

Input by civil society organisations to the Asylum Report 2025

Fields marked with * are mandatory.

Dear Colleagues,

The production of the Asylum Report 2025 is currently underway. The annual [Asylum Report](#) presents an overview of developments in the field of international protection in Europe.

The report includes information and perspectives from various stakeholders, including experts from EU+ countries, civil society organisations, researchers and UNHCR. To this end, we invite you, our partners from civil society, academia and research institutions, to share your reporting on developments in asylum law, policies or practices in 2024 by topic as presented in the online survey (**'Part A' of the form**).

We also invite you to share with us any publications your organisation has produced throughout 2024 on issues related to asylum in EU+ countries (**'Part B' of the form**).

These may be reports, articles, recommendations to national authorities or EU institutions, open letters and analytical outputs.

Your input can cover information for a specific EU+ country or the EU as a whole. You can complete all or only some of the sections.

Please note that the Asylum Report does not seek to describe national systems in detail but rather to present key developments of the past year, including improvements and challenges which remain.

All submissions are publicly accessible. For transparency, contributions will be published on the EUAA webpage and contributing organisations will be listed under the Acknowledgements of the report.

All contributions should be appropriately referenced. You may include links to supporting material, such as analytical studies, articles, reports, websites, press releases, position papers.

Some sources of information may be in a language other than English. In this case, please cite the original language and, if possible, provide one to two sentences describing the key messages in English.

The content of the Asylum Report is subject to terms of reference and volume limitations. Contributions from civil society organisations feed into EUAA's work in multiple ways and inform reports and analyses beyond the Asylum Report.

NB: This year's edition of the Asylum Report will be significantly revamped to achieve a leaner, more analytical report with streamlined thematic sections. The focus will be on key trends in the field of asylum rather than on individual developments. For this reason, information shared by

respondents to this call may be incorporated in the Asylum Report in a format different than in the past years.

Your input matters to us and will be much appreciated!

Please submit your contribution to the Asylum Report 2025 by Friday, 10 January 2025.

Contact details

* Name of Organisation

Border Violence Monitoring Network

Name and title of contact person

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I accept the provisions of the EUAA [Legal and Privacy Statements](#)

General observations

Before sharing information by thematic area, please provide your general observations on asylum developments as indicated in the following three fields:

What areas would you highlight where important developments took place in the country/countries you cover?

What are the areas, where only few or no developments took place?

Would you have any observations to share specifically about the implementation of the Pact on Migration and Asylum in the national context of the country/ countries you cover?

PART A: Contributions by topic

Please share your reporting on developments in asylum law, policies or practices in 2024 by topic. Kindly make sure that you provide information on:

- New developments and improvements in 2024 and new or remaining challenges;
- Changes in legislation, policies or practices, or institutional changes during 2024.

1. Access to territory and access to the asylum procedure (including first arrival to territory and registration, arrival at the border, application of the non-refoulement principle, the right to first response (shelter, food, medical treatment) and issues regarding border guards)

In 2024, the Border Violence Monitoring Network (BVMN) and Member Organizations continued to document cases of pushbacks across Greece and the Western Balkans. BVMN understand pushbacks as State practices by which people on the move are forced across a border, without consideration of their individual circumstances and without the possibility to apply for asylum or to object against the measures taken. Pushbacks in themselves are illegal, however they can also be a cluster of other human rights violations, including, but not limited to, the prohibition of non-refoulement; Articles 2,3,5,6,8,14 of the European Convention on Human Rights ECHR; Articles 1,2,4,6,8, 18, 21,47 of the EU Charter of Fundamental Rights. Pushback practices represent the most utilized tactic by States to prevent access to territory and consequently access to rights, including the right to seek asylum. In the past years, states have qualified pushbacks as “prevention of entry”, or “refusal of entry”, or “prevention of departure”. Regardless of qualification, these practices are unlawful. Pushbacks continue to be a direct threat to life.

As these unlawful practices persist, it is crucial to emphasize the connection between pushbacks and the denial of access to asylum procedure. Pushbacks are not only an attack on individuals but a direct denial of their right to access protection.

The situational report of February 2024 on Sarajevo conducted by BVMN Member Organization Collective Aid highlights continued pushbacks. Operational patterns continue to be systematic and structured involving frequent use of physical violence from border guards, beating with batons, confiscation of clothes and personal belongings, destruction through burning, forced immersion in rivers, and police dogs as means of intimidation. Drowning is also reported by culminating with Drina River boat disaster of August 22, when at least 12 people drowned. Croatian police have reportedly forced people across the river between Croatia and Bosnia-Herzegovina. A BVMN testimony from July recounts how officers pushed a group of migrants toward the Korana River, knowing the risks involved. Deaths at the border continue to be documented in this area, with at least 41 victims recorded in 2024, most of whom were young adults aged 20 to 30 and their bodies were recovered by volunteers. Pushbacks have also been reported at the Romanian and Bulgarian borders. While the number of people transiting through Serbia has decreased, many still attempt to cross the mountainous Bulgarian border on foot, only to face violent pushbacks by Serbian authorities. Testimonies from May 2024 describe how Serbian officers inflicted beatings on a group of migrants and stole their phones before forcing them to return to Bulgaria. Similar reports of violence have surfaced at the Serbian-Romanian border. In Bulgaria the border with Turkey continues to be fortified, with increased personnel and equipment deployed as part of the country's partial accession to the Schengen zone. In Greece the number of pushbacks reported remains high. According to statistics released by the Turkish Coast Guard (TCG) in April 2024, 1384 individuals were rescued by the coastguard that month, 728 of whom were pushed back by Greek authorities. In March 2024 it was reported that there were 27 life rafts used and the TCG rescued 1224 people, with 878 being victims of pushbacks. The data also indicates that 1951 people were stopped before crossing, while 1818 people arrived on the Greek islands and were registered. In April 2024 it was reported that a life boat that was pushed back by Greek assets and with migrants on board sank off the coast of Muğla's Fethiye district, and 1 TUR CG Boat (TCSG-911) was immediately dispatched to the scene. 12 migrants and 1 child were rescued from the lifeboat detected in a half sunken state by the TUR CG Boat dispatched to the scene and from the surface of the sea. In July 2024 the TCG rescued 2198 people, 1270 of whom were victims of pushbacks by the Greek Coast Guard.

2. Access to information and legal assistance (including counselling and representation)

3. Provision of interpretation services (e.g. introduction of innovative methods for interpretation, increase/decrease in the number of languages available, change in qualifications required for interpreters)

4. Dublin procedures (including the organisational framework, practical developments, suspension of transfers to selected countries, detention in the framework of Dublin procedures)

5. Special procedures (including border procedures, procedures in transit zones, accelerated procedures, admissibility procedures, prioritised procedures or any special procedure for selected caseloads)

6. Reception of applicants for international protection (including information on reception capacities – increase/decrease/stable, material reception conditions - housing, food, clothing and financial support, contingency planning in reception, access to the labour market and vocational training, medical care, schooling and education, residence and freedom of movement)

There are 1,851 people registered in the Mavrovouni Lesvos CCAC out of a total of 2,008 people on the move in Lesvos. Basic necessities are lacking: there is no hot water above 18 degrees Celsius, and shade is minimal due to camp authorities' fears of fire hazards, exacerbating concerns about the camp's poorly chosen location. The camp also suffers from a severe shortage of medical staff, psychologists, psychiatrists, interpreters, and safe spaces for vulnerable groups, including unaccompanied minors. Women frequently report feeling unsafe, often resorting to wearing diapers at night to avoid using unsecured toilets where they fear assault. Toilets lack doors that can be locked, further compromising safety. Severe criticalities are raised in relation to access to food that has become a systemic issue. Despite UN intervention in July 2023, no action was taken, leaving affected individuals reliant on inadequate food distributions by NGOs. Pregnant and lactating women were among those impacted, underscoring the Greek government's failure to uphold its legal obligations. The evidence presented underscores systemic failures across key areas—living conditions, safety, food access, and medical care.

