Border Violence Monitoring Network

# ILLEGAL PUSHBACKS AND BORDER VIOLENCE REPORTS 2026

## THEMATIC MONTHLY REPORT **AUGUST**

*Early signs of the New Pact*



Burnt accommodation container in Amygdaleza Pre-Removal Detention Centre, March 2026.
Source: Detention Landscapes.



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Other contributors:









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# Methodology and Terminology

## REPORTING NETWORK

BVMN[1] is a collaborative project between multiple grassroots organisations and NGOs working along the Western Balkan Route and Greece, documenting violations at borders directed towards people on the move. The partners have a common website database, used as a platform to collate testimonies of illegal pushbacks which are gathered through interviews.

## METHODOLOGY

The methodological process for these interviews leverages the close social contact that we have as independent volunteers with refugees and migrants to monitor pushbacks at multiple borders. When individuals return with significant injuries or stories of abuse, one of our violence reporting volunteers will sit down with them to collect their testimony. Although the testimony collection itself is typically with a group no larger than five persons, the pushback groups which they represent can exceed 50 persons. We have a standardised framework for our interview structure which blends the collection of hard data (dates, geo-locations, officer descriptions, photos of injuries/medical reports, etc.) with open narratives of the abuse.

## TERMINOLOGY

The term pushback is a key component of the situation that unfolded along the EU borders (Hungary and Croatia) with Serbia in 2016, after the closure of the Balkan

Route. Pushback describes the informal expulsion (without due process) of an individual or group to another country. This lies in contrast to the term "deportation", which is conducted in a legal framework. Pushbacks have become an important, if unofficial, part of the migration regime of EU countries and elsewhere.

## ABBREVIATIONS

BiH - Bosnia and Herzegovina
HRV - Croatia
SRB - Serbia
SLO - Slovenia
ROM - Romania
HUN - Hungary
AUT - Austria
MNK - North Macedonia
GRC - Greece
BGR - Bulgaria
TUR - Turkey
EU - European Union

1 BVMN is a network of watchdog organisations active in the Balkans, Greece, Turkey, Poland and France, including Rigardu, Mobile Info Team, Collective Aid, Blindspots, I Have Rights, Center for Legal Aid, Mission Wings. Legal Centre Lesvos, We Are Monitoring, InfoPark, Human Rights Observers and Calais Food Collective.

# Introduction

Pushbacks, *de facto* detention, enforced disappearances, deaths and violence along migration routes to Europe are not incidental to European policy. European institutions bear responsibility both by action and by omission. They bear responsibility by action, through their support for externalisation policies or their funding of agencies such as Frontex; by omission, because the violence at Europe's borders is extensively documented and well known, yet institutions have consistently failed to take effective measures to prevent it. Therefore, when we speak of "border violence", European policies carry precise responsibilities.

Equally, the Pact on Migration and Asylum, the EU's new set of asylum and border rules is not being implemented in a vacuum. The Pact entered into force on June 12th and landed in a context already marked by systematic violence. Monitoring efforts at EU external borders confirm that its implementation has not interrupted these practices. Former Commissioner Ylva Johansson claimed the Pact would mean "no pushbacks at the border." Yet police beatings, illegal expulsions and other forms of violence are still repeatedly documented at most EU borders. Criminalization compounds this, supported by other EU instruments such as the Facilitation Directive. The Directive is currently blocked in the European Parliament, but if approved, it will further endanger both people on the move and human rights watchdogs.

Against this backdrop, the Pact adds an apparatus of regulations that feeds political propaganda more than it responds to the reality of the routes. The discourse centers on "illegal arrivals," yet precarious legal status is most often experienced when permits expire after people are already in the EU.

At least four central points stand out in the Pact. The first one is the default treatment of people on the move as suspects. People rescued at sea or entering through green and blue borders are immediately treated as suspects and must undergo screening to verify their eligibility for an asylum procedure. This goes hand in hand with a fixation on keeping people out of EU territory, even after they have arrived. The Screening Regulation provides for a "legal fiction of non-entry," which separates a person's physical location from their legal status. A person may cross an EU border, but they can still be considered to be "outside" while detained in the screening centres, with serious implications for rights protection and safeguards. Additionally, screening is meant to last no more than seven days. However, according to the monitoring of BVMN's members, that limit is already being widely violated.

