**Submission for the Report *on Human rights violations at international borders: trends, prevention and accountability***

**To the UN Special Rapporteur on the Human Rights of Migrants**

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This document[[1]](#footnote-1) concerns the application of the STC concept in Greece, and the continued refusal of the Greek authorities to examine the merits of asylum applications that have been deemed inadmissible on the basis of Turkey being considered a STC, notwithstanding the fact that readmissions to Turkey have been suspended indefinitely since March 2020.

This practice has impacted the effective access to the right to seek asylum, as established by Article 14 of the UDHR, Articles 4 and 18 of the EUCFR, Article 3 of the ECHR and Article 3 of CAT, and has left thousands[[2]](#footnote-2) in a legal and protection limbo.

**The use of the ‘safe third country’ concept in Greece**

In response to the significant increase of asylum seekers in Europe, the members of the European Council and Turkey reached an agreement aimed at stopping attempts to reach European territory through Turkey on March 18, 2016.[[3]](#footnote-3) According to the joint *EU-Turkey Statement[[4]](#footnote-4)*, all persons who had arrived irregularly from Turkey to one of the five islands of the Eastern Aegean as from 20 March 2016 and whose asylum applications had been declared inadmissible should be returned to Turkey.[[5]](#footnote-5)

On April 3 2016, the Greek Parliament, under a proposal of the Greek government, passed Law 4375/201[[6]](#footnote-6) (and subsequent amendments). The new law introduced the fast-track border procedure for asylum applications submitted at one of the islands of Eastern Aegean.[[7]](#footnote-7) Moreover, the law established that asylum applications registered in the islands should firstly be examined to determine their admissibility.[[8]](#footnote-8)

In practice, between 2016 and 2019, Greece assessed asylum applications lodged on the islands under the border procedure differently, depending on the nationality of the applicant. Non-Syrians from a country with a recognition rate of over 25% would have their asylum application assessed both in terms of admissibility and merits (‘merged procedure’), while non-Syrians from a country with a recognition rate of under 25% would have their applications examined based only on merits. Further, Syrian nationals would have their application exclusively examined on admissibility (STC).

Notwithstanding the lack of legislative changes on this issue, the Greek authorities changed their practices concerning the examination of asylum applications on the five Eastern Aegean islands at the beginning of 2020. From January 2020, only Syrian nationals had their asylum application examined on admissibility while the rest of the applications were examined on the merits. This was despite the fact that an admissibility decision was not included in their GAS file and the Greek police were automatically issuing readmission decisions to Turkey right after individuals’ arrival to the Greek islands.[[9]](#footnote-9) Therefore, Syrian nationals have been the most affected by the introduction of the STC concept that emerged following the *EU-Turkey Statement*.[[10]](#footnote-10)

Prior to 2020, Law 4375/2016 allowed exemptions for asylum seekers with vulnerabilities and in need of special procedural guarantees, permitting them to bypass the fast-track border procedure on the islands. As a result, their asylum applications were examined on the merits under the regular procedure. However, in 2020, with the introduction of Law 4636/2019[[11]](#footnote-11), the provision that exempted vulnerable asylum seekers in need of special procedural guarantees from the fast-track border procedure and their referral to the regular procedure was abolished.[[12]](#footnote-12) This legislative change is contrary to Article 24(3) of the APD[[13]](#footnote-13) and the jurisprudence of the CJEU.[[14]](#footnote-14)

Finally, in June 2021, the Greek Ministry of Foreign Affairs and the Ministry of Migration and Asylum published a JMD[[15]](#footnote-15) designating Turkey as a STC for asylum seekers who are nationals of Syria, Afghanistan, Pakistan, Bangladesh and Somalia. The JMD applied to all asylum seekers whose asylum interview had not taken place, notwithstanding their date of arrival. With this decision, the Greek authorities can deem asylum applications inadmissible and refuse to assess material facts (the merits) of the application for international protection lodged by nationals of these five countries, which represent approximately 70% of all asylum applications filed in 2020 in Greece,[[16]](#footnote-16) and around 60% of asylum applications in 2021.[[17]](#footnote-17)

The adoption of this JMD is contrary to European legislation.[[18]](#footnote-18) It does not provide any legal reasoning to explain which principles the regulation was based on, or explanation of the methodology by which the competent authorities satisfied themselves that the STC concept can be applied in the case of Turkey for asylum seekers from the aforementioned five nationalities. The lack of a clear methodology and blanket presumption also gives Greek authorities discretion to apply the JMD differently in distinct moments of the procedure and without considering the individual vulnerabilities of asylum seekers when assessing whether Turkey is a STC.

