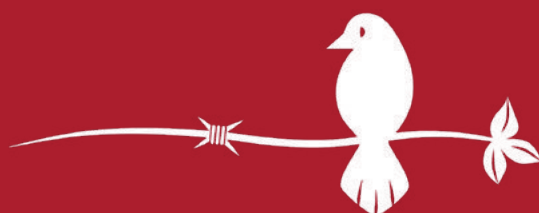


HOW TO BUILD A DETENTION CENTRE

THE CASE OF VASTRIA IN LESVOS



community peacemaker teams
AEGEAN MIGRANT SOLIDARITY

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THE CASE OF VASTRIA IN LESVOS

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EXECUTIVE SUMMARY

The Vastria Closed Controlled Access Centre (CCAC) on Lesbos marks a strategic shift in Greek and European migration policy. Unlike the overcrowded and chaotic detention centres of the past, such as the one in Moria, authorities now favour isolated, enclosed facilities with strict surveillance. Vastria, located deep in a pine forest 30km from Mytilene, is a prime example of this new model, combining biometric monitoring, geographical restrictions, and severely limited access.

Despite widespread local opposition—especially following protests at Karava in 2020—the construction advanced through a patchwork of legislative amendments and repeated revisions of environmental permits.

The Vastria structure spans approximately 240,000 square meters, with a total built area exceeding 41,000 square meters. It includes a reception and identification facility, a pre-removal detention centre, designated zones for vulnerable groups, administrative offices, sports facilities, and quarantine areas. Its location—far from the city, next to the island's landfill site, and within a highly flammable forest—is seen as intentional: to isolate migrants from the public sphere and limit civil society or local community involvement and civic oversight.

The project faced repeated legal challenges due to procedural violations and environmental concerns. The most significant decision came from the Plenary of the Council of State, which annulled the issued permits due to the lack of an Environmental Impact Assessment (EIA)—a legal requirement for facilities of this scale. In response, the Ministry of Migration and Asylum submitted a retroactive EIA and temporarily reduced the facility's capacity to 2,952 people before raising it again to 5,001—likely in order to secure continued European funding. Despite these manoeuvres, the courts ruled that even a smaller facility violated environmental standards and declared illegal the planned deforestation of 35,000 pine trees for the access road. Regional authorities—such as the North Aegean Region and the Municipalities of Mytilene and Western Lesbos—filed appeals and objections, citing both substantive risks and the lack of democratic consultation.

Nevertheless, the Ministry proceeded with a tactic of administrative attrition. With every legal challenge, new Joint Ministerial Decisions were issued, altering technical descriptions just enough to bypass annulments or suspensions. This pattern reveals a broader political strategy: maintaining the project by undermining institutional oversight through bureaucratic sleight of hand. This reflects a political will to legitimize a regime of legal exception in the name of migration control.

Local reactions to the Vastria CCAC have been marked by shifting alliances, pressure, and strategic silence. The North Aegean Region, under Governor Kostas Moutzouris, initially led the main opposition—particularly after the violent clashes at Karava in February 2020, which temporarily halted the project. His stance, framed in terms of national sovereignty and limiting state arbitrariness, was electorally rewarded. However, over time, the Region adopted a softer stance, limiting its actions to legal appeals without sustained public confrontation.

The Municipality of Mytilene showed a more dramatic reversal. Under its previous Mayor, Stratis Kytelis, who was aligned with the central government, the municipality actively supported the construction of the new structure, arguing that its remote location would protect the city from further strain. This narrative was reinforced by the closure of all alternative facilities, such as the municipal centre at Kara Tepe. Only after the 2023 municipal elections, under new mayor Panagiotis Christofas, did the Municipality of Mytilene formally withdraw its support and initiate new legal actions.

In contrast, the Municipality of Western Lesvos consistently opposed the project. However, its limited jurisdiction—mainly over the access road—reduced its ability to intervene effectively. Civil society and the solidarity movement have been gradually eroded. The once-vibrant solidarity movement that emerged during the operation of the Moria camp was weakened by state pressure, criminal prosecutions, administrative hurdles, and attacks from local reactionary groups. Simultaneously, the mandatory registration of NGOs in a state registry—along with opaque approval processes for accessing the facilities—restricted their presence and reduced civic oversight to a handful of state-sanctioned actors.

The COVID-19 pandemic was used as a pretext for further disruption, while threats of prosecution against protesters—many of whom still face charges—fostered a climate of fear. Many international organizations fully withdrew. This vacuum has resulted in a condition of passive acceptance of the proposed structure. The population, exhausted by years of instability, is now portrayed as “in agreement” with the project. In reality, a form of controlled consent has prevailed: opposition is rendered impossible through legal, geographical, and economic constraints. European funding, local construction contracts, and targeted tax incentives have created a web of dependence that isolates dissent and fragments collective resistance. The Vastria site lies within one of the most fire-prone ecosystems in the Eastern Mediterranean.

The Vastria forest, composed mainly of pine trees, has lacked a management plan for years. According to the European Forest Fire Information System and expert reports, the risk of a mega-fire is already high and is expected to peak once the facility becomes operational. The approved fire protection plan includes internal fire protection measures, a fire station, firebreak zones, water tanks, and AI-powered detection systems with cameras. However, critics highlight the absence of a second escape route from the structure, the ineffectiveness of fire

zones during strong winds, and the fact that critical infrastructure (such as the fire detection system) remains unfinished. The emergency escape road, mandated as a 2024 environmental condition, hasn't even been mapped—escalating the danger once the site opens.

These shortcomings violate both EU and national environmental law and the fundamental precautionary principle. In the event of a mega-fire, the consequences could be catastrophic—not only for the environment but also for human lives. Legal experts argue that if authorities proceed with knowledge of these risks, criminal liability may arise in the case of casualties. If completed and put into operation, the Vastria CCAC would institutionalize a de facto detention regime under the guise of “controlled reception.” Although not officially classified as a prison, the facility is designed to impose strict limitations on freedom of movement—via perimeter fencing, curfews, mandatory nightly presence, and internal surveillance systems. These constraints, combined with geographical restriction policies prohibiting residents from leaving the island, create a legal grey zone, denying freedom without formal legal process. While the law allows administrative detention for up to 25 days, in practice, restrictions often last much longer—especially for rejected asylum seekers, who may be held in pre-removal centres for up to 18 months.

Surveillance infrastructure further reinforces this architecture of control. The Vastria CCAC is expected to incorporate two AI-enhanced systems—Centaur and Hyperion—which combine biometric recognition, CCTV systems, drone surveillance, and behaviour analysis. In 2024, the Hellenic Data Protection Authority imposed a significant fine on the Ministry of Migration for serious GDPR violations, citing inadequate risk assessments and insufficient safeguards in the use of these systems. Meanwhile, in other island facilities—particularly in Samos and Lesbos—there are reports of systematic confiscation of residents' phones, limiting access to legal aid, and external oversight through restricted communications. In this context, isolation is not a side effect—it is the goal. Vastria is not merely a place of detention; it is designed to exclude its residents from the public sphere and from the protection of their rights.

Basic infrastructure remains incomplete. There is still no water supply, and the facility will need daily deliveries via tankers. At the same time, sewage disposal could impact protected local streams, while projected estimates of solid waste appear suspiciously low.

The economic footprint of Vastria's CCAC is enormous for the island—representing the second-largest public or private expenditure in decades. With over €80 million (mainly from EU funds), the project has created construction contracts, land leases, and long-term service agreements. This financial injection, along with tax incentives and administrative favours, has fostered relationships of dependency in the local community, partly explaining the reduction in opposition.

Vastria is not merely a detention center—it is the material embodiment of a European policy shift toward invisibilization, technological control, and bureaucratic exclusion. It replaces the chaotic refugee landscape with totalitarian control—at a tremendous human, environmental, and democratic cost. As of mid-2025, the project is nearly complete, but its operation is still pending due to the absence of basic infrastructure: electricity, fencing, and—most crucially—an emergency escape road. Under the current design, the centre remains a potential death trap—and a monument to a failed migration policy based on confinement rather than protection.

INTRODUCTION

The siting and operation of migrant detention or reception facilities is an extremely sensitive issue within Greece. The collision between political and economic interests—and deeply rooted racist stereotypes—has repeatedly led to clashes between national authorities and local communities. Lesvos, long positioned as a key entry and control point for migration flows, is no exception. Over the years, various detention facilities on the island have sparked opposition from different parts of society. The island has become a battleground where social cohesion has fractured—not only among residents themselves, but also in their relationship with the Greek state.

The most emblematic moment came in March 2020, when the island was placed under a de facto state of emergency following the arrival of earthmoving machinery at the proposed construction site of a new facility in Karava. The backlash was so intense that the Greek government deployed a large police force to impose the start of the works. This decision provoked an island-wide uprising and unprecedented confrontations between residents and police, eventually forcing the government to back down and temporarily suspend the project. The decision to construct yet another facility on Lesvos is not merely a consequence of the collapse of the “Moria model”—exacerbated by overcrowding, the COVID-19 lockdown, and the 2020 fire—but signals a strategic shift in Greek migration policy. It marks a clear break from the previous “hotspot” system, replacing it with closed, remote, and tightly controlled structures such as the one proposed in Vastria. This is a profoundly political decision: a demonstration of state authority, a disciplinary turn in migration governance, and an attempt to reassert control over the islands after years of chaos, human rights violations, and local unrest.

THE VASTRIA CLOSED CONTROLLED ACCESS CENTRE

Despite strong local opposition, the Greek state refused to back down from its decision to proceed with new island facilities. In May 2021, a year after the confrontations with Lesvos residents, the Ministries of Environment & Energy, the Interior, and Migration & Asylum issued a new joint decision approving the construction and operation of a new centre at the “Vastria” site (known also as Plati in official documentation), just a few kilometers from the previously proposed Karava location.¹



Location of Vastria CCAC and existing Facilities

Vastria lies in the northeastern part of Lesvos, roughly 30 kilometers and 45 minutes by car from the city of Mytilene. The nearest settlements are Nees Kydonies (4.5 km southeast) and Agia Paraskevi (10 km northwest), though neither has direct road access to the site. About 500 meters west of the planned facility lies the island's landfill (sanitary waste disposal site), adding further environmental burden to the area. According to reports in the local press, the

¹ Joint Ministerial Decision No. 11359/2021, Government Gazette D' 265/18-05-2021: Granting of siting and construction permit for the project: “Construction of Regional Services, Facilities and Designated Areas as defined in Article 8 of Law 4375/2016 on the island of Lesvos,” at the location “Vastria” (Plati), within the Municipal Unit of Loutrópolis Thermís, Municipality of Mytilene, and the Municipal Unit of Agia Paraskevi, Municipality of Western Lesvos, Regional Unit of Lesvos, North Aegean Region.

site selection was orchestrated by Lesvos MP Charalambos Athanasiou (New Democracy) and then-mayor of Mytilene, Stratis Kytelis (also affiliated with the same party). The location was later approved by Beate Gminder, Deputy Director-General for Migration at the European Commission, during her visit to Lesvos in October 2020.

The facility falls within the administrative boundaries of the Municipal Unit of Loutrópolis Thermís (Municipality of Mytilene), although part of the access road crosses the territory of the Municipal Unit of Agia Paraskevi (Municipality of Western Lesvos). Both municipalities are part of the Regional Unit of Lesvos in the North Aegean Region.

The initial design for the CCAC was for a total capacity of 5,000 people, distributed as follows:

- a. General population – 1,300
- b. Special categories – 1,700
- c. Pre-removal detention centre – 2,000

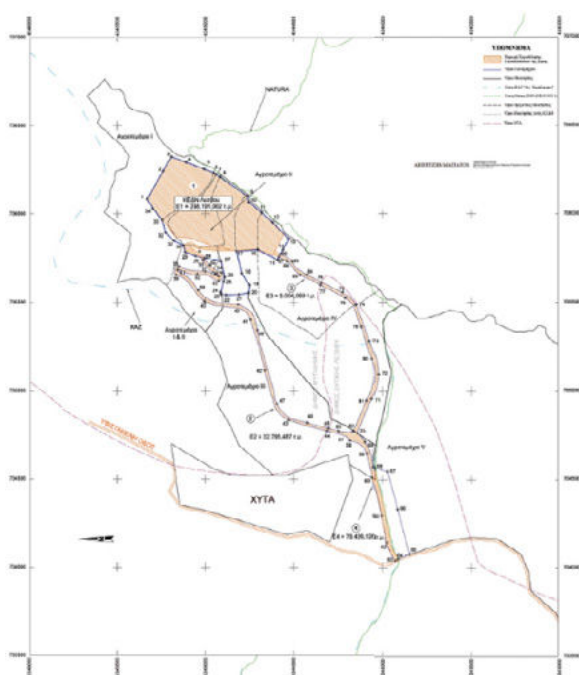


Diagram of the Vastria Structure and Accompanying Projects
(2021)

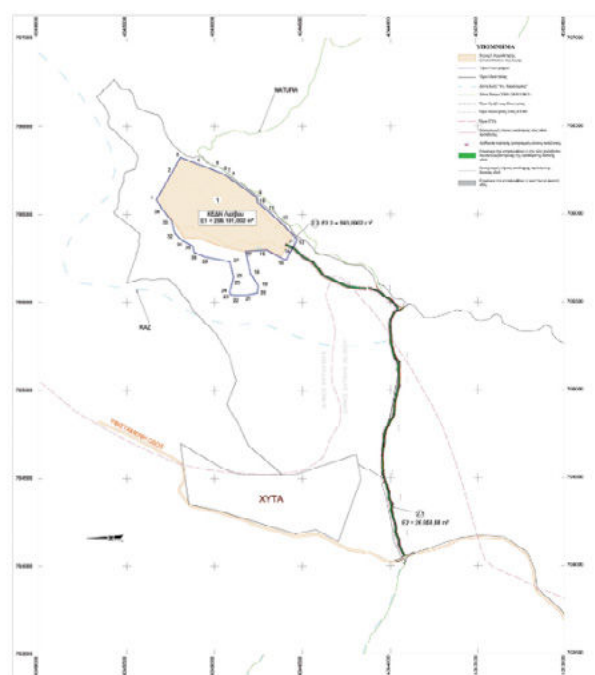


Diagram of the Vastria Structure and Accompanying Projects
(2024)