The second one is that the Pact is a laboratory of surveillance. Screening entails the mandatory collection of biometric data, including from children aged six and over. Refusal may result in the automatic rejection of the asylum application. The Asylum Procedure Regulation also provides for intrusive practices, such as checks of personal items that may involve extracting data from mobile phones. The Closed Controlled Access Centers in Greece, the EU's blueprint for the Pact, have proven to be 24/7 surveillance centers with fingerprint-controlled

access and monitoring drones. Millions are spent on tech while people sleep on the floor, with broken toilets, insufficient food and other degrading conditions, as continuously denounced by solidarity organisations.

The third one is detention, which is significantly increased by the new set of rules. In asylum procedures at the border, detention can last up to 12 weeks. The Crisis and Force Majeure Regulation allows a further six-week extension, making for a total of over four months. The Return Regulation, renamed the "Deportation Regulation" by more than 200 civil society organizations, reinforces this trajectory. Detention is extended to 24 months for people with a return order, and the grounds for detention are broadened to include children and other vulnerable groups. Approved on October 1st 2026, the Deportation Regulation now formally allows people to be deported to off-shore, prison-like facilities in non-EU countries (so-called "return hubs").

The fourth aspect to highlight is the gap between the official narrative and reality. In her October 13th, 2026 letter to EU leaders, President von der Leyen emphasized the push for further externalization and deportations. She relied on the usual dehumanizing language of "illegal" arrivals and never once acknowledged the realities civil societies document. The letter announces a new European Emergency Response Framework that would give Member States "additional flexibility" in border management and in standard asylum and return procedures, risking the normalization of exceptions to safeguards. This gap between narrative and reality is also a gap in accountability. The Pact foresees a monitoring mechanism, but it is partial at best: it operates only in circumscribed locations, does nothing to address push-backs, and triggers no investigations.

So the question remains: who will be held responsible for the systematic violence we keep witnessing at the borders?




Timeline outlining some of the main administrative events in the development of the New Pact at the EU level.

# UPDATE ON THE SITUATION



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# Croatia

## Violence continues as usual despite the implementation of the Pact

Croatia was among the EU Member States that failed to provide a national migration and asylum strategy - in the context of the preparation for the implementation of the New Pact - before the deadline of June 12th 2025. In October 2025, the country adopted the Migration and Asylum Management Plan, which includes, among its objectives, the prevention of "irregular movements through effective external border monitoring and cooperation with neighbouring third countries". While it has been hard to understand the extent and impact of Croatia's legislative changes against the backdrop of the Pact's entry into force, one thing is clear: the new rules have done nothing to prevent the systematic violence perpetrated by Croatian state authorities against people on the move at the country's borders.

Unsurprisingly, the summer months following the deadline for the implementation of new Pact have been characterized by similar (if not higher) levels of violence against people on the move at EU borders. The new rules, focused on deterrence through detention and deportation, do not change people's need and wish to migrate, nor have they addressed the impunity surrounding systematic state violence. Thus, in August, the Collective Aid and Medical Solidarity International teams in Bosnia-Herzegovina collected countless accounts of unrelenting violence along the Balkan route, most sharply on the Croatian border. Several people described severe beatings and theft of essential belongings. More than once, phones were not merely stolen but deliberately smashed with batons, leaving people on the move stranded with no means of navigation outside forests and perilous routes. Many are then stuck at the Blažuj Temporary Reception Centre (TRC), waiting to heal the injuries inflicted by state authorities. Speaking to Collective Aid, one man from Sudan shared that officers ordered him and his group back into Bosnia while keeping their phones and shoes. They were sent back walking barefoot over rocks, at night. Outside Blažuj TRC, in Sarajevo, he and his friends showed the Collective Aid team the scabs covering their legs and feet, marks resulting from the forced walk back from the Croatian border. His friend, beaten by officers and left untreated, shared:

> "I will try never to return to Bosnia, I hate being here."

Yet the group remained in Blažuj for several weeks after that incident, unable to move forward and continue their journeys.