In June 2021, HIAS Greece and Equal Rights Beyond Borders requested access to the ‘Opinion Recommending Turkey to be designated as a STC’ from the Head of GAS on behalf of their clients.[[19]](#footnote-19) Their request was initially rejected by the Head of the Asylum Service,[[20]](#footnote-20) but was finally guaranteed following an order by the Public Prosecutor of Athens.[[21]](#footnote-21)

Contrary to what is established by EU and Greek law, the ‘Opinion’ only provided a compilation of sources containing information on Turkey, without any legal reasoning for the designation of Turkey as a STC for nationals of the five aforementioned countries.[[22]](#footnote-22)

**Suspension of readmissions from Greece to Turkey**

On March 16, 2020, Turkish authorities announced the suspension of the readmission process for rejected asylum seekers from Greece until further notice, due to the COVID-19 pandemic.[[23]](#footnote-23) Two years after the announcement, the readmission process has yet to resume, leaving thousands of asylum seekers whose asylum applications have been deemed inadmissible under Articles 84, 86 of Law 4636/2019 and the JMD in a ‘legal limbo’ situation.

In June 2020, the Hellenic Police sent two requests to the Turkish authorities requesting information on when the return operations authorised under the *EU-Turkey Statement* would resume.[[24]](#footnote-24) On January 14, 2021, Greece submitted a request to the European Commission and Frontex for the immediate return of 1,450 persons whose asylum applications had been deemed inadmissible on the basis of Turkey being an STC.[[25]](#footnote-25) Finally, on July 28, 2021, the Greek Minister of Migration and Asylum requested that Frontex and the European Commission immediately return 1,908 persons to Turkey.[[26]](#footnote-26) Despite the aforementioned requests of the Greek authorities, the readmissions to Turkey based on the *Statement* are still suspended indefinitely. In addition, Turkey has suspended the application of the Greece-Turkey Bilateral Readmission Protocol since 2018 and readmission requests sent by the Greek authorities receive no reply from the Turkish authorities.

FENIX requested clarifications on the state of the readmission procedure on behalf of FENIX’s clients from the Readmission Unit of the Hellenic Police Headquarters. In the responses[[27]](#footnote-27), the Readmission Unit confirmed what is already publicly known: Turkey has indefinitely suspended readmission from Greece since March 16, 2020. Moreover, the Readmission Unit acknowledged that they are no longer sending readmission requests to Turkey due to the aforementioned suspension. The Readmission Unit recently issued the same response after an enquire fromFENIX on behalf of another client.[[28]](#footnote-28)

Under Article 86(5) of Law 4636/2019,[[29]](#footnote-29) the Greek authorities must examine the merits of an asylum application where the third country does not allow the applicant whose application was rejected as inadmissible to enter its territory. As proven by the notes of the Hellenic Police, the Greek authorities are fully aware of the indefinite suspension of readmissions to Turkey; nonetheless, they continue on the one hand to systematically apply the safe third country concept based on Joint Ministerial Decision 42799/2021, leading to a large number of applicants having their claims dismissed as inadmissible and being ordered to return to Turkey, without any prospects of readmission.

On June 1 2021, Commissioner Johansson, in response to a question submitted by a member of the European Parliament, stated very clearly that Greece must examine on the merits the asylum applications rejected as inadmissible on the basis of the STC concept, on the merits, to ensure the access to the asylum procedure.[[30]](#footnote-30)

In addition, the analysis must be supported by tangible facts or deduced from elements that can validate the presumption. Given the indefinite suspension of readmissions by the Turkish authorities, there are no reasonable grounds to believe that readmission processes will restart shortly. Therefore, following the provisions of EU and Greek legislation, Greece is undeniably responsible for the examination of the asylum applications based on their merits in order to respect the guarantees envisaged in EU *acquis* and international conventions signed by Turkey. In Ms Johansson's response to the European Parliament on June 1 2021, the Commission also reinforced this idea.[[31]](#footnote-31) However, such position does not align with the practice of the Greek government.

