

## **VASTRIA AS THE BLUEPRINT FOR EU PACT CAMPS**

The development of Vastria, within the [framework of Law 5226/2025](#) and the [EU Pact on Migration and Asylum](#), poses a direct threat to fundamental human rights, the rule of law, the environment, and community safety. Its construction signals a shift towards the systematic deprivation of liberty of people on the move, entrenching detention as the default practice, rather than an exceptional measure.

The construction of Vastria CCAC continues to advance despite overwhelming and long-standing opposition from local communities, human rights and environmental organizations, and scientific experts. Nevertheless, the Greek government has approved yet another - its twelfth - extension of the project, pushing construction forward until at least [13th of March 2026](#). On February 26, the new amendment to the Environmental Terms (Ref. No. 5127/26.02.2026) has been passed, approving the construction of a photovoltaic plant and a battery storage facility, solely for the CCAC's use. In the same amendment, the construction of the legally required emergency evacuation route has been approved, despite serious concerns about its location right next to the access road and within a protected NATURA 2000 site.

In parallel, the Decentralized Administration of the Aegean has authorized the [construction of a desalination plant to be used solely to supply Vastria CCAC with drinking water](#), underscoring the government's determination to implement this project even as fundamental concerns remain unaddressed.

[Recent budget allocations](#) further confirm this trajectory: while funding for all other Greek CCACs has been planned through 2030, the budget for the existing Lesvos CCAC in Kara Tepe (Mavrovouni), extends only through the end of 2026, another clear indication that authorities intend to replace it with the Vastria CCAC in the coming year.

### **Vastria in the light of the EU Pact on Migration and Asylum:**

The establishment of Vastria must be understood within the context of the [EU Pact on Migration and Asylum](#) and the [proposed Return Regulation](#). These measures signal a wider shift in EU migration governance toward punitive, detention-focused policies. The EU Pact on Migration, together with the European Return Regulation, urge countries to build multi-purpose reception centers to hold asylum seekers and migrants. This means constructing facilities where initial screening, asylum procedures, return/deportation procedures, and detention if rejected, are all conducted within the same center. Collectively, these regulations create a system where detention is the default rather than

the last resort, reinforcing legal precarity, exposure to human rights violations, and forced deportations and returns.

Key elements of the EU framework include:

- **Expansion of detention and coercive measures:** The new measures broaden the grounds for administrative detention (in other words, detention without imposition of any criminal charges), extending maximum detention periods up to 24 months, including [for children](#) and vulnerable groups. Specifically, the [Screening Regulation](#) introduces the screening of third country nationals at external borders or just after arrival, where people are held in de facto detention in specific facilities until this process, or border procedure, is completed. This raises concerns not only because people that have not been charged or convicted of any crime will be incarcerated, but also because access to legal aid during critical legal procedures will be more difficult. With the implementation of the Screening Regulation, facilities such as Vastria CCAC will inevitably become sites of confinement in prison-like conditions.
- [European Return Order \(ERO\)](#): Under the proposed [ERO](#), return decisions made in one Member State must be recognized and enforced by other Member States, limiting individual agency and increasing the risk of forced cross-border deportation. The proposed mechanism effectively institutionalizes pre-removal detention as a tool to enforce return across EU borders, and prevents freedom of movement.
- **Return hubs and offshore deportation:** The EU proposals also provide legal grounds for the establishment of “return hubs” outside the EU, which are likely to replicate the restrictive, prison-like conditions expected in Vastria CCAC. These measures of externalisation raise significant risks of continued arbitrary detention even outside the EU, refoulement, and violations of fundamental rights, particularly for individuals [with no prior ties](#) to the country of return.
- **Erosion of appeal and procedural safeguards:** Legal remedies are further weakened under the Pact and Return Regulation, [with the suspensive effect of appeals no longer automatic](#). While the right to appeal a negative asylum decision is guaranteed under European law, this right will have no meaning, as under the proposed Regulation, people could be deported before a decision is reached on their appeal.
- **Digital surveillance and monitoring:** Finally, the Pact encourages extensive use of digital tracking, surveillance, and data sharing, including in detention facilities. Under the [amended Eurodac Regulation](#), an expanded immigration database will be operational, tracking migrants as young as six years old (down from 14 in the previous Regulation) and introducing facial recognition in addition to use of fingerprint technology.

## **Vastria in light of Law 5226/2025:**

The establishment of Vastria CCAC cannot be viewed in isolation from [Law 5226/2025](#), which significantly expands grounds for detention and criminalizes “illegal stay”. The law mandates departure for rejected asylum seekers within 14 days, with penalties for “illegally staying” in Greece punishable by 2–5 years’ imprisonment, fines (€5,000–€10,000), and electronic monitoring, converting an administrative infraction of the migration code into a criminal offense. The law also extends the maximum administrative detention from 18 to 24 months, with broad and vague grounds to detain, including security concerns and risk of absconding. [UNHCR has expressed](#) serious concerns that these provisions risk arbitrary detention and penalize individuals whose protection needs have not yet been assessed.