Comparative Coverage Map of the Proposed Projects in Vastria

The construction would occupy 298,000m² for the detention centre facilities and an additional 117,000m² for accompanying infrastructure (access roads, etc.). The primary access route would use the existing road leading to the island's landfill site (XYTA Lesvou), continuing along a 2,255-meter forest road. However, in an effort to overcome legal hurdles—mainly environmental—four separate modifications to the original siting and construction permits were issued (262745/12.05.2022, 416419/18.07.2022, 364995/05.09.2023, and 248595/01.11.2024). The most significant change was the elimination of a secondary access road that would have cut

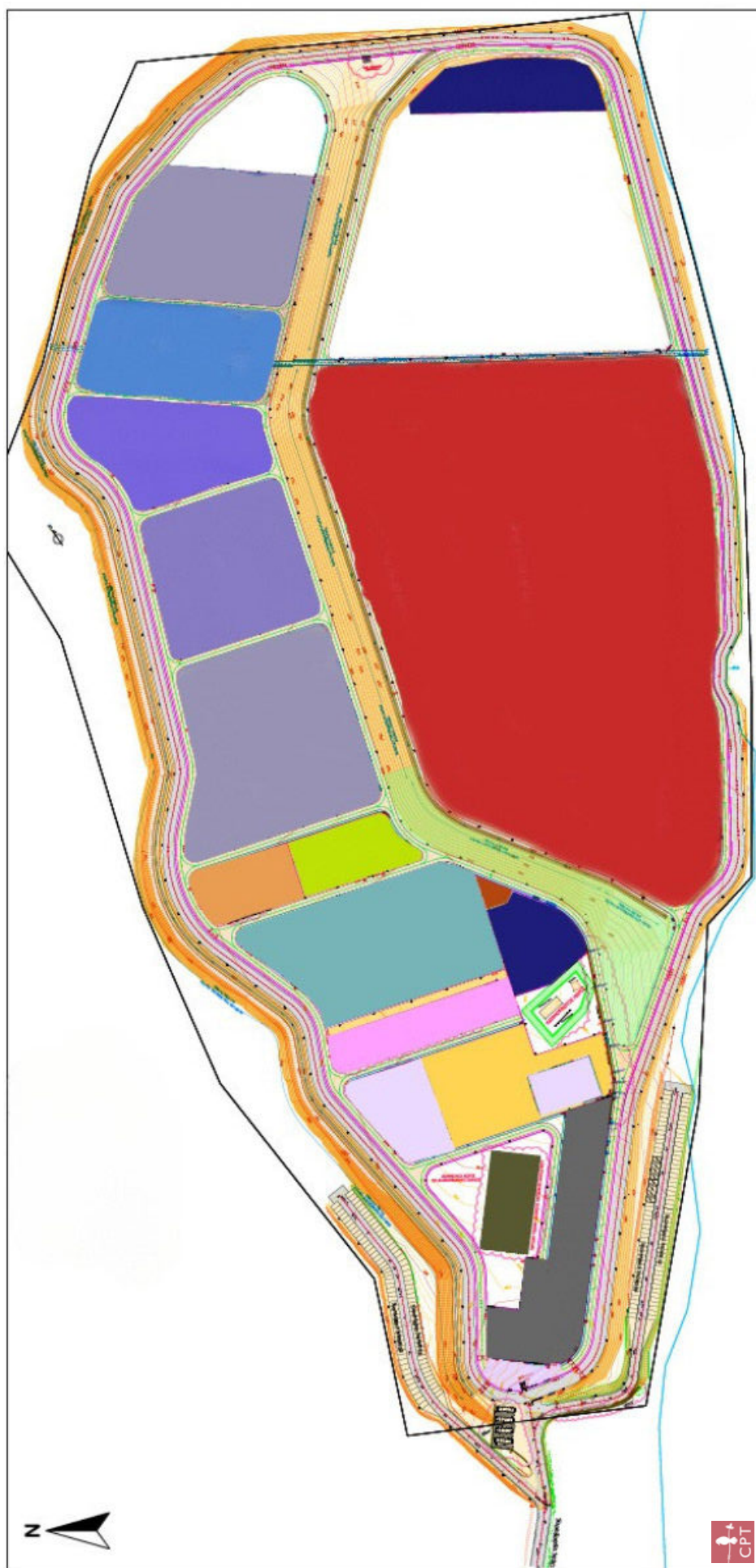
through a protected NATURA 2000 forest zone, thereby reducing the area of auxiliary works to approximately 26,000m².

Following the revisions, the facility will cover roughly 240,100m² (within perimeter fencing), with buildings occupying around 41,250m². Twelve metal shelters of 300m² each are planned, along with two 150m² shelters, one 300m² shelter for fire vehicles, four sports fields, and four playgrounds. A six-meter-wide perimeter road with asphalt paving and fencing will encircle the facility. Access will follow the pre-existing route to the landfill and then continue via the forest road.

According to the submitted Environmental Impact Assessment (EIA), the facility will include the following components:

1. Eight pre-removal detention units (240 people each)
2. A unit for unaccompanied minors (196 people)
3. A unit for single-parent families – men (262 people)
4. A unit for single-parent families – women (524 people)
5. A unit for single adult men (262 people)
6. Two units for controlled accommodation (524 and 786 people, respectively)
7. Temporary stay and quarantine zone
8. Site administration offices
9. Common activity areas
10. Electrical/mechanical systems and sewage treatment plant
11. Reception and waiting area
12. Identification and departure area
13. Entry/exit control zone
14. Sports facilities
15. Administration offices for the pre-removal detention centre.

A point of concern remains that the site is planned to also include designated areas for potential future expansion.



Coverage Chart of the Facilities of the CCAC of Vastria

Coverage diagram of the Vastria CCAC

	Pre-removal Centre		Single Parents' Unit (M)		Common activity areas		Common areas		Reception and Identification Offices
	Controlled Accommodation Centre		Single Parents' Unit (F)		Health Service Area		Quarantine Site		Water supply and sewerage installations
	Single Men's Unit		Unaccompanied Minors' Unit		Administration Offices		Biological Treatment Plant		Space for Future Expansion

FROM CONFLICT TO ACCEPTANCE?

The role of local authorities

The construction of a new facility for the registration and containment of migrants arriving on the island of Lesbos has long been a flashpoint of tension, both between local authorities and the central government, particularly the Ministry of Migration, and among local actors themselves. Over the years, this issue has become a major political issue, especially for regional institutions like the North Aegean Prefecture and the Municipality of Mytilene, which are directly affected by the implementation of the migration management policies. Electoral candidates' positions on this matter has often been a key component of their platforms and a decisive factor in election outcomes.

The North Aegean Region

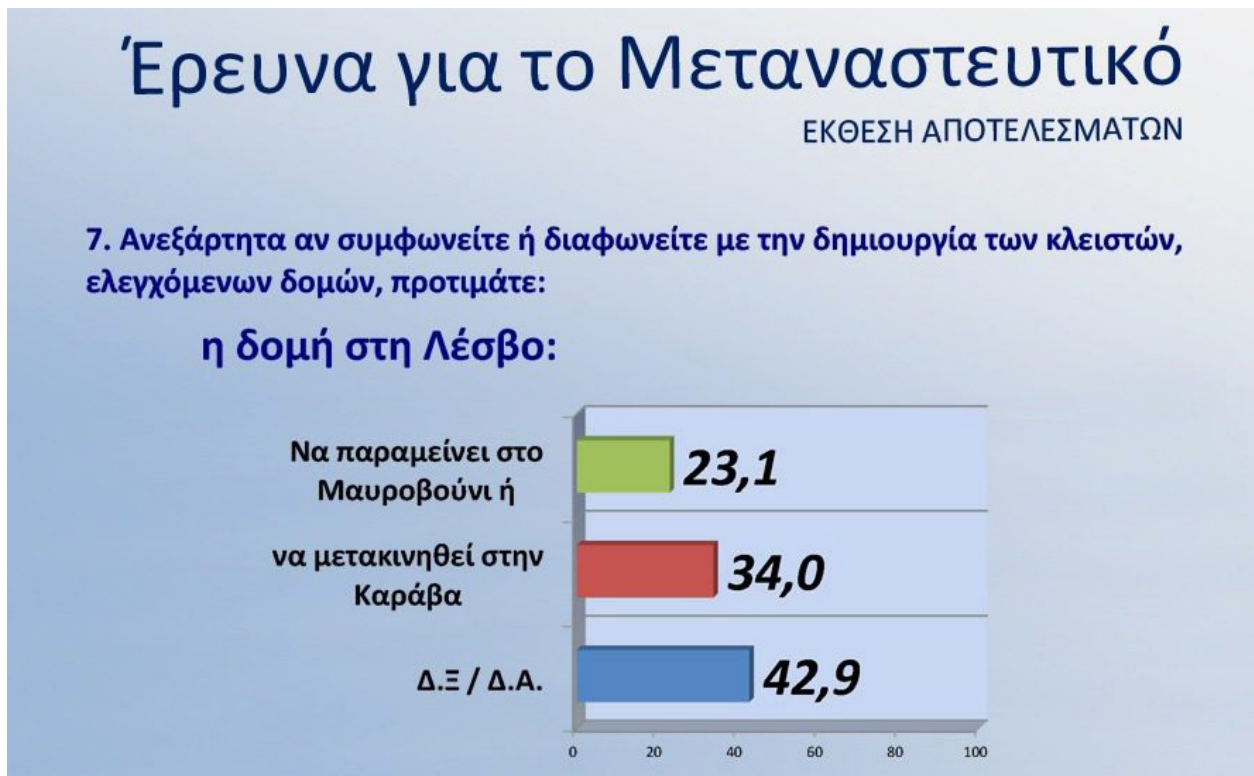
From the outset, the North Aegean Region took a firm stance against the construction and operation of the Vastria facility. Its governor, Konstantinos Moutzouris, clashed with the Ministry of Migration and Asylum over plans to build new structures on the islands. This confrontation is believed to have contributed significantly to his election in 2019 and his re-election in 2023. A core pillar of the regional administration's agenda has been the decongestion of the islands under the slogan “We want our islands back”, advocating for only a small facility dedicated to the initial registration and identification of arrivals. These positions are often coupled with proposals for: a) stricter border controls, and b) tighter oversight of NGO activities—messages that resonate particularly with far-right and reactionary segments of the island's population.

The 2020 events in Karava led to a temporary but complete breakdown of relations between the regional authority and the government. These events elevated the regional prefecture administration in the eyes of many locals as the main opposition force to government plans on the islands. Although the regional authority maintained its opposition to the Vastria project, its response was more subdued in the years that followed. Still, in March 2022, it initiated legal proceedings against the construction (see ‘Legal Battles’ below). Furthermore, in a session held on 22 March 2023, it issued a negative opinion on the Environmental Impact Assessment for the Vastria site. During a 2024 visit to the Vastria facility by regional officials and Ministry of Migration and Asylum staff, the regional authority proposed converting the area into a space for social infrastructure (e.g., children's camps, senior housing, athlete training facilities).² While symbolically significant, the proposal faces serious legal and practical obstacles and cannot be taken seriously in procedural terms.

2 Sto Nisi. (2024, 16 January). *Η Βαστριά να γίνει παιδική κατασκήνωση* [Vastria should become a children's summer camp]. Retrieved June 27, 2025, from <https://www.stonisi.gr/post/68122/h-vastria-na-ginei-paidikh-kataskhnwsh>

Municipality of Mytilene

The stance of the Municipality of Mytilene can be divided into two distinct periods. From 2019, following the election of a local administration aligned with the ruling New Democracy party and led by Stratis Kytelis, the municipality became the Ministry of Migration's closest local ally in pushing forward the new detention centre. Alongside other party-aligned actors, it promoted the creation of a new centre to initially relieve pressure on Moria and later close the currently-operating Mavrovouni site. Their key argument was that the new facility would be located far from Mytilene's residential area. In exchange, they also demanded the closure of all other migrant reception or housing facilities, including those serving vulnerable groups.



Preferences regarding the location of the migrant facility in Lesbos.

Respondents were asked whether they preferred the facility to remain in Mavrovouni or be relocated to Karava, regardless of whether they agreed or disagreed with the creation of closed, controlled structures. 23.1% preferred it to remain in Mavrovouni, 34.0% preferred relocation to Karava, while 42.9% answered "Don't know / No answer."

In November 2020, the municipality ordered the eviction of the informal PIKPA shelter, and in May of the following year, in cooperation with the Ministry of Migration and Asylum, shut down the municipal reception facility at Kara Tepe. These actions aimed to shift public opinion in favour of the new project. Media outlets sympathetic to the administration amplified this shift through targeted reporting and polling suggesting the local population supported the new centre.³ The culmination came in April 2021, when the municipal council narrowly voted in favour of the new structure.

3 Sto Nisi. (2020, 10 March). 34% θέλουν Κάραβα ! [34% want Karava!]. Retrieved June 27, 2025, from <https://www.stonisi.gr/post/11865/34-theloy-n-karava-reportaz>

The new administration, elected in October 2023 under Panagiotis Christofas, has publicly declared its opposition to the Vastria facility, and stated its intention to pursue legal measures to halt construction and operation. On 25 November 2024, the municipal council formally reversed the previous decision approving the centre, and also annulled a related project for road paving to the island's landfill site—widely perceived as an accompanying project which would enable access to the adjacent new facility. However, this reversal only concerns the road section from the national network to the landfill. The Ministry of Migration and Asylum already holds the permits needed to pave the remaining section from the landfill to the facility.

Municipality of Western Lesvos

The Municipality of Western Lesvos has consistently opposed the construction of the new facility, aligning itself with the slogan “No new structures on the islands.” However, its jurisdiction is limited: only a small stretch of the access road to Vastria passes through its territory. Since the closure of the Controlled Temporary Accommodation Facility for Asylum Seekers in Megala Therma in August 2024, there are no longer any official state-run migrant-reception facilities within the municipality's boundaries.