Contrary to Article 40 of APD, a Circular[[32]](#footnote-32) of the Ministry of Migration and Asylum provides that subsequent applications lodged following the dismissal of the initial claim under the STC concept in the border procedure are subject to a preliminary admissibility assessment solely on new elements relating to whether Turkey is a STC. Subsequent applications are therefore channelled into a dual admissibility procedure and are dismissed either for want of new elements or again based on the STC concept, contrary to CJEU case law.[[33]](#footnote-33)

On January 25, 2022, in a written response given by Ms Johansson on behalf of the European Commission to a question from the European Parliament,[[34]](#footnote-34) the Commissioner clearly stated once again that where the third country does not permit the applicant to enter its territory, the Member States must examine the merits of the application.[[35]](#footnote-35)

**Reception Conditions During ‘Legal Limbo’**

The aforementioned refusal leaves thousands of asylum seekers in a situation of ‘legal limbo’ without access to material reception conditions. Contrary to what is defined in Article 2(i) of Directive 2011/95/EU[[36]](#footnote-36), the Greek government does not consider those who had their asylum applications deemed inadmissible on the basis of Turkey being considered a STC to have the status of an asylum seeker. The definition of a ‘final decision’ is defined in both European[[37]](#footnote-37) and Greek[[38]](#footnote-38) legislation, which establishes that only where there is a determination of whether or not a third-country national is recognised as a beneficiary of international protection, can a person lose their “asylum seeker” status.

Due to the fact that the procedure employed to deem asylum applications inadmissible on the basis of Turkey being an STC did not assess whether the applicants should be granted international protection, asylum seekers who are rejected on this basis should not lose their status as applicants for asylum, and therefore should not lose access to reception conditions defined under European and Greek law, including access to accommodation, cash assistance, food, or medical care.[[39]](#footnote-39)

Finally, on December 27, 2021, the Greek Government adopted JMD 472687/2021[[40]](#footnote-40) which establishes the obligation of paying application fees,[[41]](#footnote-41) and mandated that each family member must pay a €100 fee to submit a second and further subsequent application. This was a change from the original text of Article 23 of Law 4825/2021[[42]](#footnote-42) which previously required a fee of €100 per asylum application and not per person.

In the aforementioned written response of Ms Johansson from January 25, 2022, the Commissioner stated that, although Article 38(4) of the APD does not exclude the possibility of a fee, the ‘unconditional application of a €100 fee for subsequent applications raises issues in terms of effective access to the asylum procedure’.[[43]](#footnote-43)

**The systematic non-compliance of Greek authorities with Greek and EU legislation results to inadmissibility decisions without any prospect of readmission to Turkey and undermines effective access to the fundamental right to seek asylum enshrined in Article 14 of the UDHR andArticle 18 of the EUCFR and may lead to violation of the fundamental principle of non-refoulement enshrined in Article 3 of the ECHR, Article 3 of the CAT, Article 33 of the Geneva Convention for Refugees and Article 4 of the EUCFR.**

1. List of Abbreviations

CAT: Convention against Torture Other Cruel, Inhuman or Degrading Treatment or Punishment

CJEU: Court of Justice of the European Union

ECHR: European Convention on Human Rights

EU: European Union

EUCFR: European Union Charter of Fundamental Rights

FENIX: Fenix - Humanitarian Legal Aid

GAS: Greek Asylum Service

JMD: Joint Ministerial Decision

NGOs: Non-Governmental Organisations

STC: safe third country

UDHR: Universal Declaration of Human Rights [↑](#footnote-ref-1)
2. In 2021, GAS issued 6.424 decisions of inadmissibility on the basis of Turkey being considered a STC, a 126% increase compared to the previous year. Ministry of Migration and Asylum (17/2/2022), “Reply to parliamentary question 2608/24-1-2022”, Available at:

<https://www.hellenicparliament.gr/UserFiles/67715b2c-ec81-4f0c-ad6a-476a34d732bd/11873945.pdf>. [↑](#footnote-ref-2)
3. “More than 1 million asylum seekers and other migrants from Syria, Afghanistan, Iraq, and countries farther afield such as Pakistan and Nigeria arrived in European Union countries in 2015, the most ever recorded in a single year.” Migration Policy Insitute (8 April 2021), “The EU-Turkey Deal, Five Years on: A Frayed Controversial but Enduring Blueprint”, Available at: [https://www.migrationpolicy.org/article/eu-turkey-deal-five-years-on#](https://www.migrationpolicy.org/article/eu-turkey-deal-five-years-on). [↑](#footnote-ref-3)
4. Council of the European Union (18 March 2016), “EU-Turkey statement, 18 March”, Press Release, Available at: <https://www.consilium.europa.eu/en/press/press-releases/2016/03/18/eu-turkey-statement/>. [↑](#footnote-ref-4)
5. ‘All new irregular migrants crossing from Turkey into Greek islands as from 20 March 2016 and especially these not applying for asylum or whose application has been found unfounded or inadmissible in accordance with the provisions of the Asylum Procedures Directive will be returned to Turkey. The aforementioned procedure will be in full accordance with EU and international law and in respect of the principle of non-refoulement’. Council of the European Union (18 March 2016), “EU-Turkey statement, 18 March”, Press Release, Available at: <https://www.consilium.europa.eu/en/press/press-releases/2016/03/18/eu-turkey-statement/>. [↑](#footnote-ref-5)
6. Law no 4375, Organisation and operation of the Asylum Service, the Refugee Authority, the Reception and Identification Service, the Establishment of the General Secreatriat for Reception, adaptation of Greek legislation to the provisions of Directive 2013/32/EU of the European Parliamnet and of the Council “on common procedures for granting and withdrawing international protection status (recast)” (L 180/29.6.2013), provisions on the employment of beneficiaries of international protection and other provisions. (Government Gazette A’ 51/3-4-2016), Available at: <https://www.taxheaven.gr/law/4375/2016> (Law 4375/2016). [↑](#footnote-ref-6)
7. Article 60(4) of Law no 4375/2016. [↑](#footnote-ref-7)
8. Articles 54 and 56 of Law no 4375/2016. [↑](#footnote-ref-8)
9. Asylum Information Database (AIDA), *Country report: Greece, 2020 update,* Available at: <https://asylumineurope.org/wp-content/uploads/2021/06/AIDA-GR_2020update.pdf>. [↑](#footnote-ref-9)
10. According to statistics provided by the Hellenic Ministry of Migration and Asylum, 2.837 asylum applications were deemed inadmissible under the on the basiss of the STC. Hellenic Ministry of Migration and Asylum, “MoMa Report December 2020”, Available at: <https://pt.scribd.com/document/492317547/MoMa-Report-December-2020>, page 13. [↑](#footnote-ref-10)
11. Law no. 4636 (Government Gazette A '169 / 01-11-2019 and Corrections of errors Government Gazette A' 173 / 05-11-2019) on International Protection and other provisions, Available at:<https://www.taxheaven.gr/law/4636/2019> (Law 4636/2019). [↑](#footnote-ref-11)
12. Articles 39(5)(d), 58(2), and 90 of Law 4636/2019 [↑](#footnote-ref-12)
13. Directive 2013/32/EU of the European Parliament and of the Council of 26 June 2013 on common procedures for granting and withdrawing international protection OJ L 180, Available at: <https://eur-lex.europa.eu/legal-content/en/TXT/?uri=celex%3A32013L0032> (APD). [↑](#footnote-ref-13)
14. ‘[...]where the adequate support which applicants in need of special procedural guarantees are to receive cannot be provided to them the framework of a border procedure, within the meaning of Article43 of that directive, Member States must not apply, or must cease to apply that procedure’. CaseC-808/18 of the Court of 17 December 2020, European Commission v Hungary, Available at:

<https://curia.europa.eu/juris/document/document.jsf?text=&docid=235703&pageIndex=0&doclang=EN&mode=lst&dir=&occ=first&part=1&cid=1287012>. [↑](#footnote-ref-14)
15. Joint Ministerial Decision No. 42799/2021, (Government Gazette 2425 / Β / 7-6-2021), Designation of third countries that are characterized as safe and compilation of a national list, according to the provisions of article 86 of Law [4636/2019](https://www.e-nomothesia.gr/tags.html?tag=4636%2F2019), Available at:

<https://www.e-nomothesia.gr/kat-allodapoi/prosphuges-politiko-asulo/koine-upourgike-apophase-42799-2021.html> (JMD). [↑](#footnote-ref-15)
16. Hellenic Ministry of Migration and Asylum, “MoMa Report December 2020”, Available at: <https://pt.scribd.com/document/492317547/MoMa-Report-December-2020>, pages 12-13. [↑](#footnote-ref-16)
17. Hellenic Ministry of Migration and Asylum, “December - International Protection, Appendix A”, Available at: <https://migration.gov.gr/wp-content/uploads/2022/01/Report_A_December-2021_International-Protection_Appendix-A.pdf>, table 18. Also in 2021, GAS issued 979 decisions of inadmissibility on the basis of Turkey being considered a STC under the border procedure (Article 90(1) of Law 4636/2019), of which 973 were decisions for nationals covered by the countries in the JMD. Ministry of Migration and Asylum (17/2/2022), “Reply to parliamentary question 2608/24-1-2022”, Available at:

<https://www.hellenicparliament.gr/UserFiles/67715b2c-ec81-4f0c-ad6a-476a34d732bd/11873945.pdf>. [↑](#footnote-ref-17)
18. Article 38(4) of APD. [↑](#footnote-ref-18)
19. Equal Rights Beyond Borders (22 July 2022), *The Greek Asylum Service Finally Shares the “Opinion” On the Basis of which Turkey was Designated as a Safe Third Country – And it only seems to be Saying the Contrary*, Available at: <https://equal-rights.org/en/news/press-release-opinion-stc/>. [↑](#footnote-ref-19)
20. Equal Rights Beyond Borders (22 July 2022), *The Greek Asylum Service Finally Shares the “Opinion” On the Basis of which Turkey was Designated as a Safe Third Country – And it only seems to be Saying the Contrary*, Available at: <https://equal-rights.org/en/news/press-release-opinion-stc/>. [↑](#footnote-ref-20)
21. Equal Rights Beyond Borders (22 July 2022), *The Greek Asylum Service Finally Shares the “Opinion” On the Basis of which Turkey was Designated as a Safe Third Country – And it only seems to be Saying the Contrary*, Available at: <https://equal-rights.org/en/news/press-release-opinion-stc/>. [↑](#footnote-ref-21)
22. GAS (14 May 2021), *Recommendation on the designation of Turkey as a safe third country,* Available at:[*https://www.hias.org/sites/default/files/greece\_doc\_save.pdf*](https://www.hias.org/sites/default/files/greece_doc_save.pdf)*.*  [↑](#footnote-ref-22)
23. “From 16 March to June 2020, the Turkish authorities suspended return operations due to the COVID-19 pandemic until further notice.” European Commission [6 October 2020], Turkey 2020 Report Accompanying the Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee, and the Committee of the Regions, Available at:

<https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52020SC0355&from=en>, p 48. [↑](#footnote-ref-23)
24. European Commission [6 October 2020], Turkey 2020 Report Accompanying the Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee, and the Committee of the Regions, Available at:

<https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52020SC0355&from=en>, p 48. [↑](#footnote-ref-24)
25. #  “Of these, 955 are currently in Lesvos (about 10% of the total number of foreigners on the island) while 180 are in Chios, 128 are in Samos, and 187 in Kos.” Στο Νησί (14 January 2021), 955 to return to Turkey from Lesvos, Available at: <https://www.stonisi.gr/post/14236/955-pros-epistrofh-sthn-toyrkia-apo-th-lesvo-video>.

