GLOBAL DETENTION PROJECT

30 YEARS OF ACTION

GREEK COUNCIL FOR REFUGEES

# GREECE

## ISSUES RELATED TO IMMIGRATION DETENTION

Joint Submission to the Working Group on Arbitrary Detention in Preparation for its Mission to Greece in December 2019

*Submitted in October 2019*

## ABOUT THE GLOBAL DETENTION PROJECT

The Global Detention Project (GDP) is a non-profit organisation based in Geneva that promotes the human rights of people who have been detained for reasons related to their non-citizen status. Our mission is:

- To promote the human rights of detained migrants, refugees, and asylum seekers;
- To ensure transparency in the treatment of immigration detainees;
- To reinforce advocacy aimed at reforming detention systems;
- To nurture policy-relevant scholarship on the causes and consequences of migration control policies.

## ABOUT THE GREEK COUNCIL FOR REFUGEES

The Greek Council for Refugees (GCR) is a Greek non-governmental organization, active since 1989, providing legal assistance and social support to persons in need of international protection in Greece. GCR has a Consultative Status in the Economic and Social Council of the UN and is an implementing partner of the UN High Commissioner for Refugees. *Inter alia* GCR is regularly visiting, upon its capacity, Pre-removal Detention Facilitates, police stations and other detention facilities across the country.

**Global Detention Project**
3 rue de Varembé
1202 Geneva
Switzerland
**Email:** admin@globaldetentionproject.org
**Website**: www.globaldetentionproject.org

**Greek Council for Refugees**
Solomou 25
106 82, Athens
Greece
**Email:** gcr1@gcr.gr
**Website**: www.gcr.gr

## Submission to the Working Group on Arbitrary Detention in Preparation for its Mission to Greece in December 2019

The Global Detention Project (GDP) and the Greek Council for Refugees (GCR) are pleased to provide the Working Group on Arbitrary Detention (WGAD) the following submission in preparation for its visit to Greece in December 2019. The submission concerns the detention of migrants and refugees and mainly addresses situations that fall within the scope of the WGAD's Category IV of types of arbitrary detention, namely: "when asylum seekers, refugees or migrants are subjected to prolonged administrative custody without the possibility of administrative or judicial review or remedy."

Following the WGAD's visit to Greece in January 2013, the Working Group issued a number of recommendations relating to immigration detention.[1] In addition to highlighting critical new concerns that have emerged since the 2013 visit, this submission provides some details that may assist the WGAD in assessing whether its previous recommendations have been implemented in light of the WGAD's Revised Deliberation No.5.

The key recommendations from 2013 were:

- Lawfulness and proportionality of detention: the WGAD recommended that Greece use detention as a last resort and explore "alternatives to detention";
- Length of detention: the WGAD recommended that detention be limited to the minimum time necessary to carry out removal or other proceedings;
- Children: the WGAD recommended that Greece refrain from detaining unaccompanied children and families with children;
- Procedural safeguards: the WGAD recommended that Greece systematically inform detainees in writing and in a language they understand the reasons for their detention and their rights, and ensure that detainees have access to interpreters and lawyers and the possibility to challenge their detention;
- Conditions of detention: the WGAD urged Greece to place migrants in dedicated detention facilities and ensure hygienic conditions, adequate food, clothes, space, and freedom of movement in the facility.

Similar recommendations were recently formulated by other international monitoring bodies. Following his mission to Greece in May 2016, the UN Special Rapporteur on the human rights of migrants (SRHRM) urged Greece to consider alternatives to detention, order detention based on individual assessment, refrain from detaining unaccompanied children and families with children, improve detention conditions and procedural safeguards, ensure independent monitoring of the centres, and ensure that immigration detainees have access to lawyer, can promptly contact their

[1] Working Group on Arbitrary Detention, "Report of the Working Group on Arbitrary Detention: Addendum: Mission to Greece, A/HRC/27/48/Add.2," 30 June 2014, http://www.ohchr.org/EN/Countries/ENACARegion/Pages/GRIndex.aspx

families, have access to their mobile phones, access to doctor and interpreter, and can challenge their detention.[2]

Since the WGAD's visit to Greece, three UN treaty bodies have issued specific recommendations to Greece, namely the Committee against Torture (CAT) in 2019, the Committee on the Elimination of Racial Discrimination (CERD) in 2016, and the Human Rights Committee (HRC) in 2015.