On 9 February 2023, the municipal council unanimously issued a negative opinion on the Environmental Impact Assessment for Vastria, and on 20 January 2025 it adopted a new resolution stating no new structures should be built on Lesvos.⁴ Nonetheless, this resolution included alternative proposals, such as a smaller (circa 500-person) facility for registration and screening, as well as improved NGO oversight.

Local Community Councils

Community reactions in areas hosting past or current facilities—or near the Vastria site—have varied. The communities of Panagiouda and Moria, among others, have repeatedly called for the removal of all facilities from their vicinity, citing the prolonged burden they have borne. The president of Panagiouda, for instance, told a local outlet in 2021: “*Let it be a proper facility, as they say—good for the migrants and for us... far away, so we forget it even exists.*”⁵

The communities of Nees Kydonies and Komi—both neighboring the planned Vastria facility—have voiced strong opposition. They even co-signed the legal appeal and request for injunctions filed by the North Aegean Region against the Greek state, the Minister for Migration and Asylum, and the construction company TERN A S.A.

4 Decision no. 12/2025, Item 9 of the Daily Agenda: “*Discussion and decision regarding the Vastria facility.*”, Municipality of Western Lesvos

5 Sto Nisi. (2021, 21 May). «*Ναι*» στη νέα δομή λένε «*Μόρια*» και «*Παναγιούδα*» [“Yes” to the new facility say “Moria” and “Panagiouda”]. Retrieved 27 June 2025, from <https://www.stonisi.gr/post/17189/nai-sth-nea-domh-lene-moria-kai-panagiouda-video>

Reactions of the local population

Describing the stance of the local population becomes even more complex. At the time of writing, no studies have been conducted that examine both the events of the turbulent past years and the central role played by Lesvos in the implementation of the policies of Fortress Europe/Greece, nor how these policies have affected the local population. Therefore, it is rather difficult to make reliable assessments, and the attempt to interpret the attitude of the local community may be partial if solely based on announcements concerning the construction of the new mega-structure in Vastria.

Nevertheless, it is widely acknowledged that the four years leading up to March 2020 were particularly intense for most of the island's residents, and there was a strong sense of “collective fatigue” throughout Lesvos, leading many to feel the need to disengage.

Still, the underlying reasons for the seemingly weak reactions—at least on the surface level—can be described as follows:

The hardening of migration policies by the Greek authorities

The government of New Democracy, elected in July 2019, had based a significant part of its communication campaign on the tightening of migrant and refugee reception policies. The far-right and racist rhetoric frequently expressed publicly by its members found broad acceptance in politically charged border communities, offering the authorities considerable flexibility in implementing their new policies.

The clashes of February 2020 constituted a temporary break in this overall alignment, one that could be attributed to rivalry between local government officials and the central government, but also to a major communications misstep by the latter: the decision to deploy what amounted to an army of riot police to protect construction operations in the area of Karava. This attempt at imposition activated strong localist reflexes among a large portion of the population—reflexes that, in this instance, proved more powerful than other loyalties (party-political, nationalist, racist, etc.).

The events of February 2020, and the temporary “victory” achieved by Lesvos society, led to an acceleration in the implementation of hardened policies: both the containment of migrants within detention centres and the deterrence strategies that included illegal pushbacks at the borders, aimed at reducing the number of migrants reaching the Greek islands. From early March 2020 onward, Greek authorities began applying the doctrine of “aggressive surveillance”,⁶ which in many instances reportedly involved the use of live ammunition, significantly curbing

6 Souliotis Y. (2020, 6 May). *Η επιτήρηση σφράγισε το Αιγαίο* [Surveillance sealed the Aegean]. Kathimerini. Retrieved 27 June 2025, from <https://www.kathimerini.gr/politics/1076841/i-epitirisi-sfragise-to-aigaio/>

the number of migrants who managed to reach the islands. Contributing to this was the introduction of movement restrictions on the Turkish side of the border due to the COVID-19 pandemic.

The pandemic itself, and the quarantine measures imposed from March 2020 on residents of Moria camp, played an additional role. The government opted for the total confinement of migrants within detention centres, leading to their invisibilization.⁷ This invisibility is thought to have played a major role in shaping public attitudes toward the detention centres.

The drastic reduction in the migrant population and the severe restriction of movement among those who remained on Lesbos after the destruction of Moria created an opportunity for local actors friendly to the ruling party to promote a narrative of successful control and flow reduction policies. The relationship between the government and the local population was recalibrated, and together with the selective application of economic measures targeting the islands “affected” by migration—such as reduced VAT and the express visa scheme for Turkish visitors—local communities began to appear far more willing to accept aspects of what they had previously opposed.

The arson of Moria camp and the opening of Mavrovouni detention centre

A key factor in the silent acceptance of the Vastria project appears to have been the arson of Moria detention centre/camp and the subsequent creation of the new “emergency” detention facility in the area of Mavrovouni, just a few kilometers outside the city of Mytilene.

Although the destruction of Moria seemed to satisfy a large part of the local population, the image of 12,000 to 13,000 migrants now living on the streets around Mytilene was perceived as a “threat.” The blocking of their entry into the city by the same police forces with whom the local population had clashed just six months earlier—shifted local feelings towards them. Moreover, the establishment of the new detention centre in Mavrovouni, on the outskirts of the city, is still seen by many as a “threat”. The prospect of relocating the centre far from the city, along with the containment of migrants within it, is considered a solution by those who have come to accept the presence of a migrant detention centre on the island.

Pandemic restrictions

The restrictions on movement and public gatherings imposed on the entire population under the pretext of controlling the COVID-19 pandemic also played their part in dampening the reactions of the local community. The decision to construct the Vastria facility was taken during the period of lockdown and restrictive measures. Meetings—and even more so, public demonstrations—were largely prohibited, effectively removing the possibility of mobilization for

7 Legal Centre Lesbos and Feminist Autonomous Centre for Research. (2023, August). A Pandemic of Abuses. [Available here](#)

those who wished to oppose the construction of the new centre.

Fear of prosecution for the events in Karava

Following the events in Karava, the authorities leaked information suggesting that investigations were underway to identify the individuals who had participated, with the aim of initiating criminal proceedings. At the same time, their potential incitement by local government officials—based on public statements deemed to have encouraged the events—was also under scrutiny. This situation generated uncertainty among a large part of the population who had taken part in the protests, raising questions about the criteria, scope, and severity of the criminal proceedings. The mere possibility of prosecution discouraged many people from organizing or participating in further protests during the early stages of the project. To this must be added the charges brought against at least five individuals for their involvement in events at the Vastria construction site, during what remains to date the most forceful protest, which took place in February 2022.⁸

Staff of the detention centre and related services

There also appear to be reactions from the employees who are expected to be transferred to the Vastria CCAC, though these concerns have so far been expressed only within the services and organizations themselves. According to the facility's organizational chart, once fully operational, it will employ 500 people. These positions cover reception, identification and asylum services, as well as security, cleaning, psychosocial support, and more. Relocating all these services 30 kilometers away from the city of Mytilene necessarily entails daily commuting for the staff. The isolated location of the centre, distant from any other settlement, implies long travel times. Moreover, the lack of available housing makes a permanent internal relocation unfeasible for the entire workforce. Several services—especially those of the Ministry of Migration and Asylum and those providing psychosocial support—have expressed concerns over their potential inability to remain staffed if the transfer goes ahead.

The same applies to many civil society organizations whose operations and activities are currently based near the Mavrovouni facility and the city of Mytilene. Their work mainly involves providing legal and psychosocial support to migrants, as well as empowering the most vulnerable groups. The ban on access to the new facility, the lack of space to relocate their operations, and the considerable distance from their existing centres and offices will result in a loss of scope for these organizations and will inevitably lead to their shutdown.

The changes that these various professional groups will face are also expected to have a direct impact on daily life and the economy of the city of Mytilene, where their presence has played a major role in recent years.

8 Tomeaki Epitropi Lesvou tou KKE. (2022, 28 April). Καταγγέλλει τις διώξεις διαδηλωτών για τη δημιουργία δομής-φυλακής στη Βάστρια [Denouncing the prosecutions of protesters against the prison-like facility in Vastria]. 902.gr. Retrieved 27 June 2025, from <https://www.902.gr/eidisi/politiki/293775/kataggellei-tis-dioxeis-diadiloton-gia-ti-dimioyrgia-domisfylakis-sti-vastria>

The solidarity movement

There has also been a significant decline among the groups and organizations involved in the migrant solidarity movement, which had been very active on the island in previous years. The targeting of the movement by the Greek authorities and parts of the local population—through fabricated criminal prosecutions and violent attacks on individuals and facilities—appears to have been a major factor in the weakening of solidarity initiatives, as many members withdrew. The COVID-19 pandemic also contributed to this, prompting many international solidarity activists to leave the island. At the same time, the shift in narrative by dominant and international media—rendering invisible the ongoing situation in the Aegean islands—and the prioritization of needs in other parts of the world, drastically reduced the momentum and reinforcement of solidarity movements on Lesbos.

That said, it should by no means be assumed that resistance to the new facility has been entirely extinguished. Actions, protests, and resolutions by associations and citizens continue to emerge.⁹



Event Against the Construction and Operation of Vastria (October 2024)

⁹ Politika. (2024, 15 October). *Βάστρια: Φορείς και οργανώσεις υπογράφουν ψήφισμα κατά της...* [Vastria: Institutions and organizations sign petition against...]. Politika. Retrieved 27 June 2025, from <https://www.politikalesvos.gr/βάστρια-φορείς-και-οργανώσεις-υπογρά/>

LEGAL BATTLES

In the absence of strong social resistance, a significant part of the opposition to the execution of the Vastria project has taken the form of annulment petitions and legal appeals by local authorities, targeting parts or the entirety of the project.

The first case took place at the Single-Member Court of First Instance of Mytilene in May 2022. The North Aegean Region, along with the communities of Nees Kydonies and Komi, filed an application for interim measures against the Greek state, the Ministry of Migration, and the project's contractor, TERNA S.A. However, in the ruling published on 23 September 2022, the court found that, based on the guidelines of the Forest Directorate, the project “neither crosses nor is developed within the Natura 2000 protected areas,” and the works carried out up to that point were deemed entirely legal.

The matter then escalated to the highest level, the Council of State. A landmark decision was issued by the Plenary Session (A.1285/2022), which ruled that no facility with a capacity greater than 3,000 individuals could be constructed without an Environmental Impact Assessment and without consultation with local stakeholders. The Ministry of Migration and Asylum had argued that the 5,000-person facility fell under categories of works requiring only a declaration of compliance with Standard Environmental Commitments. The Plenary's decision rejected this view. In an attempt to bypass the ruling, the Ministry's Technical Department revised the plans and studies, reducing the facility's capacity to 2,952 persons—ignoring the Council of State's remarks that even a reduced-capacity structure still did not meet environmental and fire safety standards. Nonetheless, in November 2022, an Environmental Impact Assessment was published for a facility of 5,001 capacity.

Meanwhile, on 17 July 2022, the North Aegean Region, together with the communities of Komi and Nees Kydonies, filed a petition for annulment (E.1378/17.06.2022) at the Council of State against all decisions permitting the construction of the Vastria facility. Specifically, they requested the suspension of:

1. report no. 17419/18.04.2022 by the Forest Directorate of Lesvos;
2. decision no. 239007/29.04.2022 of the Ministry of Migration and Asylum;
3. declaration no. 236189/28.04.2022 of compliance with Standard Environmental Commitments submitted by the Ministry's Technical Department;
4. decision no. 262745/11.05.2022 (Gov. Gazette 333/12.05.2022) issued by the Ministers of Environment & Energy, the Interior, and Migration & Asylum, and any other related administrative act or omission.

They also requested the suspension of execution of the contested acts and documents until the case was heard.

Although the initial suspension request was rejected by the Council of State's Holiday Chamber in August 2022, the Suspension Committee, in a session held on 19 December 2022, accepted the North Aegean Region's and Local Communities Councils' request with decision 199/2022. The suspension request was examined only in relation to two aspects: the construction of the access road and the project's classification under Standard Environmental Commitments. The Committee ruled that the following factors did not preclude, on their own, the success of the petition:

1. "...the imminent execution of road construction works would cause significant and irreparable damage in the event that the annulment petition is accepted,"
2. the existence of an active facility at Kara Tepe,
3. the short timeline until the annulment hearing, and
4. potential loss of project funding and burden on the Greek state.

As a result, any works involving tree cutting for the access road were suspended, as were the acts 239007/29.04.2022 by the Ministry of Migration and 262745/11.05.2022 by the three ministries mentioned above.

The Plenary Session of the Council of State, in its meeting on 25 September 2023, ultimately accepted the Region of North Aegean's arguments and annulled the project's approval due to the absence of an environmental study.¹⁰ It also annulled the permit to intervene in 21 acres of forest area for the access road, judging the cutting of 35,000 pine trees—which would have been removed to widen the road and install energy, water, and sewage infrastructure—illegal. The ruling was welcomed by local authorities and communities.

However, the Ministry, either ignoring or disregarding the Council of State's decisions, returned with successive administrative amendments and Joint Ministerial Decisions to bypass the rulings and allow the works to continue. First, it issued an ex post Environmental Terms Approval for the facility and reclassified the access road project from the originally designated "Forest Road" category to that of "A IV Collector Road, outside NATURA 2000 areas."

In December 2024, the North Aegean Region—this time with the Municipality of Mytilene as an ally—submitted a new petition for annulment and suspension at the Council of State, seeking to overturn the new government decision regarding the siting and construction of the Vastria

¹⁰ Decision no. 1335/03.02.2023 – Decision of the Fifth Chamber of the Council of State on the annulment application filed by the Region of North Aegean, et al.

facility, as well as any related acts. The case was scheduled to be heard by the Plenary of the Council of State in February 2025. However, the Ministry requested that the hearing should be cancelled, citing new regulatory provisions that increased the facility's capacity to 5,001 individuals and allowed tree felling in protected forest areas. Despite this, the hearing proceeded as planned and a final decision is now pending.