In November 2024, IHR provided further evidence of the deteriorating conditions in the Samos CCAC. Water shortages—a long-standing issue—had become more severe, with near-daily water cuts since September 2023 and no long-term solutions in sight. Overcrowding exacerbated the dire circumstances, with residents, including women and survivors of human trafficking, forced to live in mixed-gender spaces lacking privacy and safety. Medical care was critically insufficient, with only one doctor available through the Hippocrates program and the NGO Médecins Sans Frontières providing services three days a week for ca 4600 people. In July 2024, the European Committee for the Prevention of Torture (CPT) published a report following its visit to Greece from November to December 2023. The report described conditions in the Samos CCAC as inhuman and degrading, echoing IHR's findings. Accommodation was deemed unsuitable, with single women and mothers housed alongside unrelated men. The chaotic and undignified food distribution system was also criticized, with vulnerable residents unable to secure daily rations. The CPT highlighted a lack of effective vulnerability assessments for new arrivals and inadequate medical checks due to insufficient staff. In the report, the accommodation facilities are described as defective and unsuitable, with single women and mothers with children being accommodated with unrelated adult men (CPT 2024; 4, 41). Moreover, the CPT pointed out that deprivation of liberty of people accommodated in the Samos CCAC often overrode legal provisions (CPT 2024; 35). The report also finds that the Greek authorities do not carry out effective vulnerability assessments of all new arrivals (CPT 2024; 4). Furthermore, the Committee expressed concern about the access and quality of medical care in the Samos CCAC (CPT 2024; 5). They found that medical checks for newly arrived persons are too rapidly conducted, due to insufficient and inadequate medical staff (CPT 2024; 43). The CPT report highlights hygiene-related issues with cleaning products given only when asylum seekers arrive in the CCAC and are meant to cover their entire stay in the facility. Sanitary facilities are described as being "in a dreadful state and in need of repair" (CPT 2024; 39).

7. Detention of applicants for international protection (including detention capacity – increase /decrease/stable, practices regarding detention, grounds for detention, alternatives to detention, time limit for detention)

CCAC Samos: BVMN Member Organization I Have Rights (IHR) documented its prison-like structure, shaped not only by its remote location but also by extensive surveillance infrastructure, use of AI technologies, constant presence of police and private security, and the severe restrictions on freedom of movement. In November 2024 despite its official capacity of 3,650, the facility held 4,678 people. The overcrowding crisis forced residents to sleep on the floor without bedding or proper clothing as temperatures plummeted. Greece has been called out several times by the ECtHR this year due to the conditions in the CCAC in Samos. The cases underscore the persistent inadequacy of Greece's reception conditions for asylum seekers. The GNCHR found that the Samos CCAC failed to meet basic standards, exposing residents to severe risks and inadequate living conditions. Key concerns included de facto detention practices, insufficient healthcare services, inadequate water supply, and overcrowding. Hygiene standards were described as deplorable, with residents lacking essential cleaning supplies, laundry services, and functional waste disposal systems. The GNCHR also raised alarm over reports of police violence and the detrimental effects on residents' mental health caused by the high-security infrastructure. Water shortages have become more severe, with near-daily water cuts since September 2023 and no long-term solutions in sight. Overcrowding exacerbated the dire circumstances, with residents, including women and survivors of human trafficking, forced to live in mixed-gender spaces lacking privacy and safety. Amnesty International's July 30th report painted a similarly grim picture, drawing on data and evidence presented by several Samos-based NGOs, including IHR. The report emphasises, among other things, the illegality of the "restriction of freedom" regime where every asylum seeker is unlawfully de facto detained upon arrival to the Samos CCAC.

In Lesbos Mavrovouni CCAC remains the main accommodation facility albeit often chronically overcrowded and under-resourced. Basic necessities are lacking: there is no hot water, and shade is minimal due to camp authorities' fears of fire hazards, exacerbating concerns about the camp's poorly chosen location. The camp also suffers from a severe shortage of medical staff, psychologists, psychiatrists, interpreters, and safe spaces for vulnerable groups, including unaccompanied minors. Women frequently report feeling unsafe, often resorting to wearing diapers at night to avoid using unsecured toilets where they fear assault. Toilets lack doors that can be locked, further compromising safety.

Collective Aid Situational Report on Bosnia and Herzegovina describes the following: The TRC in Blazuj reports poor conditions, with video evidence confirming the issues. Hygiene and toilet facilities are in bad shape, there is no heating in containers, and only cold water is available. Violence has been reported over small material possessions, emphasizing the scarcity of basic supplies, such as blankets. The TRC in Lipa is overcrowded, housing 1,600 people in a space designed for 1,500. There have been reports of violence, and one person was killed. Access to basic services, such as healthcare and sanitation, is highly limited. The site is located far away from key infrastructure and directly next to a minefield, creating further risks. Lukavica Detention Centre is described as lacking transparency, with the last anti-torture committee visit occurring in April 2021. The facility is urgently in need of investigation. Locals describe it as a "black hole," where families, including children, are reportedly taken. Reports of racism from guards, as well as a lack of access to essential items like clothing, legal support, and translation services, have surfaced. Additionally, detainees are often not informed of the reasons for their detention, and there are reports of psychological violence. These conditions call for immediate attention and intervention to address human rights violations and ensure the safety and dignity of those held in these facilities.

8. Procedures at first instance (including relevant changes in: the authority in charge, organisation of the process, interviews, evidence assessment, determination of international protection status, decisionmaking, timeframes, case management - including backlog management)

On July the 11th, the European Ombudsman opened an inquiry into how the European Union Agency for Asylum (EUAA) addresses allegations of fundamental rights violations in its activities in Greece (case 229 /2024/AML). The inquiry stems from a joint complaint filed against the EUAA by IHR and Avocats sans Frontières France. The organizations provided evidence of fundamental rights violations in the EUAA's operations in Samos. Specifically, the complaint highlights how EUAA caseworkers routinely fail to adequately assist survivors of pushbacks and human trafficking. The joint complaint, submitted to the European Ombudsman's Office in January 2024, raises serious concerns about how the EUAA addresses and investigates allegations of fundamental rights violations committed either by its staff or by the staff of national authorities where it operates. IHR has denounced the treatment of survivors of human trafficking , especially the failure of identification and proper vulnerability assessment. Following a report and three communications, the UN Special Rapporteur on Trafficking in Human Beings wrote a letter of allegation to the Greek authorities.