Another man, from Iran, talked to us about Croatia and the EU:

> "They have no regard for human rights and have no sympathy for immigrants," and "they broke my teeth, hurt my back, and beat me with their batons. I will never forget this... but I want to let everyone know that in Croatia, immigrants are treated like slaves."

Moreover, at least one person shared this month that they were illegally pushed back despite their immediate request for asylum to the police in Croatia, a practice long documented by BVMN and other organisations.

These stories provide evidence of Croatia's continuous lack of compliance with the screening processes agreed upon as part of the New Pact (as well as with human rights international obligations more generally), which require all Member States to register anyone who enters the country irregularly. Furthermore, while it can't be determined to have any relation to the implementation of the Pact, it's important to highlight that an increase in the amount of violent pushbacks has been observed over the past couple of months, many of them including severe dog attacks and beatings by state authorities. Additional observations have also remarked on testimonies from people who recount having been pushed back from close to cities such as Zagreb, where in previous months it was more likely for people to be brought to an official camp. Two separate groups over the past month shared having been stopped while on a train near Zagreb, brought to the border with Bosnia-Herzegovina and forced to return.

### Plans for a new immigration centre at the border with Bosnia

Earlier this year, it was reported that Croatia had begun its development of a new immigration center in the former Yugoslav airbase in Željava, along the Bosnian-Croatian border. To date, the exact purpose of this centre remains unclear; whether it will be used primarily as an open or closed centre, or for planned detention and processing purposes. Irrespective of this, its construction along the border, as well as the protests from local residents on both sides of the country line, suggest that its *de facto* function will be to intercept, register, and potentially detain up to 1,500 people on the move before they are able to travel further inland into EU territory. The project is set to cost nearly 10 million euros, 90% of which is meant to be co-financed by the EU with funds from the Integrated Border Management Fund, with Croatia's financial participation being 10%. The EU's funding of the centre can point at the Pact's vision for "rapid border processing", amidst a broader geopolitical strategy to fund "outer frontier border processing" nodes. In practicality, many fear it will operate as a prison-like detention facility, increasing the scope for the extensively documented practice of illegal pushbacks to Bosnia-Herzegovina.

# Bosnia - Herzegovina

## Bosnia's ever-increasing role in EU externalisation

In Bosnia, the rapid expansion of the technological infrastructure surrounding Europe's external borders demonstrates that the infrastructure needed to meet the Pact's demand for sophisticated and "stronger" border controls is already being constructed and used. In this way, the Pact may not need to create entirely new enforcement mechanisms in Bosnia. It can operate through an existing and expanding ecosystem of European-funded equipment, training, information-sharing and institutional cooperation; it can continuously, and subtly, develop through further EUFOR/Frontex donations of equipment and EU donations of sensor systems and thermal imaging equipment, slowly fortifying their EU-shared borders. In this context, Bosnia-Herzegovina remains in a particular position with regards to the EU, due to its status as both a direct external bordering country, as well as an EU candidate, making it especially vulnerable to the influence and impact of the policies of the Union. With regular financial support from the EU, and expectations of border management pushed as standards for membership, Bosnia-Herzegovina has slowly responded accordingly through agreements on border control and readmission, as well as through the deployment of Frontex in the country, to name a few developments.

In June, Collective Aid reported on the "Letter of Intent" signed by EUFOR (European Union Force in BiH) and Frontex to establish a framework for practical cooperation, including closer coordination, information sharing and situational awareness. This included provisions for the transfer of equipment to the Bosnian border police. Details on what kind of equipment will be transferred and which Border Police units will receive it remain unclear.

# Serbia

## Increased cooperation with Frontex and EU Member States

Just as Bosnia-Herzegovina, Serbia is not meant to formally implement any aspects of the Pact, as it is not an EU Member State. However, two of the main goals of the New Pact revolve around preventing secondary or onward movements and strengthening control at external borders; aims for which the EU has, for a long time, heavily counted on the collaboration of neighbouring countries. In this context, in the past few months, we have observed a growing cooperation between Serbian police, Frontex, Europol and other EU Member States.