The CAT recommended that Greece refrain from detaining asylum seekers and irregular migrants for prolonged periods, use detention as a measure of last resort and for the shortest period possible and continue the application of non-custodial measures, ensure that immigration detainees have access to counsel; guarantee judicial review to challenge the legality of detention; ensure adequate living conditions in all immigration centres; ensure adequate medical and mental health care to detainees; establish an effective and independent oversight mechanism giving possibility to detainees to bring complaints; ensure that all allegations of torture and ill-treatment by law-enforcement officials are promptly, thoroughly, and impartially investigated by the authorities, that the perpetrators are prosecuted, and if found guilty, punished and that victims are provided with redress. The Committee also urged Greece to ensure that children are not detained solely because of their immigration status and cease detaining migrants and asylum seekers, especially unaccompanied children, in police holding cells (§ 21 and 23).[3]

The CERD urged Greece to eliminate the automatic detention of migrants arriving on the islands after the conclusion of the statement by the European Union and Turkey on migration, introduce alternatives to detention, ensure that those deprived of their liberty enjoy due process and take measures to convert the reception and identification centres on the islands into open centres (§ 23).[4]

The HRC called upon Greece to ensure that detention of all irregular migrants is necessary and proportionate and for the shortest possible period of time, and that alternatives to detention are available in law and implemented in practice. The Committee also recommended ensuring decent living conditions in detention centres, by providing adequate health care services, food, and sanitary conditions (§ 28).[5]

Despite the intense and ongoing international attention that Greece has received since the WGAD's visit in 2013, it is widely documented that the issues the WGAD and other human rights bodies have addressed during these years with regards to immigration detention remain relevant today. At the same time, new issues have emerged, including as a result of the 2016 EU-Turkey Statement (commonly referred to as the "EU-Turkey deal") and the closure of the so-called Balkan corridor in 2016,

---

[2] Special Rapporteur on the Human Rights of Migrants, "Report of the Special Rapporteur on the Human Rights of Migrants on his Mission to Greece, A/HRC/35/25/Add.2," 24 April 2017, http//www.ohchr.orgEN/Issues/Migration/SRMigrants/Pages/CountryVisits.aspx

[3] UN Committee against Torture (CAT), "Concluding Observations on the Seventh Periodic Report of Greece, CAT/C/GRC/CO/7," 2019, https://www.ohchr.org/EN/Countries/ENACARegion/Pages/GRIndex.aspx

[4] UN Committee on the Elimination of Racial Discrimination (CERD), "Concluding Observations on the Twentieth to Twenty-Second Periodic Reports of Greece, CERD/C/GRC/CO/20-22," 3 October 2016, https://www.ohchr.org/EN/Countries/ENACARegion/Pages/GRIndex.aspx

[5] UN Human Rights Committee (HRC), "Concluding Observations on the Second Periodic Report of Greece, CCPR/C/GRC/CO/2," 3 December 2015, http://www.ohchr.org/EN/Countries/ENACARegion/Pages/GRIndex.aspx

both of which had important impacts on detention practises on both the islands and the mainland. Also importantly, legislative amendments presented by the Greek Government in October 2019 would, if adopted, lead to drastic changes with regards to the detention of asylum seekers.

It should be emphasised that Greece faces a disproportionate burden as one of the key entry points into the EU, a burden that is compounded by the Dublin Regulation, which allows other countries to transfer people back to Greece.[6] Hence, the policies of the EU and other member states have been important contributing factors in the predicament non-citizens face in Greece.