Throughout 2024, IHR documented numerous instances of postponed asylum interviews in the Samos CCAC. By the end of July, there was a noticeable increase in the number of interview postponements for asylum seekers on Samos. Within one week, between July 23 and August 1, four clients had their interviews postponed. For each of them, the interview was rescheduled twice. Based on IHR's experience, interviews can be postponed as many as four times. What makes this situation particularly concerning is the vulnerability of those affected. All of the clients identified that week were vulnerable individuals, including survivors of female genital mutilation, sexual violence, and/or human trafficking. These delays further exemplify the systemic failures within the CCAC to provide timely and adequate support to asylum seekers. The ongoing reporting and monitoring continue to shed light on the violations occurring within the Samos CCAC, calling for urgent action to address the facility's systemic failures and to uphold the fundamental rights of those seeking protection.

In Lesvos Mavrouni CCAC, Significant challenges remain in the processes for assessing both nationality and age, undermining the rights of asylum seekers and vulnerable individuals. Article 15 of the Universal Declaration of Human Rights (UDHR) guarantees the right not to be arbitrarily deprived of nationality. However, violations of this right have been documented extensively. The process of nationality screening, overseen by the Registration and Identification Service (RIS) with significant involvement from Frontex, has raised numerous concerns. These screenings are guided by internal Frontex regulations, and the resulting assessments are classified as "non-paper" documents, which makes them inaccessible and virtually impossible to challenge. Asylum seekers are often registered with both a stated nationality and an estimated nationality. When these do not align, people on the move face immense difficulties proving their nationality, especially as many lack access to original identity documents due to the circumstances of their displacement. The estimated nationality often leans toward "safer" countries. This discrepancy significantly impacts the likelihood of receiving a positive asylum decision.

In Greece, major obstacles persist for asylum seekers attempting family reunification. One of the most significant challenges lies in the requirement for family members abroad to submit certified copies of identity documents, travel documents, and proof of familial ties, such as family booklets. These certifications must be conducted by Greek consular services, which are often inaccessible or entirely absent in many countries where applicants' family members reside, such as Afghanistan, Sierra Leone, Palestine, Sudan, Burundi, and Bangladesh. This situation forces family members to travel to neighboring countries to access Greek consular services, often at great personal risk and without the necessary travel permits. Even when they manage to reach a consular office, they may be turned away because the office cannot process their requests, and no alternative pathways are provided. These insurmountable hurdles become particularly dire in regions plagued by warfare where family reunification becomes almost impossible.

9. Procedures at second instance (including organisation of the process, hearings, written procedures, timeframes, case management -including backlog management)

10. Issues of statelessness in the context of asylum (including identification and registration)

11. Children and applicants with special needs (special reception facilities, identification mechanisms/referrals, procedural standards, provision of information, age assessment, legal guardianship and foster care for unaccompanied and separated children)

Situational Update from Lesbos Greece; Evidence and Report collected by BVMN Member Organization Collective Aid:

Most children in the camp lack access to education or recreational activities, and the trauma of camp life compounds their previous experiences of violence. Info Migrants has documented severe cases of children as young as seven expressing suicidal thoughts, some attempting suicide. Others display signs of complete shutdown—ceasing to speak, eat, or respond to stimuli. Parents, overwhelmed and hopeless, often express suicidal thoughts themselves, believing their children might be better cared for if they were no longer alive. The evidence presented underscores systemic failures across key areas—living conditions, safety, food access, and medical care. With construction of the Vastria CCAC moving forward despite legal and logistical concerns, there is a growing fear among NGOs and human rights advocates that these issues will only be reproduced and further entrenched in the new facility. Without immediate action to address these deficiencies, asylum seekers in Greece will continue to face conditions that not only violate their fundamental rights but also jeopardize their health, safety, and dignity.

Similarly, the age assessment process on Lesbos has drawn criticism for its flawed implementation, which puts unaccompanied minors at risk. Age assessments are intended to verify whether an applicant is a child, thereby ensuring access to additional protections. However, the procedures used have often been harmful and unreliable. A recent report by Fenix Legal Aid, which analyzed 14 case studies, noted some improvements in the process between 2020 and 2023. Yet, several critical violations persisted, including the failure to provide adequate information, lack of proper notification, incomplete assessments, and the systematic use of X-rays, which can negatively impact the psychological well-being of minors.

Meanwhile, vulnerabilities related to gender-based violence (GBV) are frequently overlooked by the Greek asylum service. Serious cases of GBV that are not physically apparent—such as late-stage pregnancy or severe psychological trauma—are often disregarded due to systemic flaws in medical and psychosocial assessments. Key issues include a shortage of medical and psychosocial professionals, lack of privacy for thorough evaluations, insufficient translators, inadequate medical screenings, and the failure of practitioners to recognize scars or trauma caused by torture and violence. Moreover, public hospitals frequently refuse referrals for further evaluation, leaving survivors without adequate care.

The situation is concerning for LGBTQIA+ asylum seekers, whose safety and well-being are inadequately addressed. A 2024 report based on interviews conducted the previous year revealed that over 30% of LGBTQIA+ respondents on Lesbos experienced a lack of appropriate accommodation, increased violence, and barriers to asylum due to insufficient training and care among officials. Many are forced to conceal their sexual orientation or gender identity, causing severe mental health strain, and exposing them to heightened risks of physical violence. Compounding this, over half of LGBTQIA+ asylum seekers interviewed in 2023 reported being subjected to invasive and prohibited questioning about sexual practices during their asylum interviews, in direct violation of EU and Greek case law, as well as UNHCR and EUAA guidelines.

12. Content of protection (including access to social security, social assistance, healthcare, housing and other basic services; integration into the labour market; measures to enhance language skills; measures to improve attainment in schooling and/or the education system and/or vocational training)

13. Return of former applicants for international protection

14. Resettlement and humanitarian admission programmes (including EU Joint Resettlement Programme, national resettlement programme (UNHCR), National Humanitarian Admission Programme, private sponsorship programmes/schemes and ad hoc special programmes)

15. National jurisprudence on international protection in 2024 (please include a link to the relevant case law and/or submit cases to the [EUAA Case Law Database](#))

16. Other important developments in 2024

Criminalization

One of the consequences of criminalizing people on the move is the frequent obstruction of their right to asylum. Smuggling-related charges have increased using criminal law to manage migration and deter mobility. This trend is evident in Greece, where individuals are arbitrarily arrested upon arrival, charged with facilitation, and detained for prolonged periods without legal aid or interpretation, effectively barring them from exercising their right to seek asylum. The trial of Homayoun Sabetara exemplifies this systemic issue: despite filing an asylum application, Mr. Sabetara was prosecuted under anti-smuggling laws. Greek courts often fail to recognise the intention to seek asylum as sufficient to trigger international protections, insisting instead on active asylum status—an impossible standard for individuals detained immediately upon arrival. Greece's anti-smuggling framework, among the harshest in Europe, criminalises operational acts like steering a boat without assessing intent or coercion. This approach contravenes international law, including the 1951 Geneva Refugee Convention, which protects asylum seekers from penalisation for unauthorised entry. By conflating migration control with criminalisation, Greece systematically undermines the fundamental right to seek asylum, perpetuating violations of procedural safeguards and international obligations.

Both humanitarian workers and refugees have been prosecuted for either providing essential humanitarian assistance or for seeking safety in Greece. Human rights defenders also continue to face criminalisation for their work with people on the move. For instance, 24 people currently face charges for having provided humanitarian assistance to people arriving on Lesbos between 2016 and 2018 leading to the closure of operations of the NGO ERCI who had been attending landings and supporting people on the move as they arrived on the island. Although misdemeanour charges against Sarah Mardini and Séan Binder were dropped in August 2023 by the Supreme Court, the following month they and the 22 other defendants were indicted for four felonies including forming and membership of a criminal organisation, and facilitating irregular entry. This hostile environment, and the fear created as a result, led to the suspension of activities of multiple organisations supporting asylum seekers on the Greek islands, and thus clearly negatively impacts reception conditions for those arriving.

