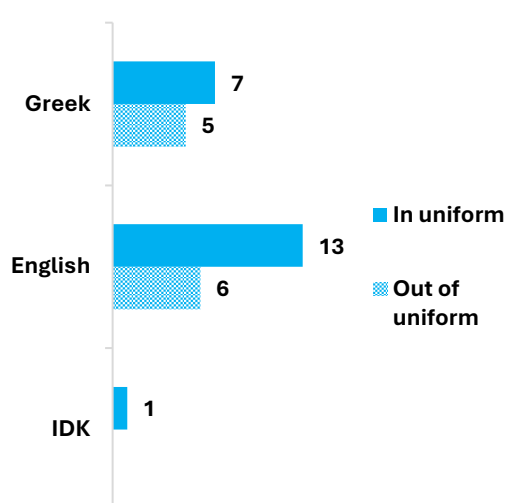
Gr. 15b: Equipment of the non-uniformed detectors involved in the recorded **maritime incidents**.



Gr. 16a: Languages spoken by the detectors involved in the recorded **Evros incidents**.



Gr. 16b: Languages spoken by the detectors involved in the recorded **maritime incidents**.



B. Data on the informal detention

- In the 2024 recordings, incidents in which informal detention appears as an intermediate stage with distinct infrastructure between detection and physical removal are significantly fewer (30%) compared to those where informal detention coincides with detection and physical removal (70%).
- Incidents not involving informal detention as an intermediate stage primarily concern cases where detection occurred in the border area of Evros, on islands, or at sea.
- Informal detention as an intermediate stage between detection and physical removal is observed more frequently in the recorded **Evros incidents** (42%) and much less frequently in the recorded **maritime incidents** (6%).
- Successive detention appears in almost half of the incidents involving informal detention (44%)
- The phenomenon of successive detention appears exclusively in the recorded **Evros incidents** (100%)

Informal detention constitutes an inherent feature and structural component of every IFR incident recorded by the Recording Mechanism. A person is considered to be under detention, when deprived of personal liberty or the possibility to move freely, irrespective of whether such detention has taken an official or recognised form and regardless of its duration.¹³

29

In the testimonies relating to the incidents recorded in 2024, alleged victims reported that they were deprived of any possibility to move freely from the moment of their detection. They were not provided with any information regarding their legal status or rights, nor subjected to any administrative procedure for registration, identification, or issuance of a decision, and were immediately transferred to another location where the act of physical removal from Greek territory took place.

However, in certain incidents, informal detention was not limited temporally or operationally to the stages of detection and physical removal but appears to be extended as an intermediate stage between them, taking the form of detention on distinct infrastructure, including the transfer of the alleged victims to designated informal detention facilities, the presence of guards, the possession of equipment, the use of surveillance measures, and the provision of sustenance, among others.

More specifically, in 37 incidents (21 occurring in the area of **Evros** and 16 occurring at **sea**), alleged victims reported that the physical removal operation was carried out immediately after the detection stage, without informal detention as an intermediate

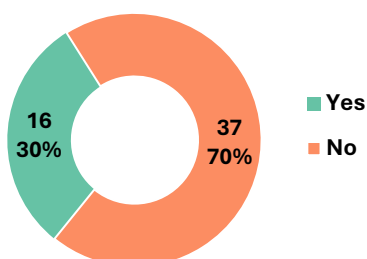
¹³ See: ECtHR - Krupko & Others v Russia (26587/07); Foka v Türkiye (28940/95); Gillan & Quinton v the United Kingdom (4158/05); Zelčs v Latvia (65367/16).

stage. This relates in particular to incidents where the detection of the alleged victims was made in the border area of Evros (near the river or on an islet within its bed), on the territory of Greek islands, or in the maritime area surrounding Greek islands. Conversely, in 16 incidents (15 occurring in the area of Evros and 1 occurring at sea), the alleged victims testified that following their detection and prior to their transfer to the location of physical removal, they were taken to facilities where they were subjected to informal detention. These incidents primarily involved detections in the hinterland or the border area of Evros (see *Graph 17a*).

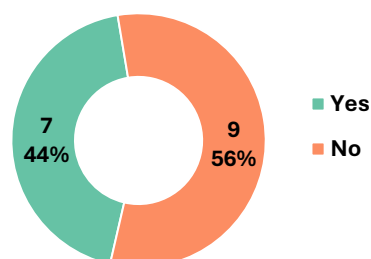
Notably, in 6 incidents in the area of Evros where detection was made in the hinterland, and in one incident where detection was made in the border area, the phenomenon of *successive detention* was recorded (see *Graph 17b*). In these incidents, the alleged victims were transferred not to a single place but successively to two or more different places of detention before reaching the location of their physical removal from the country.

Finally, it is evident that incidents where informal detention constitutes a distinct stage between detection and physical removal, supported by distinct infrastructure, are more frequently observed in the Evros region than at sea (see *Graph 18a* and *Graph 18b*).

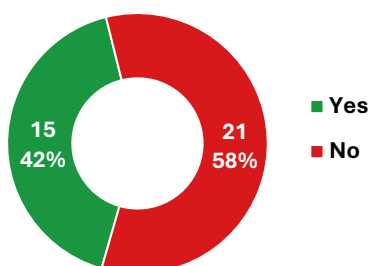
Gr. 17a: Informal detention applied as an intermediate stage



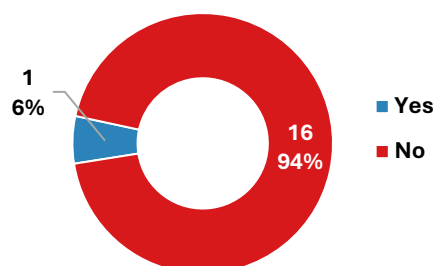
Gr. 17b: Incidents of successive detention



Gr. 18a: Frequency of informal detention in the recorded Evros incidents.



Gr. 18b: Frequency of informal detention in the recorded maritime incidents.

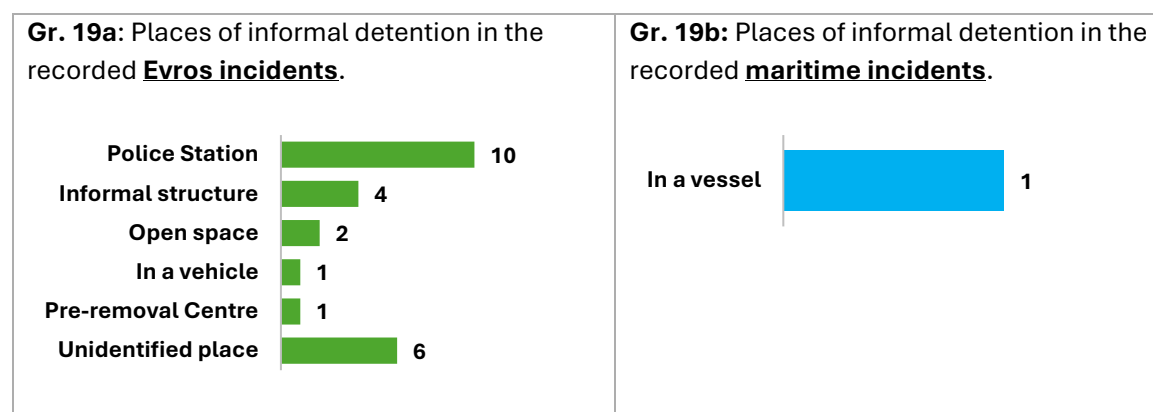


The statistical analysis of informal detention presented below concerns the 15 recorded Evros incidents and the single maritime incident in which informal detention constitutes an intermediate operational stage between detection and physical removal, characterised by functional autonomy and distinct infrastructure.

i) Topography of informal detention

In 10 incidents that occurred in **Evros**, the place of informal detention was reported as a place that resembled a Police Station or Border Guard Station. In 2 incidents, the alleged victims reported being subjected to restriction of their liberty in an open space. In 4 incidents, an informal structure was reported, namely a building or guarded area originally used for another purpose without any apparent identifying markings. In 6 incidents, an unidentified place was reported, i.e., a place that the alleged victims were unable to identify, in 1 incident inside a vehicle and in 1 incident a place resembling a Pre-Departure Centre (see *Graph 19a*).¹⁴

In 1 **maritime incident**, in which the detection was made in open waters, the alleged victim reported that the informal detention took place aboard a vessel (see *Graph 19b*).



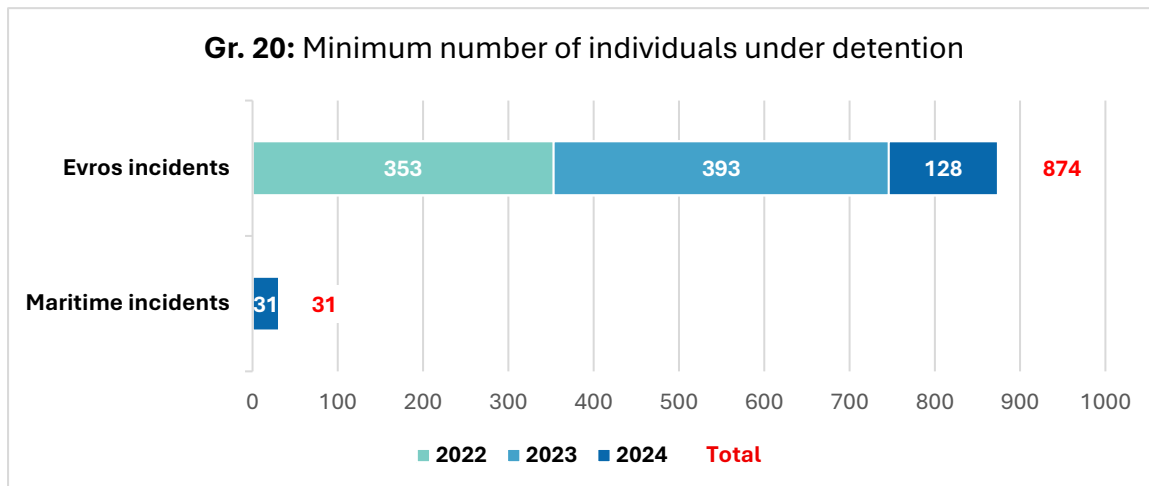
ii) Demography of alleged victims under detention

According to testimonies regarding the 15 **Evros incidents**, for which the alleged victims claimed they were subjected to informal detention in the aforementioned places, the number of detainees is estimated *at a minimum* of 874 persons (see *Graph 20*). At least 149 women and 74 children were among them. Furthermore, according to testimonies, among the individuals under detention, 57 were persons with other special needs, such as persons with health problems, elderly people, persons with disabilities, and others.

According to the testimony regarding the single **maritime incident**, for which the alleged victim claimed they were subjected to informal detention, the number of detainees is calculated *at a minimum* of 31 individuals (see *Graph 20*). At least 6 women and 11 children were among them. Furthermore, according to testimonies, among the

¹⁴ There are incidents, where the alleged victims reported that they were subjected to informal detention, successively, in more than one place of detention.

individuals under detention, 3 were persons with other special needs, such as persons with health problems and persons with disabilities.

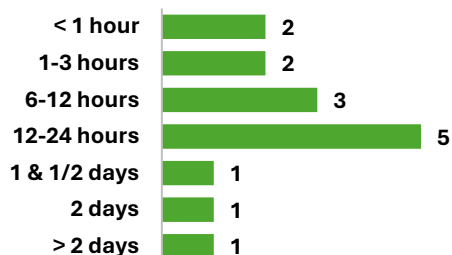


iii) Time duration of informal detention

As regards the time duration of informal detention in the incidents that occurred in **Evros**, in 2 testimonies, the alleged victims stated that it lasted less than 1 hour; in 2 testimonies, it was reported to have lasted between 1 and 3 hours; in 3 testimonies, between 6 and 12 hours; in 5 testimonies, between 12 and 24 hours; in 1 testimony, one and a half days; in 1 testimony, 2 days; and in 1 testimony, more than 2 days (see *Graph 21a*).

As for the single **maritime incident**, in 1 testimony the alleged victim reported that it lasted between 2 and 4 hours (see *Graph 21b*).

Gr. 21a: Time duration of informal detention to the recorded **Evros incidents.**



Gr. 21b: Time duration of informal detention in the recorded **maritime incident.**



iv) Characteristics of the guards

- In the recorded **Evros incidents**, the guards were reported to be mainly uniformed personnel. However, in a significant number of cases (60%), the presence of non-uniformed guards was noted, primarily operating in mixed groups with uniformed personnel and in close coordination with the authorities.
- In the **maritime incident** where informal detention was carried out as an intermediate stage between detection and physical removal, the group of guards reportedly consisted exclusively of uniformed personnel (100%)
- According to the testimonies, the uniformed guards involved in the recorded **Evros incidents** bore the characteristics of personnel of the Hellenic Police (87%) or the Hellenic Army (6%).
- In one **Evros incident**, the use of a trained dog was reported during the guarding of the alleged victims.
- In certain **Evros incidents**, it was reported that the uniformed guards spoke, in addition to Greek and English, some of the languages of the alleged victims, such as Turkish, Farsi, Arabic, and Urdu.
- In the recorded **maritime incidents**, it was reported that the guards spoke only Greek.

In 6 recorded **Evros incidents**, it was reported that the informal detention of the alleged victims was carried out solely by groups of uniformed guards; in 1 incident solely by non-uniformed guards; and in 8 incidents by mixed groups, namely guards consisting of both uniformed and non-uniformed individuals (see *Graph 22a*).

In 13 **Evros incidents**, the alleged victims reported that the uniformed guards bore characteristics of personnel of the Hellenic Police; in 1 incident, characteristics of Hellenic Army personnel; and in 1 incident, the alleged victim was unable to specify the professional capacity of the uniformed guards (see *Graph 23a*).

In 13 testimonies regarding **Evros incidents**, it was reported that the guards' uniforms were blue in colour; in 3 testimonies, green/khaki; and in 1, black. In 5 testimonies, distinctive insignia were mentioned, such as the Greek flag and the Hellenic Police (EL.AS.) emblem on the guards' clothing. In 6 testimonies, it was reported that uniformed guards wore full-face hoods; in 7, that they carried handcuffs; in 6, radio transceivers; in 3, bulletproof vests; and in 1, that they were accompanied by a trained dog. In 14 testimonies, the alleged victims stated that the uniformed guards were armed with weapons such as pistols, knives, and batons (see *Graph 24a*).

In 9 incidents at the **Evros** border where non-uniformed guards were involved in guarding operations, the alleged victims reported that these individuals were likely acting in coordination with the authorities (see *Graph 25*). This coordination is inferred from the

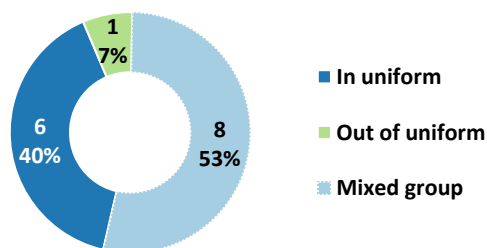
testimonies, as in 8 incidents the informal detention was carried out by mixed groups of guards, while in 1 incident, coordination is inferred from the testimony indicating that detection had been carried out by uniformed personnel.

In 8 testimonies, it was reported that non-uniformed guards wore full-face hoods; in 1, that they used handcuffs; in 1, that they carried radios; and in 1, that they were accompanied by a trained dog. In 10 testimonies, it was reported that non-uniformed guards were armed with handguns, including pistols, rifles, and batons (see *Graph 26*).

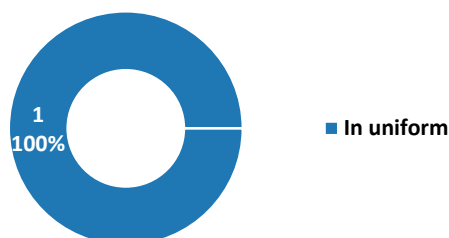
In 14 testimonies about the **Evros incidents**, the alleged victims identified Greek as the language spoken by uniformed guards; in 6, English; in 2, Turkish; and in 1, the language could not be identified. In 5 testimonies, the non-uniformed guards were reported to have spoken Greek; in 3, English; in 2, Turkish; in 2, Arabic; in 3, Farsi/Dari; and in 1, Urdu (see *Graph 27a*).

In the single **maritime incident**, it was reported that the informal detention of the alleged victims was carried out solely by uniformed guards (see *Graph 22b*). In this incident, the alleged victims reported that the uniformed guards bore the characteristics of Coast Guard personnel (see *Graph 23b*). In 1 testimony regarding this incident, it was reported that the guards' uniforms were blue in colour (see *Graph 24b*). In the same testimony, the alleged victim identified Greek as the language spoken by the guards (see *Graph 27b*).

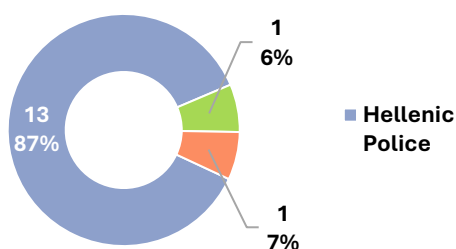
Gr. 22a: Clothing of guards involved in the recorded **Evros incidents**.



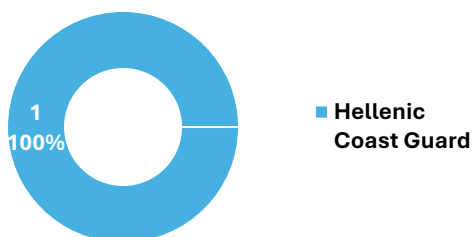
Gr. 22b: Clothing of guards involved in the recorded **maritime incident**.



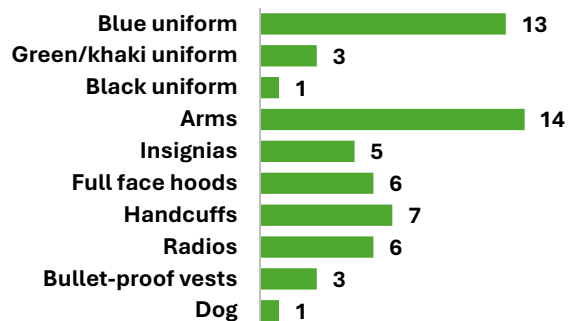
Gr. 23a: Presumed professional capacity of the uniformed guards involved in the recorded **Evros incidents**.



