

Ms Ylva Johansson
European Commissioner for Home Affairs
European Commission
Rue de la Loi 200, B-1049, Brussels, Belgium

Athens, 8 March 2022
Reference No: #) \$#(" "&\$&&

Re: Implementation of the safe third country concept in Greece

Honourable Commissioner,

We, representatives of 27 civil society organisations active in the areas of asylum and migration in Greece, wish to hereby convey to you our concerns regarding systematic non-compliance

The European Commission has received at least three targeted written questions from the European Parliament on non-compliance by Greece with Article 38(4) of the Asylum Procedures Directive,¹¹ letters from stakeholders,¹² as well as direct complaints from applicants for international protection affected from the aforementioned violations.¹³

Despite the Commission's efforts and ongoing dialogue with the Greek authorities, Greece has not complied with EU law. Over the past year, the use of the safe third country concept in line with the EU acquis has not been revisited, nor have the recommendations from the Commission. Greece has also taken further legislative steps to limit access to refugee status determination to persons affected by the aforementioned violations through: JMD 42799/2021 declaring Turkey a safe third country and triggering admissibility procedures throughout the territory; JMD 458568/2021 amending said list; Art 23 L 4825/2021 and JMD 472687/2021 introducing a 100 € fee per person for second subsequent applications, including vis-à-vis

26. Symbiosis-School of Political Studies in Greece, Council of Europe Network
27. Terre des hommes Hellas