## Critical concerns include:

- A new draft law on asylum has been tabled by the Greek Parliament on 21 October 2019, which according to UNHCR "*introduces extensive provisions for the applicants to be detained*,"[7] thus threatening to undermine the principle that detention of asylum seekers should only be applied exceptionally and as a measure of last resort. The draft law proposes:
    - The possibility of detaining asylum seekers even when they apply for international protection when not detained, on the basis of any of the grounds provided by Directive 2013/32/EU, contrary to the current legislation which exceptionally provides detention only in cases where the person applies for asylum while already detained in view of return/deportation.
    - Extending the maximum duration of detention. According to the draft law, the detention of an asylum seeker can be imposed for an initial period up to 50 days and it can be successively prolonged up to the maximum time limit of 18 months. Furthermore, and as clearly stipulated by the draft law, the detention period in view of removal (return/deportation etc) is not calculated in the total time, and thus the total detention period of a non-citizen within the migration context may reach 36 months (18 months while the asylum procedure + 18 months in view of removal).
    - Abolishing critical guarantees, including automatic (ex officio) judicial examination of the decision imposing/prolonging the detention of asylum seekers[8] and the obligation of issuing a recommendation by the Asylum Service on the continuation of a detention measure prior to detention.
    - The possibility (Article 116 (8) and (13)) for the Reception and Identification Service to establish and operate "closed Temporary Reception Facilities for third-country citizens or stateless persons who

[6] Commission Recommendation of 8 December 2016 addressed to the Member States on the resumption of transfers to Greece under Regulation (EU) No. 604/2013, C(2016) 8525

[7] UN High Commissioner for Refugees (UNHCR), "UNHCR urges Greece to Strengthen Safeguards in Draft Asylum Law," 24 October 2019, https://www.unhcr.org/gr/en/13170-unhcr-urges-greece-to-strengthen-safeguards-in-draft-asylum-law.html

[8] Working Group on Arbitrary Detention (WGAD), "Revised Deliberation No. 5 on Deprivation of Liberty of Migrants," 7 February 2018: "Any form of detention, including detention in the course of migration proceedings, must be ordered and approved by a judge or other judicial authority."

have applied for international protection and against whom a detention decision is issued," which would be "organised like Pre-removal Detention Centres," in effect mandating the creation of new detention centres.[9]

- Immigration detention is on rise. The number of administrative detainees in Greece is one of the highest among all EU member states. Following a significant reduction of the number of detainees in 2015, the use of administrative detention has been gradually resumed, in particular after the launch of the EU-Turkey Statement of 18 March 2016. A total number of 31,126 detention orders were issued in 2018, compared to 25,810 in 2017. The total number of asylum seekers detained in 2018 was 18,204, almost doubling 2017 figures (9,534). Out of the total 2,933 persons detained by the end of 2018, 1,815 were asylum seekers.[10]

- No individual assessment procedure prior to the imposition of detention is in place and detention continues to be applied indiscriminately, including against vulnerable applicants—families with children, persons suffering from mental health problems, victims of torture, among others—while non-custodial "alternatives" are not examined or applied in practice. This results in migrants and asylum seekers being systematically detained. Within the framework of the EU-Turkey Statement, in Lesvos and Kos island, authorities continue to automatically detain upon arrival and for the entire asylum procedure, asylum applicants from countries that have low asylum recognition rate (below 25% in Lesvos and below 33% in Kos).[11]

- In contrast to the EU Returns Directive, Greek legislation includes ground for detention on account of threat to public order or national security. Public order is used as a ground for detention in an excessive and frequently wholly unjustified manner. This is particularly the case where these grounds are based solely on a prior prosecution for a minor offence, even if no conviction has ensued, or in cases where the person has been released by the competent Criminal Court after the suspension of custodial sentences. In addition, detention on national security or public order grounds has been also ordered for reasons of irregular entry into the territory, contrary to Article 31 of the Refugee Convention and the prohibition on detaining asylum seekers on account of their irregular entry or presence under Article 46(1) of Law 4375/2016.[12]