Gr. 23b: Presumed professional capacity of the uniformed guards involved in the recorded **maritime incident**.



Gr. 24a: Equipment of the uniformed guards involved in the recorded **Evros incidents**



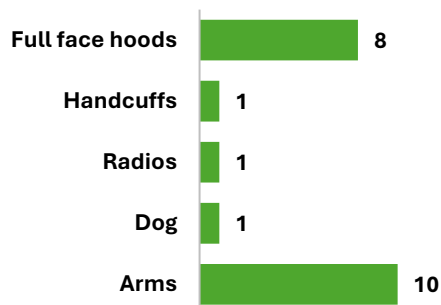
Gr. 24b: Equipment of the uniformed guards involved in the recorded **maritime incident**.

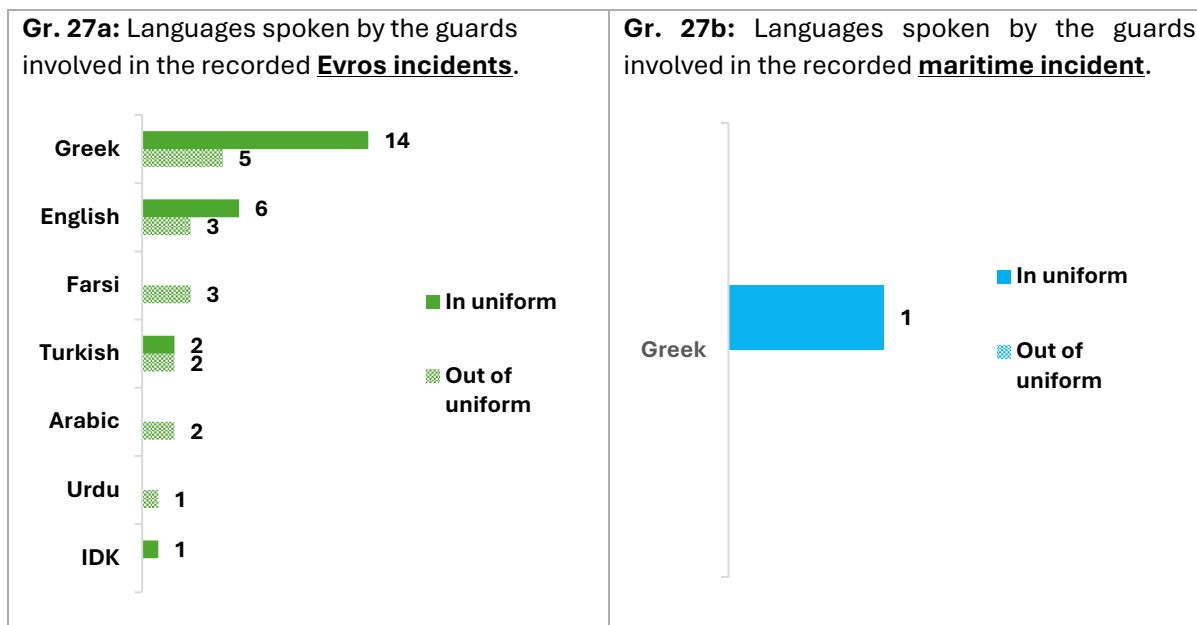


Gr. 25: Coordination and/or association of the uniformed guards involved in the recorded **Evros incidents** with State Authorities.



Gr. 26: Equipment of non-uniformed guards involved in the recorded **Evros incidents**.





C. Data on the act of physical removal

The stage of *physical removal* constitutes the final and most significant operational phase of an IFR incident, during which the alleged victims are forcibly removed from Greek territory in violation of the established legal procedure governing the removal of third-country nationals from Greek territory. Physical removal is carried out either by crossing the Evros River or by sea, primarily in the Eastern Aegean. This practice entails the illegal return of third-country nationals or stateless persons without prior individual assessment of their needs for international protection, without a prior administrative or judicial decision justifying and ordering such return, without provision of information regarding their rights, and without access to effective legal remedies.

The significance of the act of physical removal extends beyond a mere cross-border transfer. It constitutes a serious violation of international and European human rights law, particularly the principle of non-refoulement, which prohibits the return of individuals to states where they face the risk of torture, inhuman or degrading treatment, or other serious harm.

i) Topography of physical removal

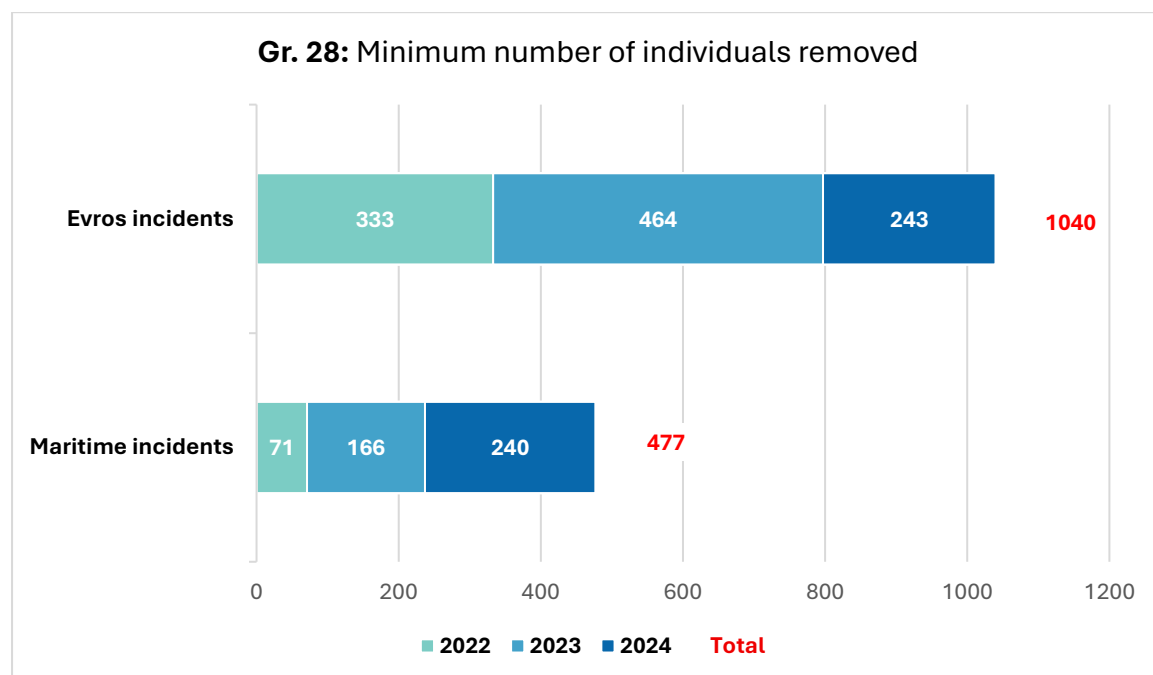
In the 35 recorded incidents where detection occurred in the hinterland or near the Evros River border area, the alleged victims reported that the physical removal was carried out via the Evros River.

In the 17 recorded incidents where detection took place at sea, near or on a Greek island, it was reported that the physical removal was carried out at sea (see above, *Graph 3*).

ii) Demography of Alleged Victims Subjected to Physical Removal

According to testimonies regarding the 35 recorded **Evros incidents**, the number of individuals subjected to physical removal in these incidents is estimated to be at least 1,040 persons (see *Graph 28*). Among them were at least 202 women and 138 children. Furthermore, according to testimonies, among those subjected to physical removal, 83 were persons with special needs, such as individuals with health problems, elderly people, persons with disabilities, and others.

According to testimonies concerning the recorded 17 **maritime incidents**, the number of individuals subjected to physical removal in these incidents is estimated to be at least 477 persons (see *Graph 28*). Among them were at least 98 women and 87 children. Furthermore, according to testimonies, among those subjected to physical removal, 50 were persons with special needs, such as individuals with health problems, elderly people, persons with disabilities, and others.



iii) Characteristics of the removers

- According to testimonies, in the majority of incidents in the area of **Evros**, physical removals were primarily carried out by non-uniformed removers (57%), to a significantly lesser extent by uniformed personnel (9%), while in some cases removals were conducted by mixed groups consisting of both uniformed and non-uniformed individuals (34%).
- The majority of uniformed removers involved in the recorded **Evros incidents** were reported to bear characteristics of personnel of the Hellenic Army (41%) and the Hellenic Police (35%).
- Nearly all testimonies regarding the recorded **Evros incidents** indicate that non-uniformed removers were acting in coordination with the Greek authorities (94%).
- In the recorded **maritime incidents**, alleged victims primarily reported the involvement of uniformed removers (76%), with very limited involvement of non-uniformed removers (12%) or mixed groups (12%).
- According to the testimonies of most recorded **maritime incidents**, the uniformed removers brought personnel characteristics of the Hellenic Coast Guard (93%).
- In all testimonies regarding **maritime incidents**, non-uniformed removers were estimated to operate in coordination with the authorities (100%). In two **maritime incidents**, it is reasonably presumed that the non-uniformed removers were members of the Hellenic Coast Guard.
- In one **Evros incident**, a trained dog was reportedly used during the physical removal of alleged victims.
- According to testimonies from **Evros incidents**, removers spoke, in addition to Greek and English, languages used by the alleged victims, including Arabic, Urdu, Pashto, Turkish, and Farsi. In **maritime incidents**, only Greek and English were reported as spoken by the removers.

According to the alleged victims' testimonies about 3 **Evros incidents**, the physical removal operation was conducted solely by groups of uniformed removers; about 20 incidents the alleged victims reported that the physical removal operation was conducted solely by groups of non-uniformed removers and about 12 incidents, that the physical removal operation was conducted by mixed groups of removers, namely by groups of uniformed and non-uniformed persons (see *Graph 29a*).

In 6 **Evros incidents**, the alleged victims reported that the removers in uniform bore characteristics of personnel of the Hellenic Police and in 7 incidents that they bore characteristics of Hellenic Army personnel. In 4 incidents the alleged victims reported



that they were not able to specify the professional capacity of the removers in uniform (see *Graph 30a*).

In 6 testimonies about **Evros incidents**, it is reported that the uniforms of uniformed removers were blue in colour, in 14 testimonies that they were green/khaki in colour, and in 3 testimonies that they were black in colour. In 5 testimonies, there is also mention of distinctive insignia, such as the Greek flag on the clothing of the uniformed persons. In 13 testimonies, it is reported that the uniformed removers wore full-face hoods; in 9 testimonies, that they were equipped with radios transceivers; in 4 testimonies, that they wore bulletproof vests; in 3 testimonies, that they carried handcuffs; and in 1 testimony, that they were accompanied by a trained dog. In 17 testimonies, it is reported that they carried weapons, such as rifles, pistols, batons, and knives (see *Graph 31a*).

In 30 incidents occurred in the **Evros area** involving non-uniformed removers in the act of physical removal, alleged victims reported that these individuals were likely acting in coordination with the authorities. The coordination of non-uniformed removers with the authorities is inferred from testimonies of alleged victims indicating that in 12 incidents, the physical removal was carried out by a mixed group of removers; in 3 incidents, that they were transferred from a place of informal detention resembling a Police Station with uniformed personnel present; in 1 incident, because the alleged victims were detained in an open space in the presence of uniformed persons; in 1 incident, because the detection was conducted by uniformed persons; and in 13 incidents, because the alleged victims were handed over to the removers by uniformed detectors. In 2 incidents, the alleged victims responded that they were unable to determine whether the non-uniformed removers were acting in coordination with the authorities (see *Graph 32a*).

39

In 32 testimonies, it is reported that non-uniformed removers wore full-face hoods; in 2 testimonies, that they were in possession of binoculars; in 4 testimonies, that they carried handcuffs; in 3 testimonies, that they used radio transceivers; in 1 testimony, that they were in possession of a drone; and in 1 testimony, that they were accompanied by a trained dog. In 25 testimonies, it was reported that they were carrying weapons, such as knives, batons, and pistols (see *Graph 33a*).

In 16 testimonies about recorded **Evros incidents**, the alleged victims identified that the uniformed removers spoke Greek; in 11 testimonies, they identified English as spoken language; and in 4 testimonies, Turkish was identified as spoken language. In 12 testimonies on **Evros incidents** involving non-uniformed removers, it was reported that Greek was the spoken language; in 6 testimonies, English was reported as the spoken language; in 11 testimonies, Arabic; in 6 testimonies, Turkish; in 15 testimonies, Farsi/Dari; in 2 testimonies, Pashto; in 3 testimonies, Urdu; and in 7 testimonies, the victims were unable to identify any of the languages spoken by the non-uniformed removers (see *Graph 34a*).



In testimonies about 13 recorded **maritime incidents**, it is reported that the physical removal of alleged victims was carried out solely by groups of uniformed removers; in 2 incidents, that it was carried out solely by groups of non-uniformed removers; and in 2 incidents, that it was carried out by mixed groups of removers (see *Graph 29b*).

In 14 recorded **maritime incidents**, the alleged victims reported that the uniformed removers bore characteristics of Coast Guard personnel, while in 1 incident, the alleged victim was unable to specify the professional capacity of the uniformed removers (see *Graph 30b*).

In 11 testimonies concerning **maritime incidents**, it is reported that the uniforms of uniformed removers were blue in colour, in 1 testimony that they were green/khaki, and in 6 testimonies that they were black. Moreover, in 10 testimonies the alleged victims reported that there were distinctive insignias on the detectors' clothing, like the word "Police", national emblems, the Greek flag and similar markings. It is further reported, in 17 testimonies, that the uniformed removers wore full-face hoods, in 1 testimony that they wore bulletproof vests, in 3 testimonies that they carried handcuffs, in 1 testimony that they were in possession of binoculars, and in 1 testimony that they possessed flashlights. In 15 testimonies, it is reported that the removers carried weapons, such as rifles, pistols, batons, knives, and tasers (see *Graph 31b*).

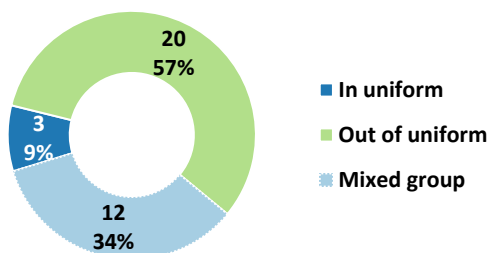
In 2 **maritime incidents**, involving non-uniformed removers in the act of physical removal, the alleged victims reported that these individuals likely acted in coordination with the authorities. The coordination of non-uniformed removers with the authorities is inferred from testimonies of the alleged victims, reporting that in 1 incident, the removers operated a vessel clearly very close to the shore, suggesting that the authorities would have been aware of their presence and activities in the area, and in 1 incident, the non-uniformed removers took the alleged victims from detectors bearing characteristics of the Hellenic Police personnel, as they used a police vehicle. Furthermore, in 2 **maritime incidents** where the removal was carried out by a mixed group of removers, it is estimated that the non-uniformed removers were members of the Hellenic Coast Guard personnel, as they operated jointly with uniformed persons bearing characteristics of Hellenic Coast Guard personnel on a vessel belonging to the Hellenic Coast Guard (see *Graph 32b*).

In 3 testimonies about maritime incidents, it was reported that the non-uniformed removers wore full-face hoods, and in 1 testimony that they wore bulletproof vests. In 5 testimonies, it was reported that they carried weapons, such as pistols, rifles, bats, and bludgeons (see *Graph 33b*).

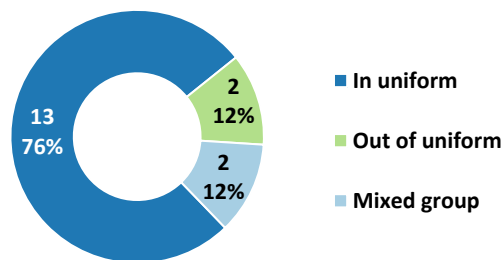
In 7 testimonies concerning **maritime incidents**, the alleged victims identified that the uniformed removers spoke Greek; in 14 testimonies, they identified English; and in 3 testimonies, the alleged victims were unable to identify the language spoken by the uniformed removers. In 5 testimonies concerning **maritime incidents** involving non-

uniformed removers, the alleged victims identified that the non-uniformed removers spoke Greek, and in 5 testimonies, they identified English (see *Graph 34b*).

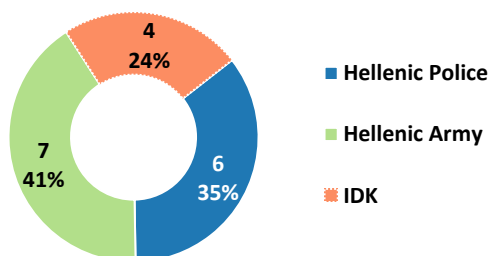
Gr. 29a: Clothing of the removers involved in the recorded **Evros incidents**.



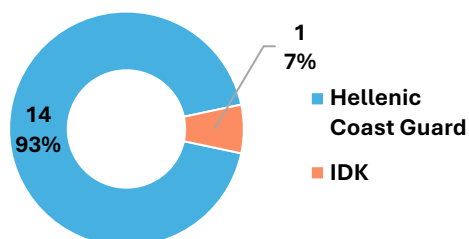
Gr. 29b: Clothing of the removers involved in the recorded **maritime incidents**.



Gr. 30a: Presumed professional capacity of the uniformed removers involved in the recorded **Evros incidents**.



Gr. 30b: Presumed professional capacity of the uniformed removers involved in the recorded **maritime incidents**.

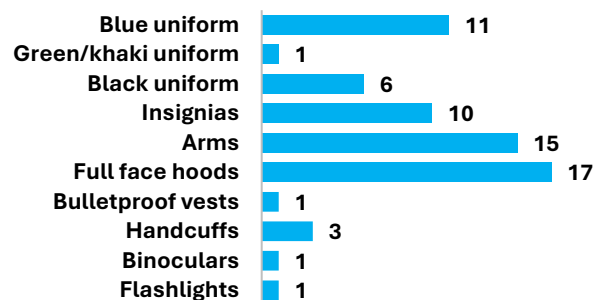


41

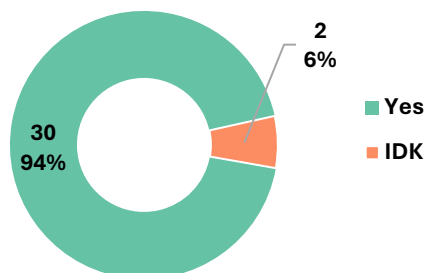
Gr. 31a: Equipment of the uniformed removers involved in the recorded **Evros incidents**.