The New Pact follows the EU's Western Balkans Action Plan 2022 and the expansion of Frontex operations in Serbia. At the beginning of June 2026, the Executive Director of the European Border and Coast Guard Agency (Frontex), Hans Leijtens, visited Serbia and BiH with the aim to deepen ties with the region, and strengthen cooperation in the field of "border management", training and coordination of security activities. Leitjens signed an agreement in Belgrade on the inclusion of the Serbian Ministry of Internal Affairs in the network of partner academies of Frontex. This will allow Serbian border police to access workshops, trainings, joint projects, exchange programs and e-learning, "with the aim of harmonising training with EU standards". Based on EU rules from 2019, Frontex can operate in the entire territory of Serbia. The June Frontex agreement with Serbia and the agreement signed between Serbia and Slovakia in June, and Slovenia in August, are examples of continued moves to expand surveillance and EU enforcement cooperation at the Serbian state borders. Frontex operations are central to Serbian-Slovenian cooperation and 9 Slovenian police officers are currently deployed in Serbia at border crossings with Hungary, Bulgaria and Bosnia-Herzegovina. Serbia's Deputy Prime Minister Dačić shared hopes to open a Regional Interpol Bureau in Belgrade and called on Slovenia's support in this. This contributes to Serbia's alignment with the EU and the New Pact through expanded border surveillance, heightened policing operations, enhanced information-sharing systems and growing emphasis on "anti-smuggling" frameworks.

Moreover, Serbian Minister of Foreign Affairs Marko Đurić met with Director-General of the European Commission's Directorate-General for Enlargement and Eastern Neighbourhood, Gert Jan Hoopman, on June 11th. The conversation was focused on Serbia's commitment to reforms and its path to joining the EU. Frontex and the EU Commission want Serbia to fully align with the EU's visa policy - that is, to impose further restrictions of movement for citizens of certain countries chosen by the EU -, to "reduce the rate of irregularized entry into the EU". None of these developments can be directly tied to the implementation of the New Pact, but they are part of the same framework constructing migration as a threat and championing containment, externalisation and violent deterrence in return.

Crucially, all these measures, plans and agreements have coincided with continued reports of extremely violent push-

backs to and from Serbia, shrinking humanitarian access, and increasing barriers to protection throughout the region, proving that ending impunity and human rights violations is never really on the agenda.

Furthermore, on June 27th, President Vučić held a rally called "Serbia, One Family" and referenced EU-accession, stating that Serbia should do everything to speed up the process and fulfil obligations, whilst refusing to take any action that will impact relations with Russia and China. Ratko Mladić the "Bosnian Butcher" died in the Hague on August 28th, aged 84, where he was living out his life-sentence for genocide. Many Serbian nationalists and right-wing extremists including President Vučić championed him as a military hero, leading to Marta Kos, the EU Enlargement Commissioner, cancelling a planned visit to Serbia, saying that "public glorification" of convicted Bosnian Serb war criminal Ratko Mladić was incompatible with the values underpinning the country's path toward EU membership".

# Bulgaria

### Violence in screening centres

Reception centers in Bulgaria have been running with a very low number of people on the move. While the State Agency for Refugees recently stopped providing detailed statistics, local NGOs report that very few people are currently staying in these facilities. At the same time, Detention Centers and Transit Centers are becoming more and more crowded. Pastrogor Transit Center and Lyubimets Detention Center are now the main facilities in use for screening and accelerated procedures, following the implementation of the New Pact. Importantly, they are close to the Bulgaria–Turkey-Greece borders and far away from the capital.

Unsurprisingly, the implementation of the New Pact has done nothing to stop systematic violence by state actors at the border and beyond, since that was never the focus of the new legislation. Based on recent information collected by BVMN member organisations in Bulgaria, several people experienced physical violence at border police stations after apprehension by state authorities. Almost none of the respondents received information about their rights for asylum or legal counsel, while the majority of people reported signing at least one document without knowing its content.

At the end of July, when a detainee in Pastrogor Transit Center managed to escape from the facility, massive repression was unleashed against the rest of the detainees. Reports point at the use of physical violence by police, as well as the destruction of phones and other belongings. In the absence of a meaningful monitoring mechanism, no investigation followed, despite the efforts of several detainees. In a second incident on August 28th, 12 detainees managed to escape from Pastrogor Transit Center. Early reports point at police's use of major physical violence against them.