Overall, an increase in criminalisation of migration can be observed within the EU. This development is interlinked with an increase of securitisation and border externalisation. The intensification of criminalisation has mainly impacted people on the move, by limiting their access to territory and the asylum procedure, essential rights during the asylum procedure, such as access to legal assistance and interpretation services, as well as essential services and fundamental rights during special procedures, reception of applicants of international protection, and during their detention. Oftentimes, those services and access to fundamental rights are provided for and monitored by Civil Society Organisations (CSOs). Through the criminalisation of CSOs, people on the move are often left without the provision of crucial support and direct aid during all aspects of the asylum procedure and beyond.

PART B: Publications

1. If available online, please provide links to relevant publications produced by your organisation in 2024

Border Violence Monitoring Network. (23 February 2024). 'Balkan Regional Report – December 2023, January 2024'. See here: <https://borderviolence.eu/reports/balkan-regional-report-december-2023-january-2024/>

Border Violence Monitoring Network. (22 March 2024). 'Balkan Regional Report – February 2024'. See here: <https://borderviolence.eu/reports/balkan-regional-report-february-2024/>

Border Violence Monitoring Network. (24 April 2024). 'Balkan Regional Report – March 2024'. See here: <https://borderviolence.eu/reports/balkan-regional-report-march-2024/>

Border Violence Monitoring Network. (11 June 2024). 'Balkan Regional Report- April 2024'. See here: <https://borderviolence.eu/reports/balkan-regional-report-april-2024/>

Border Violence Monitoring Network. (25 June 2024). 'Balkan Regional Report- May 2024'. See here: <https://borderviolence.eu/reports/balkan-regional-report-may-2024/>

Border Violence Monitoring Network. (1 August 2024). 'Balkan Regional Report- June 2024'. See here: <https://borderviolence.eu/reports/balkan-regional-report-may-2024-2/>

Border Violence Monitoring Network. (13 September 2024). 'Balkan Regional Report- July 2024'. See here: <https://borderviolence.eu/reports/balkan-regional-report-july-2024/>

Border Violence Monitoring Network (1 October 2024). 'Joint Statement on Mr. Sabetara's Appeal Trial'. See here: <https://borderviolence.eu/reports/joint-statement-on-mr-sabetaras-appeal-trial/>

Border Violence Monitoring Network (18 December 2024). 'Balkan Regional Report- October 2024'. See here: <https://borderviolence.eu/reports/balkan-regional-report-october-2024/>

Collective Aid (February 2024). 'Sarajevo Situational Update- January 2024'. See here: https://drive.google.com/file/d/1aJjNY1pUuv-NpxexKV2E_MG6ZLQLa3Z/view

Collective Aid (May 2024). 'Lesvos Situational Update- May 2024'. See here: <https://drive.google.com/file/d/1eSoESZWmnUJSJYUv4U5sT15rjuOR96vp/view>

Collective Aid (July 2024). 'Serbia and Bulgaria Situational Update- July 2024'. See here: <https://drive.google.com/file/d/1VIJYj907W3s90GXvewkWfloyXri0gmQT/view>

I Have Rights (7 February 2024). 'Press Release-Degrading Conditions in Samos CCAC: The European Court of Human Rights Grants Interim Measures'. See here: <https://ihaverights.eu/european-court-of-human-rights-grants-interim-measures/>

I Have Rights (19 April 2024). 'Press Release-European Court of Human Rights Again Condemns Greece's Treatment of an Asylum Seeker on Samos'. See here: <https://ihaverights.eu/european-court-of-human-rights-again-condemns-greeces-treatment-of-an-asylum-seeker-on-samos/>

I Have Rights (29 May 2024). 'Joint Statement: Lack of Interpretation Services Lengthens Existing Delays to Access Asylum and Leaves People without Protection'. See here: <https://ihaverights.eu/joint-statement-lack-of-interpretation-services-lengthens-existing-delays-to-access-asylum-and-leaves-people-without-protection/>

I Have Rights (17 July 2024). 'Press Release - European Ombudsman Opens an Inquiry into how the European Union Agency for Asylum Addresses Allegations of Fundamental Rights Violation in its Activities in Greece'. See here: <https://ihaverights.eu/european-ombudsman-opens-an-inquiry-into-how-the-european-union-agency-for-asylum-addresses-allegations-of-fundamental-rights-violations-in-its-activities-in-greece/>

I Have Rights (24 September 2024). 'Press Release- Greek Ombudsman Condemns Samos CCAC's Unlawful Practice of Requiring Asylum Seekers to Waive Their Right to Reception Conditions'. See here: <https://ihaverights.eu/greek-ombudsman-condemns-samos-ccacs-unlawful-practice-of-requiring-asylum-seekers-to-waive-their-right-to-reception-conditions/>

I Have Rights (15 November 2024). 'The UN Special Rapporteur on Trafficking in Persons Highlights Serious Gaps in the Greek Authorities' Treatment of Survivors of Human Trafficking in the Samos CCAC'. See here: <https://ihaverights.eu/the-un-special-rapporteur-on-trafficking-in-persons-highlights-serious-gaps-in-the-greek-authorities-treatment-of-survivors-of-human-trafficking-in-the-samos-ccac/>

2. If not available online, please share your publications with us at: Asylum.Report@euaa.europa.eu or upload your file using the functionality below (max. file size 1MB).

Please upload your file

The maximum file size is 1 MB

3. For publications that due to copyright issues cannot be easily shared, please provide references using the table below.

	Title of publication	Name of author	Publisher/Organisation	Date
1				
2				
3				
4				
5				

Useful links

[EUAA Asylum Report 2024 \(https://euaa.europa.eu/asylum-report-2024\)](https://euaa.europa.eu/asylum-report-2024)

[Executive Summary -Asylum Report 2024 \(https://euaa.europa.eu/asylum-report-2024/executive-summary\)](https://euaa.europa.eu/asylum-report-2024/executive-summary)

[Sources on Asylum 2024 \(https://euaa.europa.eu/publications/sources-asylum-2024\)](https://euaa.europa.eu/publications/sources-asylum-2024)

[National asylum developments database \(https://euaa.europa.eu/national-asylum-developments-database\)](https://euaa.europa.eu/national-asylum-developments-database)

[International Protection in Europe: 2023 in Review \(https://euaa.europa.eu/international-protection-europe-2023-review\)](https://euaa.europa.eu/international-protection-europe-2023-review)

Background Documents

[Word template to submit input](#)

Contact

[Contact Form](#)

Input by civil society organizations to the EUAA Asylum Report 2025

The Border Violence Monitoring Network

***Disclaimer:** The following is the contribution of the Border Violence Monitoring Network (BVMN) to the EUAA Annual Report. BVMN deems it crucial to provide field information and evidence to all EU institutions and agencies. However, it is important to note that BVMN neither endorses nor agrees with the conclusions drawn in the EUAA reports. BVMN acknowledges numerous reports highlighting significant deficiencies in the Agency's work, ranging from self-imposed quota limitations on recommendations for international protection to allegations of covering up irregularities and a lack of accountability. BVMN also urges that the information from our contribution not be reframed or reformulated to cast doubt upon our findings.*