- Access to the asylum procedure while in detention remains a matter of serious concern as the full registration of the asylum application of detainees is delayed

[9] See: Greek Council for Refugees (GCR), "GCR's Comments on the Draft Bill 'On International Protection,'" 21 October 2019, https://www.gcr.gr/media/k2/attachments/GCR_on_bill_about_International_Protection_en.pdf

[10] Greek Council for Refugees (GCR), "AIDA Report on Greece, Update 2018," https://www.asylumineurope.org/reports/country/greece; Greek Council for Refugees (GCR), "Administrative Detention in Greece: Findings from the Field (2018), Executive Summary," https://www.gcr.gr/media/k2/attachments/GCR_Leaflet_ENGL_small_v1.pdf

[11] Greek Council for Refugees (GCR), "AIDA Report on Greece, Update 2018"; Greek Council for Refugees (GCR), "Administrative Detention in Greece: Findings from the Field (2018)," https://www.gcr.gr/media/k2/attachments/GCR_Leaflet_ENGL_small_v1.pdf

[12] Greek Council for Refugees (GCR), "AIDA Report on Greece, Update 2018"; Greek Ombudsman, "Return of Third Country Nationals, Special Report," 2018, https://www.synigoros.gr/resources/docs/english-final.pdf

depending on the capacity of the Asylum Service and the number of detainees willing to apply for asylum. Delays in the full registration of asylum applications lodged by detainees results in the deprivation of basic procedural guarantees and in delays as regards the asylum procedure in detention, including the excess of the three months' maximum detention time limit provided by law for asylum seekers.[13]

- Detention is imposed against persons who belong to vulnerable groups, including those who suffer physical or mental health issues, and families with minors and unaccompanied children (UAMs).[14] The immigration detention of children is not prohibited by national law. There is a critical lack of reception capacity for UAMs, which results in unaccompanied children being held in "protective custody" in substandard conditions as they await transfer to an age-appropriate facility. Detention on the basis of the provisions concerning "protective custody" is not subject to a maximum time limit.[15] No assessment of the best interests of the child takes place before or during detention. Moreover, no age assessment procedure is provided by the national framework to be applied by the Hellenic Police for minors held in detention. Thus, children may find themselves detained with adults due to their wrongful identification and registration as adults and shortcomings in age assessment procedures.[16] As of 30 September 2019, 238 children remained under "protective custody" in police facilities while an additional number of UAMs remained in conditions tantamount to *de facto* detention in Evros Reception and Identification Centre (RIC).[17] In 2019, the European Court of Human Rights has twice granted interim measures under Rule 39 with regards to UAMs who remained detained in Tavros Pre-removal Detention Facility, Kolonos Police Station (Athens), and Amigdaleza Pre-removal Detention Facility, while awaiting to be transferred to a shelter.[18] In May 2019, the European Committee of Social Rights of the Council of Europe urged the Greek authorities to take "*immediate measures*" with a view to avoiding serious, irreparable injury to the integrity of migrant minors at immediate risk of life, physical and moral integrity and *inter alia* "to ensure the

[13] UN High Commissioner for Refugees (UNHCR), "Recommendations by the Office of the United Nations High Commissioner for Refugees Concerning the Execution of Judgments by the European Court of Human Rights in the Cases of *M.S.S. v. Belgium and Greece* and of *Rahimi v. Greece*," https://search.coe.int/cm/Pages/result_details.aspx?ObjectId=090000168094938c; Greek Council for Refugees (GCR), "Administrative Detention in Greece: Findings from the Field, 2018."

[14] Greek Council for Refugees (GCR), "AIDA Report on Greece, Update 2018,"; Greek Council for Refugees (GCR), "Administrative Detention in Greece: Findings from the Field, 2018)."