# Greece

## Lack of preparedness and suspension of registrations on mainland Greece

On the Greek mainland, the first weeks following the Pact's entry into force were marked by an apparent lack of preparedness. Even though the legislative texts of the Pact had been adopted two years earlier, the national implementation law was only put to public consultation one month before the June 12th implementation deadline, and adopted ultimately only three days before that date.

This left very little time for the elaboration of clear administrative and operational guidance to frontline authorities, as evidenced by the publication of some essential implementing decisions after June 12th (e.g. Decision No. 120961/26 on the provision of free legal guidance to asylum seekers, published on June 30th; and Decision No. 126098/2026 on the implementation of the asylum procedure at the border, on July 9th), as well as by reports and testimonies from various actors on the ground. Certain technological upgrades, including that of information systems that allow for interoperability with European databases, were seemingly also not completed before the implementation deadline. As a result, an informal suspension on the registration of asylum applications followed, while the necessary upgrades were made. This resulted in the *de facto* detention of some in Reception and Identification Service (RIS) facilities, pending formal registration and completion of the screening procedure, as well as the detention and criminalisation for illegal stay of others.

According to monitoring by Equal Rights Beyond Borders (ERBB), the seven-day timeframe prescribed by law for completing screening procedures has not been respected at the Malakasa Reception and Identification Centre (RIC), with most of their clients remaining *de facto* detained for one month, until the reception of their asylum seeker card. The NGO has raised concerns about the unclear legal basis for this restriction of liberty, noting that most of its clients did not receive any written order documenting the measure. Unclear as well is the procedure to which people who arrived after June 12th were referred to, as no documentation was reportedly provided in this regard, and requests for information from the authorities have failed to provide clear answers.

In a case represented by Refugee Support Aegean, a single mother and her two children were arrested while - and despite - requesting protection at the Malakasa RIC, after their attempt to book an appointment via the online platform failed. The staff of the RIC themselves reportedly called the police, and the family was first detained in a police station before they were taken to Amygdaleza Pre-Removal Detention Centre (PRDC), with a return decision and a criminal case opened under charges of "illegal stay". Besides the inhuman nature of this event, the authorities' practices constitute a complete breach of EU and international law. Under EU law, an individual is considered an "applicant" for international protection from the moment they have "made" an application, meaning they have expressed their wishes to receive international protection. Prosecuting an

applicant for international protection for illegal entry or stay goes against well established principles enshrined in the 1951 Geneva Convention.

It therefore appears that the shortcomings of the Greek asylum system, the lack of preparation and general state of confusion have been exploited as an opportunity to pursue and reinforce punitive practices.

## The disappointing first assessment of Greece's Pact implementation by the European Commission

Following a decision by the European Commission in 2025, Greece will be entitled to benefit from the EU Solidarity Pool from 2026, as established by the Regulation on asylum and migration management (AMMR). Yet, in order to do so, all issues related to the implementation of the old Dublin III framework must be remedied, such that there are no persistent "systematic shortcomings" which could negatively impact the "effective operation" of the new responsibility rules under the AMMR. If there are, it would be grounds for other Member States not to proceed with their solidarity contributions to the country in question.

The Commission accordingly carried out its first assessment in July 2025, in the process also evaluating Greece's overall progress in implementing the Pact. Although the Commission judged that it was not yet possible to come to a definitive conclusion as to whether all issues under the previous Dublin III framework had been remedied, it reflected positively on the progress Greece was making toward that goal, in the context of broader positive progress made toward implementing the Pact.

While there may have been a political incentive to come to a more positive conclusion so as not to stunt progress made toward implementing the AMMR, the positive findings of the assessment present only part of the picture. The assessment fails to account for various missteps and shortcomings that emerged in the implementation process, as well as the negative consequences that followed from an administrative and fundamental rights' perspective.

For a start, the Commission praises Greece for having made "*significant progress in establishing the legal and institutional framework necessary for the implementation of the Pact*". It also notes that "*extensive coordination and communication efforts*" have taken place, as well as "*the preparation of operational guidance and dedicated workshops*". The assessment eclipses the full reality by not acknowledging the operational deficiencies that followed the late passing of the national implementation law, some of which have been outlined in the above section.