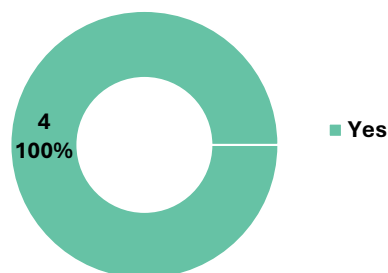
Gr. 31b: Equipment of the uniformed removers involved in the recorded **maritime incidents**.



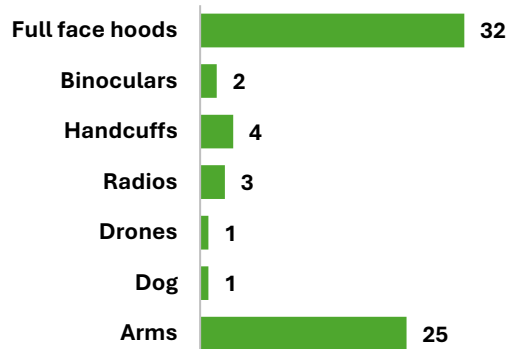
Gr. 32a: Coordination and/or association of the non-uniformed removers involved in the recorded **Evros incidents** with State Authorities



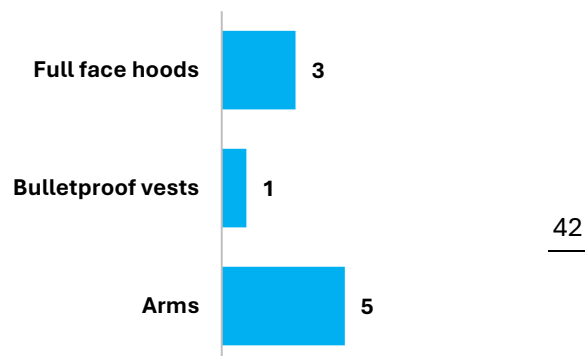
Gr. 32b: Coordination and/or association of the non-uniformed removers involved in the recorded **maritime incidents** with State Authorities.



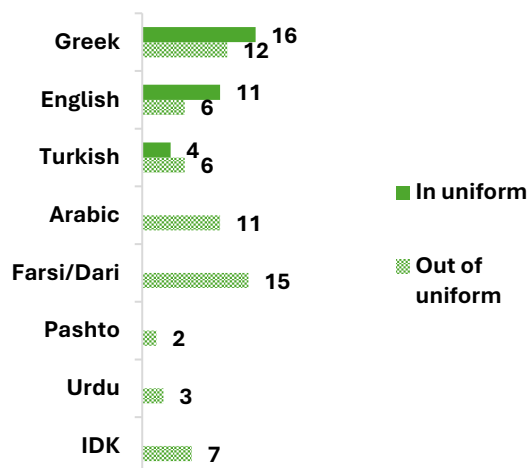
Gr. 33a: Equipment of the non-uniformed removers involved in the recorded **Evros incidents**.



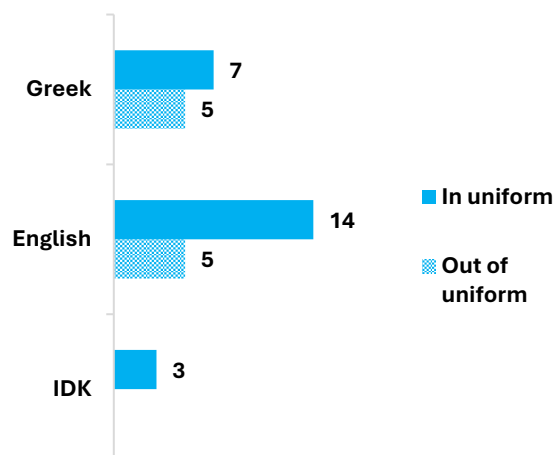
Gr. 33b: Equipment of the non-uniformed removers involved in the recorded **maritime incidents**.



Gr. 34a: Languages spoken by the removers involved in the recorded **Evros incidents**.



Gr. 34b: Languages spoken by the removers involved in the recorded **maritime incidents**.



iv) Means and modes of physical removal

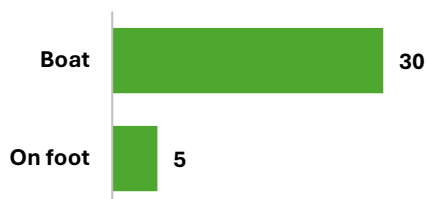
In 30 **Evros incidents**, the alleged victims reported that the act of physical removal was carried out by crossing the Evros River using a boat. In 5 incidents, the alleged victims reported that the act of physical removal was conducted on foot (see *Graph 35a*).

In 26 **Evros incidents**, where the act of physical removal was carried out by crossing the Evros River using a boat, the alleged victims reported that the operation involved transportation to the Turkish bank of the Evros River. In 3 incidents, it was reported that the physical removal was conducted by crossing the Evros River using a boat to the midpoint of the river, followed by the forced push of the alleged victims into the river, compelling them to cross on their own from the midpoint to the Turkish bank. In 1 incident, the alleged victim was transferred to Türkiye by forced boarding a boat and subsequently being pushed of the boat into the river, compelling the alleged victim to navigate the boat on their own toward the Turkish bank. In 3 incidents in the Evros region, where the act of physical removal was conducted on foot, the alleged victims reported that the physical removal involved forced push into the Evros River, compelling them to walk on their own toward the Turkish bank. In 2 incidents, the alleged victims reported that the physical removal was carried out on foot through the border fence (see *Graph 36a*).

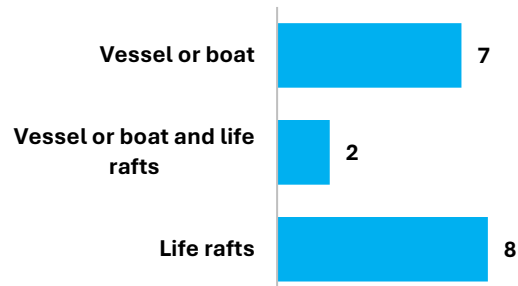
In 7 **maritime incidents**, the alleged victims reported that the act of physical removal was carried out exclusively by vessel or boat; in 2 incidents, it was reported that the physical removal was initially conducted by vessel or boat, followed by forced embarkation onto life rafts; in eight (8) incidents, it was reported that the physical removal was carried out solely through the use of life rafts (see *Graph 35b*).

In 5 **maritime incidents**, the alleged victims reported that the removers detached or destroyed the engine of the boat or raft on which the alleged victims were aboard; in 5 incidents, it was reported that the removers emptied the fuel from the engine of the boat or raft on which the alleged victims were aboard; in 2 incidents, it was reported that the removers destroyed the boat or raft on which the alleged victims were aboard; in 4 incidents it was reported that the removers performed manoeuvres with their vessels with the intent of creating waves; in 1 incident, it was reported that the removers pushed back the boat carrying the alleged victims, using poles; in 11 incidents it was reported that the removers forced the alleged victims to board a boat or raft; in 14 incidents, it was reported that the removers abandoned the alleged victims on unseaworthy boats or rafts; in 1 incident it was reported that the defectors abandoned the alleged victims at sea; in 7 incidents, it was reported that the removers towed the vessel or raft of the alleged victims (see *Graph 36b*).

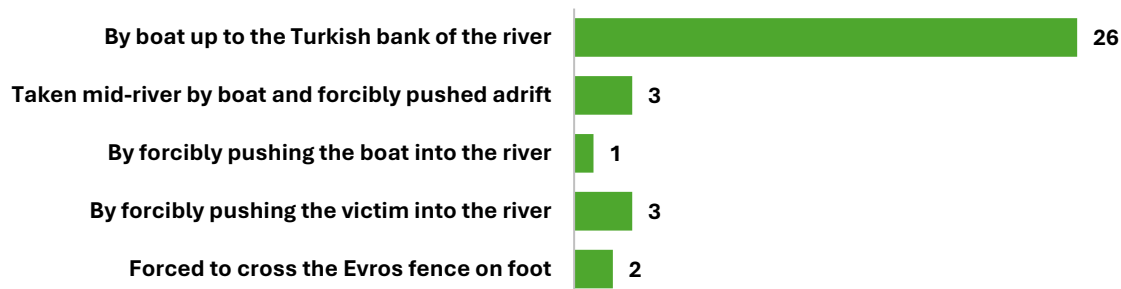
Gr. 35a: Means of implementation of the physical removal in the recorded **Evros incidents**.



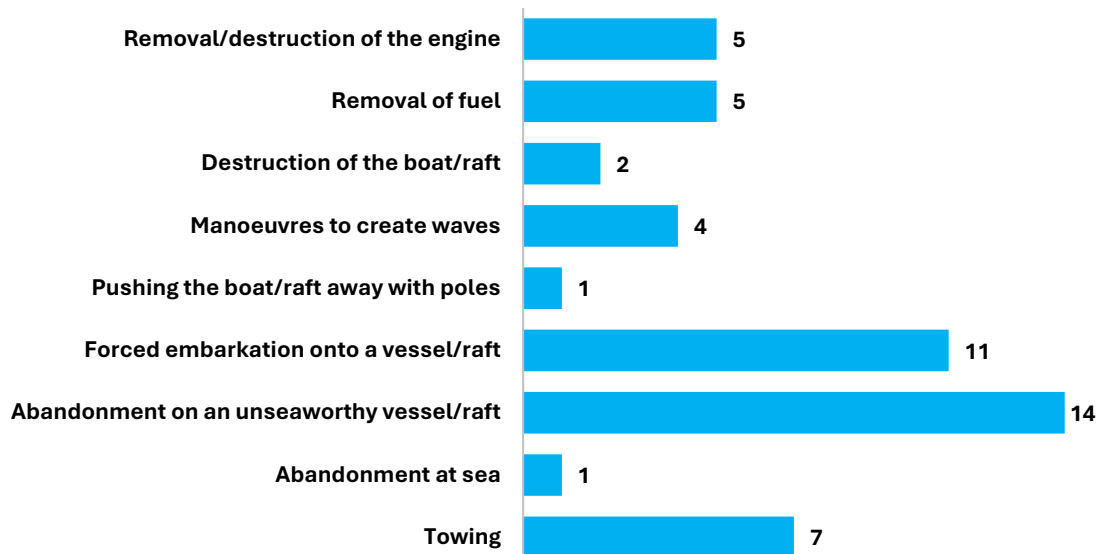
Gr. 35b: Means of implementation of the physical removal in the recorded **maritime incidents**.



Gr. 36a: Modes of implementation of the physical removal in the recorded **Evros incidents**.



Gr. 36b: Modes of implementation of the physical removal in the recorded **maritime incidents**.



v) Incidents of Convergent Removal

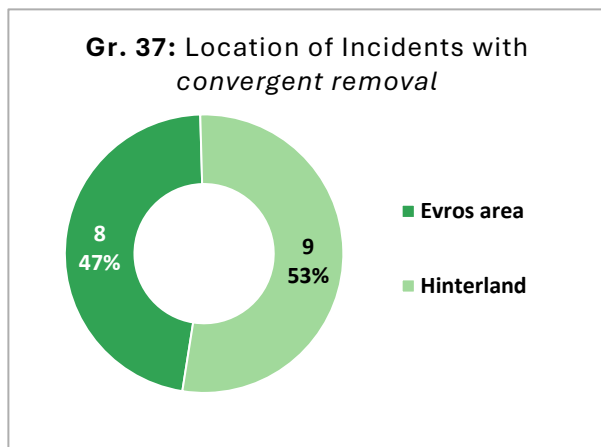
- The phenomenon of *convergent removal* demonstrates additional levels of organization in the execution of IFR operations.
- Incidents of *convergent removal* were observed exclusively in the geographical area of **Evros** (100%).
- Convergent removal was identified in incidents where detection occurred in the hinterland (53%), as well as in incidents where detection occurred in the Evros border area (47%).
- Informal detention was recorded with high frequency in incidents of *convergent removal* (76%), with the majority of these involving successive detention (58%)

The recording of IFR incidents through personal interviews with alleged victims lies at the core of the methodology of the Recording Mechanism. This method provides the opportunity for direct access to experiences of the alleged victims, enabling the collection of detailed and more reliable information. Furthermore, linking the testimony to a specific individual who has been informed about the recording process, has given their consent for the recording of their testimony, and remains identifiable for quality control purposes, enhances the credibility of the process and facilitates feedback.

However, despite the advantages of this approach, there is also a methodological limitation. Due to its nature, personal testimony takes typically the form of a linear narrative. The alleged victim describes the incident experienced, starting from the moment of their detection, proceeding to the stage of informal detention (if such an intermediate stage occurred), detailing both their legal treatment (informality) as well as their physical treatment, and concluding with their physical removal from Greek territory. The narrative is presented as a coherent process with distinct, sequential stages.

This linear representation, in certain cases, does not reflect the complexity of the actual incident. When the analysis moves to a comparative level, for instance when multiple testimonies concerning the same incident are examined, or when information emerges indicating that the alleged victim whose testimony is being recorded has joined other groups previously detected at different points in time, it is observed that the progression described by the alleged victims is not unique, but constitutes one among several pathways of distinct experiences which intersect and converge towards a common final outcome, namely the physical removal. In such incidents, the phenomenon of *convergent removal* is observed, and a discrepancy arises between the numbers of individuals detected, those subjected to informal detention, and those ultimately removed (see below, *Graph 40*).

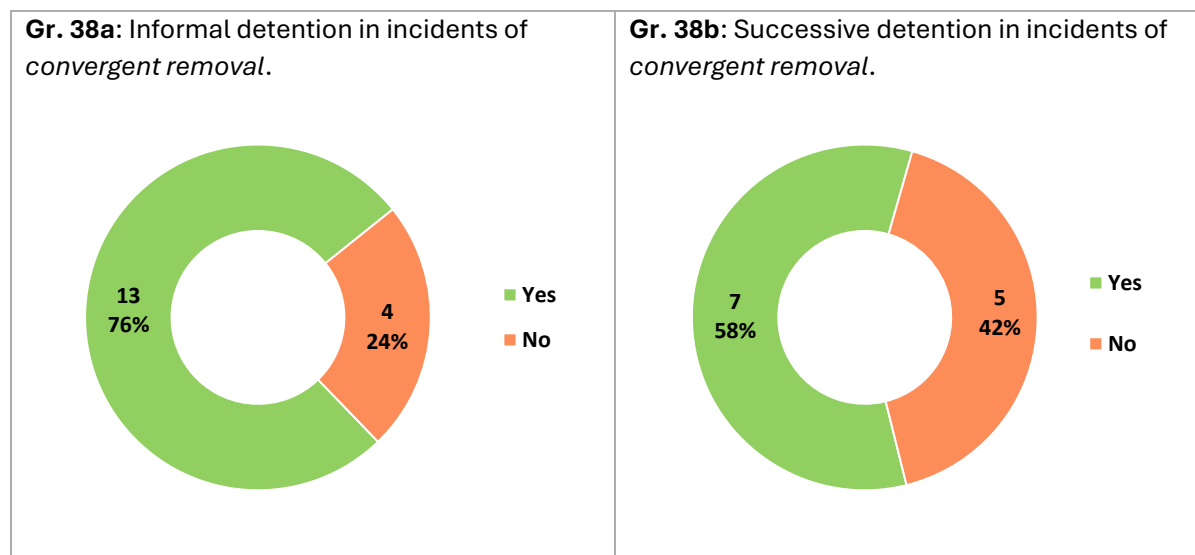
During the 2024 recording cycle, the Recording Mechanism identified and documented 17 incidents exhibiting characteristics of *convergent removal*. All 17 incidents occurred in the Evros region; in 9 of them the initial detection of the alleged victims took place in the hinterland; in 8 it occurred in the Evros border area (see *Graph 37*).



This dual observation along the axis of geographical differentiation highlights, on the one hand, a significant divergence in the *modus operandi* between Evros and maritime incidents, and, on the other hand, that operations in Evros are not confined strictly to the immediate border area but extend deep into the hinterland, reinforcing the picture of extensive, large-scale land operations.

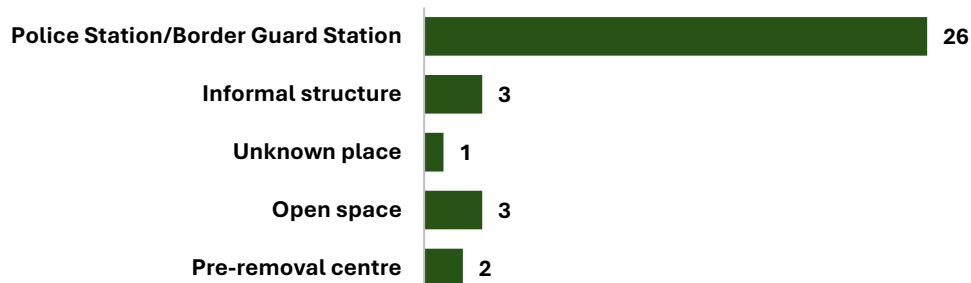
According to the recordings, 13 of the *convergent removal* incidents involved also informal detention as an intermediate stage (see *Graph 38a*). In 7 of these incidents, the detention was successive, meaning that the alleged victims were transferred to and held in more than one place of detention (see *Graph 38b*). This pattern reinforces the view that the operations follow an organized framework, involving multiple locations and detention facilities prior to the completion of the removal.