HUMAN RIGHTS CONCERNS

In 2009, Lesvos' Pagani detention centre was closed after protests over its living conditions. Since that time, through the years of the Moria detention camp and its replacement by the newer facility in Mavrovouni, Lesvos has gained a grim reputation for the inhumane conditions of detention and “reception” imposed on People on the Move. Time and again, those held in these facilities, along with legal and humanitarian organizations and international bodies, have denounced the conditions, leading even to international condemnation and convictions of the Greek state by European courts. The names of the facilities may have changed over the years—from Detention centres, to Reception Centres, to Hotspots, and more recently to Closed Controlled Access Centres (CCAC)—but their fundamental nature has remained the same. They are centres of biopolitical management of displaced populations, more akin to prisons or even concentration camps. As noted in the report *Deadly End*,¹¹ between 2016 and 2020 there were at least 26 deaths in the detention centres of Lesvos, which can be directly or indirectly attributed to the dehumanizing conditions imposed on the populations trapped in these structures.

The new model of the proposed CCACs promoted by the Ministry of Migration and Asylum has drawn serious objections from numerous bodies and organizations. The five island-based CCACs—operational or planned in the Eastern Aegean (Kos, Leros, Samos, Chios, and Lesvos)—were presented by the European Commission and the Greek state as “model” facilities that would offer dignified reception conditions for asylum seekers. Their stated purpose is to function as administrative structures for the reception, accommodation, and processing of asylum applications upon arrival in Greece. However, the specifications regarding fencing and surveillance, the geographical and technical restrictions on movement within the facilities, and the strict internal regulations point more to sites of punitive control. One telling excerpt comes from a report by Amnesty International:

*Located in remote areas far from local communities, with 24/7 CCTV and barbed-wire fences, these prison-like complexes illustrate some of the most punishing elements of a European asylum policy that has a disproportionate focus on deterrence, isolation and containment. Instead of being welcomed and supported to rebuild their lives and contribute to their new communities, asylum-seekers are isolated, subject to constant surveillance, and provided limited access to essential services.*¹²

11 Aegean Migrant Solidarity (2024, 10 April). *Deadly End*. Retrieved 27 June 2025, [Available here](#)

12 Amnesty International (2022, 19 September). One year since Greece opened new “prison-like” refugee camps, NGOs call for a more humane approach, Amnesty International, Retrieved 04 July 2025, From <https://www.amnesty.eu/news/one-year-since-greece-opened-new-prison-like-refugee-camps-ngos-call-for-a-more-humane-approach/>

Beyond the structural violations of fundamental human rights through the operation of the CCACs, the facility under construction in Vastria raises additional concerns. A telling example is a report published by the University of Amsterdam,¹³ which examined whether the construction and operation of the facility are in line with international human rights law, and in particular with regard to the right to liberty, the right to life, and the right to education. As expected, the conclusions of the study are highly alarming.

Right to liberty and security

One of the fundamental principles of human rights is the right to liberty and security (Article 5, European Convention on Human Rights). According to this provision, liberty may only be restricted in very specific circumstances, must be fully justified, the person subject to such restrictions must be fully aware of the reasons, the deprivation must be imposed for the shortest possible period, and always as a last resort. Newly arrived individuals on the islands, according to existing Greek legislation, are subjected to administrative detention (for a maximum of 25 days), in addition to any quarantine time, for the purpose of verifying their personal information or other necessary data (criminal background, national security concerns, etc.). However, even after this detention period expires, their freedom of movement and travel remains subject to numerous restrictions and prohibitions. Nonetheless, for the Greek state, “... these measures, which ultimately amount to a deprivation of liberty—de facto detention—are not characterized as such, but are instead defined as ‘restrictions’ on liberty.”¹⁴

Since June 2017, newly arrived individuals on the islands have also been subjected to a geographic restriction confining them to the island on which they arrived, in order to facilitate the implementation of the European Union–Turkey Joint Statement of 18 March 2016.¹⁵ This restriction policy, which among other things directly contradicts Article 5 of the ECHR, has been repeatedly criticised by human rights organisations and challenged before the competent higher courts (see Council of State Decision 805/2018). Nevertheless, the Greek state continues to implement it through subsequent Joint Ministerial Decisions and regulatory acts.

Beyond that, the strict internal regulations governing the Closed Controlled Access Centres (CCACs) on the islands include entry and exit hours, mandatory overnight stays within the structures, and constant surveillance and control within the facility premises. Violations of these regulations may result in severe administrative sanctions, such as expulsion from the facility,

13 Festa, V. Z., Salinas López, H., Lourenço Gomes, A., Kempf, A., Krösschell, M., & Sarafi, G. A. (2023, 20 June). The Vastria CCAC: A legal report.

14 I Have Rights. (2023, 23 February). The EU-Funded Closed Controlled Access Centre – The De Facto Detention of Asylum Seekers on Samos, [Available here](#)

15 The implementation of this decision began with the Decision of the Director of the Asylum Service in June 2017 (No. 10464/31.5.2017, Government Gazette B 1977/7.6.2017), and is currently enforced under Ministerial Decision 1140/2019, published in Government Gazette B 4736/20.12.2019.

rejection of the submitted asylum application, and revocation of any allowances provided for the dignified stay of asylum seekers.

In the case of the Vastria facility, control over residents' movements in and out of the site has been included as a condition for the approval of the fire protection plan by the Directorate for Forest Coordination and Inspection (see below, 'Proposed fire protection measures'). This is expected to be used as a pretext for confining residents within the structure and enforcing absolute control over their mobility.

Furthermore, the remote location of the facility—far from any village or town on the island—will further contribute to the isolation of its residents. As noted above, the facility is being built 30km from the city of Mytilene, with no direct access to nearby settlements. Many have considered this a primary reason for choosing the location, in an effort to render the residents trapped within the facility invisible. The long distances in themselves, especially when combined with restricted circulation hours, can be regarded as *de facto* detention and deprivation of liberty for the residents.

Even more alarming are the measures foreseen for asylum seekers whose applications are rejected. Under Greek law, rejected applicants are transferred to closed pre-removal detention centres (PRO.KE.K.A) for a period of up to 18 months, with the stated aim of facilitating their deportation. However, as has been observed in the past, in most cases deportation cannot be carried out for a variety of reasons related to bilateral agreements or national and international human rights law. As a result, although detention in the PRO.KE.K.A is technically administrative, it is often used for punitive and disciplinary purposes. In fact, according to statements made by the (until recently) Minister of Migration and Asylum, Makis Voridis, a bill is expected to be submitted extending the detention period for rejected applicants to 24 months.¹⁶

The right to life

The overwhelming majority of those residing in the facilities come from places in which their lives were under serious threat and danger. The high rates of asylum recognition for those who have arrived—despite the numerous obstacles most face during the asylum procedures—confirm this.¹⁷ What is often overlooked are the great dangers that most people faced in their

16 Press Office, Ministry of Migration and Asylum. (2025, 6 May). *Μ. Βορίδης στο Action24: «Ο παράνομος μετανάστης θα βρίσκεται αντιμέτωπος με ένα πολύ πιο δυσμενές θεσμικά περιβάλλον – Έρχεται αυστηροποίηση του πλαισίου»* [M. Voridis on Action24: The irregular migrant will face a much more institutionally adverse environment – A tightening of the framework is coming]. Retrieved 27 June 2025, from <https://migration.gov.gr/m-voridis-sto-action24-o-paranomos-metanastis-tha-vrisketai-antimetopos-me-ena-poly-pio-dysmenes-thesmika-perivallon-erchetai-aystiropoiisi-toy-plaisiyo>

17 Refugee Support Aegean. (2025, May). Asylum procedure statistics in Greece 2024: Four in five asylum applications granted. Refugee Support Aegean. Retrieved 27 June 2025, from <https://rsaegean.org/en/asylum-procedure-statistics-in-greece-2024/>

attempt to reach Greek and European territory. The absence of “safe passages” for asylum seekers forces them to rely on smuggling networks and to use increasingly dangerous routes. As a result, there is a very high number of deaths and disappearances in Greek and European waters.¹⁸

Illegal practices carried out by European states at their borders, and within their territories, also play a significant role, with the most characteristic example being the unlawful pushbacks. Despite the Greek state’s explicit denial (until recently) of using such methods, undeniable evidence—from pushback victims, humanitarian organizations, researchers, and independent media outlets—proves their systematic use by Greek forces. These practices have resulted in hundreds of deaths. A recent ruling by the European Court of Human Rights has confirmed this at the highest level.¹⁹

Many of those who arrive on the islands and are transferred to the CCACs are victims of these practices. The need to provide a framework of safety must be a primary concern of the Greek state — legally, but above all morally. The choice to locate these facilities in remote and isolated areas raises serious concerns about respect for their rights to freedom and dignity.

However, the construction of the Vastria facility, in the heart of the island’s largest pine forest, raises extremely serious questions about their right to life, particularly in the event of a wildfire. As highlighted in fire safety studies, by representatives of fire service employees, and in risk assessments by experts,²⁰ the danger of such an event is at the highest possible level (see below, ‘Fire risk’). The measures provided for are only preliminary and responsive in nature,²¹ and the consequences of a highly likely major wildfire would be devastating for the local environment and above all for the people living and working in the facility. The responsibilities of those in charge would be criminal.

As also pointed out in the report by the University of Amsterdam,²² according to the UN International Covenant on Civil and Political Rights, “...States (if they can reasonably be expected to know) are compelled to protect the right to life of the people under their jurisdiction or

18 International Organization for Migration. (2024). Missing Migrants Project. Retrieved June 27, 2025 <https://missingmigrants.iom.int/>

19 A.R.E. v. Greece, Application No. 15783/21, Eur. Ct. H.R. (2025)

20 Papanikolaou N. (2022, 9 June). *ΒΑΣΤΡΙΑ: Το έργο προοδεύει ο κίνδυνος παραμονεύει- SOS από Πυροσβεστική* [Vastria: The project is progressing, the danger is lurking – SOS from the fire brigade]. Politika Newspaper. Retrieved 27 June 2025, from <https://www.politika.esvos.gr/vastria-to-ergo-proodeyei-o-kindynos-paramoneyei-sos-apo-pyrosvestiki/>

21 Petsikos M. (2023, 14 October). *Μπορεί να είναι στη Λέσβο η επόμενη μεγαπυρκαγιά* [Could the next mega-wildfire be in Lesbos?]. Stonisi. Retrieved 27 June 2025, from <https://www.stonisi.gr/post/63573/mporei-na-einai-sth-lesvo-h-epomenh-megapyrkagia/>

22 ibid

control from and within the scope of their powers from ‘reasonable threats and life-threatening situations that can result in loss of life’.”²³ In the case of Vastria, no one will be able to claim they didn’t know.

Even more concerning is that in previous public statements, the newly appointed Minister for Migration, Thanos Plevris, when asked about his view on how to deal with migration flows, openly expressed the opinion that effective “border protection” requires deaths, and that the living conditions for arriving migrants in the country should appear worse than in their country of origin.²⁴

The right to education

The education of migrant minors faces many obstacles. Beyond the various systemic barriers, perhaps even more significant are the social ones, which arise from widespread stereotypes and prejudices. There have been several instances in which refugee minors, in their efforts to attend classes in public schools on Lesbos, were met with hostility—even violence—from local residents.²⁵ But access to education is not—nor should it be considered—a privilege. This right is recognized and protected by a large number of international conventions and treaties (e.g., Article 26 of the Universal Declaration of Human Rights, 1948) and has been implemented into the applicable national legislation, as well as enshrined as a fundamental provision of the Greek Constitution (Article 16).

Equally important is that no personal characteristics—such as country of origin, religion, skin colour, etc.—can be used as a criterion for access to the right to education or for creating a two-tiered student system. However, the asymmetry here is stark: for local students, lack of access to—or failure to attend—school constitutes a criminal offence, while for migrant students, there is almost no provision ensuring unhindered access to educational institutions.

More specifically, in the case of underage asylum seekers and refugees, the European Directive 2013/33/EU “laying down standards for the reception of applicants for international protection,” which has been transposed into Greek law via Law 4540/2018, provides that

Member States shall grant to minor children of applicants and to applicants who are minors access to the education system under similar conditions as their own nationals for so long as an

23 UN Human Rights Committee (CCPR), “General Comment No.36 – Article 6: the right to life” (3 September 2019)

24 I Avgi (June 28, 2025), Θάναος Πλεύρης / Όταν ζητούσε νεκρούς μετανάστες και πρόσφυγες στα σύνορα [Thanos Plevris / When he was calling for dead migrants and refugees at the borders], Avgi Newspaper. Retrieved 1 July 2025, from https://www.avgi.gr/politiki/507611_otan-zitoyse-nekroys-metanastes-kai-prosfyges-sta-synora-binteo

25 Sto Nisi. (2021, 5 February). Διασπορά μίσους σε ανήλικα παιδιά [Spreading hatred toward underage children]. Retrieved 27 June 2025, from <https://www.stonisi.gr/post/14788/diaspora-misoys-se-anhlika-paidia>

*expulsion measure against them or their parents is not actually enforced. Such education may be provided in accommodation centres.*²⁶

According to the Greek planning framework, school-aged children between 4 and 15 years old residing in reception and accommodation facilities attend an afternoon preparatory class program (Reception School Facilities for the Education of Refugees – DYEP classes). The program's lessons take place in public schools located near the accommodation facilities or places of residence, which are designated annually by Ministerial Decisions. If this is not feasible, the children must attend regular morning classes in local schools together with the children of permanent residents. In such cases, reception classes must be established to support refugee children in learning the Greek language, which is necessary for following the curriculum. In practice, however, in many cases these reception classes do not function, resulting in the effective exclusion of migrant pupils from the educational system.²⁷

In the case of the Vastria facility, the greatest obstacles arise from its isolation and the expected lack of reliable transport connections with the city of Mytilene as well as the nearby villages. It is considered impossible for the families of minors to support, in any way, the daily transportation of their children to educational facilities. Even if public buses were available, most families would be unable to cover such a daily expense, let alone prioritize it over other pressing needs. The idea of accompanying their underage children outside the facility is even less feasible—not only because of the additional cost, but also due to daily bureaucratic obligations and personal needs, which force them to wait for hours in queues and waiting areas, often with no clear outcome.