The Commission's mention of "*additional reception capacity in Crete*" is almost ironic. While the authorities have indeed added metal beds in the former exhibition centre in Chania, which serves as an accommodation facility since 2024, conditions remain deplorable, and overcrowding of the second structure on the island was still reported in June, days before the Pact's implementation deadline. In a press

release published early September, the Greek Ombudsman qualified the structures in Chania and Heraklion as "*unsuitable spaces*" which "*cannot substitute for the standards of dignified accommodation and the first-reception procedures that the law requires the Ministry of Migration and Asylum to provide*". The Ombudsman considered that the way people are held in those structures amounts to a transitional *de facto* detention regime, and denounced it as a violation of the Screening Regulation.

In addition, the Commission highlighted that "*Greece successfully implemented*" the requirements necessary to connect national information systems to the Eurodac system, but omitted the delays in those adjustments, and the temporary suspension on the processing of asylum registrations that followed.

The assessment also notes that a number of additional staff have joined the National Dublin Unit (responsible for the implementation of Dublin rules in Greece), "*significantly [strengthening]*" the operational capacity of the Unit. Yet, the assessment also implies that, at the time of publication, Greece had not replied to other member states' take charge and take back requests (the deadline for doing so in some instances had reportedly not yet expired). At the same time, regarding family reunification procedures for people who arrived in Greece but have family in Germany, ERBB's report shows that information concerning the necessary processes could not be obtained from the Greek authorities by the applicants, nor their legal representatives during the first weeks of implementation.

Consequently, the Commission's assessment largely appears to reproduce an account that could have been provided by the Greek authorities, while omitting relevant information and presenting findings that are at odds with observations made on the ground. This calls into question the Commission's adherence to the principle of transparency, as well as its accountability for ensuring proper implementation of the Pact in line with relevant procedural and substantive safeguards.

### Return Hubs and the expansion of return infrastructure

The operational shifts are taking place against the backdrop of a broader push to expand Europe's return infrastructure outward. Greece is one of five EU states -alongside Germany, Austria, the Netherlands, and Denmark- actively working toward offshore return hubs targeted for operation by 2027. Rwanda and Uganda are the most frequently cited locations, despite Rwanda having been found by the UK Supreme Court to not constitute a "safe third country", and Uganda maintaining laws that would put LGBTQ+ people transferred there at serious risk. Amnesty International has warned that such facilities risk becoming human rights "black holes", where protection against arbitrary detention and forced return would depend on host-state law rather than EU oversight. The people most likely to be sent there are those whose asylum claims have been rejected under procedures like the border procedure now being rolled out in the country.

### New Joint Ministerial Decision on legal aid

A new Joint Ministerial Decision provides state-certified lawyers with an additional fee, up to €250, where an applicant in the border procedure submits a voluntary departure request within two months of receiving legal guidance. The fee is payable when the returns procedure is completed. With other NGOs, we have publicly opposed this measure. Legal guidance must be confidential, independent, individual, and rights-based. Linking lawyer remuneration to departure outcomes risks converting legal counselling into an instrument of deterrence policy. The Greek Bar Associations have also indicated that they will not participate in providing legal guidance under the new framework until the relevant Joint Ministerial Decision is amended, an amendment that has not yet materialised.

Separately, it appears that people opting for state legal aid are facing delays in their asylum interview dates, as the state legal aid sessions have limited capacity, although information on this remains unclear.

## *Lesvos*

### Stalled registrations and confusion

Similarly to the situation on the mainland, when the EU Pact on Migration and Asylum came into force on June 12th, the introduction of the new screening and border procedures disrupted registration and asylum processing across Greek islands. On Lesvos, registration came to a complete halt for over a month. Newly arrived people were left stranded without documentation, unable to leave the Closed Controlled Access Centre (CCAC) or access services outside the camp. While registration has since resumed, delays, uncertainty and procedural gaps continue to define the experience of those going through the new system.

New stages have been inserted between arrival and access to the asylum procedure. People transferred from Crete to Lesvos have, in some cases, spent extended periods in the CCAC quarantine area while awaiting registration and the issuance of asylum-seeker cards. In one recent case documented by protection actors, nationals of Bangladesh and Egypt remained in the quarantine area for approximately two and a half weeks, unable to leave the area or access health services within the camp. After registration, they were channelled into the border procedure and subjected to movement restrictions, allowing them to exit the CCAC only between 10:00 and 18:00.