[15] Article 118 PD 141/1991.

[16] Greek Council for Refugees (GCR), "AIDA Report on Greece, Update 2018,"; see also: "Submission by the UNHCR in the case of International Commission of Jurists (ICJ) and European Council for Refugees and Exiles (ECRE) v. Greece (Complaint No. 173/2018) before the European Committee of Social Rights," August 2019, https://rm.coe.int/cc173casedoc5-en-observations-by-the-unhcr/168096c416

[17] National Center of Social Solidarity (NCSS), "Situation Update: Unaccompanied Children (UAC) in Greece," 30 September 2019, https://data2.unhcr.org/en/documents/download/71629

[18] Greek Council for Refugees (GCR), "The European Court of Human Rights Grants Interim Measures in Favour of Two Detained Unaccompanied Girls," 28 March 2019, https://bit.ly/36dGMyi; Arsis, "The ECHR Grants Interim Measures Putting an End to the Detention of Unaccompanied Minors in Police Stations," 10 October 2019, http://www.arsis.gr/en/press-release-the-echr-grants-interim-measures-putting-an-end-to-the-detention-of-unaccompanied-minors-in-police-stations/; Efsyn.gr, "The ECtHR Issues a Second Decision on Interim Measures for Unaccompanied Minors", 18 October 2019, https://www.efsyn.gr/ellada/koinonia/215393_deyteri-apofasi-asfalistikon-metron-apo-edda-gia-asynodeytoys-anilikoys

use of alternatives to detention of migrant children, and to ensure in particular that unaccompanied children in police stations, pre-removal centres, and Reception and Identification Centres are provided with immediate access to age-appropriate shelters".[19] As of today, Greek authorities have not complied with said "immediate measures."

- Non-citizens in detention are frequently deprived of fundamental procedural guarantees. In practice, detainees are not informed about their legal status, the grounds for their detention, the length of detention and the available legal remedies. In addition, their ability to challenge their detention before domestic courts is severely restricted due to the lack of a free legal aid scheme.[20] Recent ECtHR case-law corroborates that in practice, major obstacles hinder effective access to the domestic legal remedy against detention.[21] Moreover, despite the amendment of Greek legislation in 2010 aiming to include the examination of the lawfulness *per se* within the scope of the remedy, to a large extent, national remedy against detention (Objections against detention) remains non-effective as the *per se* lawfulness of the detention, including detention conditions, are not effectively examined in that framework. The ECtHR has found that, in a number of cases, despite the amendment of Greek law, the lawfulness of applicants' detention had not been examined in a manner equivalent to the standards required by Article 5(4) ECHR.[22] Based on the cases supported by the GCR, it seems that Administrative Courts tend not to thoroughly examine complaints regarding detention conditions. Moreover, it seems that the Objections procedure may also be marred by a lack of legal security and predictability, which is aggravated by the fact that no appeal stage is provided in order to correct the decisions of the Administrative Courts. The GCR has supported a number of cases where the relevant Administrative Courts' decisions were contradictory, even though the facts were substantially the same.[23] Finally, the *ex officio* judicial review of detention orders appears highly ineffective, as the review takes place in a stereotypical and rudimentary way. Official data corroborates these concerns. Out of a total 1,192 detention orders for asylum seekers examined by the Administrative Court of Athens in 2018, there were only four cases in which the ex officio review did not approve the detention measure imposed (0.3 percent of all orders).[24]

---

[19] ECSR, International Commission of Jurists (ICJ), and European Council for Refugees and Exiles (ECRE) v. Greece, Complaint No. 173/2018, Decision on admissibility and on immediate measures, 23 May 2019.

[20] This was recently observed by the CPT following its 2018 visit to Greece, "CPT/Inf (2019) 4, Report on the Visit to Greece from 10 to 19 April 2018, 19 February 2019."