46



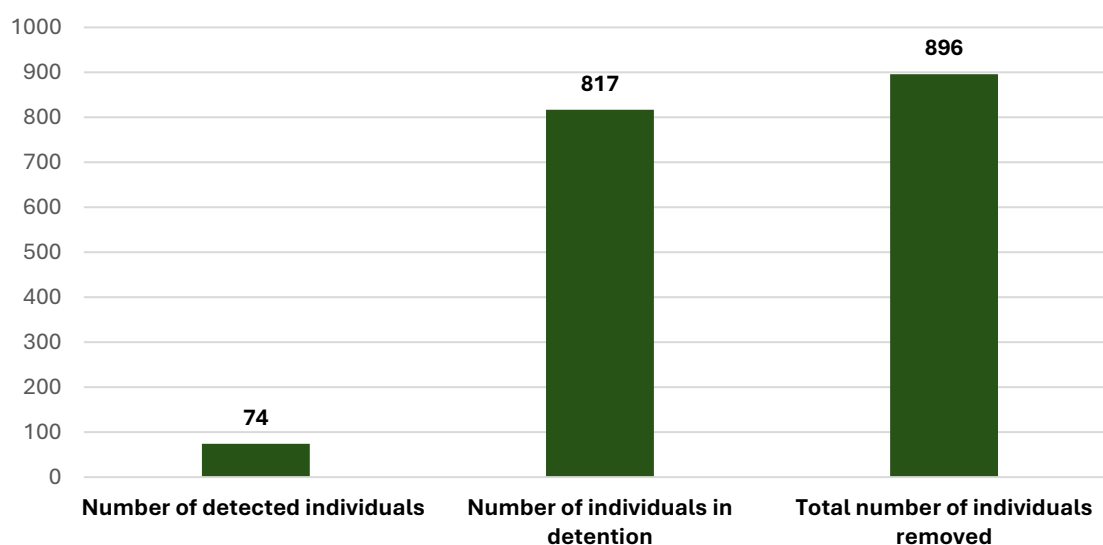
In 8 incidents, detention facilities resembling Police Stations or Border Guard Stations were reported; in 6 incidents the locations remained unidentified; in 4 incidents, informal detention facilities were reported; in 2 incidents, open spaces; and in 1 incident, a place resembling a pre-removal detention centre (see *Graph 39*).

Gr. 39: Detention places in incidents of *convergent removal*



In these incidents of *convergent removal*, the total number of individuals detected amounts to 74, the number of individuals in detention to 817 and the number of individuals subjected to physical removal to 896 (see *Graph 40*).

Gr. 40: Graphic representation of *convergent removal* through the number of victims



The phenomenon of *convergent removal* in IFR incidents constitutes an indication of increased operational complexity and reinforces the evidence suggesting that the planning and execution of IFRs are not spontaneous or uncoordinated phenomena. On the contrary, they bear features of planning and organisation, highlighting the degree of operational maturity and structuring of the mechanisms implementing IFRs. It is also noteworthy that such incidents have been identified exclusively in the Evros region and not in maritime contexts, which represents an additional distinguishing feature along the axis of geographical differentiation concerning the modus operandi of these operations.



II. Indicators of Informality

Indicators of Informality reflect actions concerning the verification of the identity of alleged victims, the authentication and recording of their personal data, the collection of biometric data (photographs and fingerprints), the administrative handling of asylum applications, and access to legal remedies to enable concerned individuals to challenge the lawfulness of their removal. When these indicators reveal deficiencies in the aforementioned procedures, the incidents of forced returns are characterized as informal (non-regular) (see *Graph 41*).

In the 2024 reporting cycle, the Recording Mechanism proceeded to a thorough reassessment of the utility of the informality indicators, following an analysis of data collected in previous reporting cycles. This review emerged from the need to optimise the methodology of the Recording Mechanism so as to enhance the analytical accuracy and evidential value of the material collected.

Specifically, two indicators previously included in the Recording Form for the 2022 and 2023 cycles were removed: a) deprivation of documents and b) seizure of personal belongings from alleged victims. It was assessed that these indicators do not sufficiently contribute to documenting the informal nature of the forced return, as delineated in the Methodological Framework of the Recording Mechanism. Instead, it was recognised that the practices of “deprivation of documents” and “seizure of personal belongings” pertain more to the treatment and potential human rights violations during IFRs and were therefore transferred to the relevant section addressing the treatment of alleged victims and human rights violations.

At the same time, a new indicator was introduced; the active request by the authorities for identity documents at the time of detection or detention of alleged victims. This new indicator provides a useful tool for assessing the Authorities’ intent to proceed with formal registration and potential legal procedures or, conversely, their intent to avoid any form of reception or processing of international protection requests, thereby confirming the summary and informal nature of the forced return.

All other indicators remain unchanged; possession of identity documents, disclosure of possession, expression of intent to submit an asylum application, related inquiries by the Authorities, provision of information on rights, recording of personal data, fingerprinting, photographing, and issuance or signing of documents. These indicators continue to serve as fundamental elements for assessing the degree of “formality” or “informality” of each reported forced return within the framework of the qualitative and quantitative analyses of the Recording Mechanism.

This revision is part of the Recording Mechanism’s ongoing effort to optimise its tools based on accumulated experience and to enhance the reliability and utility of its data for purposes of awareness-raising, documentation, and accountability.

Gr. 41: Indicators of Informality

Possession of documents	61 testimonies - Victims in possession of identity documents - Victims out of possession of identity documents Type of identity document <table border="1"> <thead> <tr> <th>Type of identity document</th> <th>Count</th> </tr> </thead> <tbody> <tr> <td>Identity Card or Passport</td> <td>22</td> </tr> <tr> <td>International Protection Applicant's Card</td> <td>1</td> </tr> <tr> <td>Documents of Recognised Beneficiaries of International Protection</td> <td>1</td> </tr> <tr> <td>Other identity documents</td> <td>8</td> </tr> </tbody> </table>	Type of identity document	Count	Identity Card or Passport	22	International Protection Applicant's Card	1	Documents of Recognised Beneficiaries of International Protection	1	Other identity documents	8
Type of identity document	Count										
Identity Card or Passport	22										
International Protection Applicant's Card	1										
Documents of Recognised Beneficiaries of International Protection	1										
Other identity documents	8										
Disclosure of documents in possession	35 testimonies - Victims' disclosure of documents in possession - Victims' failure to disclose documents in possession										

Request to display identity documents	61 testimonies ■ Authorities' request for disclosure of identity documents ■ Omission by the authorities to request for identity documents
Expressed intent to apply for International Protection	61 testimonies ■ Victims who expressed their intent to apply for international protection ■ Victims' failure to express their intent to apply for international protection
Investigation by the Authorities into the Need for International Protection of the Alleged Victims	In no testimony was it reported that the competent authorities asked if the alleged victims intended to submit an application for international protection. Furthermore, in cases where the alleged victims already enjoyed international protection status in Greece or were registered applicants for asylum, no testimony indicated that such status was taken into consideration.
Information on rights	In no testimony did the alleged victims report to have being provided with any information on their rights by the competent authorities, in a language they understood.
Recording of personal information	In 60 testimonies , the alleged victims reported that, at no stage of the incident, were they subjected to registration of their personal data by the competent authorities. Only in 1 testimony about an incident in which the alleged victim was subjected to sequential detention, was it reported that the authorities at the initial place of detention proceeded to register the alleged victim's personal data.
Fingerprinting	In no testimony was it reported by the alleged victims that biometric data, such as fingerprints, were collected.
Photographs	In no testimony did the alleged victims report to have been officially photographed by the competed authorities.
Signing/Provision of a document	In no testimony did the alleged victims report that they were provided with an official administrative document nor that they have signed any such document.

III. Treatment of the alleged victims

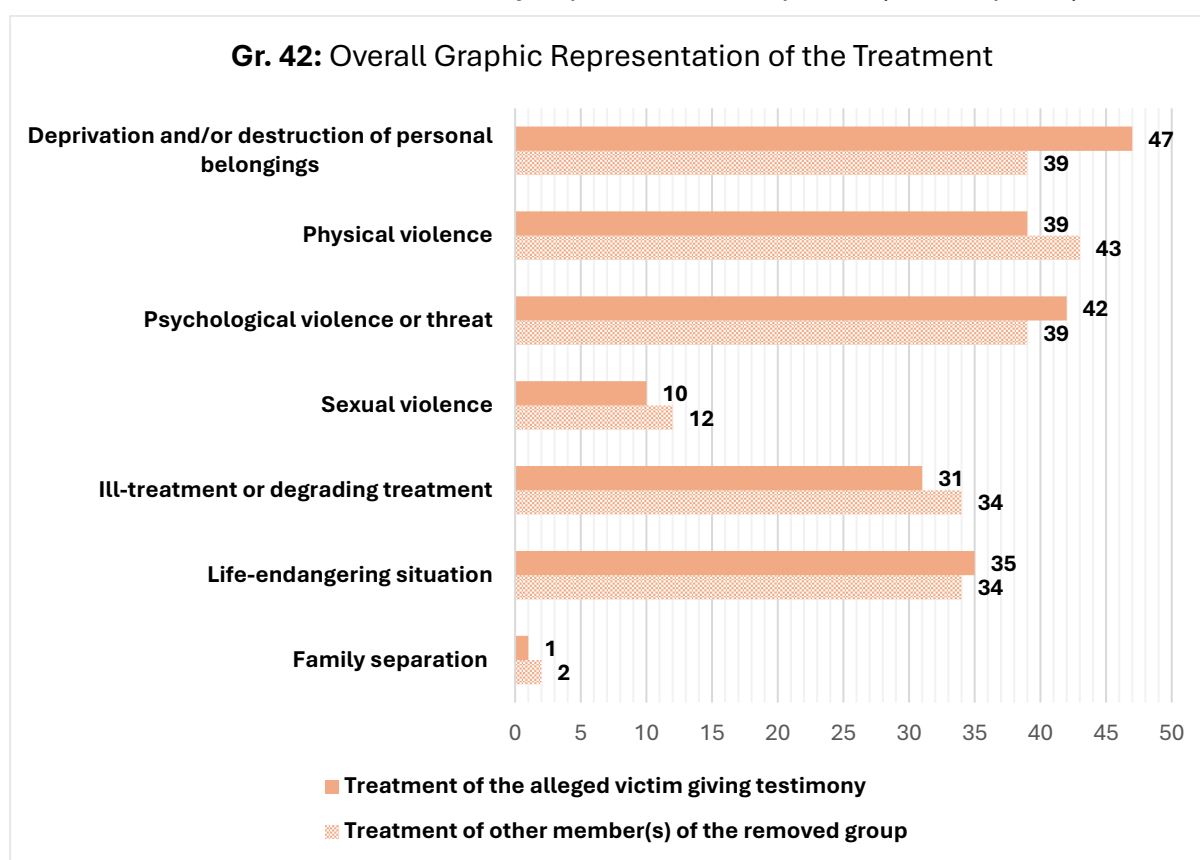
- Treatment indicators point to violent treatment in various forms (physical, sexual, psychological, or degrading), recorded at higher rates in the **Evros incidents** (65%) compared to **maritime incidents** (49%).
- Life-endangering situations are more frequent in the recorded **maritime incidents** (24%) than in the recorded **Evros incidents** (12%).

This chapter reflects the treatment to which the alleged victims were subjected, according to their testimonies. The aim is, at first, to provide an overall depiction of the treatment experienced by both the alleged victims, whose testimonies were recorded by the Recording Mechanism through personal interviews, as well as by other individuals belonging to the same groups who were removed along with them. By this, the violent treatment is exposed in its entirety, highlighting the various forms of violence and ill-treatment endured by the alleged victims, ranging from the deprivation of personal belongings and physical violence to psychological coercion, sexual violence, degrading practices, life-endangering situations, and family separation.

The analysis further extends to the axis of geographical differentiation, with incidents being classified as either those that occurred in the area of Evros or those that occurred at sea. This distinction enables the emergence of potential differences in the practices of ill-treatment, the conditions facilitating them, and the specificities associated with each respective environment, whether land borders or maritime routes. At the same time, the different categories of perpetrators involved in these acts are highlighted, providing a more comprehensive picture of violent treatment and its origins.

Specifically, with regard to the treatment of the alleged victims whose testimony was recorded by the Recording Mechanism through personal interviews, in 47 incidents, the alleged victims reported deprivation or destruction of personal belongings, such as identity documents, electronic devices (telephones and tablets), money, food, and other items; in 39 incidents, the use of physical violence was reported, including pushing, kicking, punching, beatings with batons, and use of tasers, among others; in 42 incidents psychological violence or threats were reported, such as verbal abuse, threats to life or bodily harm, pointing with firearms, and display of weapons, among others; in 10 cases, sexual violence was reported, such as touching genitals and other indecent gestures; in 31 incidents, other forms of ill-treatment or degrading treatment were reported, such as strip body searches, body searches conducted by persons of a different sex, forced undressing, and removal of shoes; in 35 incidents, life-endangering practices were reported, such as abandonment in unseaworthy boats or rafts, destruction of boats or causing shipwrecks, and forcing individuals into rivers, among others; in one incident, family separation was reported (see *Graph 42*).

Testimonies of the alleged victims recorded by the Recording Mechanism, also reveal information regarding the treatment of other individuals in the groups removed alongside the recorded victims. According to these testimonies, in 39 incidents, other individuals in the removed groups experienced deprivation or destruction of personal belongings; in 43 incidents, physical violence was reported; in 39 incidents, psychological violence or threats were reported; in 12 incidents, sexual violence was reported, including one case of rape; in 34 incidents, other forms of ill-treatment or degrading treatment were reported; in 34 incidents, life-endangering situations were reported, including two fatal incidents; and in two incidents, family separation was reported (see *Graph 42*).

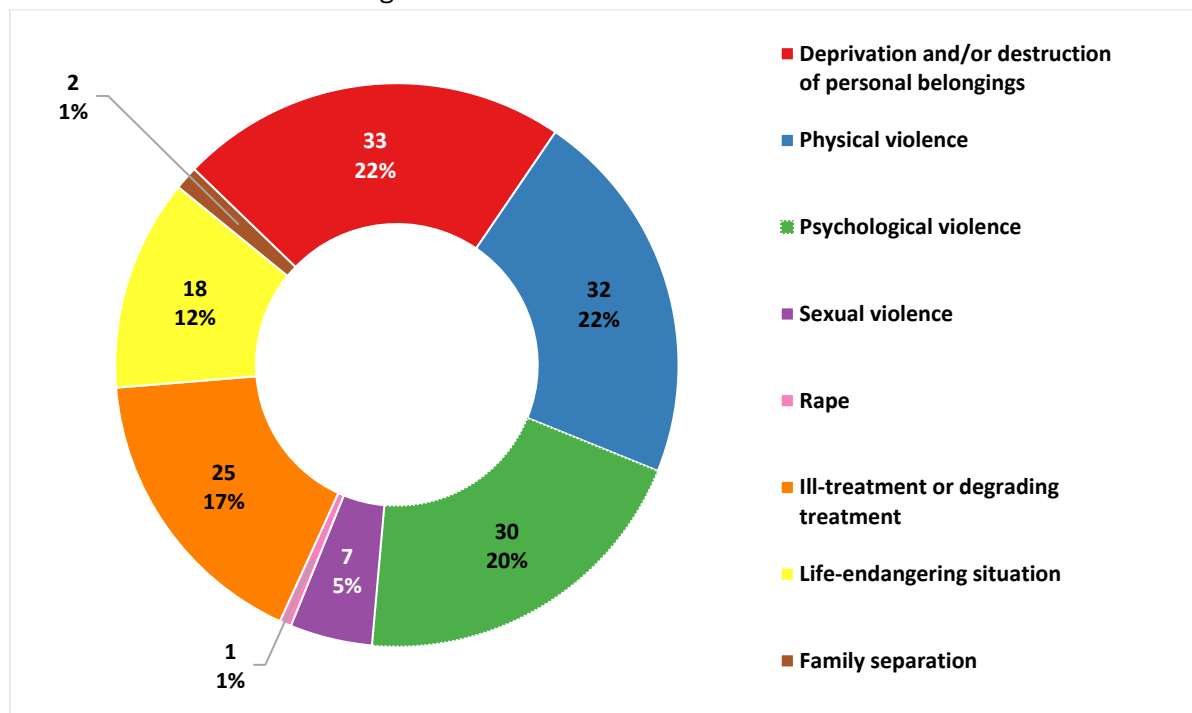


In 32 **Evros incidents**, there were reports of deprivation or destruction of personal belongings; in 32 incidents, physical violence was reported; in 30 incidents, psychological violence or threats were reported; in 1 incident, rape was reported; in 7 incidents, other forms of sexual violence were reported; in 25 incidents, other forms of ill-treatment or degrading treatment were reported; in 18 incidents, life-endangering practices were reported; and in 2 incidents, family separation was reported (see *Graph 43a*).

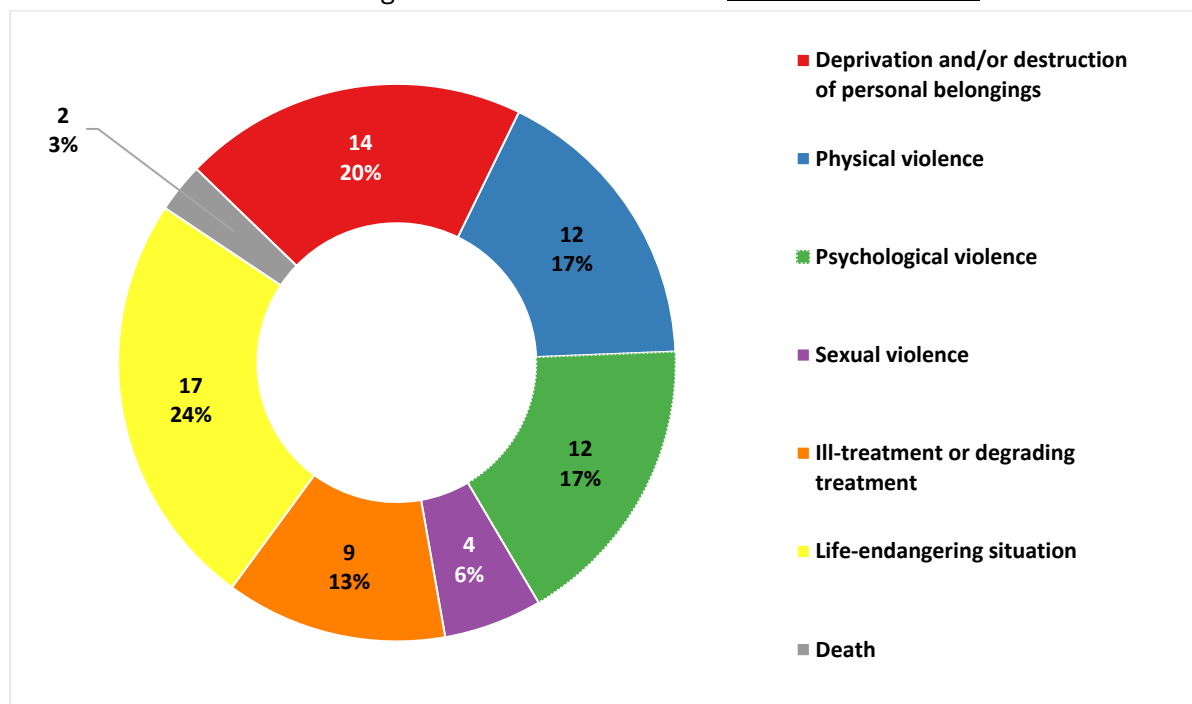
In 14 **maritime incidents**, there were reports of deprivation or destruction of personal belongings; in 12 incidents, physical violence was reported; in 12 incidents, psychological violence or threats were reported; in 4 incidents, sexual violence was reported; in 9 incidents, other forms of ill-treatment or degrading treatment were

reported; in 2 incidents, death was reported; in 17 incidents, life-endangering practices were noted; and in 2 incidents, family separation was reported (see *Graph 43b*).