The new procedures have also created confusion about what follows registration. Legal practitioners on Lesvos reported that some people were later told they would be transferred to facilities on the mainland. Those who questioned or resisted this decision were reportedly directed by camp authorities to address their concerns with the police. People transferred from Lesvos to the mainland have also reported having little information about their destination, with some asked to sign transfer documents without interpretation. In general, asylum seekers have often not been informed about the procedural steps they will

undergo. At the beginning of the implementation, authorities often communicated that "the rules have changed" but did not provide details on the status of their process, making it impossible for them and for the organisations supporting them to understand whether the new procedure was being applied and on which legal basis the detention is taking place.

### Lesvos as a new temporary processing hub

The transfers from Crete are revealing Lesvos's emerging role as a temporary processing hub. On August 23rd, 217 people on the move were transferred from Crete to Lesvos. Almost half of them were reportedly Sudanese nationals. Local reporting on a further transfer of 368 people from Crete on September 12th described their stay on the island as temporary, with people expected to depart after registration and identification.

Information shared by protection actors suggests that differences in screening capacity between the islands are contributing to this pattern: people are increasingly being brought to Lesvos for registration and screening before being moved elsewhere. In practice, someone may arrive on Greek territory, spend a few weeks undergoing registration and screening on Lesvos, and then be transferred again to mainland facilities or elsewhere depending on the procedure they enter. This movement is occurring alongside an increase in the population of the Lesvos CCAC, from approximately 270 people on July 28th to 732 on September 9th. The main countries of origin reported by protection actors are Sudan, Afghanistan, Eritrea, Yemen and Sierra Leone.

Nationality plays a central role in determining which procedure people enter. The Asylum Service channels applicants into the regular or the border procedure largely based on recognition rates: nationalities with recognition rates below 20% are generally directed toward the border procedure, which carries stricter movement restrictions and faster timelines. So far, most people arriving on Lesvos have entered the regular procedure.

### New legal and protection gaps

The new framework has exacerbated gaps in legal assistance, interpretation and procedural information. While the European Union Agency for Asylum (EUAA) currently provides interpreters in several key languages, protection actors continue to report unmet needs in several African languages including Wolof, Krio and Oromo.

Furthermore, age assessments were temporarily suspended pending a new Joint Ministerial Decision under Law 5307/2026, raising concerns from protection actors that children could be held in facilities together with adults and that Dublin family reunification procedures could be interrupted. Assessments subsequently resumed under the previous framework, but this episode illustrates how quickly the new legislative structure produces protection failures at the operational level.

Access to individual legal support also remains precarious. In one case, a Palestinian man was detained despite already holding asylum seeker status. He was released following a UNHCR referral and successful objections filed by HIAS. He reported having requested a lawyer and Arabic interpretation during penal proceedings for illegal entry and stay, without success. In another case, a family whose first-instance asylum application had been rejected was notified that their appeal hearing would take place three days later, with all legal submissions due the day before, leaving only two days to prepare.

***Kos***

### Changing procedures increase uncertainty and isolation

Over the month of August, the CCAC in Kos has operated at approximately half of its maximum capacity, with the resident population fluctuating and currently including recognised refugees, unaccompanied children, and people held in detention. The main nationalities present are Bangladeshi, Sudanese, Egyptian, Palestinian and Syrian.

Similarly to the situation in other islands, since the implementation of the new EU Pact on Migration and Asylum began, July and August have marked the Greek authorities' first attempts to apply the new border procedures on Kos. As part of this, the rules governing movement in and out of the CCAC have changed repeatedly, deepening the isolation of those inside. Testimonies from visitors and other actors on the island confirm that, in July, asylum-seekers were unable to exit the camp at all, which blocked their access to any service outside the facility. In August, exit was permitted for only three hours a day, still not enough time to reach Glocal Roots' community centre or other nearby services. As a result, residents have been left without support to cover some of their basic needs for extended periods of time, with no realistic way to access medical care or legal information, among other types of support. This increased isolation has been compounded by several parallel developments on the island. Recent legislative changes have also reshaped the framework governing freedom of movement, and the geographical restrictions that previously applied no longer appear to be enforced in the same way.