1. Access to Asylum Procedure, Temporary Reception Centers, Closed Controlled Access Centers, Detention Centers: Denying Rights and Undermining Dignity through Barriers to Asylum and Institutional Failures

The conditions in facilities for asylum seekers throughout the Western Balkans and Greece directly violate international and asylum law. These conditions breach several key legal principles, including the prohibition of inhumane or degrading treatment as outlined in the European Convention on Human Rights (ECHR) and the UN Convention Against Torture. Moreover, the lack of access to essential services such as clean water, medical care, and adequate nutrition, as well as the presence of fire hazards, contravenes the rights of detainees under the International Covenant on Civil and Political Rights (ICCPR) and the EU Charter of Fundamental Rights. Additionally, the systemic failure to provide timely asylum procedures violates the right to seek asylum, as enshrined in the 1951 Refugee Convention and EU asylum regulations. The neglect of vulnerable groups, including minors, women, and survivors of trafficking, further exacerbates these violations, failing to uphold the principle of non-discrimination and special protection measures for those at risk. Racism and ill treatment from guards are as well reported in some facilities amounted to an environment that already negatively impacts people's psychological well-being.

GREECE

In Greece, the asylum system has often been unpredictable and unreliable due to both technical and administrative failures including a frequent lack of staff and interpreters. [**During May and June of 2024 it was not possible to register an asylum claim anywhere in Greece due to a**](#)

[systems update](#). This left people who were waiting to register their claim or to renew their documents at risk of detention and in some cases without access to food and accommodation. Moreover, asylum seekers are often unable to access legal assistance in a timely manner, and there are frequent delays in asylum procedures, resulting in prolonged uncertainty and distress. The lack of clear information and support regarding asylum rights, coupled with the inadequate recognition of specific needs, such as those of minors and survivors of trafficking, further impedes their ability to effectively engage with the asylum process.

Samos

In September 2021, the first Closed Controlled Access Centre (CCAC) on Samos opened, situated in an isolated location 8 kilometers from the nearest town. BVMN Member Organization I Have Rights (IHR) documented its prison-like structure, shaped not only by its remote geographical placement but also by the extensive surveillance infrastructure, including the use of AI technologies, the constant presence of police and private security, and the severe restrictions on freedom of movement. BVMN has condemned the systematic and automatic detention of people on the move within the CCAC, arguing it violates EU law and international standards.

By November 2024, IHR reported that conditions in the Samos CCAC had reached alarming lows, marked by severe overcrowding, degrading treatment, and insufficient access to necessities. **Despite its official capacity of 3,650, the facility held 4,678 people between November 16th and 18th, functioning at 128% of its capacity.** The overcrowding crisis forced residents to sleep on the floor without bedding or proper clothing as temperatures plummeted.

Greece has been called out several times this year due to the conditions in the CCAC in Samos. In April 2024, the European Court of Human Rights (ECtHR) condemned Greece for subjecting asylum seekers on Samos to inhuman and degrading treatment. This ruling in the case of [A.R. and Others v. Greece](#) was the third such judgment within a year. In [W.A. v. Greece](#), another case concerning the conditions in Samos, the applicant, suffering from a severe chronic illness, endured degrading conditions in the overcrowded facility between August 2019 and July 2020. Earlier that year, in February 2024, the ECtHR issued an [interim measure](#) demanding the Greek authorities relocate a mother and her baby from the CCAC to suitable accommodation. Again in October 2024 the ECtHR [condemned](#) Greece for the human rights violations of seven unaccompanied minors by subjecting them to inhuman and degrading treatment in Samos in 2019 and 2020. **These cases underscore the persistent inadequacy of Greece's reception conditions for asylum seekers.**

The Greek National Commission for Human Rights (GNCHR) found that the [Samos CCAC failed to meet basic standards, exposing residents to severe risks and inadequate living conditions](#). Key concerns included de facto detention practices, insufficient healthcare services, inadequate water supply, and overcrowding. Hygiene standards were described as deplorable,

with residents lacking essential cleaning supplies, laundry services, and functional waste disposal systems. The GNCHR also raised alarm over reports of police violence and the detrimental effects on residents' mental health caused by the high-security infrastructure—including CCTV cameras, barbed wire, and a NATO-style double security fence.

In November 2024, IHR provided further [evidence](#) of the deteriorating conditions in the Samos CCAC. **Water shortages—a long-standing issue—had become more severe, with near-daily water cuts since September 2023 and no long-term solutions in sight.** Overcrowding exacerbated the dire circumstances, with residents, including women and survivors of human trafficking, forced to live in mixed-gender spaces lacking privacy and safety. Medical care was critically insufficient, with only one doctor available through the Hippokrates program and the NGO Médecins Sans Frontières providing services three days a week for ca 4600 people.

In July 2024, the European Committee for the Prevention of Torture (CPT) published a [report](#) following its visit to Greece from November to December 2023. The report described conditions in the Samos CCAC as inhuman and degrading, echoing IHR's findings. Accommodation was deemed unsuitable, with single women and mothers housed alongside unrelated men. The chaotic and undignified food distribution system was also criticized, with vulnerable residents unable to secure daily rations. The CPT highlighted a lack of effective vulnerability assessments for new arrivals and inadequate medical checks due to insufficient staff. In the report, the accommodation facilities are described as defective and unsuitable, with single women and mothers with children being accommodated with unrelated adult men (CPT 2024; 4, 41). Moreover, the CPT pointed out that deprivation of liberty of people accommodated in the Samos CCAC often overrode legal provisions (CPT 2024; 35). The report also finds that the Greek authorities do not carry out effective vulnerability assessments of all new arrivals (CPT 2024; 4). Furthermore, the Committee expressed concern about the access and quality of medical care in the Samos CCAC (CPT 2024; 5). They found that medical checks for newly arrived persons are too rapidly conducted, due to insufficient and inadequate medical staff (CPT 2024; 43). The CPT report highlights hygiene-related issues with cleaning products given only when asylum seekers arrive in the CCAC and are meant to cover their entire stay in the facility. Sanitary facilities are described as being “in a dreadful state and in need of repair” (CPT 2024; 39).

Amnesty International's July 30th [report](#) painted a similarly grim picture, drawing on data and evidence presented by several Samos-based NGOs, including IHR. **The report emphasises, among other things, the illegality of the “restriction of freedom” regime where every asylum seeker is unlawfully *de facto* detained upon arrival to the Samos CCAC.** Chronic water shortages, inadequate medical care, and insufficient psychological support were highlighted as emblematic of the broader failures in Greece's reception system. Amnesty International warned that the Samos CCAC serves as a cautionary example for the EU and its member states as they implement the new EU Migration and Asylum Pact.