Establishing an educational structure within the premises of the facility might, in theory, resolve the issue of access to education. However, this solution would bring further complications. Beyond the fact that it rules out the possibility of gradual integration into their new life through a mixed school community, the environment of a CCAC can in no way be considered suitable or appropriate for an educational process. Experience from other such facilities shows that where this solution is implemented, formal education provided by the state is often replaced by informal educational programs offered by Non-Governmental Organisations. It should also be noted that the architectural plan of the Vastria facility does not include any space designated for educational activities. This suggests that the original design did not incorporate education into its planning.

Overall, it is assessed that the isolation of the facility will lead to the isolation of the children

26 Directive 2013/33/EU of the European Parliament and of the Council of 26 June 2013 laying down standards for the reception of applicants for international protection (recast), OJ L 180, 29.6.2013, p. 96–116.

27 Greek Council for Refugees. (2024, 10 July). *Access to education*. Asylum Information Database. Retrieved 27 June 2025, from <https://asylumineurope.org/reports/country/greece/reception-conditions/employment-and-education/access-education/>

themselves, hindering their healthy integration into the local community, the development of their social skills, and their sense of belonging within a school community. Thirty-two Refugee Education Coordinators also expressed this concern in a letter addressed to the authorities in May 2023 by, denouncing the very poor living conditions of asylum seekers in reception facilities across Greece, especially in the new-type CCAC structures on the islands. As they noted, these facilities often hinder children's access to public education due to their distance from schools, resulting in the drastic limitation of children's interaction with peers outside the facility, their inability to participate in social activities, and a stifling environment for the development and integration of minors.²⁸

Beyond all this, in the case of unaccompanied minors, access to education takes on an additional important legitimizing role. On reaching adulthood, they are required—under Article 161 of the Immigration Code—to have successfully completed at least three grades of secondary education in order to be granted the ten-year special residence permit.²⁹ Due to the structural issues present in integration programs and access to educational structures, many young migrants, beyond being deprived of their right to education, are effectively driven toward exclusion and criminalization.

Violations of privacy and personal data protection

Serious concerns have been raised by civil society organizations regarding the protection of personal data belonging to third-country nationals, as well as staff working in the new CCACs. The Ministry of Migration and Asylum has introduced two new surveillance and monitoring systems in reception and accommodation structures for asylum seekers. These two systems, named Centaur and Hyperion, are designed to monitor the movements and behaviour of residents within the facilities, and to control the entry and exit of both residents and staff. More specifically, as described in a decision by the Hellenic Data Protection Authority:

The “Centaur” program is reportedly a comprehensive digital system for managing electronic and physical security both around and within the premises of the Closed Controlled Access Centres (CCACs) and Reception and Identification Centres (RICs) for third-country nationals on the islands of Lesbos, Chios, Samos, Leros, and Kos. It utilizes cameras and movement analysis algorithms (Artificial Intelligence Behavioural Analytics), and is managed by the Ministry of Migration and Asylum (YMA). Among other components, the “Centaur” program includes the use of CCTV systems and unmanned aerial vehicles (drones), which are used to process personal data—at the very least, visual data.

28 Alfavita. (2023, 15 May). Εκπαίδευση προσφυγόπουλων: SOS από Συντονιστές εκπαίδευσης για κλειστές δομές - «ανοικτές φυλακές» [Education of refugee children: SOS from Education Coordinators regarding closed facilities – “open-air prisons”]. Alfavita.gr. Retrieved 27 June 2025, from https://www.alfavita.gr/ekpaideysi/416406_ekpaideysi-prosfygopoylon-sos-apo-syntonistes-ekpaideysis-gia-kleistes-domes

29 Joint Ministerial Decision No. 180647/GD4/2016, Government Gazette B” 3502/31-10-2016: Establishment, organization, operation, coordination, and educational program of the Reception Structures for the Education of Refugees (DYEP), criteria and procedure for staffing these structures.

At the same time, the “Hyperion” program is described as an integrated entry–exit control system for the aforementioned facilities. Its purpose is to monitor the entry and exit of both residents and certified members of registered NGOs, through the presentation of an asylum seeker card or NGO employee/member ID, and of facility staff through an RFID reader combined with a fingerprint scan (two-factor authentication). Consequently, the system involves the processing of personal data, including biometric data.³⁰

The project, with a total budget of approximately €8,500,000 for all the facilities in Greece was divided into three lots by geographical regions. Two of them were undertaken by the consortium of companies ESA Security Solutions and ADAPT IT, and one by Space Hellas, in September 2021.

The European Parliament’s Committee on Civil Liberties, Justice and Home Affairs (LIBE Committee) submitted requests for information to the Hellenic Data Protection Authority, regarding the legality of these systems’ use and operation. Civil-society organizations (the Hellenic League for Human Rights, HIAS Greece, Homo Digitalis, and Dr. Niovi Vavoula of Queen Mary University of London) submitted a request for information and opinion, and the UNHCR Representation in Greece raised a formal question at the end of 2021 and beginning of 2022.

As Homo Digitalis highlighted in its press release on the issued decision (Decision 13/2024), the HDPa acknowledged

the very serious deficiencies into which the Ministry of Migration and Asylum had fallen in the course of conducting a complete and coherent Data Protection Impact Assessment, while it pointed out the significant violations of the GDPR [General Data Protection Regulation] that were identified and which concern a large number of data subjects who face real difficulty in exercising their rights.³¹

For the above-mentioned violations, the Authority imposed a €175,000 fine on the Ministry of Migration and Asylum and ordered it to comply within three months from the date of the decision. This amount represents the highest fine ever imposed on a public body in Greece for breaches of the GDPR. It remains unknown whether the Ministry has complied with the recommendations of the independent authority to date.

30 Hellenic Data Protection Authority. (2024, 15 April). Ministry of Migration and Asylum receives administrative fine and GDPR compliance order following an own-initiative investigation by the Hellenic Data Protection Authority. *Hellenic Data Protection Authority – Press releases*. Retrieved 4 July 2025, from <https://www.dpa.gr/en/enimerwtiko/press-releases/ministry-migration-and-asylum-receives-administrative-fine-and-gdpr>

31 Homo Digitalis. (2024, 3 April 3). The Hellenic Data Protection Authority fines the Ministry of Migration and Asylum for the “Centaurus” and “Hyperion” systems with the largest penalty ever imposed to a Greek public body [Press Release]. *Homo Digitalis*. Retrieved 27 June 2025, from <https://homodigitalis.gr/posts/132183/>

A recent report by I Have Rights, which operates mainly on the island of Samos, and the Border Violence Monitoring Network, emphasizes that—aside from the various violations of data protection legislation brought about by the use of the Centaur and Hyperion systems—another breach of a wide range of fundamental rights occurs in the systematic confiscation of mobile phones belonging to residents in the facilities, which has been documented in the Samos CCAC.³² Among these are the right to privacy, the right to information, the impact on human dignity, and the right to equality and non-discrimination. Reports of the unjustified confiscation of residents’ mobile phones have also been documented in the Mavrovouni facility on Lesbos.³³

Of the two systems, Centaur and Hyperion, only the latter is partially operational at the Mavrovouni centre, but both are expected to be installed and ready for activation whenever the Vastria CCAC becomes operational.

Access for civil society

As a counterbalance to the threats looming over the rights of residents in the facilities—and in an effort to improve their daily lives—civil society organisations have played a crucial role. Both formal and informal groups, political and humanitarian, international and local, have managed through their presence to document abuses, raise public awareness, and apply pressure for improved living conditions for the migrants trapped in these facilities, to the extent that such improvement is possible within a detention centre. Their contribution is also considered significant in informing residents of their rights and supporting them in preparing their asylum claims.

However, their presence has repeatedly been instrumentalised in propaganda efforts by conservative and reactionary circles. Statements made even by government officials have vaguely targeted such organisations as the “source of the problem”, fuelling a public discourse aimed at distracting from the real and substantive causes behind the social phenomenon of migration and its broader implications. Several organisations have come under judicial scrutiny, facing accusations such as “facilitating illegal entry into the country,” while additional prosecutorial investigations include suspicions of money laundering—resulting in the freezing of their bank accounts and the effective suspension of their operations.³⁴ Beyond the institutional pressure they face, organisations and their members have also been subjected to violent reactions from

32 I Have Rights. (2025, 25 January). NGOs on Samos uncover a covert operation against asylum seekers and the invasive use of technology in the Samos Closed Controlled Access Centre [Press Release]. Retrieved 27 June 2025, from <https://ihaverights.eu/samos-border-tech/>

33 Legal Centre Lesbos. (2025, 12 February). Unlawful confiscation and surveillance of migrants’ phones in Lesbos CCAC. Legal Centre Lesbos. Retrieved 27 June 2025, from <https://legalcentrelesvos.org/2025/02/12/unlawful-confiscation-and-surveillance-of-migrants-phones-in-lesvos-ccac/>

34 Free Humanitarians. (n.d.). Free Humanitarians [Facebook page]. Facebook. <https://www.facebook.com/freehumanitarians/>

segments of the local population in the areas where they operate.³⁵

Since 2020, through a Joint Ministerial Decision, the “NGO Registry”³⁶ has been operational. Its purpose was “to bring order to the activities of organisations,”³⁷ by extending Greek authorities’ control over them. Access to reception and accommodation centres is now allowed only to organisations and their members registered in the registry, significantly limiting civic oversight of their operations and the documentation of possible violations of the rights of residents and detainees.

All these pressures on civil society organisations are not merely part of a political confrontation or an attempt at control. The primary goal is to restrict their intervention—or even exclude them altogether—which contributes to the ongoing devaluation of migrants.

This is expected to be further aggravated by the geographical isolation and difficulty of accessing the new CCACs, combined with the other restrictions imposed by the electronic control systems (Hyperion) installed in the facilities. These measures affect not only residents but also workers and visitors, creating an additional layer of isolation and exposing migrants to violations of their fundamental rights.

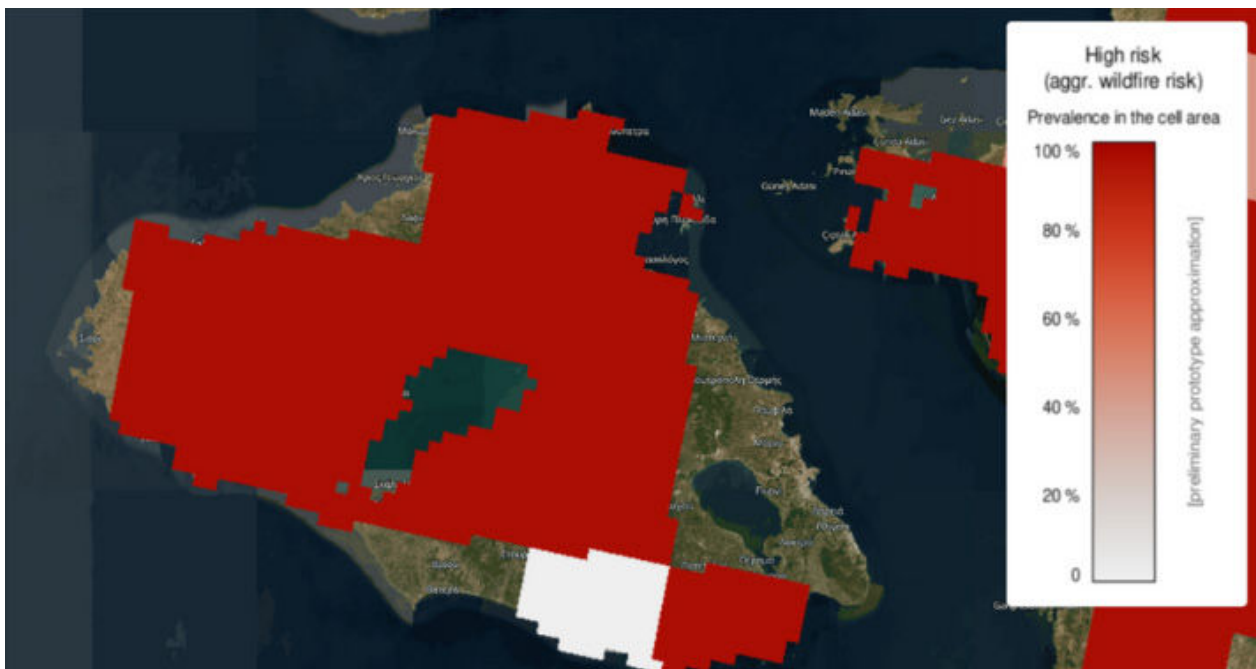
35 ERT News. (2020, 13 March). Το χρονικό των πογκρόμ και των επιθέσεων στη Λέσβο [The chronicle of the pogroms and attacks in Lesbos]. Retrieved 27 June 2025, από https://www.ertnews.gr/perifereiakoi-stathmoi/voreio_aigaio/to-xroniko-ton-pogkrom-kai-ton-epitheseon-sti-lesbo/

36 Joint Ministerial Decision 10616/2020, Government Gazette B’ 3820/09.09.2020: Regulation of the operation of the ‘Registry of Greek and Foreign Non-Governmental Organizations (NGOs)’ and the ‘Registry of Members of Non-Governmental Organizations (NGOs)’ engaged in issues of international protection, migration, and social integration within the Greek territory.”