Gr. 43a: Treatment of the alleged victims in the recorded **Evros incidents**.



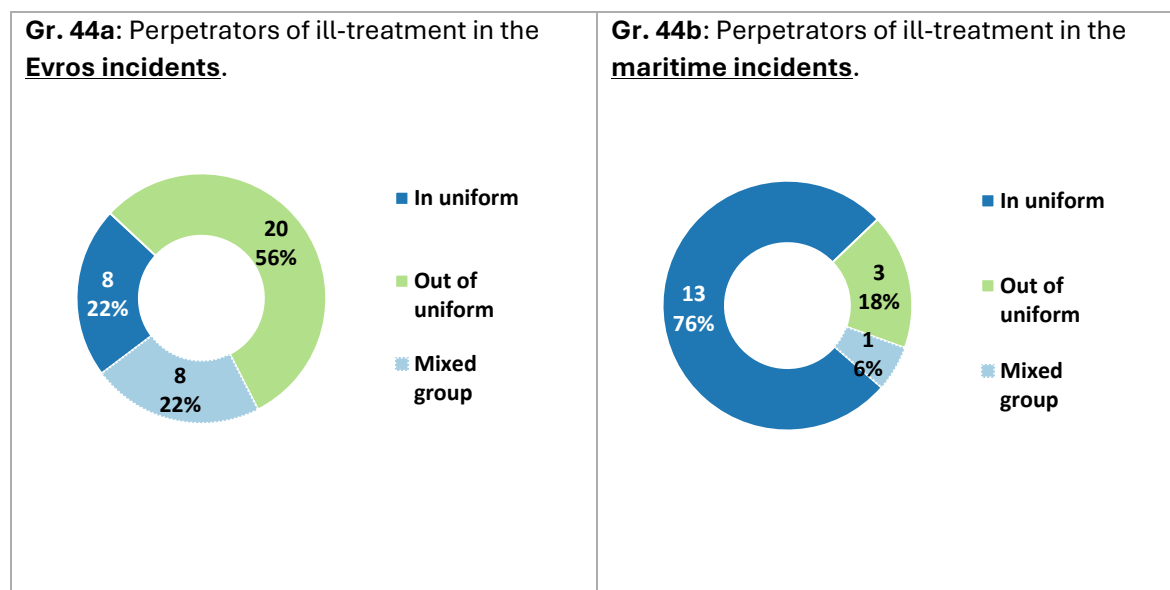
Gr. 43b: Treatment of the alleged victims in the recorded **maritime incidents**.



In 8 **Evros incidents**, the perpetrators were identified solely as uniformed individuals; in 20 incidents, they were identified solely as non-uniformed individuals; and in 8 incidents,

mixed groups of perpetrators were reported, namely groups consisting of both uniformed and non-uniformed individuals (see *Graph 44a*).

In 13 **maritime incidents**, the perpetrators were identified solely as uniformed individuals; in 3 incidents, solely as non-uniformed individuals; and in 13 incidents, mixed groups of perpetrators were reported, namely groups consisting of both uniformed and non-uniformed individuals (see *Graph 44b*).



IV. Supporting Evidence¹⁵

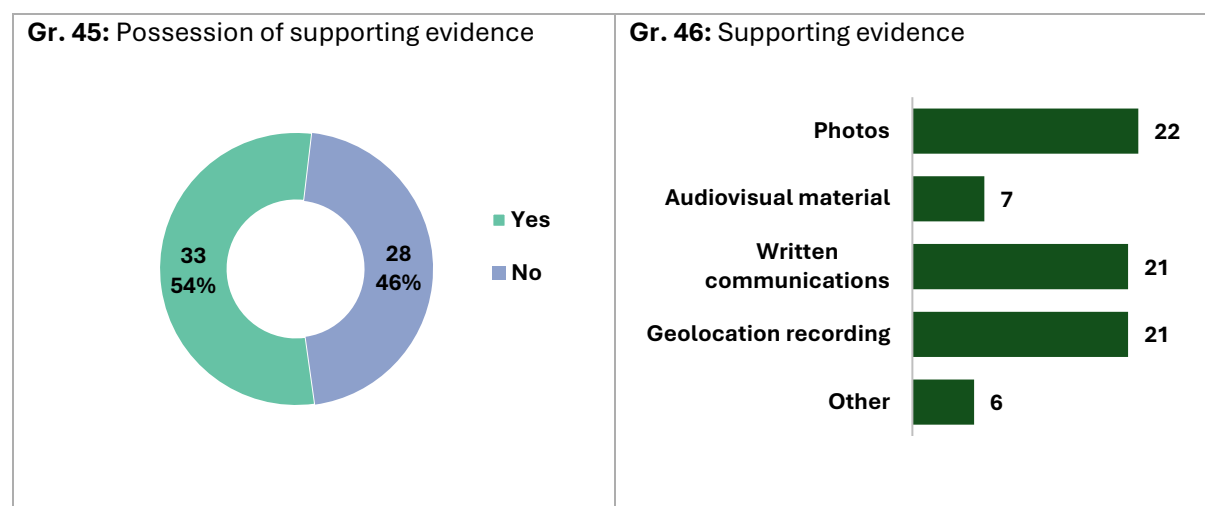
In 33 testimonies, the alleged victims reported that they possess evidence in support of their allegations.¹⁶ In the remaining 28 other testimonies, the alleged victims reported that they are no longer in possession of any evidence, which is usually justified by the

¹⁵ The Recording Mechanism has as its exclusive mandate the recording, in accordance with a specific methodology, of credible testimonies from individuals alleging that they have been victims of IFR incidents from the Greek territory to a third country or to their country of origin. The Recording Mechanism is not vested with the competence to investigate or to collect evidence from, or on behalf of, the alleged victims. In cases where the alleged victims are in possession of evidence documenting their allegations, such evidence remains in their own possession and may also be available to their legal representatives. Under no circumstances is such evidence in the possession of the Recording Mechanism, nor does the Recording Mechanism require victims to be in possession of such evidence as a precondition for the recording of a testimony, since, as indicated by the testimonies, in the majority of incidents the alleged victims were deprived of all their personal belongings.

¹⁶ Evidence refers to the statements made by the alleged victims during the recording procedure. The Recording Mechanism is not aware whether the alleged victims have retained until today the supporting evidence, allegedly possessed during the recording, or whether they have lost it or further enriched it.

fact that they had been deprived of their personal belongings, including photos, audio or video material, geolocation recording etc. by the alleged perpetrators (see *Graph 45*).

In 22 testimonies the alleged victims reported that up to the time of the recording procedure, they were in possession of photos, in 7 testimonies that they were in possession of audiovisual material, in 3 testimonies that they were in possession of written communications, in 21 testimonies they reported that they had recorded their geographical location on electronic devices and in 6 testimonies the alleged victims stated that they had in their possession other kind of supporting evidence, such as documents issued by the Turkish Authorities, whose content was related to illegal entries to Türkiye or articles published in the Turkish press (see *Graph 46*).



V. Legal Actions taken by the Alleged Victims¹⁷

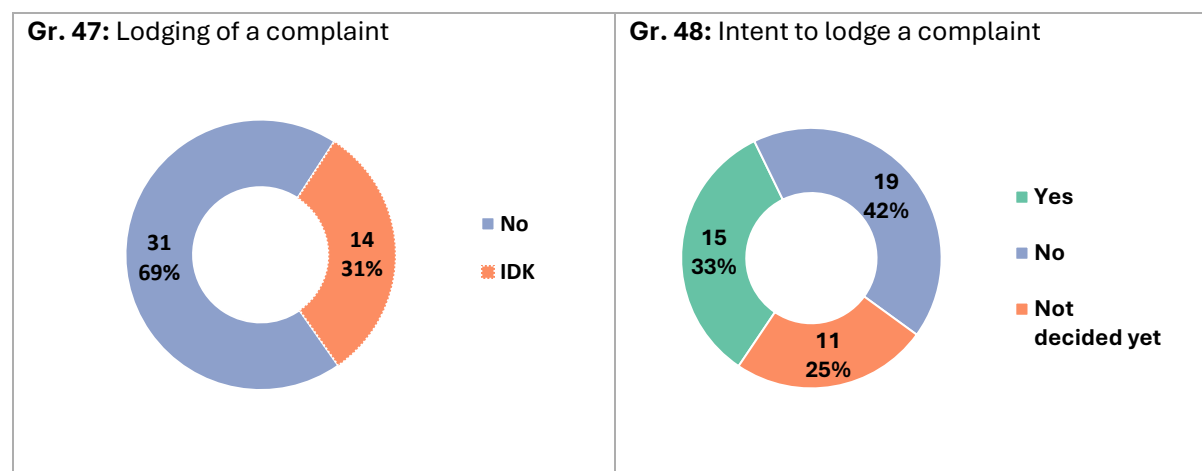
As evidenced by the records kept by the Recording Mechanism, the alleged victims in 28 incidents reported that they had not lodged formal complaints before competent national authorities, while in 1 incident, the alleged victim stated that they were unaware

¹⁷ It is noted that the Recording Mechanism does not operate as a legal counsellor, representative, or advisor of the alleged victims. This is a deliberate choice of the Recording Mechanism, as maintaining distance from the legal representation of the alleged victims is a prerequisite for ensuring the Mechanism's independence and impartiality. Additionally, the Recording Mechanism is not permitted to forward the individual Recording Forms of the alleged victims, which are in any case received by the Recording Mechanism in an anonymized form, to any other state authority without first obtaining the explicit and informed consent of the alleged victims. In all cases, alleged victims, should they so wish, may submit formal complaints, reports, or appeals to competent national or European institutional bodies, independently and in parallel to the recording of their testimony by the Recording Mechanism. Nevertheless, the Recording Mechanism, through the identification of alleged victims and the secure recording process, encourages and facilitates their recourse and access to Justice.

whether their legal representatives had lodged a formal complaint on their behalf before competent national authorities (see *Graph 47*).

The alleged victims involved in 14 IFR incidents have brought their cases before the European Court of Human Rights (ECtHR). In one incident, the victim lodged an appeal on the merits before the ECtHR. Prior to lodging applications before the ECtHR, the alleged victims, through their legal representatives, had informed the competent Greek authorities (Prosecutorial Authorities, Police, the Greek Ombudsman, the National Transparency Authority) of their presence in Greece, the need for rescue, and their intent to access international protection. In another incident, a criminal complaint was filed by the alleged victim, and in one further incident, the alleged victim filed a report with the Fundamental Rights Officer of FRONTEX.

Out of the 29 incidents in which, at the time of recording, the alleged victims had not filed an official complaint or were unaware whether their legal representatives had done so, in 5 incidents they stated that they intended to file one, while in 11 they stated that they did not. The most common reasons cited were fear of retaliation by the alleged perpetrators, concerns about a potential negative impact on their application for international protection, and fear of re-traumatisation. In the remaining 13 incidents, the alleged victims had not yet reached a decision (see *Graph 48*).



CHAPTER 3. Additional information

The Recording Mechanism sources its data from the recording of testimonies through personal interviews with alleged victims of incidents of IFR incidents, applying a rigorous and uniform methodology. This methodology encompasses multiple stages of assessment before a testimony is finalised in the Recording Mechanism's database, ensuring the reliability of the data collected by the Mechanism. The reliability of the data collected is guaranteed by the coherent application of methodological standards and, at a final stage, by the quality control carried out for each recording prior to its finalisation in the database of the Recording Mechanism.

Furthermore, data derived from information gathered by institutional bodies, such as the GNCHR, and findings from other entities, such as civil society organisations, serve as additional sources of information. These are utilised by the Recording Mechanism as reference points and for comparative evaluation to ensure the reliability of its own data and findings.

This chapter presents a summary of the findings derived from these sources.

I. Decisions on Interim Measures (R39) indicated by the European Court of Human Rights (ECtHR)

The GNCHR, as the National Human Rights Institution (NHRI) and the independent advisory body to the Greek State on matters pertaining to human rights, shall have among its areas of competence, the constant monitoring of developments related to the human rights situation in Greece, and the provision of assistance and advice to state stakeholders, on the harmonisation of national legislation and practice with the country's international and European commitments.

As the National Human Rights Institution in Greece, the GNCHR shall be monitoring the execution of judgements and decisions of the European Court of Human Rights (ECtHR), and therefore attaches particular importance to compliance with orders for interim measures, issued by the Court.

In 2024, there was a significant increase in applications for interim measures before the ECtHR. The GNCHR has been informed by Civil Society Organisations, such as the Greek Council for Refugees (GCR), which participates in the composition of the GNCHR and the Recording Mechanism's Plenary, and the Refugee Support Aegean (RSA), which participates in the composition of the Recording Mechanism's Plenary, regarding 58 incidents involving third-country nationals seeking asylum who irregularly entered Greek territory in various areas of the Evros border region. For these cases, 58 decisions on

interim measures were issued by the Court pursuant to Rule 39 of its Rules of Procedure, concerning a total of 460 applicants.¹⁸

By these decisions, the Court issued decisions requiring the Greek authorities to identify the applicants, prevent their removal from Greek territory, ensure access to the asylum procedure, and provide food, water, and adequate medical care.

It is noted that decisions issued pursuant to Article 39 of the Court's Rules, although not prejudging the Court's judgement on the merits of the cases, are issued only in exceptional circumstances and only where the applicants face a real risk of serious and irreparable harm.¹⁹ Compliance with these decisions is mandatory for the respondent State, and any failure to comply constitutes a violation of Article 34 of the European Convention on Human Rights (ECHR).²⁰

In 31 of these incidents, the GNCHR has intervened in writing to the Ministry of Citizen Protection, pointing out that provisional measures have been ordered and applicants from certain countries have increased needs for international protection, combined in certain cases with other elements such as the political or other activities of the applicants in their countries of origin.²¹

¹⁸ (571/24) N.G. & Y.Y. v Greece, (844/24) Z.S. & Others v Greece, (969/24) F.A. & Others v Greece, (2411/24) J.W. & Others v Greece, (5135/24) M.K. & Y.A. v Greece, (7521/24) A.M.A.H. & Others v Greece, (7560/24) B.M. & Others v Greece, (7861/24) Y.I. V Greece, (7855/24) M.Y. & N.G. v Greece, (10855/24) A.E. v Greece, (11163/24) E.H.A. v Greece, (11521/24) S.H. & Others v Greece, (11663/24) A.E. & Others v Greece, (11799/24) H.A. & Others v Greece, (12008/24) Y.S.H. & Others v Greece, (12182/24) M.M.S.S & Others v Greece, (12197/24) R.H.S. & Others v Greece, (12349/24) Q.M.O.M v Greece, (12426/24) A.I. & Others v Greece, (12444/24) H.I. & M.N. v Greece, (13222/24) F.Z.A. & Others v Greece, (13848/24) R.B. & Others v Greece, (15843/24) H.S.N. & Others v Greece, (16566/24) O.B.D. & Others v Greece, (16598/24) H.P. & M.Y. v Greece, (16685/24) H.M. & Others v Greece, (18464/24) A.S. & Others v Greece, (18468/24) Orgerim & Others v Greece, (18485/24) I.S. & Others v Greece, (18540/24) A.K. v Greece, (18550/24) N.W.A. & Others v Greece, (18585/24) B.C. & M.T. v Greece, (18956/24) Y.A. & Others v Greece, (21570/24) K.A. & Others v Greece, (23449/24) S.A. & Others v Greece, (23557/24) F.B. v Greece, (25633/24) R.S. & Others v Greece, (25772/24) K.A. & Others v Greece, (26038/24) A.S. & Others v Greece, (26043/24) G.H. & Others v Greece, (26399/24) G.A. & K.S. v Greece, (27268/24) D.M.S. & Others v Greece, (27659/24) O.C. & Others v Greece, (27671/24) F.I. & Others v Greece, (28495/24) M.A. & Others v Greece, (29481/24) S.H.O. & Others v Greece, (32385/24) O.A. & M.E.D. v Greece, (32441/24) A.N.G. & Others v Greece, (34200/24) H.C.S. & F.A. v Greece, (34345/24) F.E. & Others v Greece, (34609/24) S.F. & Others v Greece, (35261/24) S.K. & Others v Greece, (35469/24) E.M. & Others v Greece, (35772/24) I.A. v Greece, (36181/24) I.O. & Others v Greece, (35552/24) Y.F. & Others v Greece, (36459/24) Y.G. & B.O. v Greece, (36905/24) H.S.K. & Others v Greece).

¹⁹ See *inter alia* (32969/19) Rackete and others v Italy and (28774/22) K.N. v the United Kingdom.

²⁰ See (46827/99) Mamatkulov and Askarov v Türkiye.