On July the 11th, the European Ombudsman opened an inquiry into how the European Union Agency for Asylum (EUAA) addresses allegations of fundamental rights violations in its activities in Greece (case 229/2024/AML). The inquiry stems from a joint complaint filed against the EUAA by IHR and Avocats sans Frontières France. **The organizations provided evidence of fundamental rights violations in the EUAA’s operations in Samos. Specifically, the complaint highlights how EUAA caseworkers routinely fail to adequately assist survivors of pushbacks and human trafficking. The joint complaint, submitted to the European Ombudsman’s Office in January 2024, raises serious concerns about how the EUAA addresses and investigates allegations of fundamental rights violations committed either by its staff or by the staff of national authorities where it operates.**

IHR has denounced the treatment of survivors of human trafficking , especially the failure of identification and proper vulnerability assessment. Following a report and three communications, the UN Special Rapporteur on Trafficking in Human Beings wrote a letter of allegation to the Greek authorities. This confirms IHR’s complaint stating that **EUAA caseworkers also fail to identify and/or report vulnerable individuals such as survivors of Human Trafficking.** UN Special Rapporteur on Trafficking in Human Beings expressed grave concerns, warning that such conditions risk retraumatizing survivors and stripping them of their dignity: *“The highly securitised environment of the CCAC, coupled with its isolated location, restrictions on movement, and lack of services, is not conducive to psychological, physical or social recovery of victims of trafficking. I would like to express grave concern that for victims of trafficking to be subject to intense surveillance and tracking infrastructure risks retraumatizing them and strip them of their dignity.”*

Throughout 2024, IHR documented numerous instances of postponed asylum interviews in the Samos CCAC. By the end of July, there was a noticeable increase in the number of interview postponements for asylum seekers on Samos. Within one week, between July 23 and August 1, four clients had their interviews postponed. For each of them, the interview was rescheduled twice. Based on IHR’s experience, interviews can be postponed as many as four times. What makes this situation particularly concerning is the vulnerability of those affected. All of the clients identified that week were vulnerable individuals, including survivors of female genital mutilation, sexual violence, and/or human trafficking. **These delays further exemplify the systemic failures within the CCAC to provide timely and adequate support to asylum seekers.**

The ongoing reporting and monitoring continue to shed light on the violations occurring within the Samos CCAC, calling for urgent action to address the facility’s systemic failures and to uphold the fundamental rights of those seeking protection.

Lesvos

Lesvos has functioned as a de facto open-air prison for asylum seekers and people on the move, with individuals restricted to the island until their asylum cases were processed. The Mavrovouni CCAC remains the main accommodation facility albeit often chronically overcrowded and under-resourced.

BVMN Member Organisation Collective Aid underline the following criticalities in their Situational Update [Report](#) on Lesvos of May 2024:

There are 1,851 people registered in the Mavrovouni CCAC out of a total of 2,008 people on the move in Lesvos. Basic necessities are lacking: there is no hot water above 18 degrees Celsius, and shade is minimal due to camp authorities' fears of fire hazards, exacerbating concerns about the camp's poorly chosen location. **The camp also suffers from a severe shortage of medical staff, psychologists, psychiatrists, interpreters, and safe spaces for vulnerable groups, including unaccompanied minors. Women frequently report feeling unsafe, often resorting to wearing diapers at night to avoid using unsecured toilets where they fear assault. Toilets lack doors that can be locked, further compromising safety.**

Significant challenges remain in the processes for assessing both nationality and age, undermining the rights of asylum seekers and vulnerable individuals. Article 15 of the Universal Declaration of Human Rights (UDHR) guarantees the right not to be arbitrarily deprived of nationality. However, violations of this right have been documented extensively. The process of nationality screening, overseen by the Registration and Identification Service (RIS) with significant involvement from Frontex, has raised numerous concerns. While Frontex is meant to play only an assisting role, it has taken over much of the nationality screening due to resource shortages within Greek authorities, such as the lack of interpreters. **These screenings are guided by internal Frontex regulations, and the resulting assessments are classified as "non-paper" documents, which makes them inaccessible and virtually impossible to challenge.** Asylum seekers are often registered with both a stated nationality and an estimated nationality. When these do not align, people on the move face immense difficulties proving their nationality, especially as many lack access to original identity documents due to the circumstances of their displacement. The estimated nationality often leans toward "safer" countries. This discrepancy significantly impacts the likelihood of receiving a positive asylum decision, as those assigned to a "safer" nationality face greater obstacles in their claims.

Similarly, the age assessment process on Lesvos has drawn criticism for its flawed implementation, which puts unaccompanied minors at risk. Age assessments are intended to verify whether an applicant is a child, thereby ensuring access to additional protections. However, the procedures used have often been harmful and unreliable. A recent [report](#) by Fenix Legal Aid, which analyzed 14 case studies, noted some improvements in the process between 2020 and 2023. Yet, several critical violations persisted, including the failure to provide adequate

information, lack of proper notification, incomplete assessments, and the systematic use of X-rays, which can negatively impact the psychological well-being of minors.

In Greece, major obstacles persist for asylum seekers attempting **family reunification**. One of the most significant challenges lies in the requirement for family members abroad to submit certified copies of identity documents, travel documents, and proof of familial ties, such as family booklets. These certifications must be conducted by Greek consular services, which are often inaccessible or entirely absent in many countries where applicants' family members reside, such as Afghanistan, Sierra Leone, Palestine, Sudan, Burundi, and Bangladesh. This situation forces family members to travel to neighboring countries to access Greek consular services, often at great personal risk and without the necessary travel permits. **Even when they manage to reach a consular office, they may be turned away because the office cannot process their requests, and no alternative pathways are provided.** These insurmountable hurdles become particularly dire in regions plagued by warfare where family reunification becomes almost impossible.

Meanwhile, **vulnerabilities related to gender-based violence (GBV) are frequently overlooked by the Greek asylum service.** Serious cases of GBV that are not physically apparent—such as late-stage pregnancy or severe psychological trauma—are often disregarded due to systemic flaws in medical and psychosocial assessments. Key issues include a shortage of medical and psychosocial professionals, lack of privacy for thorough evaluations, insufficient translators, inadequate medical screenings, and the failure of practitioners to recognize scars or trauma caused by torture and violence. Moreover, public hospitals frequently refuse referrals for further evaluation, **leaving survivors without adequate care.**

The situation is concerning for **LGBTQIA+ asylum seekers**, whose safety and well-being are inadequately addressed. A 2024 [report](#) based on interviews conducted the previous year revealed that over 30% of LGBTQIA+ respondents on Lesbos experienced a lack of appropriate accommodation, increased violence, and barriers to asylum due to insufficient training and care among officials. **Many are forced to conceal their sexual orientation or gender identity, causing severe mental health strain, and exposing them to heightened risks of physical violence.** Compounding this, over half of LGBTQIA+ asylum seekers interviewed in 2023 reported being subjected to invasive and prohibited questioning about sexual practices during their asylum interviews, in direct violation of EU and Greek case law, as well as UNHCR and EUAA guidelines.

Severe criticalities are raised in relation to access to food—a fundamental human right under Article 25 of the Universal Declaration of Human Rights— which has become a systemic issue in Lesbos. In 2021, it was estimated that 60% of camp residents did not receive food or cash assistance, creating a widespread hunger crisis. The issue persisted into 2023 when,

in May, food and water were cut for Mavrovouni residents, no longer part of an asylum procedure. **Despite UN intervention in July 2023, no action was taken, leaving affected individuals reliant on inadequate food distributions by NGOs. Pregnant and lactating women were among those impacted, underscoring the Greek government's failure to uphold its legal obligations.**

Most children in the camp lack access to education or recreational activities, and the trauma of camp life compounds their previous experiences of violence. Info Migrants has [documented](#) severe cases of children as young as seven expressing suicidal thoughts, some attempting suicide. Others display signs of complete shutdown—ceasing to speak, eat, or respond to stimuli. Parents, overwhelmed and hopeless, often express suicidal thoughts themselves, believing their children might be better cared for if they were no longer alive.