37 ERT News (2020, 6 February). Μητσοτάκης: Θα μπει τάξη στη δραστηριότητα των ΜΚΟ – Τα νησιά θα αποσυμφορηθούν [Mitsotakis: Order will be brought to the activity of NGOs - The islands will be decongested]. Retrieved 27 June 2025, from https://www.ertnews.gr/perifereiakoi-stathmoi/voreio_aigaio/mitsotakis-tha-mpoi-taxi-sti-drastiriota-ton-mko-ta-nisia-tha-aposymforhoun/

FIRE RISK

The looming risk of fire is a central issue concerning the construction and operation of the facility. The European Forest Fire Information System classifies Vastria as a Wildfire High-Risk area.³⁸ Such a scenario would primarily place the residents and workers in the facility at enormous risk, as well as the sensitive forest ecosystem of the area and the island. This risk, and its sharp increase if the facility becomes operational, is also evident in the supporting studies of the Environmental Impact Assessment (EIA). This risk is explained further in a study by the UN Special Expert on Forests and Climate Change, Mpampis Petsikos, who has repeatedly highlighted the danger through articles in the press and expert opinions submitted to the competent courts.³⁹



Wildfire risk map

Lesvos is one of the areas in Greece most threatened by desertification. Since 1980, the area has been declared particularly sensitive to wildfires, with measures prescribed for its protection.⁴⁰ The proposed facility is located in the core of a very important pine forest on the island of Lesvos. The main species found there is the Turkish pine (*Pinus brutia*), which is the most flammable ecosystem type in the eastern Mediterranean.

38 European Forest Fire Information System, <https://forest-fire.emergency.copernicus.eu/about-effis>

39 Petsikos M. (2023, 14 October). *Μπορεί να είναι στη Λέσβο η επόμενη μεγαπυρκαγιά [Could the next mega-wildfire be in Lesvos?]*. Stonisi. Retrieved 27 June 2025, 2025, from <https://www.stonisi.gr/post/63573/mporei-na-einai-sth-lesvo-h-epomenh-megapyrkagia/>

40 Presidential Decree 575/1980. (1980, 9 July). Government Gazette, Series A, Issue 157: *On the declaration of forest and woodland areas particularly vulnerable to fire as hazardous*.

Most of the forest has, for years, been neglected from management actions, such as logging, thinning, and the necessary removal of biomass, resulting in increased density and significant accumulation of combustible material. Indeed, the island's Forest Agency, having identified this threat, has addressed the island's two municipalities, emphasizing the need to develop and implement modern management plans. According to the approved EIA, the last management plan for the area was prepared in 2009, covering only the southern part of the Vastria forest. It was approved for the period 2011–2015, and mainly includes silvicultural logging.

It should also be noted that since 2021, the Ministry of Environment has been implementing a forest protection program called AntiNero.⁴¹ This multi-year program, with a total budget of €58 million for Lesvos, involves, among other things, maintenance of the forest road network, construction and maintenance of firebreak zones, installation of water tanks within forest areas, management of combustible material, and the development of wildfire protection plans. However, this program itself has provoked reactions from agencies and citizens, as it does not require environmental permits for its interventions, even in protected areas.⁴²



AntiNero Program Water Tanks

In Petsikos' contemporary risk analysis, according to the technical specifications set by the Ministry of Environment, the condition of the pine forest in eastern Lesvos shows the highest possible flammability and combustion potential, while the degree of vegetation continuity is high. According to this, the threat of wildfire outbreak is considered very high, scoring 8–9 on a scale from 1 to 10.

In the event that the facility becomes operational in the Vastria location, the elements of this analysis change. Two criteria, “Causes of fire” and “Values threatened”, would show heightened risk. With the increase in “Causes of fire”, the risk rises accordingly, as experience from similar facilities has shown that small fires occur very frequently. According to the Hellenic Fire Service

41 Koutsavli A. (2025, 10 Ιουνίου). Σε εφαρμογή οι εργασίες του προγράμματος AntiNero [The work of the AntiNero project is underway]. Emprosnet, Retrieved 27 June 2025, from <https://www.emprosnet.gr/e-tv/se-efarmogi-oi-ergasies-tou-programmatos-antinero-vid/>

42 Lialios, G. (2025, June 12). Δάση – Πυρκαγιές: Κόντρα μεταξύ φορέων και ΥΠΕΝ για το Antinero [Forests – Fires: Conflict between agencies and the Ministry of Environment over Antinero]. Kathimerini. Retrieved 27 June 2025, from <https://www.kathimerini.gr/society/reportaz/563659018/dasi-pyrkagies-kontra-metaxy-foreon-kai-ypen-gia-to-antinero/>

data, in less than seven years of operation of the Moria facility, 247 fires occurred.⁴³ Meanwhile, the “Values threatened” would include the 5,000 detained migrants and 500 workers, in addition to the extremely sensitive and protected ecosystems of the area. In this case, the wildfire threat increases, reaching the maximum possible value on the danger scale, 10 out of 10. In other words, the wildfire threat is extreme, and there is a very high likelihood of a mega-wildfire, with very destructive consequences.

Proposed fire protection measures

To address the risk, the Ministry of Migration and Asylum and the construction company have proposed a series of measures, which focus on detecting and attempting to deal with such a wildfire.

The Fire Protection Study, which concentrates on managing a fire within the facility, was submitted along with the Environmental Impact Assessment. Beyond various fire detection systems and the positioning of fire hydrants and equipment, the deployment of a fire brigade team is also planned. For the necessary water supply, a well with a capacity of 26,280m³/year is planned within the region of the facility, with a 150m³ storage tank located at its eastern edge. The contractor has already received approval for this well from the Water Directorate of the North Aegean.⁴⁴

The study, “STRENGTHENING FIRE PROTECTION OF THE WIDER FOREST AREA OF VASTRIA”, with minor deviations from the study accompanying the EIA, was approved by the Directorate of Forest Coordination and Inspection in December 2022. However, a new revised version, with a total budget of €1,999,529.04, including additional provisions, was considered and approved in February 2024 and included six main interventions:

1. Construction of a firebreak zone 80 meters wide and 1,354.94 meters long
2. Maintenance of covered firebreak zones on six selected branches of the existing forest roads
3. Creation of one new covered firebreak zone branch
4. Construction of a fine firebreak zone 40 meters wide with a total area of 53.3 acres
5. Forestry operations for forest fire prevention on selected forest areas covering a total area of 1,173.31 acres
6. Supply, transport, installation, and filling of fifteen prefabricated heavy-duty metal cylindrical

43 Durie, A., & Levy, G. (2025, 22 May). On Greece’s Lesvos, new migrant camp sparks wildfire fears. Ekathimerini. Retrieved 27 June 2025, from <https://www.ekathimerini.com/in-depth/society-in-depth/1270475/on-greeces-lesvos-new-migrant-camp-sparks-wildfire-fears/>

44 Decision No. 26838/03.10.2024. (2024, 3 October). *Granting of a water use permit to the Ministry of Migration and Asylum for a borehole, for fire protection purposes, at the location “Plati-Vastria”, Nees Kydonies community, Municipal Unit of Loutrapoli Thermis, Municipality of Mytilene*. Water Directorate of the North Aegean

water tanks with a capacity of at least 20 cubic meters (m³), placed near the road network of the study area.

At the same time, while acknowledging the deficiencies of the submitted and approved study, it stipulated as a condition of approval some additional terms, primarily concerning securing measures to prevent the outbreak of fire within the facility and its spread to the adjacent forest. These include the construction and staffing of fire watchtowers around the facility, regular clearing of flammable biomass from the area, availability of sufficient water quantity, maintenance of the electrical network, management of the local forest complexes, implementation of the related terms mentioned in the Environmental Terms Approval Decision, control of the movements of residents within the facility, and the preparation and implementation of a study for installing a modern smart fire detection system.

However, a significant weakness of the study, as noted by Petsikos, is that

*it does not analyze, quantify, or present the fire risk. Therefore, it does not assess to what extent the risk is reduced by the proposed measures. So, without risk analysis, how do we know that the measures are appropriate, sufficient, and will be effective?*⁴⁵

Moreover, repeating the risk analysis in light of the proposed measures, the fire threat remains at the highest possible level on the danger scale and is characterized as extreme.⁴⁶

In May 2025, the Ministry of Migration and Asylum announced a tender for the “Creation of an integrated fire detection system, according to the study, for the early warning of forest fires at the facility being constructed in the forest area of Vastria, Lesvos”, with a budget of €673,196, including VAT. The deadline for submitting offers was 28 May 2025, while the project’s implementation period was a proposed four months from the date of signing the relevant contract. This system is designed to detect a fire and issue an early warning using high-resolution cameras and three autonomous fire monitoring and detection stations in the wider area. The system’s operation also involves the use of artificial intelligence algorithms.

The reactions and pressures exerted by various stakeholders forced the Ministry to revise the initially incomplete studies and fire protection measures. However, in their entirety, these measures constitute preventative and suppressive actions against such an event, since the choice to locate the facility within such a sensitive site contradicts the “precautionary principle”,

45 Petsikos Babis, (2024, 18 October). [https://www.facebook.com/babis.petsikos/posts/pfbid02XlqAeM9BTS6ogEWxQQi4V2itMnCjCrmeFYfnhtf7x9KLHbX4sCVNfp3JSWlRQHarl?__cft__\[0\]=AZXqFQoSfWlvEVJFv63lAGHIRJnZiveHROVopz-YPIhBzCB6UvzWhOQd4OY4JVGjnvB6H7eSyne3TXa6b2vIFlg7UZep8tyr0VADQvA2Ef0IKPWtKoTd8-UGj9z2B96ZKA&__tn__=%2CO%2CP-R](https://www.facebook.com/babis.petsikos/posts/pfbid02XlqAeM9BTS6ogEWxQQi4V2itMnCjCrmeFYfnhtf7x9KLHbX4sCVNfp3JSWlRQHarl?__cft__[0]=AZXqFQoSfWlvEVJFv63lAGHIRJnZiveHROVopz-YPIhBzCB6UvzWhOQd4OY4JVGjnvB6H7eSyne3TXa6b2vIFlg7UZep8tyr0VADQvA2Ef0IKPWtKoTd8-UGj9z2B96ZKA&__tn__=%2CO%2CP-R)

46 ibid

which is a fundamental principle of environmental protection at EU, national, and international levels. Experts also raise objections regarding the effectiveness of firebreak zones as a means to limit and suppress fires in pine forests. Previous experience has shown they are not effective, especially under strong wind conditions. Therefore, firebreak zones cannot in any case be the primary fire protection measure.

An additional condition included in a later amendment to the Environmental Terms Approval Decision⁴⁷ deems it necessary to construct an additional escape route for residents and workers

at the facility, besides the access road, due to the very high fire risk. This is considered significant for the project's development. To date, this route's location remains uncertain, as it is expected to cause additional environmental pressure on the area's ecosystems, potentially leading to new objections and legal challenges from groups opposing the facility's operation.



Firebreak zones opened in the area of Vastria

⁴⁷ Decision No 20588/23-07-2024, Amendment of Decision 10546/19-04-2023 of the Decentralized Administration of the Aegean, Approval of Environmental Terms for the Project: "Temporary Accommodation Facility under Article 8 of Law 4375/2016, at the location 'Vastria' of the Municipal Unit of Loutrópoli Thermís of the Municipality of Mytilene and the Municipal Unit of Agia Paraskevi of the Municipality of Western Lesvos, in the Prefecture of Lesvos, North Aegean Region.", Environmental and Spatial Planning Department

ENVIRONMENTAL CHALLENGES

Aside from the objections regarding possible violations of fundamental human rights, and the enormous risk of fire outbreak, concerns have also been expressed about issues related to the area's sensitive and unique ecosystem.

Although the site of the facility, after various amendments, lies outside the NATURA 2000 protected areas, it remains within the Wildlife Refuge (KAZ) "Agios Charalampos," and in immediate proximity to the Special Protection Area (SPA) for birds, GR4110011 "Mount Olympus of Lesvos." Also, part of the project completion site and access road falls within Special Protection Zones PEPI, Forests, Forest and Reforestation Areas, and B2, Control and Restriction Zones for Building.

As described above, the site selection and start of works began without carrying out any Environmental Impact Assessment Study or consultation with local stakeholders and residents. The Ministry of Migration and Asylum argued that the project and its complementary works fell within legislation provisions requiring only compliance with Standard Environmental Commitments.⁴⁸ To start the works, the former Minister of Migration, Panagiotis Mitarakis, in May 2021, signed the approval of the declaration of compliance with Standard Environmental Commitments,⁴⁹ which was renewed the following year with a new decision.⁵⁰ A few months earlier, the declaration of compliance with Standard Environmental Commitments was also approved for the access road passing through forest areas.⁵¹

48 Joint Ministerial Decision No.169905/2013, Government Gazette B 2035/22-8-2013: *Standard environmental commitments for the projects and activities of Category B of the 12th Group "Special Projects and Activities" of Annex XII of Ministerial Decision no. 1958/2012 (Government Gazette B 21), as amended.*

49 Approval No 10992/17-05-2021. (2021, 17 May). *Approval of declaration of inclusion and inclusion in Standard Environmental Commitments of the project "Construction of Regional Services, Structures and Distinct Areas under Article 8 of Law 4375/2016 on the Island of Lesvos," at the location "Vastria" (Plati), Municipal Unit of Loutrópoli Thermís, Municipality of Mytilene, and Municipal Unit of Agia Paraskevi, Municipality of Western Lesvos, Regional Unit of Lesvos, North Aegean Region., Ministry of Migration and Asylum*

50 Approval No 416395/16-07-2022 (2022, 16 July). *Approval of declaration No. 416107/15-07-2022 of inclusion and inclusion in Standard Environmental Commitments of the project "Construction of Regional Services, Structures and Distinct Areas under Article 8 of Law 4375/2016 on the Island of Lesvos," at the location "Vastria" (Plati), Municipal Unit of Loutrópoli Thermís, Municipality of Mytilene, and Municipal Unit of Agia Paraskevi, Municipality of Western Lesvos, Regional Unit of Lesvos, North Aegean Region—Amendment of decision No. 10992/17-05-2021 on inclusion in PPD. Ministry of Migration and Asylum*

51 Approval No. 239007/29-04-2022 (2022, 29 April). *Approval of declaration no. 236189/28-04-2022 of inclusion and inclusion under Standard Environmental Commitments for the project: Forest Road Construction (Category A) for the access road to the temporary facility at the location "Plati Vastria" on the island of Lesvos, as an accompanying project for the "Construction of Regional Services, Facilities, and Designated Areas under Article 8 of Law 4375/2016 on the island of Lesvos," at the location "Vastria" (Plati), Municipal Units of Loutrápoli Thermis (Municipality of Mytilene) and Agia Paraskevi (Municipality of Western Lesvos), Regional Unit of Lesvos, North Aegean Region. Ministry of Migration and Asylum*

However, Decision A.1285/2022 of the Council of State (see above, “Legal Battles”) clarified that the project fell within provisions requiring Environmental Terms Approval. This was taken into account by the Plenary of the Council of State, which accepted the objections of local stakeholders to annul the project and suspend the works.