²¹ These are the GNCHR letters with protocol numbers 50/10.1.24, 52/11.1.24, 125/25.1.24, 221/19.3.24, 223/20.3.24, 301/16.4.24, 307/22.4.24, 319/29.4.24, 352/23.5.24, 372/10.6.24, 445/8.7.24, 555/13.9.24, 576/1.10.24, 757/12.12.24, 698/28.11.24, 729/6.11.24, 757/12.12.24, addressed to the Minister for Citizen Protection and the Minister for Migration and Asylum, and copied to the Office of the United Nations High

Of these 31 written interventions by the GNCHR in 2024, 8 have received formal replies from the Hellenic Police Headquarters.²² According to these replies, in 8 incidents involving a total of 74 applicants, despite repeated efforts to locate and rescue them in the indicated locations, the competent authorities managed to locate only two of the applicants.

According to information communicated to the GNCHR, out of the 58 incidents mentioned above, in 25 the applicants later reported to their legal representatives that they had been subjected to IFRs to Türkiye; in 21 incidents the applicants' legal representatives lost all contact with them and their fate remains unknown; whereas only in 8 incidents was the outcome positive, as the competent authorities detected the 28 applicants, proceeded with their rescue, and subsequently registered their applications for international protection.²³

As for the legal developments, in 5 of the above cases a full appeal on the merits has been filed before the ECHR, in accordance with the standard procedure.²⁴

II. Testimonies received by children

During the 2024 reporting cycle, the Recording Mechanism of Informal Forced Returns recorded testimonies from alleged victims who, at the time of the interview, were adults or, in exceptional cases, minors close to reaching adulthood. The collection of testimonies from children, based on the tools and methodology of the Mechanism, has not yet been fully implemented, as the development of specialised tools and procedures tailored to the specific needs and rights of children is still in progress.

Nevertheless, organisations participating as Members in the Recording Mechanism, in the context of providing psychosocial and legal services to minors, regularly engage with children who report their involvement in incidents of Informal Forced Returns. During these interactions, children often refer to multiple attempts to enter Greece and subsequent returns to Türkiye, mainly across the Evros border. In these incidents, children claimed that, following their detection by Greek authorities, they were forcibly returned to Türkiye without any prior administrative procedure.

Commissioner for Refugees, the Greek Ombudsman, the European Border and Coast Guard Agency (Frontex), and the National Transparency Authority.

²² These replies are recorded under protocol numbers 1588/24/359542 and 1588/24/2316552 of the Hellenic Police Headquarters (Aliens and Border Protection Branch / Border Protection Directorate / Coordination Directorate for Border Management - KO.DI.S.ME.).

²³ These concern the applicants in the cases (571/24) N.G. & Y.Y. v Greece, (5135/24) M.K. & Y.A. v Greece, (7560/24) B.M. & Others v Greece, (7855/24) M.Y. & N.G. v Greece, (10855/24) A.E. v Greece, (12349/24) Q.M.O.M v Greece, (18540/24) A.K. v Greece, (25772/24) K.A. & Others v Greece.

²⁴ These concern the applicants in the cases (844/24) Z.S. & Others v Greece, (969/24) F.A. & Others v Greece, (18468/24) Orgerim & Others v Greece, (36181/24) I.O. & Others v Greece, (35552/24) Y.F. & Others v Greece.



Organisations recorded the relevant information using their own methodological tools, primarily within the framework of assessing the best interests of the child. Although these reports were not recorded according to the Recording Mechanism methodology, they provide important qualitative data. The non-standardised interview and the non-implementation of internally established protocols of the Recording Mechanism preclude full verification of their reliability; however, they come directly from children assisted and relate to experiences they claim to have endured.

During the reporting period, 85 unaccompanied minors (all male, with an average age of 16 years) reported a total of 361 IFR incidents, which allegedly occurred within a timeframe ranging from three years to one month prior to the interview date.

The incidents allegedly occurred either in the border area of Evros or at sea within the Greek territorial waters, particularly near the Dodecanese islands (Leros, Kos, Rhodes, Symi) and at unspecified locations. In addition, there were reports of incidents in parts of the hinterland, such as Thessaloniki and Komotini, as well as on islands like Lesbos and Chios.

According to children's testimonies, their detection was carried out by groups of uniformed and/or non-uniformed individuals, dressed in black or camouflage uniforms, with covered faces or wearing hoods. There were reports of gunshots fired into the air to intimidate and force people to return. In incidents occurred at sea, descriptions included intimidating manoeuvres by vessels circling around the boats of the alleged victims, creating waves, approaching by Coast Guard vessels or vessels bearing Greek insignia, removal of engines from boats, or forced boarding onto vessels without a motor.

As regards incidents that occurred in the area of Evros, testimonies reported transportation by van-type vehicles from detection locations – often in points within hinterland – to informal detention places and subsequently to locations of physical removal, where children were forced to cross the river by swimming or in inflatable boats.

A common feature of all testimonies is the inhumane and degrading treatment: beatings with wooden sticks, threats, seizure of personal belongings (mobile phones, documents, money, clothing), and destruction of documents. Specifically, in incidents at sea, explicit references were made to the throwing of children's documents into the sea.

While these reports do not constitute official records of the Recording Mechanism, they highlight the need to develop a specialised methodology for systematically recording children's testimonies in a manner consistent with child protection requirements and international standards.

CHAPTER 4. CONCLUSION

This report is the third successive annual report of the Recording Mechanism and confirms the solidity and operational maturity of its methodology, as applied successively from 2022 to 2024.

The vast majority of the alleged victims stated that they entered Greek territory from Türkiye, and in all cases where the physical removal is alleged to have been completed, Türkiye is reported as the country of return.

The demographic analysis of the 45 recorded alleged victims shows that 27 were men and 18 women, while 44 were adults and 1 was a minor at the time of the interview. Of particular importance is the finding that 24 out of the 45 alleged victims fall into categories of vulnerability, including 9 victims of torture, 7 victims of sexual violence, 7 victims of other serious physical or psychological violence, 6 single-parent families, as well as persons with serious health problems, mental illnesses, pregnancy or disability. This finding confirms that physical removal practices disproportionately affect people with a particular need for protection and enhanced safeguards.

It is noteworthy that 40 out of the 45 persons stated that they were never subjected to any official procedure of registration or identification by the Greek authorities, despite their detection, a fact which constitutes a serious indication of violation of Greece's obligations under national, Union and international law, and in particular of the safeguards arising from the right of access to the asylum procedure.

61

The gravity of the above finding is further intensified by the fact that, among the alleged victims, there are included three recognised refugees in Greece, one registered asylum seeker, as well as one asylum seeker whose application had been rejected by the competent authorities. The recording of these specific cases highlights the dangerous practice of forced removal of persons under a protection status or in the process of examining an application for international protection, thereby circumventing in a highly alarming manner the fundamental safeguards provided for by the Geneva Convention relating to the Status of Refugees, the Charter of Fundamental Rights of the EU and the EU Directives on reception and asylum procedures.

With regard to the nationality of the alleged victims, it is observed that the majority originate from countries with significant rates of recognition of international protection, such as Syria, Afghanistan, Iraq, Eritrea, Lebanon, Somalia, and Sierra Leone.

Special mention should be made to the recording of 11 Turkish nationals, as their return to Türkiye, which is their country of origin, without access to the asylum procedure and individualised assessment of the risk of persecution, constitutes a direct violation of the principle of non-refoulement, as enshrined both in the Geneva Convention relating to the Status of Refugees and in Article 3 of the ECHR, which prohibit the return of persons to



countries of origin or third States where they are threatened with persecution or serious harm.

The distinction between Evros and maritime incidents, as also reflected in the 2024 recordings, confirms the existence of two distinct operational settings, each characterised by different patterns of action and separate mechanisms of engagement.

The recorded Evros incidents are characterised by a significant topographical dispersal, as the detection of the alleged victims is not only limited to the border area, but also extends to urban centres of the hinterland, such as Thessaloniki or Komotini. This wide range of detection locations indicates the existence of a broader operational network, which is not strictly limited to the prevention of border crossing, but also includes *secondary actions* within the country.

In contrast, maritime incidents present a denser geographical distribution, and detection is observed to occur mainly in the maritime area near the coasts of the Eastern Aegean islands or in some cases also in the open waters, while detection on the land of the islands is observed more rarely. Such maritime incidents at sea indicate that the perpetrator's aim is to prevent access to the territory of the Greek islands. Therefore, actions in recorded incidents at sea, whether taking place within Greek territorial waters or in international waters under conditions that render the Greek authorities responsible (e.g. boarding of victims on a Coast Guard vessel), follow an operational model characterised by enhanced control and proactive targeting, aimed at preventing the disembarkation of alleged victims on the territory of the islands. Detection in the maritime environment, often near Lesbos, Samos, or Chios, exhibits a higher degree of recurrence and a distinct geographical pattern.

The demographic analysis demonstrates that, although the maritime incidents make up only 1/3 of the total number of incidents, they concern, however, almost 2/3 of the total number of individuals detected during the detection stage of all the recorded incidents. The maritime incidents do not present any dispersal at the detection stage, resulting in fewer detection occurrences related to these incidents, but involving larger groups of alleged victims per detection occurrence.

Furthermore, with regard to the operational identity of the detectors, it emerges that both in the area of Evros and at sea, the majority of incidents involve uniformed detectors. In Evros however, a significant percentage of detections (40%) is attributed either to mixed groups, i.e. groups consisting of both uniformed and non-uniformed or to groups exclusively of non-uniformed detectors. The role of non-uniformed detectors appears more prevalent in the area of Evros, a fact that may be linked to the action of informal mechanisms and possible non-state actors. It is not excluded, however, that some of the non-uniformed detectors were members of the security forces, operating in civilian clothing.

At sea, according to testimonies of the alleged victims, detectors bear characteristics of Coast Guard personnel. However, there are also references to the use of hoods, weapons, and absence of identifying insignia, common characteristics that are also recorded in the Evros incidents, thereby enhancing operational secrecy and lack of transparency.

Informal detention, in those incidents where it is carried out using distinct infrastructure, constitutes a critical intermediate stage between detection and physical removal in the IFR incidents.

The majority of informal detention incidents are recorded in Evros (15 incidents), with only 1 incident occurring at sea. The topographic analysis demonstrates the existence of a multidimensional network of detention places, which includes facilities resembling Police Stations or Border Guard Stations (10 incidents), places bearing characteristics of a Pre-departure Detention Centre or guarded facilities of other use (1 incident), and informal or unidentified structures, such as unknown buildings, outdoor spaces or even vehicles (9 incidents).

The spread and variety of these locations suggest the existence of a network of infrastructure used for deprivation of liberty in an informal detention regime.

The phenomenon of *successive detention* was observed in incidents occurring exclusively in Evros. In these incidents, the alleged victims were transferred sequentially to two or even more different detention places before ending up at the point of their physical removal from the country.

This observed practice appears to serve operational needs related to the geographical distance of the detection point from the final point of physical removal. However, the use of successive detention places reveals the complexity of the operational planning in the execution of IFR incidents. On the one hand, the need for more facilities, means of transport and human resources and, on the other, their effective interconnection add an extra layer of organisation and gradual execution to these activities, amplifying their impact and suggesting the existence of a solid mechanism operating in distinct stages with a clear role-sharing.

According to testimonies, in the 15 incidents that occurred in Evros, involving informal detention, the minimum number of detainees is estimated at 874 individuals, of whom 149 were women, 74 were children, and 57 were persons with special needs (e.g. serious medical problems, elderly people, persons with disabilities). The corresponding (unique) incident at sea involved 31 individuals, with a high percentage of those identified as vulnerable: 6 women, 11 children and 3 people with severe needs. The high number of vulnerable persons involved in incidents where informal detention occurred highlights the abusive nature of these practices.

The guarding of detainees in the area of Evros is carried out to a greater extent by groups of uniformed personnel operating either alone (6 incidents) or in mixed groups with non-uniformed persons (8 incidents).

According to testimonies the uniformed guards bore characteristics of Police personnel (13 cases) or in one case of the Army. Their uniforms are mainly blue, but green or black ones have also been reported, with distinctive insignias (Greek flag, Hellenic Police, etc.). There was also observed systematic use of full-face hoods (6 testimonies), as well as portable arming and suppression equipment, radios, handcuffs, bulletproof vests, batons, and even trained dogs.

The non-uniformed guards, despite the lack of uniform clothing, presented characteristics of relative operational uniformity, using full-face hoods, radios and bearing arms. In the majority of the incidents, there are serious indications of their coordination with the authorities, either due to their co-presence with uniformed personnel or due to transfer from places operating under the control of police forces.

The languages of the guards were mainly Greek and English, both for uniformed and non-uniformed guards, however, among the non-uniformed guards other languages were also recognised, such as Arabic, Turkish, Farsi/Dari, Urdu. This multilingualism enhances the image of a mixed operational group with different backgrounds and supporting functions that includes persons originating from the same countries as the alleged victims.

The final act of physical removal, as described in the testimonies of alleged victims for the 2024 recording cycle incidents, presents clear and repetitive characteristics both as to its geographic footprint as well as to the demographic characteristics of the alleged victims and the composition and characteristics of the actors alleged to be involved in its execution. These features are in addition to all the previous ones relating to the recognition that there have been operational planning and consistent patterns of action that do not constitute piecemeal or ad hoc measures, but rather a repetitive practice of violating the principle of non-refoulement.

The analysis of data shows that the act of physical removal is systematically carried out along the two main geographical points of entry into Greek territory. In the Evros incidents, the removal is alleged to be carried out mainly through crossing the river, irrespective of whether the detection has taken place in the border area or in urban fabric of the hinterland. Correspondingly, in the maritime incidents, the removal is alleged to be carried out in the Eastern Aegean area. The systematic nature of these places where the physical removal act is executed, is indicative of a standard operational topography, which is repeated over time.

In the vast majority of Evros incidents (32 out of 35), groups of non-uniformed removers are alleged to be involved, either alone or in coordination with uniformed personnel. It is important to note that in 30 of these incidents, according to testimonies, there is a link

between the non-uniformed removers and state agencies or uniformed representatives of the authorities (detectors or guards), a fact supporting indications of state involvement or tolerance.

Correspondingly, at sea, the active involvement of removers bearing characteristics of Hellenic Coast Guard personnel is apparent in 14 out of 17 incidents, an element that differentiates the maritime operational setting in terms of greater institutional involvement of uniformed personnel. The presence of non-uniformed removers is also recorded in incidents at sea, but on a much smaller scale, with indications of coordination with the authorities in 2 incidents and association in 2 more.

The multilingualism of the non-uniformed removers in Evros, often revealing knowledge of languages spoken by migrant and refugee communities (e.g. Turkish Farsi/Dari, Arabic, Urdu, etc.), suggests active involvement of individuals with cultural proximity to the alleged victims as intermediaries, a fact that is likely linked to the intention of the uniformed removers to disengage from the final phase of physical removal, by diffusing responsibility. The absence of this characteristic in the maritime incidents, both among uniformed and non-uniformed removers, demonstrates the almost exclusive participation of removers bearing characteristics of Coast Guard personnel with limited involvement of intermediaries or persons not institutionally integrated into the operations.

In 17 cases the phenomenon of *convergent removal* was observed. More specifically, alleged victims or groups of alleged victims are reported to have been detected at different places and times from each other or even to have been informally detained at different informal detention places from each other, before finally being gathered and led all together to a large common physical removal operation. The combination of different narratives reveals the existence of multiple detection or even informal detention events that are operationally merged into a single removal event. Moreover, in such incidents, there emerges a difference between the number of the individuals detected, those who were finally placed under informal detention and those who were subjected to physical removal.

These incidents indicate that there is a network of coordinated actions, with multiple centres of operational control and distribution of roles. There are indications of use of different infrastructures, vehicles, personnel, technological means, as well as the rotation of distinct groups of perpetrators who appear to be working in coordination with the aim of carrying out the final phase of the removal.

Convergent removal incidents provide additional evidence of the gradual and organised implementation of the IFR operations with combination of different places of detection, detention and final removal. Successive detention places and gathering of persons from different locations in one common physical removal operation suggest the existence of a plan and role-sharing.

The methodology of physical removal presents significant differentiations between the incidents in Evros and the incidents at sea. Although in all cases the absence of legal procedures and the use of coercive practices is established, the characteristics of the execution differ significantly both as to the means of implementation of the removal and as to the methods.

In the Evros incidents, the act of physical removal appears to be part of a consistent operational plan, predominantly involving transfer by boat across the Evros River, mainly using small boats, with most of those removed ending up on the Turkish bank of the river. However, variations of the same *forcible thrusting* practice were observed. In certain incidents, the alleged victims were taken by boat only to the middle of the river and were thrust into the water, being forced to cross the rest of the river on foot or by swimming. In one case, the alleged victim was forced to drive the boat alone towards the Turkish side, after being forcibly pushed away. Other incidents involved alleged victims being pushed towards the river and compelled to cross it entirely to the Turkish bank, either on foot or by swimming. This practice of *forcible thrust* appears to reflect a strategy aimed at distancing the removers from the direct responsibility of physical removal. In very few incidents, victims were forced to cross on foot through the Evros fence or via informal crossing points, reflecting geographical knowledge, tactical flexibility, and coordinated role allocation in the execution of IFRs.

In the incidents at sea, the pattern of *abandonment* of the alleged victims in floating means prevails, mainly in life-rafts or non-self-propelled boats. Of particular concern are indications related to the *actions to obstruct buoyancy*, such as the removal or destruction of engines, the dumping of fuel or even deliberate damage to the integrity of the floating means. In addition, the creation of waves by means of manoeuvres by the removers' vessels is reported, as well as pushing the boats with poles, with the aim of removing the alleged victims from Greek territorial waters. This pattern, unlike that encountered in the Evros incidents, is characterised by actively cutting off victims from any possibility of navigation or rescue, a factor that increases the risk and danger to the lives of the alleged victims. Moreover, in two incidents at sea, there were human casualties.

The above data constitute significant findings on the axis of geographical differentiation. In Evros, the pattern of *cross-border transfer* or *forcible thrust*, while at sea the prevailing pattern is *abandonment* or *actions to obstruct buoyancy*. In both cases, however, the structured nature, repeated patterns, and pre-planned actions are recorded, which negate the argument of isolated or fragmentary operations.