 [↑](#footnote-ref-25)
26. Ministry of Migration and Asylum (28 July 2021), *New request from Greece for the return of 1.908 illegal economic migrants to Turkey*, Available at: <https://migration.gov.gr/en/neo-aitima-tis-elladas-gia-tin-epistrofi-1908-paranomon-oikonomikon-metanaston-stin-toyrkia/#:~:text=The%20Minister%20of%20Migration%20and,camps%20in%20the%20Aegean%20islands>. [↑](#footnote-ref-26)
27. The answers are dated 25 October 2021, 27 October 2021, and 11 January 2022. FENIX (6/12/2021), “Fenix calls the Greek authorities to examine the merits of asylum applications rejected on admissibility”, Available at: <https://www.fenixaid.org/articles/fenix-calls-the-greek-authorities-to-examine-the-merits-of-asylum-applications-rejected-on-admissibility>. [↑](#footnote-ref-27)
28. Hellenic Police, 4666/3-123762, 16 February 2022. [↑](#footnote-ref-28)
29. Transposing Article 38(4) of APD. [↑](#footnote-ref-29)
30. ‘Article 38(4) of the Asylum Procedures Directiveprovides that ‘where the third country does not permit the applicant to enter its territory, Member States shall ensure that access to [an asylum] procedure is given’. In line with that provision, applicants whose application has been declared inadmissible are therefore able to apply again. In re-examining and deciding on those applications, Greece will need to take into account the circumstances at the time of the (re-) examination of the individual applications, including with regard to the prospect of return in line with the EU-Turkey Statement. In the meantime, applicants shall have access to material reception conditions under the conditions set out under the EU Charter of Fundamental Rights, EU and national law.’ P-000604/2021 Answer given by Ms Johansson on behalf of the European Commission (1.6.2021), Available at: <https://www.europarl.europa.eu/doceo/document/P-9-2021-000604-ASW_EN.pdf>. [↑](#footnote-ref-30)
31. ‘[…] applicants whose applications have been declared inadmissible are therefore able to apply again […]’. P-000604/2021 Answer given by Ms Johansson on behalf of the European Commission (1.6.2021), Available at: <https://www.europarl.europa.eu/doceo/document/P-9-2021-000604-ASW_EN.pdf>. [↑](#footnote-ref-31)
32. The Circular provides guidelines to all regional asylum offices for the examination of subsequent applications of asylum seekers whose initial applications had been examined in the context of the fast-track border procedure under Article 90 of Law 4636/2019 and had been deemed inadmissible under Articles 84(1)(d) and 86 of Law 4636/2019 and the Joint Ministerial Decision of 7 June 2021. Circular 112808/2022, 7/7/2021, Available at: <https://tinyurl.com/p66szyp8>. [↑](#footnote-ref-32)
33. C-921/19 LH v Staatssecretaris van Justitie en Veiligheid [2021], Available at:<http://www.europeanmigrationlaw.eu/en/caselaw/lh-aff-c-921-19.html>, para 40. [↑](#footnote-ref-33)
34. Question for written answer E-005103/2021 to the Commission (Rule 138) by Erik Marquardt (Verts/ALE) on Doubts on Greece’s compliance with EU law in the processing of asylum applications (24 November 2021), Available at: <https://www.europarl.europa.eu/doceo/document/E-9-2021-005103_EN.html>. [↑](#footnote-ref-34)
35. ‘[...] shall ensure that access to the procedure on substance is given, and therefore shall not reject the subsequent application as inadmissible on the basis of the safe third concept [...]’. ENE-005103/2021Answer given by Ms Johansson on behalf of the European Commission (25.1.2022), Available at: <https://www.europarl.europa.eu/doceo/document/E-9-2021-005103-ASW_EN.pdf>, para 3. [↑](#footnote-ref-35)
36. ‘[…] applicant is a “third-country national or a stateless person who has made an application for international protection in respect of which a final decision has not yet been taken [...]”’. Article 2(i) of Directive 2011/95/EU [↑](#footnote-ref-36)
37. Article 2(e) of Directive 2013/32/EU. [↑](#footnote-ref-37)
38. Article 63(a) of Law 4636/2019. [↑](#footnote-ref-38)
39. This is in line with the opinion of the Advocate General Priit Pikamäe in the case FMS and others: ‘[…] migrants only cease to be applicants for international protection at the time a decision is taken not to recognise them as refugees or persons needing subsidiary protection or, put differently, at the time of a decision rejecting the application on the substance’. AG’s Opinion delivered on 23 April 2020 in the Joined Cases C-924/19 PPU and C-925/19 PPU, para 116 to 127. [↑](#footnote-ref-39)
40. Decree No. 472687/2021, Government Gazette 6246 / Β / 27.12.2021, Defining a procedure for registering credits in the regular subdivision of the Ministry of Immigration and Asylum according to the revenues collected in ALE 1450114001 "Payments of each subsequent of the first application by an applicant for international protection" and other related issues, Available at: <https://mydocman.gr/472687-2021>. [↑](#footnote-ref-40)
41. As provided in Article 23 of Law 4825/2021. [↑](#footnote-ref-41)
42. Law No. 4825/2021, Government Gazette 157/A/4-9-2021, Reform of deportation and return procedures of third country nationals, attraction of investors and digital nomads, issues of residence permits and procedures for granting international protection, provisions of competence of the Ministry of Migration and Asylum and the Ministry of Civil Protection and other urgent provisions, Available at: <https://www.e-nomothesia.gr/kat-allodapoi/nomos-4825-2021-phek-157a-4-9-2021.html>. [↑](#footnote-ref-42)
43. ENE-005103/2021Answer given by Ms Johansson on behalf of the European Commission (25.1.2022), Available at: <https://www.europarl.europa.eu/doceo/document/E-9-2021-005103-ASW_EN.pdf>, para 2. [↑](#footnote-ref-43)