The Ministry of Migration and Asylum, as the project authority, submitted an Environmental Impact Assessment belatedly, in November 2023. Local groups reacted strongly against the study, as it some elements appeared arbitrary, and it had been conducted with no consultation of local stakeholders. Some characteristic examples include: the fact that the facility was depicted on a map outside the KAZ of Agios Charalampos; the facility’s population was restored to 5,001 persons, despite the Ministry’s amendment now referring to a facility for 2,952 persons; and the construction of a firebreak zone occupying 54.10 acres within a Natura area.⁵² The qualitative criteria assessing the project’s impact on the population and human health, ranging from neutral to positive, also provoked negative impressions.

The Decentralized Administration of the Aegean approved the environmental terms, with provisions for all stages of the construction and operation of the facility,⁵³ despite the study’s obvious weaknesses and the negative opinions of three local-authority bodies and other competent services (for example the Directorate of Environment and Spatial Planning). To date, there have been three further amendments to the approved terms.⁵⁴

The North Aegean Region filed an annulment appeal against the approved environmental terms at the Council of State. However, on 2 October 2024, the Ministry of Migration informed the Council of State that it would withdraw the existing study and proceed with drafting a new Environmental Impact Assessment for the construction of a facility with a capacity of 5,001 persons. This move was considered a procedural evasion ahead of the upcoming hearing of the annulment request by the Council of State.

52 Pagoudis, G. (2024, October 16). *Παρωδία μελέτης για τη δομή στη Βάστρια* [A parody of a study for the facility in Vastria]. Efimerida ton Syntakton. Retrieved 27 June 2025, from https://www.efsyn.gr/ellada/koinonia/375212_parodia-meletis-gia-ti-domi-sti-bastria

53 Decision no. 10546/19-04-2023 (2023, 19 April). Decision of the Decentralized Administration of the Aegean: Approval of environmental terms for the project “Temporary Accommodation Facility under Article 8 of Law 4375/2016, at the location ‘Vastria’ in the Municipal Unit of Loutrapoli Thermis of the Municipality of Mytilene and the Municipal Unit of Agia Paraskevi of the Municipality of Western Lesvos, Lesvos Prefecture, North Aegean Region,” due to reclassification from Category B to A2. Environmental and Spatial Planning Department

54 A) Decision No. 15519/02-06-2023, B) Decision No. 20588/23-07-2024, C) Decision No. 25905/24-09-2024

PUBLIC UTILITIES

The connection of the facility to public utilities (water supply, sewage, electricity, etc.) constitutes a major challenge for the construction of the project. The choice of the construction site at a location with no prior infrastructure, combined with the interventions that must be carried out in the surrounding area to connect it, have significantly increased both the construction cost and the environmental pressure the area will face.

Water supply and firefighting

The island of Lesvos faces an increasing problem of water scarcity. This results partly from broader problems caused by climate change, and partly from problematic management plans. It should be noted that the largest percentage of the island's water resources is directed towards irrigation. The problem worsened in 2025 due to low rainfall. As a result, with the consent of the island's two municipalities, in April 2025 the island was declared in a state of emergency for one month. This allowed the bypassing of bureaucratic procedures, aiming to approve necessary projects for the conservation and storage of the available water supply. Meanwhile, the construction of the Tsiknias Dam in central Lesvos has already been approved and tendered. This is expected to be of great importance for addressing the water scarcity problem of the island. However, it is not expected to be completed before the end of 2028.

The facility's water needs are divided into quantities intended for firefighting and those for its water supply. For firefighting needs, the water requirements will be met through a borehole, which will be drilled within the facility grounds, and through storage in tanks (see above, "Proposed fire protection measures").

However, the water supply situation is more complicated. So far, during the construction stage, water needs have been served by water tanker trucks. During operation, according to the Environmental Terms (AEPO), the total water supply needs amount to 136,875m³/year. Concerns have been raised that the estimate included in the project studies falls short of actual needs. Contrary to the limits set by the competent decision,⁵⁵ which define consumption from 100 to 200 litres per person per day, the project studies calculate consumption in the facility as 75 litres per person per day! This estimate is based on various management plans for saving or reusing water, but these should be questioned.

To meet the needs, the Ministry of Migration's initial design included the creation of a desalination unit on the island's eastern coasts. The Ministry offered compensatory benefits, including the purchase of a water tanker truck and a water supply network study for the area's

55 Decision No D11/F16/8500/91 Official Gazette B' 174/26-3-1991: "Definition of minimum and maximum limits of necessary quantities for the rational use of water in water supply"

settlements. The Municipal Water and Sewerage Company of Lesvos (DEYAL) had issued a positive decision⁵⁶ in March 2023, which was revoked in October 2024 following changes in its board of directors.

The facility's water supply remains uncertain, but examples from other existing facilities (see Samos CCAC) indicate the facility could start operating by meeting water needs through the use of tanker trucks.

Waste

The following provisions are planned for liquid and solid waste disposal.

Liquid waste

During construction, chemical toilets were provided for the workers' liquid waste. During operation, with an estimated volume of about 500m³/day, a biological treatment unit is planned, which will separate components and, after treatment, provide for their reuse or disposal. The study submitted with the Environmental Impact Assessment (EIA) foresees some of the water being used as industrial water and in toilet flush tanks, with the remainder directed to an infiltration field. It should be noted, however, that the Directorate of Environment and Spatial Planning submitted a negative opinion on the siting and construction of the Vastria facility, arguing that the area has no absorption capacity during the winter months due to soil and geological conditions, warning that treated wastewater would end up in the nearby Agios Ioannis stream, which lies within NATURA and KAZ protected areas where pollution is prohibited. Solid waste from the process, after further treatment, is planned to be directed to the nearby landfill. The treatment units will be installed at the facility's eastern edge, with storage of excess treatment matter near the facility's western entrance. As mentioned above, the water consumption estimates are questionable, which also has a bearing on waste water calculations.

Solid waste

Solid waste generated during construction comes from site personnel, the packaging from construction materials, electromechanical equipment materials, and excavation products. The project EIA estimates construction material waste at 2 tonnes total, which would be taken to the nearby landfill. Excavation, construction, and demolition waste would be directed for reuse without further burden. However, the quantity of municipal waste is not negligible, estimated at about 1 tonne/day during construction and 2 tonnes/year for materials from facility maintenance.

The study estimates that, once operational, the facility will produce 3 tonnes of municipal

⁵⁶ Decision No. 138/2023: *Update to the Municipal Council regarding document no. 155697/15-3-2023 (ref. no. 3232/16-3-2023 DEYAL) of the Ministry of Migration and Asylum concerning "Installation of a desalination unit for the water supply needs of the new Lesvos facility at the location 'Vastria'."*, Municipal Water and Sewerage Company of Lesvos

waste per day. Again, concerns arise from this estimate. At full capacity, with 5,001 residents and 500 staff, this forecast is well below the expected European average of 1.4kg per person per day.⁵⁷ Also, experience has proved that implementing recycling systems within such facilities is difficult. There is a likelihood that all waste will be taken to the island's only landfill site. In order to implement waste management plans during construction and operation, the Ministry of Migration and Asylum and the contractor TERNA have respectively signed agreements with the Municipality of Mytilene's Directorate of Sanitation and Recycling (DCA 29715/06-09-2022) and the company ANAKEM S.A.

Gaseous and airborne waste

Unlike the above, significant air pollution in the area is not expected. The facility's location within a basin surrounded by higher hills works as a deterrent for disturbance over a wider area, and any disturbances are expected to be mainly local. During construction, increased noise levels are expected due to machinery, installations, and vehicles operating onsite, while during operation any pressure will come from vehicle traffic.

Electricity supply

For the facility's electricity supply, the Ministry of Migration and Asylum made a decision to sign a contract with the company, Hellenic Electricity Distribution Network Operator S.A. (DEDDHE), to connect the medium voltage distribution network of the new facility at a cost of €598,492.82 including VAT.⁵⁸ The agreement foresees a power supply of 3,700 kVA via an overhead network up to the Lesvos landfill intersection, and underground cables reaching the facility. Despite the agreement between the Ministry and DEDDHE, the facility's connection has not progressed, despite being considered an uncomplicated project. Some excavation works for underground cables towards the facility started at the end of May 2025 but were temporarily halted pending a new connection study. It is estimated that the interconnection will be completed by the end of summer 2025.

Archaeological finds

The facility's site is not considered of particular archaeological interest. The competent authority, the Ephorate of Antiquities of Lesvos (EFALES), initially gave a positive opinion through decision 130255/02-04-2021, establishing the usual rules for cases where archaeological finds are discovered. During excavations, two early Christian basilicas with remains of tombs, alongside

57 Eurostat. (2025, 13 February). *Municipal waste down by second consecutive year*. Publications office of the European Union. <https://ec.europa.eu/eurostat/fr/web/products-eurostat-news/w/ddn-20250213-1>

58 Ref. no.688025/16/11/2022, *Decision on service contract awarded based on exclusive rights for coverage of connection cost to the HEDNO network of the Regional Service / Structure under Article 8 of Law 4375/2016, at the location Plati Vastria, Municipal Unit of Loutrópoli Thermís, Municipality of Mytilene (contract number 5-85400548-01), within the project "Construction of Regional Services, Structures and Distinct Areas under Article 8 of Law 4375/2016 on the islands of Lesvos and Chios and the upgrade of the existing structure at Fylakio Evrou."*. Ministry of Migration and Asylum

other architectural elements in their vicinity, were uncovered. According to the terms set, the Ministry of Migration and Asylum and the contractor were obliged to fence and protect the finds. However, the lack of the necessary study in the submitted EIA led the EFALES to ultimately issue a negative opinion on the Environmental Terms approval, stressing the belated preparation of the study and significant alterations already visible in the area's environment due to the works.⁵⁹

Subsequently, the company reportedly submitted a fencing study for the finds, which the EFALES approved positively.⁶⁰

59 Ref. no. 624988-28/12/2022, *Consultation and collection of opinions procedure from competent authorities within the framework of the environmental terms approval process for the project: "Temporary Accommodation Structure under Article 8 of Law 4375/2016, at the location 'Vastria' of the Municipal Unit of Loutrópoli Thermís, Municipality of Mytilene, and the Municipal Unit of Agia Paraskevi, Municipality of Western Lesvos, Regional Unit of Lesvos, North Aegean Region."*. Ephorate of Antiquities of Lesvos

60 Ref. no. No 145089/29-03-2023, *Approval of the fencing study for the antiquities discovered during the construction of the temporary accommodation structure for third-country nationals at the location "Vastria," Municipal Unit of Loutrópoli Thermís, Municipality of Mytilene*. Ephorate of Antiquities of Lesvos

THE ECONOMIC PARAMETERS OF THE VASTRIA FACILITY

The economic benefits derived from the construction and operation of the Vastria facility are a major factor both in the decision taken by the Greek government—despite the significant disadvantages and risks for the area—and in the support of these decisions by part of the local population.

Undeniably, migration has become a serious economic factor in Lesbos, at least over the last decade. The economy that has developed around migration management, dominated by what is often called the “border industrial complex”—a multi-billion euro sector—has left many people eager to secure a share of the profits.⁶¹ The billions that flowed in offered a lifeline to broad social groups—and a field of profit for business interests—especially considering that Greece was grappling with the economic crisis, amplified even more in isolated border regions with one-dimensional economies and high unemployment rates. The billions that flowed in offered a lifeline to broad social groups—and a field of profit for business interests—especially considering that Greece was grappling with the economic crisis, amplified even more in isolated border regions with one-dimensional economies and high unemployment rates. There is no precise quantitative record of the economic impact of migration in Lesbos. However, if one considers the direct financial flows (i.e. labour, construction and maintenance of detention centres, catering, and related services) and the indirect ones (e.g. rents, food sector, transport), the economic footprint can be estimated at hundreds of millions of euros over the years.



ATM at the Samos CCAC

The construction project of the Vastria CCAC represents the second-largest public or private expenditure on Lesbos island in decades. After the Tsiknias Dam—budgeted at €98 million, with work beginning in May 2025—the construction of the Vastria facility and its accompanying works is a massive economic undertaking for the island.

The project was tendered on 31 May 2020 and included the construction of facilities in Lesbos

61 European Commission. (n.d.). Financial support from the EU. In Migration management Greece. Retrieved June 28, 2025, from https://home-affairs.ec.europa.eu/policies/migration-and-asylum/migration-management/migration-management-greece/financial-support-eu_en

and Chios and upgrades to the centre in Fylakio (Evros), with a total budget of €176,576,000 (VAT included), and allowed just 14 days for proposal submissions. As expected, it attracted the interest of major construction firms. However, the lack of subdivision of the contract into smaller lots, and the selection criteria set for bidders, effectively excluded the majority of Greek construction companies, prompting two of them to appeal the process. Notably, EKTER S.A. stated in its appeal to the Hellenic Authority for the Examination of Preliminary Appeals:

*The disproportionately and excessively burdensome financial and economic sufficiency terms set out in Article 22.C of the tender constitute a tailor-made provision, as they are addressed to a specific circle of three (3) domestic companies that are the only ones capable of participating.*⁶²

The contract between the Ministry of Migration and Asylum and the contractor company TERNA S.A. was signed in December 2021, with a final total budget of €164,068,948.10 (VAT included).⁶³ The initial cost of the Lesbos facility (not including additional or unforeseen expenses) was estimated at €67,865,532.80. With supplementary decisions approving summary tables of works from the initial contract, the Ministry of Migration and Asylum has revised the budget, raising the total cost to over €80 million. It is worth noting that the project is 100% funded by the European Union through the Emergency Assistance Mechanism of the Asylum, Migration and Integration Fund.