Administrative delays have added a further layer of uncertainty: initial screening on arrival can take up to seven days -with detention of up to 12 weeks possible for those in an "irregular migration situation"-, official documents are taking considerably longer than usual to issue and many asylum seekers are still waiting for their asylum interview invitations. Overall, the reporting period has been characterised by a transition period in which new border procedures were gradually introduced but remained only partially operational and subject to frequent changes, thus posing significant challenges for asylum seekers and support actors operating on Kos.

### Further restrictions for people with so-called "non-refugee profile"

On top of the general increased restrictions on movement in and out of the CCAC. Since August, exit rules have also begun to diverge by nationality, with individuals classified under a so-called "non-refugee profile" facing additional restrictions, making it even harder for them to leave and return to the CCAC.

At the same time, transfers from Kos to the Greek mainland have continued, particularly affecting Bangladeshi nationals and other "non-refugee profile" nationalities such as Egyptians, whose countries of origin are designated as safe and who consequently face accelerated asylum procedures and a higher likelihood of first-instance rejections, a trend that intensified in August as the new Pact's faster timelines took effect.

### *Samos*

### *De facto* detention and registration delays in the Samos CCAC

The first months of the implementation of the EU Pact in Samos have also been marked by confusion and resulted in prolonged *de facto* detention, disrupted healthcare access, and reduced legal safeguards for people arriving on the island.

Following the law's entry into force, on Samos, just like on Lesvos, registration for CCAC residents arriving after June 12th was suspended for more than a month, reportedly due to a lack of standard guidelines and delayed IT infrastructure that left the central registration system non-operational. During this period, affected residents were unable to leave the CCAC, as they did not receive their registration cards (also called "red cards"), resulting in *de facto* detention and amounting to unlawful and arbitrary deprivation of liberty. In-depth medical screenings were also suspended, while vulnerability assessments were limited.

Many people contacted I Have Rights' hotline during this period. Some had spent weeks in quarantine upon arrival without being able to see a doctor despite having health issues, before being detained for longer periods. Some people even reported being refused access to the camp clinic altogether because they did not yet hold a red card. Overcrowding in quarantine was also reported, with people forced to sleep on the floors of poorly equipped and unsecured containers, leaving several facing severe anxiety and uncertainty. Many expressed a sense of helplessness, as one person told us:

> "I don't understand why my rights are being violated."

More than 35 cases have been documented by I Have Rights, predominantly involving Eritrean nationals, of prolonged detention in the CCAC without registration or access to healthcare. In one case, I Have Rights filed an application for interim measures on behalf of one of our clients with the European Court of Human Rights, which were granted by the Court, ordering Greece to act. Greece delayed complying with the measures for a significant amount

of time and only acted after repeated intervention by several actors on Samos.

**Recent developments**

Registration has resumed but delays and a lack of interpretation are making the Pact's 7-day registration target unrealistic in practice. It is important to note that meeting this deadline is not desirable either as a faster process risks compressing time available for individual assessment and vulnerability screening.

Practices also remain contradictory, with some decisions issued very quickly and others taking months. This discrepancy seems to be linked to whether a person is placed in the new border procedure or not, but the lack of transparency from the authorities makes it difficult to confirm.



Border Violence
Monitoring Network

Border Violence Monitoring Network

# Network structure and contact

BVMN acts as an alliance of organisations in the Balkans and Greece. BVMN is based on the efforts of member organisations working in the field of documentation, media, advocacy and litigation.

We finance the work through charitable grants and foundations, and are not in receipt of funds from any political organisation. The expenditures cover transport subsidies, several part-time paid coordination positions and some costs incurred by member organisations for their contributions to our shared work.

To follow more from the Border Violence Monitoring Network, check out our website for the entire testimony archive, previous monthly reports and regular news pieces. To follow us on social media, find us on Twitter handle @Border_Violence and on Facebook.

For further information regarding this report or more on how to become involved, and for press and edia requests please email us at mail@borderviolence.eu.

**@Border_Violence**