[21] ECtHR, J.R. and Others v. Greece, application No 22696/16, 25 January 2018 and ECtHR, O.S.A. v. Greece, Application No 39065/16, Judgment of 21 March 2019; Kaak and others, Application no 34215/16, 3 October 2019.

[22] ECtHR, R.T. v. Greece, application no 5124/11, 11 February 2016; Mahammad and others v. Greece, application no 48352/12, 15 January 2015; MD v. Greece, application no 60622/11, 13 November 2014; Housein v. Greece, application no 71825/11, 24 October 2013. In the case F.H. v. Greece, application no 78456/11, 31 July 2014, the Court found a violation of Article 3 combined with Article 13, due to lack of an effective remedy in the Greek context in order to control detention conditions. Likewise the Court found that "the applicant did not have the benefit of an examination of the lawfulness of his detention to an extent sufficient to reflect the possibilities offered by the amended version" of the law, see: ECtHR, "S.Z. v. Greece, application No 66702/13," 21 June 2018.

[23] Greek Council for Refugees (GCR), "AIDA Report on Greece, Update 2018,"; Greek Council for Refugees (GCR), "Administrative Detention in Greece: Findings from the Field, 2018."

[24] Greek Council for Refugees (GCR), "AIDA Report on Greece, Update 2018,"; UN High Commissioner for Refugees (UNHCR), "Recommendations by the Office of the United Nations High Commissioner for

- Overall detention conditions in pre-removal detention facilities (PRDFs)[25] remain substandard, despite some good practices which have been adopted in some pre-removal detention facilities (such as allowing detainees to use their mobile phones). Major concerns include a carceral, prison-like design, the lack of sufficient hygiene and non-food items, including clothes and shoes, clean mattresses and clean blankets, the lack of recreational activities, and overcrowding persisting in some facilities. The provision of medical services in PRDFs remains critical, as the available resources remain inadequate with respect to observed needs.[26]

- Police stations and other police facilities continue to be widely used for detaining non-citizens, including asylum seekers. For example, almost one in three non-citizens in immigration detention at the end of 2018 were detained in a police station—in other words, 835 persons (or 28.4 percent) out of the total 2,933 persons in detention.[27] Detention conditions in police stations and other police facilities are by their nature unsuitable for detention exceeding 24 hours.[28] Among various concerns is the fact that no medical services are provided to police stations or to other police facilities. At the end of September 2019, Greek authorities announced the opening of new pre-removal detention facilities ("closed pre-removal centres"). According to these statements, new detention facilities are *inter alia* aiming to deter the irregular entry of non-citizens.[29] The locations of these facilities, and their expected capacity, is currently not yet known.

## International monitoring

During its previous visit, the WGAD visited detention centres in Thessaloniki, Filakio, and Komotini, as well as Soufli border guard station. The WGAD noted that detention conditions in all these facilities were inadequate, in particular as regards lighting, temperature, and food supply. Migrants were mostly locked in their cells, with no recreational activities nor outdoor area. The centres in Fylakio and Thessaloniki were overcrowded.

---

Refugees Concerning the Execution of Judgments by the European Court of Human Rights in the Cases of *M.S.S. v. Belgium and Greece* and of *Rahimi v. Greece*."

[25] As of October 2019, there are eight Pre-removal Detention Facilities (PRDF) in use: Tavros (Petrou Ralli), Amidgaleza, Corinth, Paranesti (Drama), Xanthi, Fylakio, Moria (Lesvos) and Pili (Kos) PRDF.

[26] The number of health care staff in PRDFs is insufficient. For example, out of the total 20 advertised positions for doctors in pre-removal centres, only nine were actually present as of the end of 2018, and as of October 2019, no doctor is present in Moria (Lesvos), Kos, or Paranesti (Drama) PRDF.

[27] Greek Council for Refugees (GCR), "AIDA Report on Greece, Update 2018,"; Greek Ombudsman, "Return of Third Country Nationals, Special Report," 2018; UN High Commissioner for Refugees (UNHCR), "Recommendations by the Office of the United Nations High Commissioner for Refugees Concerning the Execution of Judgments by the European Court of Human Rights in the cases of *M.S.S. v. Belgium and Greece* and of *Rahimi v. Greece*."