The economic implications of the project extend far beyond the construction phase. Substantial profits are expected during the operation phase of the facility, with costs covered by both the EU and Greece. Prime examples are the contracts for meal distribution and catering, and facilities management services—each worth tens of millions of euros annually. To this must be added the amounts paid in rent to the owners of the land where the Vastria facility is being built, amounting to €740,000. In May 2025, the Ministry of Migration and Asylum decided to directly lease land plots totalling 100 acres from 13 owners.⁶⁴ The lease agreement runs until 31 December 2025, with the option to extend it for another five years.

In addition, the financial benefits received by local authorities from the Ministry of Migration and

62 General filing number 1175/8-6-2021, Pre-contractual appeal by the economic operator under the trade name EKTER S.A. before the Hellenic Authority for the Examination of Preliminary Appeals (AEPP).

63 Ref. no. 464675/17-12-2021: *Construction of Regional Services, facilities, and designated areas under Article 8 of Law 4375/2016 on the islands of Lesbos and Chios and the upgrading of the existing facility at Fylakio/ Evros, valued at €164,068,948.10 including 24% VAT.* Ministry of Migration and Asylum

64 Ref. no. 1505/19-05-2021, decision for the direct conclusion of a lease contract for land parcels in the location “Vastria,” between the administrative boundaries of the Municipality of Mytilene and the Municipality of Western Lesbos, within the Regional Unit of Lesbos, North Aegean Region, for the installation of a facility under paragraph 4 of article 8 of Law 4375/2016 for the temporary reception and accommodation of third-country nationals or stateless persons seeking asylum. Ministry of Migration and Asylum

Asylum—mainly through the Solidarity Fund⁶⁵—should be taken into account. These amounts often cover not just additional but also basic needs of municipalities and communities, and are delivered through this fund, as well as through emergency grants and unified municipal fees. Alongside local authority funding, financial and tax tools are deployed targeting island residents. These include reduced VAT for the “migration crisis” islands, the “express visa” scheme for Turkish tourists, and subsidised holiday programmes for “affected businesses”, among others. Such measures create relationships of economic dependency between local communities and the Greek state’s migration policies. There have been several cases where the Greek government has used the threat to withdraw these benefits as blackmail to extract consent.⁶⁶

Vastria’s high construction cost, and the European funding it received, have repeatedly been used by the Greek government as leverage to push local authorities into accepting the facility. Initially, this was the reason to readjust its capacity to 5,001 persons, after the government had temporarily retreated to a structure capable of holding 2,952. During a visit to Lesbos in February 2025, the then-Minister of Migration and Asylum, Nikos Panagiotopoulos, argued that operating the facility was imperative to avoid sanctions from the European bodies funding it.⁶⁷ This remark, perceived as blackmail, combined with his statement about running two parallel facilities on Lesbos, sparked strong reactions—even from members of the ruling party—leading to a retreat.⁶⁸

Beyond the involvement of local and national contractors in completing the Vastria facility, there have also been complaints and reports of unlawful involvement by other “entities”. In January 2022, the ‘Committee of Struggle Against the New Facility’ reported that Greek military machinery was unlawfully used for roadwork in the Vastria area.⁶⁹ A parliamentary question

65 Ministry of Migration and Asylum. (2023, 9 February). *Μηταράκης: Η Μυτιλήνη επέστρεψε στην κανονικότητα, τα αποτελέσματα στο μεταναστευτικό μιλούν από μόνα τους* [Mitarakis: Mytilene has returned to normality; the migration results speak for themselves] [Press release]. <https://migration.gov.gr/mitarakis-i-mytilini-epestrepse-stin-kanonikotita-ta-apotelesmata-sto-metanasteytiko-miloy-n-apo-mona-toys/>

66 Taxheaven. (2021, 23 June). *Μείωση συντελεστών ΦΠΑ για Λέρο, Λέσβο, Κω, Σάμο και Χίο – Κατατέθηκε η τροπολογία* [Reduction of VAT rates for Leros, Lesbos, Kos, Samos, and Chios – The amendment was submitted]. Taxheaven. Retrieved 27 June 2025, from <https://www.taxheaven.gr/news/54964/meiws-h-syntelestwn-fpa-gia-lero-lesbo-kw-samo-kai-xio-katateohke-h-tropologia>

67 ERT News. (2025, 6 February). *Λέσβος: Τι είπε ο υπουργός Μετανάστευσης για τις δομές σε Μαυροβούνι και Βάστρια – Αντιδράσεις* [Lesvos: What the Minister of Migration said about the facilities in Mavrovouni and Vastria – Reactions]. Retrieved 27 June 2025, from https://www.ertnews.gr/perifereiakoi-stathmoi/voreio_aigaio/lesvos-ti-eipe-o-ypourg-os-metanasteysis-gia-tis-domes-se-mayrovouni-kai-vastria-antidraseis-vinteo/

68 Ministry of Migration & Asylum. (2025, February 6). *Νίκος Παναγιωτόπουλος: “Δεν υπάρχει θέμα παράλληλης λειτουργίας των δύο δομών στη Λέσβο* [Nikos Panagiotopoulos: There is no issue of parallel operation of the two facilities in Lesbos]. Retrieved 27 June 2025, from <https://migration.gov.gr/nikos-panagiotopoylos-den-yparchei-thema-parallilis-leitoyrgias-ton-dyo-domon-sti-lesvo/>

69 Στο Νησί. (2022, January 3). *Ο στρατός ανοίγει το δρόμο για τη Βάστρια*. [The army opens the road to Vastria]. Sto Nisi. Retrieved June 27, 2025, from <https://www.stonisi.gr/post/22789/o-stratos-anoigei-to-dromo-gia-th-vastria>

was submitted on this matter⁷⁰ by then-SYRIZA MP for Lesvos, Giannis Bournous. The Ministry of National Defence responded by claiming that military units had only engaged in “defensive infrastructure works, including the opening and maintenance of operational routes using machinery in its area of responsibility.”⁷¹

Examples of projects Funded by the Solidarity Fund of the Ministry of Migration and Asylum

Body	Project	Budget
Municipality of Mytilene	Repair of the building of the old Port Authority of Mytilene for the creation of a local information center	€548.000
Municipality of Mytilene	Reconstruction of the municipal road Moria – Panagiouda	€65.000
Municipality of Mytilene	Study for the modernization and improvement of the irrigation network of Thermi	€350.000
Municipality of Mytilene	Reconstruction of a section of pavement in the church square of Panagiouda	€65.000
Municipality of West Lesvos	Beautification and Restoration Works of common areas in the Local Community of Lepetymnos	€65.000
Municipality of West Lesvos	Restoration and reinforcement of the electrification of settlements of the Municipality of West Lesvos	€65.000
Municipality of West Lesvos	Redevelopment of Petra Park Municipality of West Lesvos	€68.000
Development Organization "Mytilene S.A." - Mytilene Single Member S.A.	Supply of equipment for the prevention of natural disasters, fire protection and environmental protection	€80.000
Municipality of Mytilene	Cement paving of a road around the burial site of migrants – refugees	€55.000
Municipality of West Lesvos	Configuration of a parking lot in Mithymna	€395.000
Municipality of West Lesvos	Repair of an existing building in Pelope	€320.000
Municipality of West Lesvos	Reconstruction of the 5*5 football pitch in Skala Sykaminia	€94.500
Municipality of West Lesvos	Supply of materials for the needs of the Municipality of West Lesvos	€540.000
Development Organization "Mytilene S.A." - Mytilene Single Member S.A.	Upgrade of Electromechanical (E/M) installations and fire extinguishing network in children's playgrounds - Neapolis Camps	€60.000
Development Organization "Mytilene S.A." - Mytilene Single Member S.A.	Supply of equipment for the prevention of natural disasters, fire protection and environmental protection	€46.000
Municipality of Mytilene	Electrical lighting of the market of the municipal community of Moria	€70.000
Municipality of Mytilene Restoration -	Cleaning of the former RIC of Moria	€550.000
Development Organization "Mytilene S.A." - Mytilene Single Member S.A.	Free Internet Access - Free Wi-Fi	€70.000
Development Organization "Mytilene S.A." - Mytilene Single Member S.A.	Restoration of damage to access to agricultural and livestock farms - Rural road construction of the communities of Moria, Panagiouda and Afalona	€594.000

70 Hellenic Parliament. (2022, January 7). *Is the Hellenic Army acting as a road construction subcontractor?* [Parliamentary question No. 2088/07-01-2022]. https://www.hellenicparliament.gr/Koinovoulftikos-Elenchos/Mesa-Koinovoulftikou-Elegxou?pcm_id=35d8d670-03e4-4130-9a0b-ae1900e881ff

71 *ibid*

Development Organization "Mytilene S.A." - Mytilene Single Member S.A.	Strategic marketing plan for the promotion of the Municipality of Mytilene as a tourist destination	€245.700
Development Organization "Mytilene S.A." - Mytilene Single Member S.A.	Completion - Asphaltting of Road to Landfill of Lesvos	€2.400.000
Municipality of West Lesvos	Upgrade of sports facilities (basketball courts) of the Municipality of West Lesvos	€600.000
Municipality of West Lesvos	a) Partial restoration of Skala Sykamineas – Mithimna road, b) Restoration and reinforcement of electric lighting of NE settlements of Lesvos c) Repair of Municipal Building d) Construction of Lepetymnos	€280.000
Development Organization "Mytilene S.A." - Mytilene Single Member S.A.	Upgrading and utilization of the Municipal land under the name Kara Tepe Mytilene	€2.800.000
Municipality of Mytilene	Reconstruction of the pavement in Moria	€195.000
Municipality of Mytilene	Asphaltting of the Municipal Road connecting the settlement of Pamphila with the settlement of Panagiuda	€145.000
Municipality of Mytilene	Repair of the existing 8*8 football pitch in P.Saltamara	€85.000
Municipality of Mytilene	Development of a recreational park in the settlement of Skala Mystegna	€600.000
Municipality of Mytilene	Repair and landscaping of the parking area in the settlement of Afalonas	€260.000
Municipality of Mytilene	Construction of a 5*5 football pitch in Panagiuda	€155.000

CONCLUSION

After the collapse of Moria—a global symbol of Europe’s migration failure—the Greek government, with financial and political backing from the European Commission, embraced a model that replaced exposure with isolation, visible precarity with controlled confinement, and chaos with algorithmic surveillance. The objective was never to improve migrants’ lives, but to remove them from public space, and turn migration management into a closed, technologized, and invisible operation.

The Vastria facility reflects this logic. From its inception, it was designed as a structure to centralise all stages of the asylum and deportation process in a single location—remote from urban centres, disconnected from community networks, and subject to tightly restricted access and movement. Far from being a transitional reception space, the CCAC is conceived as a site of prolonged confinement, with capacity for up to 5,000 people—including families, unaccompanied minors, and particularly vulnerable applicants—held for months while awaiting administrative decisions or deportation.

This model does not work in an institutional vacuum. It is closely linked to the new European Pact on Immigration and Asylum, adopted in 2024, which promotes the generalised application of “border procedures” for specific categories of asylum seekers. The logic of the Pact, which is due to come into force in 2026, is territorialised in facilities such as Vastria and involves speeding up asylum decisions, centralising bureaucratic functions, minimising procedural safeguards and ensuring the swift deportation of rejected applicants. The incarceration of people who have not committed a crime ceases to be an exception; it becomes the organising principle of the entire system.

Meanwhile, the project has advanced through a strategy of repeated *faits accomplis*. Over four years, the Ministry of Migration and Asylum has pushed the construction forward via successive legal amendments and technical redesigns that have circumvented Council of State rulings, bypassed environmental regulations, and avoided consultation with local authorities. Each time a technical illegality threatened to block progress, the project description was adjusted *ad hoc* to fit the legal framework. Construction never stopped. This approach has deliberately eroded institutional checks and disabled oversight mechanisms that, in a functioning rule-of-law system, should operate by default.

At the time of writing, the structure is nearly complete. Yet its activation still depends on three critical components: the power supply, the completion of the perimeter fence, and the opening of an evacuation road. The latter is especially urgent. The facility is located within one of the most fire-prone forest areas in the eastern Mediterranean, and lacks any alternative escape route

in case of fire—posing a clear threat to the lives of thousands. Although this road was explicitly included in the latest amendment to the environmental terms, its final route has yet to be determined. As things stand, the facility remains without a functional emergency exit in an area where wildfires are not just likely, but statistically recurrent.

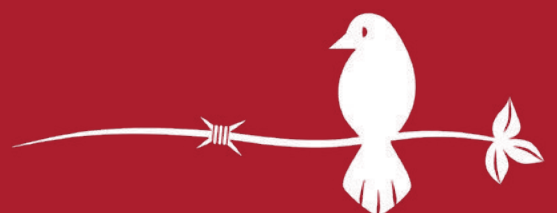
Several local stakeholders have raised concerns that, once these minimum infrastructures are in place, an artificial state of emergency—such as a controlled breakdown of the current Mavrovouni centre—might be staged to justify the immediate activation of the new CCAC. This kind of strategy—inducing a crisis by allowing a population build-up in the streets—has been employed before on other Aegean islands, forming part of a broader strategy to pressure local communities into accepting facilities they initially opposed.

The government's insistence on completing the project rests on two pillars: on the one hand, its contractual obligations towards the European institutions, which are fully funding the centre; on the other hand, the economic and political implications of the operation of detention and control structures for migrants. However, locally the political cost of opening Vastria remains high. The final decision must weigh up not only the technical feasibility of the project, but also its institutional, environmental and social consequences.

What is ultimately at stake is not simply the opening of yet another structure. The Vastria CCAC marks the consolidation of a model of migration management based on invisibility, isolation and long-term deprivation of freedom. This model redefines borders not only as transit points, but also as places of confinement. Its development, and its eventual operation, should not be treated simply as a matter of administrative engineering or spatial planning. They should be seen as part of a wider transformation of the border regime: the exception becomes the rule and rights become privileges, with limited and conditional access.

In this context, the border becomes a technology of containment. Vastria is one of its most advanced laboratories.

building partnerships to transform violence and oppression



community peacemaker teams
AEGEAN MIGRANT SOLIDARITY