The evidence presented underscores systemic failures across key areas—living conditions, safety, food access, and medical care. With construction of the Vastria CCAC moving forward despite legal and logistical concerns, there is a growing fear among NGOs and human rights advocates that these issues will only be reproduced and further entrenched in the new facility. Without immediate action to address these deficiencies, asylum seekers in Greece will continue to face conditions that not only violate their fundamental rights but also jeopardize their health, safety, and dignity.

Such dire conditions, if replicated in the planned Vastria CCAC, will only worsen the situation. The remote site, 30 kilometers from Mytilene, is accessible via a single dirt road, posing significant challenges for emergency vehicles and other essential services. The Greek Supreme Administrative Court revoked the construction permit for Vastria's access road and canceled the camp permit, citing the lack of an environmental study. However, the Greek Migration Minister has publicly stated that construction will continue despite these rulings and warnings from the fire service and local residents. The planned site in a forested isolated area heightens risks of fire and emergency response delays. Historical precedence highlights these dangers: the original Moria camp was destroyed by fire in 2020, and another fire in 2022 destroyed a rubbish hall in Mavrovouni CCAC, leaving 150 people without shelter. Collective Aid's Situational Update underlines that ever since 2022, the local fire brigade has expressed serious concerns about the location of the Vastria camp warning that if a fire started there, it would burn half of the island, and it would be hardly realistic that the camp would be evacuated. Collective Aid has addressed an [open letter](#) to the Eu Commission warning that conditions in the camp could lead to human rights breaches, with issues surrounding freedom, safety, and access to essential services. Despite delays due to a court-ordered revocation of the construction permit for its access road—stemming from the lack of an environmental study—the construction continues, with the contract extended until November 30, 2024.

We have reasons to believe that the right to life, protected under Article 6 of the ICCPR and Article 2 of the ECHR, is severely undermined. If this right is not upheld, no other human rights can be fully enjoyed.

WESTERN BALKANS

Serbia

Throughout February, various NGOs have been providing regular assistance to people sleeping outside the Obrenovac Asylum Centre (AC) near Belgrade. The number of people in this group has ranged from 10 to 70, including adult men, families, and unaccompanied minors. **Those staying outside the camp reported that the center has rarely allowed new arrivals to register.** In February, the Obrenovac AC was hosting approximately 50 people, far below its 1,200-capacity, all of whom are already registered in the Serbian asylum process and had been staying at the center long-term. The camp also reopened its 200-capacity quarantine area, initially designed for the COVID-19 pandemic. Collective Aid have noted that the quarantine area was overcrowded, lacked access to charging facilities, and many people were reluctant to use it due to reports of systematic evictions by the police. [Testimonies](#) collected from BVMN member organisations show that **throughout February, people outside the camp consistently reported being subjected to violence and harassment by the police and Commissariat security, as well as forced relocations to other state-run camps in southern Serbia, such as the Sjenica and Tutin Asylum Centres.** Additionally, there have been multiple reports of shelter items and personal belongings being destroyed by authorities, as well as physical and verbal assaults.

Bosnia- Herzegovina

Collective Aid Situational [Report](#) on Bosnia and Herzegovina describes that Bosnia Herzegovina is currently managing four Temporary Reception Centers (TRC), one Reception Centre, one Asylum Centre, and one Detention Centre, with concerning conditions reported across several facilities:

The TRC in **Blazuj** reports poor conditions, with video evidence confirming the issues. Hygiene and toilet facilities are in bad shape, there is no heating in containers, and only cold water is available. Violence has been reported over small material possessions, emphasizing the scarcity of basic supplies, such as blankets. The TRC in **Lipa** is overcrowded, housing 1,600 people in a space designed for 1,500. There have been reports of violence, and tragically, one person was killed. **Access to basic services, such as healthcare and sanitation, is highly limited. The site is also located far away from key infrastructure and directly next to a minefield, creating further risks.** **Lukavica Detention Centre** is described as lacking transparency, with the last anti-torture committee visit occurring in April 2021. It is a mixed facility, and there is a **lack of data regarding its capacity and the number of people detained there since 2022.** The facility is urgently in need of investigation. **Locals describe it as a "black hole," where families, including children, are reportedly taken.** Reports of racism from guards, as well as a lack of

access to essential items like clothing, legal support, and translation services, have surfaced. Additionally, detainees are often not informed of the reasons for their detention, and there are reports of psychological violence. **These conditions call for immediate attention and intervention to address human rights violations and ensure the safety and dignity of those held in these facilities.**

2. Pushbacks: Access to Territory and Access to Asylum, Arrival at the Border, Application of the *Non-Refoulement* Principle

In 2024, the Border Violence Monitoring Network (BVMN) and Member Organisations continued to [document](#) cases of pushbacks across Greece and the Western Balkans. The increasing criminalization of migrants, coupled with a rise in detention and border violence, has forced many to retreat into more obscure areas, making it even harder for them to access essential services and for human rights defenders to reach them. BVMN understand pushbacks as State practices by which people on the move are forced across a border, without consideration of their individual circumstances and without the possibility to apply for asylum or to object against the measures taken.

Pushbacks in themselves are illegal, however they can also be a cluster of other human rights violations, including, but not limited to, the prohibition of *non-refoulement*, right to life (Art. 2 ECHR, CFREU), prohibition of torture and inhuman and degrading treatment (Art. 3 ECHR, Art. 4 CFREU), inviolability of human dignity (Art. 1 CFREU), right to the integrity of the person, right to liberty and security (Art. 5 ECHR, Art. 6 CFREU), right to property (Art. 17 CFREU), respect for private and family life (Art. 8 ECHR, Art. 7 CFREU), right to asylum (Art. 18 CFREU), right to a fair trial (Art. 6 ECHR, Art. 47 CFREU), right to an effective remedy (Art. 13, Art. 47 CFREU), prohibition of discrimination (Art. 14 ECHR, Art. 21 CFREU), protection of personal data (Art. 8 CFREU), and others.

In relation to the so-called “non-refoulement ban” we are referring to one of the main pillars of international law and binding legislation (*jus cogens*) accepted and recognized in its entirety by the international community of States. **Furthermore, States are obliged to give the individuals concerned information about accessing asylum procedures, translation and legal assistance and an effective opportunity to challenge negative asylum decisions and deportation orders.**

Pushback practices represent the most utilized tactic by States to prevent access to territory and consequently access to rights, including the right to seek asylum. In the past years, states have qualified pushbacks as “prevention of entry”, or “refusal of entry”, or “prevention of departure”. Regardless of qualification, these practices are unlawful. The Lisbon

Treaty obliges EU states to ensure compliance with the principle of non-refoulement', while the EU Charter prohibits collective expulsions. In fact, on June 13th the European court of justice (ECJ) had ordered Hungary to pay a fine of €200 million for a continued breach of European Law in regard to their treatment of people on the move, access to asylum and pushback practices to Serbia. The penalty comes after a failure to implement a previous judgement of the court back in 2020 after which they dismantled the container camps where they had held people in terrible conditions at the Serbian border.