Law 5226/2025 has been in effect in Greece since September 2025, with [people being arrested](#) immediately after receiving a rejection of an asylum application on appeal, in some cases when people voluntarily present themselves to authorities to receive this decision. Following arrest, people face accelerated criminal procedures with accusations of illegal stay, followed by orders of administrative detention even if and when ordered released from criminal detention. These practices hinder their rights to challenge the rejection decisions, or to have the adequate means and time to properly prepare their defence as international and national legislation require. This model of accelerated criminal procedures, followed by transfer from criminal procedures to administrative detention, is expected to further extend when the EU Pact comes into effect, and facilities such as Vastria CCAC are operating.

Currently, there is no Pre-Removal Detention Center for Foreigners (PROKEKA) on Lesbos island, and those detained on administrative grounds in Lesbos are either eventually released, or transferred to mainland pre-removal detention facilities such as [Amygdaleza](#). When Vastria CCAC opens, it is expected that an increasing number of people will be held in administrative detention there for increasing periods of time, under coercive and precarious conditions.

## **Introduction of pre-removal detention centre in Lesbos.**

Vastria CCAC, in fact, has been explicitly designed to detain people on the move for extended periods, functioning in part as a pre-removal detention center, in accordance with the priorities of the EU Pact on Migration and Asylum. The facility’s design envisages a total capacity of 5,000 people, with 1,300 allocated for the general population, 1,700 for special categories, and 2,000 specifically for pre-removal detention.

The operation of the existing CCACs, most of which do not have pre-removal detention centres within their facilities, has already proven to violate fundamental rights of people held there, regarding the right to liberty (Article 5) and the prohibition of inhuman treatment (Article 3) under the ECHR. Documented conditions in other Greek facilities, [such as the Samos CCAC](#) outside Vathy, highlight the risks of overcrowding, unhygienic environment, and insufficient medical care. The European Court of Human Rights (ECtHR) has also issued a decision against the Greek Government for unlawful detention of [unaccompanied minors](#) while the European Ombudsman has expressed reservations about “whether respect for human dignity, the protection of the best interests of the child and the protection of the vulnerable can be ensured when beneficiaries are forced to live in such an environment,” referring to the actual CCACs.

Furthermore, human rights organisations have documented rights violations of families and children who are detained, including privacy rights of those living and working in the centres, through the operation of Hyperion and Centaurus' digital surveillance systems. In 2024, the Hellenic Data Protection Authority (HDPA) fined the competent Ministry of Migration and Asylum, for [violations of the General Data Protection Regulation](#) (GDPR). In Vastria CCAC, similar technologies will be used to monitor residents' and workers movements and interactions, creating an environment of constant control that mirrors the practices already in place in other CCACs, exacerbated by the operation of a pre-removal detention centre within the site.

## **Environmental Concerns and Fire Risk**

The specific site chosen for the construction of the Vastria CCAC [raises even further concerns for](#) the people detained due to its location within the island's largest pine forest, which is both within a protected NATURA 2000 area, and is also highly flammable. Environmental and forest experts have repeatedly warned that the combination of human activity, extensive permanent infrastructure, and the region's forest character makes a major wildfire not only possible but foreseeable and preventable. This causes an imminent threat for the lives and security of the people who are detained or work in the CCAC, and for the surrounding ecosystem. The [€585.680 contract that has](#) been awarded to Green Construction ATE to install a fire detection system acknowledges this threat, but a fire detection system will have only a reactive rather than proactive role. The memory of the [multiple fatal fires throughout Moria camp's tenure](#), underscore the catastrophic consequences of ignoring these warnings.

## Vastria as the blueprint for EU Pact Camps

Its remote location, combined with further restrictions already applied in the operating CCACs, but also described in the Environmental Terms specifically for the Vastria CCAC, are intended to completely isolate and restrict the residents of the facility, leading to a de facto detention, in a clear violation of Article 5 of the ECHR. Due to its remote location, residents will be further isolated from legal aid, psychosocial services and direct interaction with the local society.

The isolated location combined with envisioned restricted access will further limit legal actors, non-governmental organizations, and independent actors from effectively monitoring the conditions within the facility and from intervening to prevent abuse.

Taken together, all these factors demonstrate that Vastria CCAC is being constructed as a large-scale detention complex where people on the move will face prolonged confinement, severely restricted rights, and limited access to independent monitoring, support, and solidarity. We reject not only Vastria's role as a pre-removal facility, but the establishment of any detention infrastructure or camp where people on the move are concentrated based on their legal status - whether at this site or elsewhere. The creation of such facilities institutionalise the deprivation of liberty, normalise discriminatory practices of segregation and unlawful detention practices, and undermine the fundamental rights of people on the move.

We refuse to accept the normalisation of these "closed" environments as envisioned within the EU Migration Pact, which serve only to penalize.



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