[28] See: European Committee for the Prevention of Torture and Inhuman or Degrading Treatment or Punishment (CPT), "Immigration Detention, CPT/Inf(2017)3," March 2017.

[29] CNN, "The Four Axes of the Government with Regards the Migration Issue," 4 October 2019, https://www.cnn.gr/news/politiki/story/192839/petsas-aytoi-einai-oi-tesseris-axones-tis-kyvernisis-gia-to-metanasteytiko

In April 2018, the CPT visited Greek immigration detention facilities, including five dedicated immigration detention centres (pre-removal centres in Amygdaleza, Fylakio, Moria (Lesvos), and Pyli (Kos), as well as Fylakio Reception and Identification Centre) and seven police and border guard stations which can also detain migrants and asylum seekers (Drapetsona, Kolonos, and Omonia in Piraeus/ Athens and Feres, Isaakio, Neo Cheimonia, and Soufli in Evros). The CPT expressed serious concerns regarding the conditions and detention regimes in both dedicated detention centres and police and border guard stations. Most of these facilities were found to be unhygienic, in a poor state of repair, and did not offer sufficient bedding and lighting. Despite the CPT's stance, non-citizens were frequently detained in police stations for extended periods. There were also reported instances of ill-treatment at the hands of guards and health care was inadequate.[30]

During his 2016 visit, the SRHRM visited the hotspots on Samos and Lesvos, Elliniko pre-removal centre (no longer in use, as of 2018), and Polykastro police station. The Special Rapporteur found that access with the outside world was difficult as mobile phones were confiscated, Elliniko centre did not offer adequate health care and activities, and the RICs offered inadequate conditions.

In light of the concerns expressed by the Working Group in 2013 and other international monitoring bodies, the WGAD may wish to pay particular attention to issues of overcrowding; hygiene; provision of clean bedding and clothes; adequate food; separation of women and men, as well as children from unrelated adults; sufficient lighting; freedom of movement within the facility; outdoors time; and recreation activities. Detention conditions are of particular concern at: the Tavros (Petrou Ralli) PRDF, which according to the CPT, due to its "carceral design," is "totally inadequate for holding irregular immigrants for short periods of time, let alone weeks or months";[31] the Thessaloniki Special holding facility for irregular migrants, known as "Metagogon" (Transfer) Centre, where a significant number of persons are detained for prolonged periods without being provided with any outdoor exercise;[32] the sections for unaccompanied minors and families at the Amigdaleza PRDF; and the police stations in Athens and Thessaloniki region. As mentioned above, no doctor is present in Moria (Lesvos), Kos, and Paranesti (Drama) PRDF, as of October 2019.

To facilitate the WGAD's identification of facilities that are used for the purposes of immigration detention in Greece, this submission provides a non-exhaustive list of facilities that the GDP and/or the GCR have identified in the attached Annex.

---

[30] European Committee for the Prevention of Torture and Inhuman or Degrading Treatment or Punishment (CPT), "Report to the Government of Greece 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 10 to 19 April 2018, CPT/Inf (2019) 4," February 2019, https://rm.coe.int/1680930c9a

[31] European Committee for the Prevention of Torture and Inhuman or Degrading Treatment or Punishment (CPT), "Report to the Greek Government on the Visits to Greece Carried Out by the European Committee for the Prevention of Torture and Inhuman or Degrading Treatment or Punishment (CPT) from 13 to 18 April and 19 to 25 July 2016, § 56, CPT/Inf (2017)25"; 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 14 to 23 April 2015, CPT/Inf (2016) 4."