Pushbacks continue to be a direct threat to life. [Pushbacks are as well related- and cause of-enforced disappearance](#) as stated by the chair of UN Committee on Enforced Disappearances. According to the International Organization for Migration (IOM), in 2024 31,184 people died in the Mediterranean, and 1,265 in the EU. UNICEF reports over 2,200 deaths in the Mediterranean alone, including hundreds of minors. However, due to the lack of systematic national or international data collection, the true extent of the deaths is severely underreported. Border deaths have occurred in various regions, with many migrants dying in forests, mountains, or drowning in rivers: their remains never recovered.

Western Balkans

The situational [report](#) of February 2024 on **Sarajevo** conducted by BVMN Member Organisation Collective Aid highlights continued pushbacks. **Operational patterns continue to be systematic and structured involving frequent use of physical violence, beating with batons, confiscation of clothes and personal belongings, destruction through burning, forced immersion in rivers, and police dogs as means of intimidation.** Testimonies from BVMN's September [report](#) confirm pushbacks from Croatia toward Bosnia-Herzegovina continue to involve highly degrading and dehumanizing practices. Drowning is also reported culminating with **Drina River boat disaster of August 22, when at least 12 people drowned.** Croatian police have reportedly forced people across the river between Croatia and Bosnia-Herzegovina. A [testimony](#) from July recounts how officers pushed a group of migrants toward the Korana River, knowing the risks involved. **Deaths at the border continue to be documented in this area, with at least 41 victims recorded in 2024, most of whom were young adults aged 20 to 30 and their bodies were recovered by volunteers.**

Despite a bilateral agreement between Croatia and Bosnia-Herzegovina, the agreement's implementation plan has never been activated, and the collective return of asylum seekers without a transparent, individual process contravenes EU asylum law, the EU Charter of Fundamental Rights and the 1951 Geneva Convention. The violent pushbacks from Croatia are part of a broader pattern of fundamental rights violations that have persisted for over seven years at the borders with Bosnia- Herzegovina and Serbia, as reported by BVMN and other organizations.

Pushbacks have also been reported at the **Romanian** and **Bulgarian** borders. While the number of people transiting through Serbia has decreased, many still attempt to cross the mountainous Bulgarian border on foot, only to face violent pushbacks by Serbian authorities. Testimonies from May 2023 describe how Serbian officers inflicted beatings on a group of migrants and stole their phones before forcing them to return to Bulgaria. Similar reports of violence have surfaced at the Serbian-Romanian border. **These practices are systematic, and while only a few examples are highlighted, they represent a much larger, pervasive issue.**

In Bulgaria the border with Turkey continues to be fortified, with increased personnel and equipment deployed as part of the country's partial accession to the Schengen zone. In May 2024, Bulgaria's police chief announced that an additional 40 vehicles and more officers would be stationed along the border. The number of Frontex officers in Bulgaria has also tripled, with 500-600 officers currently deployed. These changes coincide with a decrease in the transit of migrants through Bulgaria and a reduction in the population of government-run accommodations. Despite the drop in numbers, Bulgaria's border control policies continue to be characterized by violence and illegal pushbacks.

Almost 100 people have died trying to pass through Bulgaria in the last two years. According to IOM's Missing Migrant Project one person of Syrian nationality has died in Bulgaria during 2024 due to exposure and three have died in Serbia due to a car accident.

Greece

In **Greece** the number of pushbacks [reported](#) remains high. According to statistics released by the Turkish Coast Guard (TCG) in April 2024, 1384 individuals were rescued by the coastguard that month, 728 of whom were pushed back by Greek authorities. The same statistics indicate that there were 22 life rafts used, and 1812 people were stopped by the authorities before they left the land. By the end of the month, 1897 people were registered on the Greek islands. The previous month, March 2024, saw similar numbers. It was reported that there were 27 life rafts used and the TCG rescued 1224 people, with 878 being victims of pushbacks. The data also indicates that 1951 people were stopped before crossing, while 1818 people arrived on the Greek islands and were registered. The numbers show a similar pattern when compared to the same month last year. On 15 April 2024 it was reported that a life boat that was pushed back by Greek assets and with migrants on board sank off the coast of Muğla's Fethiye district, and 1 TUR CG Boat (TCSG-911) was immediately dispatched to the scene. 12 migrants and 1 child were rescued from the life boat detected in a half sunken state by the TUR CG Boat dispatched to the scene and from the surface of the sea.

According to the statistics released by the TCG, in July 2024 the TCG rescued 2198 people, 1270 of whom were victims of pushbacks by the Greek Coast Guard. According to the same statistics, 2634 people were apprehended before they left Turkish land and 3865 people were registered on the Greek islands. These numbers constitute an increase from those of June, when

1634 people were reported to have been rescued (1019 after a pushback), 2306 apprehended by Turkish authorities, and 2379 arrived and were registered on the Greek islands.

As these unlawful practices persist, it is crucial to emphasize the connection between pushbacks and the denial of access to asylum. Pushbacks are not only an attack on individuals but a direct denial of their right to access protection.

3. Other Important Developments: Criminalization

One of the consequences of criminalizing people on the move is the frequent obstruction of their right to asylum. Smuggling-related charges have increased using criminal law to manage migration and deter mobility. **This trend is evident in Greece, where individuals are arbitrarily arrested upon arrival, charged with facilitation, and detained for prolonged periods without legal aid or interpretation, effectively barring them from exercising their right to seek asylum.** [The trial of Homayoun Sabetara](#) exemplifies this systemic issue: despite filing an asylum application, Mr. Sabetara was prosecuted under anti-smuggling laws. Greek courts often fail to recognise the intention to seek asylum as sufficient to trigger international protections, insisting instead on active asylum status—an impossible standard for individuals detained immediately upon arrival. Greece’s anti-smuggling framework, among the harshest in Europe, criminalises operational acts like steering a boat without assessing intent or coercion. This approach contravenes international law, including the 1951 Geneva Refugee Convention, which protects asylum seekers from penalisation for unauthorised entry. By conflating migration control with criminalisation, Greece systematically undermines the fundamental right to seek asylum, perpetuating violations of procedural safeguards and international obligations.

Both humanitarian workers and refugees have been prosecuted for either providing essential humanitarian assistance or for seeking safety in Greece. [Human rights defenders also continue to face criminalisation for their work with people on the move.](#) For instance, 24 people currently face charges for having provided humanitarian assistance to people arriving on Lesbos between 2016 and 2018 leading to the closure of operations of the NGO ERCI who had been attending landings and supporting people on the move as they arrived on the island. Although misdemeanour charges against Sarah Mardini and Séan Binder were dropped in August 2023 by the Supreme Court, the following month they and the 22 other defendants were indicted for four felonies including forming and membership of a criminal organisation, and facilitating irregular entry. This hostile environment, and the fear created as a result, led to the suspension of activities of multiple organisations supporting asylum seekers on the Greek islands, and thus clearly negatively impacts reception conditions for those arriving.

Overall, an increase in criminalisation of migration can be observed within the EU. This development is [interlinked](#) with an increase of securitisation and border externalisation. **The**

intensification of criminalisation has mainly impacted people on the move, by limiting their access to territory and the asylum procedure, essential rights during the asylum procedure, such as access to legal assistance and interpretation services, as well as essential services and fundamental rights during special procedures, reception of applicants of international protection, and during their detention. Oftentimes, those services and access to fundamental rights are provided for and monitored by Civil Society Organisations (CSOs). Through the criminalisation of CSOs, people on the move are often left without the provision of crucial support and direct aid during all aspects of the asylum procedure and beyond.

4. Relevant Publications

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