The analysis of testimonies of the alleged victims, recorded during the 2024 recording cycle, reveals a pattern of systematic and multifaceted violent behaviour, with compelling indications of inhuman and/or degrading treatment of the alleged victims in violation of Article 3 of the ECHR.

In almost the entirety of the recorded incidents (47/52), the alleged victims denounced deprivation or destruction of personal belongings, often critical for personal safety or proof of their personal and legal status (identity documents, mobile phones, money). In 39 incidents, physical violence was recorded in various forms and escalations ranging from pushes, punches and kicks to blows with batons and tasers, while psychological violence and threat, such as pointing with weapons, insults and threats against life, is equally prevalent (42 incidents).

Particular concern is raised by allegations of sexual violence in at least 10 incidents, including 1 allegation of rape. Degrading practices such as stripping, body searches by persons of different gender and forced removal of shoes are also common. In 35 incidents, real life-endangering practices were recorded, such as abandonment in unseaworthy boats or violent thrusts away into the Evros river.

On the axis of geographical differentiation, the treatment indicators show various forms of violent treatment (physical, sexual, psychological, degrading treatment) at higher percentages in the Evros incidents than in incidents at sea, while life-endangering practices are more frequent in incidents at sea than in those in the area of Evros.

Family separation practices were recorded in 3 incidents in total, revealing an additional serious violation of International Refugee Protection Law and the Convention on the Rights of the Child.

Overall, the range and intensity of the recorded practices highlight a pattern of systematic ill-treatment and endangerment of life with common operational characteristics and repetitive patterns, which indicate either tolerance on the part of competent authorities or the existence of a mechanism with established characteristics that emphasises not only the removal from the territory, but also the deterrent, punitive or degrading treatment of those attempting to enter or remain in the country.

This finding enhances the need for independent, effective, and specialised investigations into the circumstances under which the reported violations occurred, with the aim of ensuring accountability, punishing the perpetrators, and providing redress to the victims, while also preventing similar practices and securing compliance with the State's international obligations.

CHAPTER 5. RECOMMENDATIONS

The following recommendations are formulated by the Recording Mechanism, based on the findings and analysis of the present Report. They reflect the main concerns arising from testimonies of the alleged victims and are intended to enhance accountability, ensure access to international protection for those claiming to be in need thereof, and secure compliance with the state's international obligations in the field of human rights.

The Recording Mechanism is making the following recommendations to the Greek Authorities:

1. Ensure that all state authorities strictly apply the principle of non-refoulement and act in full compliance therewith.
2. Ensure that the competent state authorities promptly carry out rescue operations within the maritime area of their responsibility, in accordance with their obligations under International Law.²⁵
3. Undertake a comprehensive review of the operational plans and procedures applied in cases of maritime emergencies, in order to early recognise high-risk situations and effectively coordinate search and rescue operations, in conjunction with issuing clear instructions to the field units to avoid any action that could aggravate the situation or increase the risk to human life.
4. Ensure adequate training of personnel of the border services/law enforcement agencies - such as the Hellenic Coast Guard, Police, Border Guard, the Reception and Identification Service, and the Asylum Service - as well as the adoption of binding codes of conduct for such personnel.
5. Implement the recommendation of the Council of Europe Commissioner for Human Rights, according to which Greek authorities must ensure that border control operations are carried out at any time in full compliance with the obligations arising from the European Convention on Human Rights (ECHR) and other relevant sources of international human rights protection.²⁶ In particular:
 - Adopt a zero-tolerance approach towards summary returns, ill-treatment, arbitrary detention, and other serious human rights violations, ensuring the immediate and effective end to such practices, as well as the rehabilitation of victims.

²⁵ See: UNHCR, Legal considerations on the roles and responsibilities of States in relation to rescue at sea, non-refoulement, and access to asylum, December 2022, available at: <https://tinyurl.com/5be88s6t>.

²⁶ See: Council of Europe Commissioner for Human Rights – Memorandum on Migration and Border Control, following the Commissioner's visit to Greece from 3 to 7 February 2025, p. 4, available at: <https://tinyurl.com/5deezk6n>.

- Ensure the prompt, impartial, thorough, and effective investigation of any credible allegation of summary returns, ill-treatment, and related violations, in accordance with the case-law of the European Court of Human Rights, guaranteeing the participation of victims and their relatives in the proceedings, as well as their access to adequate compensation.
6. Immediately end the reported practice of informal forced returns of families and children, ensuring their individual identification, registration, and protection in line with Articles 6, 22, and 37 of the Convention on the Rights of the Child, and provide support, rehabilitation, and protection to child victims, in accordance with the recommendation contained in the Concluding Observations of the UN Committee on the Rights of the Child.²⁷
 7. Proceed with the ratification of the Fourth Additional Protocol to the ECHR, which prohibits collective expulsions.
 8. Pursue full compliance with the interim measures Decisions of the ECtHR, issued pursuant to Rule 39 of its Rules of Court, and in particular with regard to the immediate identification of third-country nationals located in the Greek territory, the prevention of any kind of their removal therefrom, the provision of adequate food, water and medical care, their unhindered access to the asylum procedure and to legal remedies, while underlining that compliance with the interim measures Decisions of the Court is mandatory and that failure to comply may result in a conviction of the State.
 9. Ensure that all applicants for international protection have access to the asylum procedures and that all third-country nationals are protected from IFRs, in accordance as well, with the recommendations included in the Concluding Observations of the UN Committee on Enforced Disappearances.²⁸
 10. Ensure the provision of information to third-country nationals or stateless persons at border crossing points and in detention facilities regarding the possibility of lodging an application for international protection; provide interpretation services adequate to ensure access to the asylum procedure; and guarantee the access of organisations and persons providing advice and counselling, in accordance with the provisions of Article 8 of Directive 2013/32/EU, on common procedures for granting and withdrawing of international protection status and the Recast Proposal.

²⁷ See UN Committee on the Rights of the Child – Concluding Observations on the combined fourth to sixth periodic reports of Greece, CRC/C/GRC/CO/4-6, June 2022, para. 40, available at: <https://tinyurl.com/mu9fdzmv>.

²⁸ See Committee on Enforced Disappearances – Concluding observations on the report submitted by Greece under article 29(1) of the International Convention for the Protection of All Persons from Enforced Disappearance, CED/C/GRC/CO/1, para.29, May 2022, available at: <https://tinyurl.com/yv8a86hs>.

11. Ensure the independent and effective investigation of complaints lodged by persons alleging to have been subjected to IFR incidents and other incidents of serious human rights violations at the borders, in line with the provisions of Circulars No. 1/2023 and 18/2023 of the Office of the Prosecutor of the Supreme Court,²⁹ emphasising that any omission to act in this respect not only is contrary to the obligations of the Greek Authorities under international human rights law and the ECHR, but also exposes the State and may lead to further findings of violations by the ECtHR [see, indicatively, *A.R.E. v. Greece* (no. 15783/21) and *Safi and Others v. Greece* (no. 5418/15)].
12. Ensure compliance with the procedures provided by law and guarantee that those responsible for any illegal actions are brought to justice.
13. Guarantee, through the use of technological equipment and other means of operational action, that objective evidence, such as the metadata derived from mobile phones, GPS devices/applications, photos and videos, are collected and subsequently delivered at the disposal of the law enforcement agencies and judicial Authorities, for the effective investigation of the reported IFR incidents.
14. Make use of the possibilities provided for in the Greek Code of Criminal Procedure and in the Council of Europe Convention of 1959, on mutual legal assistance in criminal matters, where necessary.
15. Take measures to ensure the effective access of victims to justice and their protection, in a manner commensurate with other victims of criminal acts, such as victims of trafficking in human beings and victims of forced labour, with particular attention to victims residing abroad.
16. Launch, in cooperation with the competent bodies of the European Union, the establishment of an independent and effective national mechanism for monitoring compliance with fundamental rights at the external borders of the European Union,³⁰ in accordance with the relevant Guidelines of the European Union Agency for Fundamental Rights (FRA) and the relevant ten points jointly communicated to the Greek authorities by the United Nations High Commissioner for Refugees (UNHCR), the Office of the United Nations High

²⁹ See the Circular of the Prosecutor of the Supreme Court No 1/2023, available only in Greek here: <https://tinyurl.com/3dhvw8v4>, and the Circular of the Prosecutor of the Supreme Court No18/2023, available only in Greek here: <https://tinyurl.com/bdffn6xp>.

³⁰ See European Union Agency for Fundamental Rights (FRA), Monitoring fundamental rights compliance during screening and asylum procedures at the border — Guidance for national independent mechanisms, September 2024, available at: <https://tinyurl.com/3aa62adx>.



Commissioner for Human Rights (OHCHR), and the European Network of National Human Rights Institutions (ENNHRI).³¹

17. Ensure the full investigation of any potential liability, act, or omission that may have contributed to the shipwreck of Pylos, in accordance with the standards established in the case-law of the European Court of Human Rights, and in particular in *Safi & Others v Greece* (5418/15).
18. To reform the legislative framework governing the composition of the Special Committee for Compliance with Fundamental Rights of the Ministry of Migration and Asylum, so that the participation of the GNCHR therein is aligned with the independent advisory role on human rights matters entrusted to it by the State.
19. Refrain from any form of public rhetoric that undermines the institutional role of the Independent Authority of the Greek Ombudsman, and to proceed with the prompt and substantive elaboration of the Ombudsman's Report on the shipwreck of Pylos, including the adoption of appropriate disciplinary measures against those found to have acted in breach of their duties.
20. Ensure an enabling environment for the activities of civil society and human rights defenders, in line with the recommendations contained in the Concluding Observations of the United Nations Human Rights Committee on the third periodic report of Greece.³²
21. Show zero tolerance for incidents of harassment, attacks, hate speech, and any other form of targeting of human rights defenders by official State bodies, by adopting a coherent policy to prevent such phenomena, in line with the recommendations contained in the Concluding Observations of the United Nations Committee on the Elimination of Racial Discrimination,³³ as well as with the recommendation of the Racist Violence Recording Network (RVRN) for the promotion of actions aimed at combating hate speech and institutional racism against refugees, migrants, and their defenders.³⁴
22. Proceed without delay to the revision of the registration requirements for non-governmental organisations and their members in the Registers of the Ministry of Migration and Asylum, so as not to unduly and disproportionately hinder the

³¹ See UNHCR, OHCHR, ENNHRI “Ten points to guide the establishment of an independent and effective national border monitoring mechanism in Greece”, available here: <https://tinyurl.com/2tth3mre>.

³² See United Nations Human Rights Committee – Concluding Observations on the third periodic report of Greece, CCPR/C/GRC/CO/3, November 2024, para. 21, available at: <https://tinyurl.com/88sm446p>.

³³ See United Nations Committee on the Elimination of Racial Discrimination – Concluding Observations on the combined twenty-third and twenty-fourth periodic reports of Greece, CERD/C/GRC/CO/23-24, December 2024, para. 21, available at: <https://tinyurl.com/3t5jya4u>.

³⁴ See 2023 Annual Report of the RVRN available at <https://tinyurl.com/5n8pdu27>.

activities of such organisations, in line, *inter alia*, with the recommendation of the European Commission in its 2022 Rule of Law Report on Greece.³⁵

23. Refrain from initiating criminal proceedings against organisations or other categories of human rights defenders for providing humanitarian assistance to third-country nationals or for the performance of their professional duties (e.g. lawyers, journalists, medical doctors, and rescue personnel).
24. For those human rights defenders who already have criminal proceedings pending, to guarantee their rights and delivery of judgements, pursuant to an expedited procedure, in accordance with the guarantees provided, *inter alia*, Article 6 of the ECHR. For attorneys at law specifically, adjust the way they are treated by the competent state bodies, in accordance with the requirements and recommendations of the Athens Bar Association.³⁶

³⁵ See: European Commission Rule of Law Report (Chapter on Greece) 2023, available at: <https://tinyurl.com/53nrycwf>.

³⁶ See: Opinion of the Athens Bar Association (ΔΣΑ) with Reference No. 143/2023, available on the website of the European Council on Refugees and Exiles (ECRE) only in Greek here <https://shorturl.at/fAOZ2>.

ANNEX – Frameworks of the Recording Mechanism

I. Founding Framework

The Greek National Commission for Human Rights (GNCHR) is the independent advisory body to the Greek State on matters pertaining to the protection of human rights, and the National Human Rights Institution (NHRI) in Greece. It was established by Law 2667/1998, in accordance with the *Paris Principles*³⁷ adopted by the UN General Assembly Resolution no. 48/134 “National Institutions for the Promotion and Protection of Human Rights” (NHRIs) of 20 December 1993. The GNCHR has acquired legal personality, functional, administrative and financial independence, under the provisions of Law 4780/2021, amending its founding legislation. Since 2001, the GNCHR has been accredited with A-status, (full compliance, in accordance with the UN Paris Principles) by the competent Global Alliance of National Human Rights Institutions (GANHRI) Sub – Committee on Accreditation, in recognition of its independence and effective fulfilment of its role.

According to Law 4780/21, the main mission of GNCHR consists of:

- constantly monitoring matters pertaining to human rights protection, raising public awareness and promoting research in this field,
- exchanging experience at supra-national and international level with similar bodies of other States, the European Union or international organisations, such as the Council of Europe, the Organisation for Security and Co-operation in Europe and the United Nations and
- formulating policy proposals on matters falling within its remit.

In particular, the GNCHR is entrusted, within the framework of its mandate, with the responsibility to continuously highlight to all State institutions the necessity of effectively safeguarding human rights, to inform public opinion about the risks of violations that may arise, and, above all, to provide guidance to the Greek State for the formulation of sound central policy on matters pertaining to human rights.

An additional guarantee of the GNCHR’s independence is its pluralistic and diverse composition, which enables it to maintain an ongoing dialogue between various civil society actors and the State. Its Plenary Assembly consists of a total of 20 members nominated by Independent Authorities, Higher Education Institutions, Research Institutes, tertiary Trade Union Organisations, Civil Society Organisations, and Bar Associations. The National Commission includes, through liaison officers, representation from the Hellenic Parliament via the President of the Permanent Special

³⁷ UN Office of the High Commissioner for Human Rights (OCHR), *Principles relating to the Status of National Institutions* (Paris Principles), available at: <http://tinyurl.com/u2bt443f>

Parliamentary Committee on Institutions and Transparency, the Ministries with relevant competencies, and parliamentary political parties.

Since its establishment, the GNCHR has attached great importance to the respect of human rights of refugees and migrants residing in Greece. Taking into account complaints about informal forced returns from Greek territory to third countries, introduced for discussion in the GNCHR Plenary, by CSOs participating in its composition by appointed members, such as the Hellenic League for Human Rights³⁸ and the Greek Council for Refugees,³⁹ the GNCHR proceeded to issue a relevant *Announcement*⁴⁰ and subsequently a *Statement*⁴¹ calling on the Greek Authorities to respect the principle of non-refoulement and to thoroughly investigate the relevant complaints.

The GNCHR in its *Reference Report on the Refugee and Migration Issue (Part A)*,⁴² called on the Greek Authorities to take all appropriate measures to ensure respect for the principle of non-refoulement, the unimpeded, early and effective access of third-country nationals illegally entering Greece, to International Protection Procedures, without any discrimination based on race, religion, nationality, participation in social groups or political opinion, as well as the early and thorough investigation of all complaints about informal forcible refoulements occurred in the area of the Evros River.

On 18 June 2020, the 3rd Section of the GNCHR on the *Application of Human Rights to Aliens*, held a hearing of stakeholders and persons. The hearing was attended by representatives of the Government, of the competent law enforcement agencies, of international and regional institutions, independent authorities, and civil society organisations.⁴³

³⁸ See: HLHR, Complaint on refoulements from the region of Evros River, 6 February 2018, available only in Greek at: <http://tinyurl.com/mrxptdjz>, and HLHR Press Release, More refoulements of Turkish asylum seekers in Evros, 06.06.2017, available at: <http://tinyurl.com/5n7hczcx>.

³⁹ GCR, Reports of systematic pushbacks in the Evros region, 20.02.2018, available at: <https://tinyurl.com/5dhykkc6>, and GCR Press Release, GCR submits complaints after refugees' allegations of pushbacks at the region of Evros, 19.06.2019, available only in Greek at: <http://tinyurl.com/44varks2>

⁴⁰ GNCHR, Statement on the allegations of irregular push backs in Evros, July 2017, available only in Greek at: <http://tinyurl.com/9jydemtu>.

⁴¹ GNCHR, Statement on complaints regarding informal pushbacks at the region of Evros, 29.11.2018, available at: <http://tinyurl.com/5e2u7ymu>.

⁴² GNCHR, Reference Report on the Refugee and Migrant Issue, Part A Refugees, September 2019, available only in Greek at: <http://tinyurl.com/5dczaj2b>. A summary and the Key Recommendations of this Report are available in English at: <http://tinyurl.com/mrxnr97y>

⁴³ See: GNCHR Press Release, Hearing of public authorities and persons on refugee and migrant issues during the meeting of the Third Sub - Commission of the GNCHR, 19.06.2020, available at: <http://tinyurl.com/bxp3fa8v>.

Following the aforementioned hearing, the GNCHR issued a *Statement*,⁴⁴ calling on the Greek authorities, *inter alia*, to guarantee that all bodies of the Greek State fully comply with the principle of non-refoulement, to establish an official independent mechanism responsible for the recording and monitoring of complaints about informal refoulements, to effectively investigate allegations about informal refoulements, disproportionate use of force and lethal injuries and to bring those responsible for any such illegal actions before the Judicial Authorities.

A more comprehensive analysis of refugees' and migrants' rights, was presented by the GNCHR in the updated *Report on the Refugee and Migration Issues (Part B)* in September 2020.⁴⁵

In particular, the GNCHR, in its July 2021 *Report on the Situation of the Rights of Migrants at the Borders*,⁴⁶ highlighted specific issues concerning the situation of migrants' rights at the borders, with reference to the reported IFR Incidents and the alleged violence, as well as to the requisite accountability for the reported violations.

In addition, the GNCHR is closely monitoring and taking into consideration the reports of international organisations, such as the United Nations High Commissioner for Refugees⁴⁷ (UNHCR) and the International Organisation for Migration⁴⁸ (IOM), as well as

⁴⁴ GNCHR, Statement on the reported practices of push backs, 9.07.2020, available at: <http://tinyurl.com/2tbkdkxm>.