[32] European Committee for the Prevention of Torture and Inhuman or Degrading Treatment or Punishment (CPT), "Report to the Greek Government on the Visits to Greece Carried Out by the European Committee for the Prevention of Torture and Inhuman or Degrading Treatment or Punishment (CPT) from 13 to 18 April and 19 to 25 July 2016, § 57, CPT/Inf (2017)25."

## ANNEX: List of migration-related detention sites

| Name | City | Status |
|---|---|---|
| Amygdaleza Pre-Removal Detention Centre | Amygdaleza, Attica | In use (2018) |
| Athens Airport Holding Facility | Athens, Attica | In use (2017) |
| Chios VIAL Reception and Identification Centre | Island of Chios, North Aegean | In use (2018) |
| Corinth Pre-Removal Detention Centre | Corinth, Peloponnese | In use (2018) |
| Drama Paranesti Pre-Removal Detention Centre | Paranesti, Drama, East Macedonia | In use (2018) |
| Drapetsona Police Station | Greece, Piraeau | In use (2018) |
| Feres Police and Border Guard Station (NEW) | Feres, Alexandroupolis, Evros, Thrace | In use (2018) |
| Fylakio (Orestiada) First Reception Centre | Orestiada, Evros, Thrace | In use (2018) |
| Fylakio Pre-Removal Detention Centre (formerly Fylakio Special Holding Facility for Irregular Migrants) | Fylakio, Orestiada, Evros, Thrace | In use (2019) |
| Iasmos Police Station | Iasmos, Rhodope, Thrace | In use (2013) |
| Igoumenitsa Coast Guard Detention Facility | Igoumenitsa, Epirus | In use (2013) |
| Isaakio Police and Border Guard Station | Isaakio, Didymoteicho, Evros, Thrace | In use (2018) |
| Kifissia Police Station (Kifisia) | Kifissia (Kifisia), near Athens, Attica | In use (2015) |
| Kolonos Police Station | Greece, Athens | In use (2018) |
| Kordello Border Guard Station | Kordello, Thessaloniki, Central Macedonia | In use (2012) |
| Kos Reception and Identification Centre | Kos, Aegean | In use (2017) |
| Leros Reception and Identification Centre | Leros, Aegean | In use (2017) |
| Lesbos Reception and Identification Centre (formerly First Reception Centre) | Island of Lesbos, North Aegean | In use (2019) |
| Metaxades Police and Border Guard Station | Metaxades, Didymoteicho, Evros, Thrace | In use (2012) |
| Moria Pre-Removal Detention Centre | Island of Lesbos, North Aegean | In use (2018) |
| Mytilene Harbour | Mytilene, Lesbos [Mytilini] | In use (2016) |
| Nea Vyssa Border Guard Station | Nea Vyssa, Orestiada, Evros, Thace | In use (2012) |
| Neo Cheimonio Police and Border Guard Station | Neo Cheimonio, Orestiada, Evros, Thrace | In use (2018) |
| Omonia Police Station | Greece, Athens | In use (2018) |
| Petrou Ralli Pre-Removal Detention Centre | Athens, Attika | In use (2018) |
| Poros Border Guard Station | Poros, Alexandroupolis, Evros, Thrace | In use (2012) |
| Pyli Pre-Removal Detention Centre | Kos, Aegean | In use (2018) |
| Samos | Samos, Aegean | Pending opening (2019) |
| Samos Vathy Reception and Identification Centre | Island of Samos, North Aegean | In use (2019) |
| Soufli Police and Border Guard Station | Soufli, Evros, Thrace | In use (2018) |
| Thermi Border Guard Station | Thermi, Thessaloniki, Central Macedonia | In use (2012) |
| Thessaloniki Aliens Police Directorate Holding Facility | Thessaloniki, Central Macedonia | In use (2017) |
| Tychero Police and Border Guard Station | Orestiada, Evros, Thrace | In use (2018) |
| Xanthi Police Station | Xanthi, Thrace | In use (2013) |
| Xanthi Pre-Removal Detention Centre | Xanthi, Thrace | In use (2018) |