⁴⁵ GNCHR, Reference Report on the Refugee and Migrant Issue, Part B', September 2020, available at: <http://tinyurl.com/283r8h4b>.

⁴⁶ GNCR, National Report on the Situation of Human Rights of Migrants at the Borders, July 2021, available at: <http://tinyurl.com/2nb94ucr>

⁴⁷ UNCHR Press Release: UNHCR deeply concerned at reports of informal forced returns from Greece to Turkey, June 2017, available at: <http://tinyurl.com/33nn69yn>. UNCHR Press Release: UNHCR calls on Greece to investigate pushbacks at sea and land borders with Turkey, June 2020, available at: <http://tinyurl.com/ye29f93k>. UNCHR Press Release: UNHCR concerned by pushback reports, calls for protection of refugees and asylum-seekers, August 2020, available at: <http://tinyurl.com/tk7d3j9f>. UNHCR Press Release: UNHCR warns asylum under attack at Europe's borders, urges end to pushbacks and violence against refugees, January 2021, available at: <http://tinyurl.com/vzw5a2xe>.

⁴⁸ IOM Press Release: *IOM Alarmed over Reports of Pushbacks from Greece at EU Border with Turkey*, June 2020, available at: <http://tinyurl.com/ycxmzktn>. IOM Press Release: *IOM Concerned about Increasing Deaths on Greece-Turkey Border*, February 2022, available at: <http://tinyurl.com/3c6y3rnd>. IOM Press Release: *More than 5,000 Deaths Recorded on European Migration Routes since 2021*, October 2022, available at: <http://tinyurl.com/56wve4k5>.



of international,⁴⁹ European⁵⁰ and national⁵¹ human rights protection bodies, which indicate that there is a gradual but steady consolidation of the characteristics of the IFR incidents, involving a repetitive methodology.

Following the aforementioned interventions, the GNCHR, building on its experience from the establishment and the eleven-year operation of the Racist Violence Recording Network⁵² and in the context of its institutional role as a bridge between the State and the Civil Society, decided to proceed with the establishment of the Recording Mechanism of Incidents of Informal Forced Returns.⁵³ Subsequently, pursuant to the authorisation of the NCHR Plenary, a Working Group was constituted with the mandate to draft the Founding Act of the Mechanism for Recording Incidents of Informal Forced Returns and to develop a Form for Recording Incidents of Informal Forced Returns (hereinafter

⁴⁹ UN Committee Against Torture, CAT/C/GRC/CO/7: *Concluding observations on the seventh periodic report of Greece*, September 2019, available at: <http://tinyurl.com/ms9x8atu>. UN Working Group on Arbitrary Detention: *Preliminary Findings from its visit to Greece (2 - 13 December 2019)*, December 2019, available at: <http://tinyurl.com/3ap6jh66>. UN Special Rapporteur on the Human Rights of Migrants, *Report on means to address the human rights impact of pushbacks of migrants on land and at sea*, May 2021, available at: <http://tinyurl.com/4ahad4cd>.

⁵⁰ Commissioner for Human Rights of the Council of Europe, *Report of the Commissioner after her visit to Greece on 25-29 June 2018*, November 2018, available at: <http://tinyurl.com/y8wufvnn>. Statement by the Commissioner for Human Rights of the Council of Europe, *Time to immediately act and to address humanitarian and protection needs of people trapped between Turkey and Greece*, 03.03.2020, available at: <http://tinyurl.com/58u8jh8n>. Commissioner for Human Rights of the Council of Europe, *Letter by the Commissioner to the Ministers of Citizen's Protection, of Migration and Asylum, and of Shipping and Island Policy of Greece*, May 2021, available at: <https://rm.coe.int/0900001680a256ad>. European Committee for the Prevention of Torture and Inhuman or Degrading Treatment or Punishment (CPT), *Report to the Greek Government on the visit to Greece carried out by the CPT from 10 to 19 April 2018*, February 2019, available at: <https://rm.coe.int/0900001680930c9a>. European Committee for the Prevention of Torture and Inhuman or Degrading Treatment or Punishment (CPT), *Report to the Greek Government on the visit to Greece carried out by the European Committee for the Prevention of Torture and Inhuman or Degrading Treatment or Punishment (CPT) from 13 to 17 March 2020*, November 2020, available at: <https://rm.coe.int/0900001680a06a86>.

⁵¹ Greek Ombudsman, *Interim Report on the alleged pushbacks to Turkey of foreign nationals who had arrived in Greece seeking international protection*, January 2021, available at: <http://tinyurl.com/4h645y6e>. National Mechanism for the Investigation of Arbitrary Incidents (EMIDIPA), *Annual Report 2021, June 2022*, available at: <http://tinyurl.com/4ab2r26d>, and *Annual Report 2022, October 2023*, available at: <http://tinyurl.com/mrxwbhvj>

⁵² The Racist Violence Recording Network (RVRN) is a joint initiative of the Greek National Commission for Human Rights (GNCHR) and the Office of the United Nations High Commissioner for Refugees in Greece (UNHCR) operating along with non-governmental organisations and stakeholders. It is currently comprised of 52 NGOs providing legal, medical, social or other supporting services and come into contact with victims of racist violence, and 2 organisations as observers. Click here <https://rvrn.org/en/> for more information

⁵³ The relevant decision was unanimously adopted at the GNCHR Plenary meeting on 09.07.2020.



“Recording Form”).⁵⁴ At its meeting on 27 September 2021, the NCHR Plenary approved the procedural acts for the commencement of the Mechanism’s operation.

Since the establishment of the Recording Mechanism, its Supervisor has been attending the GNCHR Plenary Meetings and providing information on all developments related to the operation and activities of the Recording Mechanism.

II. Operational Framework

The objective of the Recording Mechanism is to monitor, record and bring to light the phenomenon of IFR incidents against third-country nationals, from Greece to other countries. It aims to foster and establish respect for the principle of non-refoulement, as well as to safeguard adequate guarantees and compliance with legal procedures. Moreover, the objective of the Recording Mechanism is to reinforce accountability for reported human rights violations allegedly occurred in the course of IFR incidents against third-country nationals, from Greece to other countries. By adopting a coherent, transparent and scientific recording methodology, the Recording Mechanism seeks to enhance the credibility of the reported incidents.

The Recording Mechanism was founded by a decision of the Plenary of the GNCHR in September 2021 as the response of the National Human Rights Institution (NHRI) following two key findings: a) the absence of an official and effective mechanism for the recording of the reported IFR incidents and b) the necessity of establishing interconnection among stakeholders which, on their own initiative, record incidents alleged to have occurred against individuals who seek services from them

Respect for human rights, diversity, multiculturalism, freedom of religion, as well as active engagement in promoting the rights of third-country nationals, are prerequisites in order for a civil society organisation to become member of the Recording Mechanism.

Non-Governmental Organisations (hereinafter NGOs) are Civil Society Organisations, and their establishment constitutes an expression of private initiative. Their operation shall be governed at national level, by Article 12 of the Constitution of Greece, under which “...the right to form non-profit associations and unions...”,⁵⁵ at European level, by

⁵⁴ The relevant delegated act was unanimously adopted at the GNCHR Plenary meeting on 12.11.2020.

⁵⁵ The Constitution of Greece, Art. 12 “Greeks shall have the right to form nonprofit associations and unions, in compliance with the law, which, however, may never subject the exercise of this right to prior permission. An association may not be dissolved for violation of the law or of a substantial provision of its statutes, except by court judgment. The provisions of the preceding paragraph shall apply, as the case may be, to unions of persons not constituting an association. Agricultural and urban cooperatives of all types shall be self-governed according to the provisions of the law and of their statutes; they shall be under the protection and supervision of the State which is obliged to provide for their development. Establishment by law of compulsory cooperatives serving purposes of common benefit or public interest or common exploitation of farming areas or other wealth producing sources shall be permitted, on condition however that the equal treatment of all participants shall be assured”, available at: <http://tinyurl.com/f7upe9dv>.

Article 11 of the European Convention on Human Rights under which “*Everyone has the right to freedom of peaceful assembly and to freedom of association with others...*”,⁵⁶ and at EU level, by Article 12 of the EU Charter of Fundamental Rights, under which “*...Everyone has the right to freedom of peaceful assembly and to freedom of association at all levels...*”⁵⁷ NGOs active in the humanitarian field (related to migrants, refugees or other matters) offer, free of charge and on the basis of the principle of equal treatment, a wide range of services to the population served, such as legal advice and assistance, medical consultation, prevention and care, psychological support and treatment, social support and empowerment, housing, educational activities, protection and fostering of minors, while in numerous cases, provide their assistance to authorities - during the period that the latter, due to several reasons, fail to fulfil their legally binding public service obligations to third-country nationals - such as interpretation services or official recognition of victims of torture. They operate in an immediate and flexible way, while their action goes in-depth into issues related to the population served. The added value of the freedom of action of these entities lies in their role as a vital link in maintaining the integration of served populations within the social fabric, while contributing to the cultural and social inclusion of populations originating from diverse cultural and social backgrounds. At the same time, they play a cultural mediator’s role, fostering better engagement with communities, peaceful and harmonious coexistence, and cultural dissemination and enrichment. Their action and operation should be encouraged and safeguarded in the context of an open and democratic society. The obstruction of their action deprives the served populations of access to essential services necessary for their livelihood and the exercise of fundamental rights, thereby contributing to the disruption of social cohesion, an increase in criminality, instances of vigilantism, the rise of racism and hate speech, and violent incidents. Furthermore, erecting barriers to or even

⁵⁶ European Convention on Human Rights (ECHR), Article 11: “*Everyone has the right to freedom of peaceful assembly and to freedom of association with others, including the right to form and to join trade unions for the protection of his interests. No restrictions shall be placed on the exercise of these rights other than such as are prescribed by law and are necessary in a democratic society in the interests of national security or public safety, for the prevention of disorder or crime, for the protection of health or morals or for the protection of the rights and freedoms of others. This Article shall not prevent the imposition of lawful restrictions on the exercise of these rights by members of the armed forces, of the police or of the administration of the State*”, available at: https://www.echr.coe.int/documents/d/echr/Convention_ENG

⁵⁷ EU Charter of Fundamental Rights, Article 12: “*Everyone has the right to freedom of peaceful assembly and to freedom of association at all levels, in particular in political, trade union and civic matters, which implies the right of everyone to form and to join trade unions for the protection of his or her interests. Political parties at Union level contribute to expressing the political will of the citizens of the Union*”, available at: https://www.europarl.europa.eu/charter/pdf/text_en.pdf.



criminalising the work of human rights defenders, lawyers,⁵⁸ medical professionals, social workers, rescuers, and others creates a stifling environment around democratic rights and freedoms at an overall level.⁵⁹

Organisations - Members of the Recording Mechanism have legal personality and representation in Greece and have submitted their statutes to the Recording Mechanism, with a view to establish their legal personality and the alignment of their operational purposes with those of the Recording Mechanism. Organisations - Members of the Recording Mechanism have signed its Founding Act and have undertaken the commitment to pursue its common objectives, to make use of its means, and to apply its Methodology.

The organisations that have acquired the status of Members of the Recording Mechanism, in accordance with its Founding Act, are the following:⁶⁰

- Greek Council for Refugees
- Hellenic League for Human Rights
- Network for Children's Rights
- Medical Intervention (MedIn)
- Metadrasi - (Action for Migration and Development)
- Greek Transgender Support Association
- Refugee Support Aegean
- HIAS Greece
- Legal Centre Lesbos
- Equal Rights Beyond Borders
- International Rescue Committee (IRC)

79

The United Nations High Commissioner for Refugees (UNHCR) Office in Greece within the framework of its mandate, provides the Recording Mechanism with its technical support and expertise on International Protection of Refugees, as a co-operating Agency. Furthermore, the Greek department of Amnesty International has acquired the status of Observer.

III. Methodological framework

The Recording Mechanism shall record testimonies collected from third-country nationals or stateless persons, irrespective of their legal status in Greece, namely, irrespective of whether they are irregular migrants, registered or unregistered asylum

⁵⁸ See: Opinion of the Athens Bar Association (ABA) with Ref.No. 143/2023, available only in Greek through the website of the European Council on Refugees and Exiles (ECRE): <https://shorturl.at/fAOZ2>

⁵⁹ OHCHR, Visit to Greece: Report of the Special Rapporteur on the Situation of Human Rights Defenders, Mary Lawlor, available here <https://tinyurl.com/44ntxaej>.

⁶⁰ Update by 31 May 2025.



seekers or recognised refugees and international protection beneficiaries, who allege to have been victims of IFR incidents from the Greek territory either directly to their country of origin (or former habitual residence for stateless persons) or to a third country. The objective of the Recording Mechanism is neither to investigate nor to verify the incidents reported, nor obviously can it function as an institution ensuring accountability for perpetrators of criminal, civil, administrative or disciplinary acts. The Recording Mechanism shall exclusively record testimonies by conducting personal interviews with the alleged victims, in order to contribute to enhancing the credibility of alleged incidents and to bring to public discourse the perspective of alleged victims.

Its aim, however, is not to record every testimony or incident of IFR, which may have occurred within the Greek territory. The Recording Mechanism aims rather at recording testimonies, that can comply with the very demanding requirements for completing the Recording Form, so that patterns and recurrent practices can be brought to light. This is actually a deliberate restriction set out by the Recording Mechanism, in order to ensure that recordings provide, to the greatest extent, testimonies that meet a fairly high level of credibility, based on the ability of the alleged victims to describe the incidents they claim to have experienced or at least to answer detailed questions about them.

The above-mentioned procedural guarantees significantly affect the number of recordings that can be accepted by the Recording Mechanism. Additional factors affecting the number of the recorded testimonies include the alleged victims' reluctance, fear, trauma or post-traumatic stress disorder, the temporal distance from the events, the geographical distance between the testimony Recorder and the alleged victim, and other relevant considerations. Consequently, the Recording Mechanism considers that its capacity to record testimonies by the alleged victims of IFR incidents is limited to what is commonly referred to as the "tip of the iceberg."

The operation of the Recording Mechanism is developed along the following 5 methodological axes.

A. Definition of an IFR incident

The cornerstone of the methodology of the Recording Mechanism is the definition of an IFR incident, as established in joint consultations with its Members and adopted by them in its Founding Act. No recording act shall be finalised by the Recording Mechanism, if the facts reported do not comply with that definition. For the scope of the Recording Mechanism an IFR incident is defined as *the informal deportation, removal, 'pushback' or return, by summary proceedings outside the legal framework, of third-country nationals, including asylum seekers and holders of legal residence titles in Greece, from the Greek territory, without individual examination of international protection or other needs, and without the possibility of having recourse to legal remedies, which may lead to a direct or indirect breach of the principle of non-refoulement as stipulated in Article 3 of the Geneva Convention, Article 3 of the International Convention against Torture,*



Article 3 of the European Convention on Human Rights, or the principles of international customary law.

B. Personal Interview

Testimonies are being recorded through personal interviews with the alleged victims of IFR incidents, conducted by testimony Recorders, nominated by the Members of the Recording Mechanism, usually with the assistance of interpreters, to ensure mutual understanding. The interviews are conducted, following the verification of the identity of the alleged victims, in a secure environment, by any appropriate means. The testimony Recorders, whether social workers, legal professionals, medical practitioners, or other scientists, professionals, or volunteers, are appointed by the Members and trained by the Supervisor of the Recording Mechanism. The Recording Mechanism does not record in the Incident Recording Forms indirect testimonies, narratives, or claims of third parties, i.e., individuals who are not victims of IFR incidents. Potential exceptions may be made in respect of testimonies provided by third parties when: (a) due to reasons of force majeure or vulnerability of the alleged victim (such as, indicatively, impossibility of tracing, disappearance, serious illness, imprisonment or death), the alleged victim is unable to participate in the relevant interview; (b) the person providing the testimony is reasonably in a position to substantiate their knowledge of the facts to which their testimony refers; and (c) the testimony is corroborated by direct testimony from another alleged victim involved in the same incident.⁶¹

81

C. Consent

An essential prerequisite for conducting a recording interview of testimony regarding an IFR incident is the prior written consent of the alleged victim, following complete information provided in a language they understand regarding the content of the Consent Form, the purposes of the interview, and the manner in which their personal data and testimony will be used.

D. Common IFR Incident Recording Form

Testimonies shall be recorded on a common Recording Form as developed by the Recording Mechanism through joint consultation meetings of its Members and the UNHCR. In order to address the needs of recording a complex phenomenon with multiple stages of implementation (detection or informal arrest, informal detention or restriction of freedom of movement, physical removal), the Recording Form is structured into corresponding sections and subsections, with the aim of collecting details and information concerning the identity of the alleged perpetrators, the locations and times relevant to each stage of the incident—from detection within the territory of the Hellenic

⁶¹ For the reporting period concerned, the Recording Mechanism has recorded one testimony through this exceptional procedure.



Republic to the fate of the alleged victim following their removal therefrom—and record the *modus operandi* of the alleged perpetrators. Finally, any stated wish of the alleged victim for further action in relation to their case, such as whether they have lodged, or wish to lodge, a complaint before the competent authorities, shall be recorded on each Incident Recording Form.⁶²

E. Quality Control of Recordings

The Recording Forms are subject to quality control by the Recording Mechanism. This process includes verifying the completeness of each Incident Recording Form, ensuring that it has been correctly completed in accordance with the relevant Guidelines, and confirming that the factual circumstances recorded in each new Form correspond to the indicators of informality⁶³ contained in the definition of IFR incident, as set out in the Founding Act of the Recording Mechanism.

⁶² This is without any obligation on the part of the alleged victim to do so and without any commitment on the part of the Recording Mechanism that it will intervene to ensure that the necessary legal action is taken.

⁶³ See Chapter 2- II, p. 48 et seq.



HELLENIC REPUBLIC
GREEK NATIONAL COMMISSION FOR HUMAN RIGHTS (GNCHR)

Recording Mechanism
of Informal Forced Returns

6, N.Vamva str., 106 74 Athens
T: (+30) 210 723 3224 - recordingmechanism@nchr.gr

nchr.gr