

HELLENIC REPUBLIC

**GREEK NATIONAL COMMISSION FOR HUMAN RIGHTS**

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**Contribution by**  
**the Greek National Commission for Human Rights (GNCHR)**  
**to the Office of the High Commissioner for Human Rights (OHCHR) in relation to**  
**Human Rights Council Resolution A/HRC/35/20 on**  
**Human Rights and Climate Change**

**16 February 2018**

The Greek National Commission for Human Rights (GNCHR) is the independent advisory body to the Greek State on matters pertaining to human rights protection. It was established by Law 2667/1998 in accordance with the UN Paris Principles. Thirty-two institutions whose activities cover the field of human rights are currently represented in the GNCHR (independent authorities, departments of university-level educational institutions, workers' and disabled persons' confederations, NGOs, political parties and ministries).

The Greek National Commission for Human Rights (hereinafter GNCHR) warmly welcomes the initiative of the Office of the High Commissioner for Human Rights to conduct a research in accordance with Human Rights Council resolution A/HRC/35/20 entitled “Human Rights and Climate Change” and would be more than willing to share input for the preparation of the report, which you will find hereto attached.

The GNCHR, which was established by Law 2667/1998 in accordance with the Principles relating to the Status of National Institutions (The Paris Principles) and is accredited with *A-status* by the Sub-Committee on Accreditation (SCA) of the Global Alliance of National Human Rights Institutions (GANHRI), is the independent advisory body to the State on matters pertaining to human rights protection. The GNCHR mandate covers the whole spectrum of human rights in terms of *ratione materiae* and, since its establishment, the GNCHR has dealt with a broad range of human rights issues, including those concerning the most vulnerable groups, such as asylum seekers, refugees or migrants. Therefore, taking into account that safeguarding the rights of migrants and persons displaced across international borders, in the context of the adverse impacts of climate change, has always been among its priorities, the GNCHR would like to make the following contribution to the Office of the United Nations High Commissioner for Human Rights:

In the framework of its institutional role as the independent advisory body to the State on matters pertaining to human rights protection and given the tremendous financial and social impact of the financial crisis on the fundamental rights of asylum seekers, refugees or migrants, the GNCHR has previously been extensively concerned with the necessity to provide institutional and effective protection to this particularly vulnerable social group, formulating, thus, proposals and recommendations<sup>1</sup>. Moreover, the GNCHR has also dealt with environmental issues in the past, such as the protection of the environment, sustainable development and the balance of the ecosystem, noting with emphasis that they are all crucial for the survival of the Greek society and the planet as a whole<sup>2</sup>.

In particular, bearing in mind that the dynamic character of the right to water will emerge, the GNCHR considered it of crucial importance to propose its protection in an equally dynamic manner. For this purpose, the GNCHR presented to the State [\*Recommendations regarding the effective protection of the right to water \(2014\)\*](#), concluding to a series of comprehensive recommendations

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<sup>1</sup> For more information see GNCHR, Refugees – Migrants, available at: <http://www.nchr.gr/index.php/en/2013-04-03-10-23-48/2013-04-03-10-43-00>.

<sup>2</sup> For more information see GNCHR, Environment, available at: <http://www.nchr.gr/index.php/en/2013-04-03-10-23-48/2013-04-03-10-42-00>.

regarding (a) adequate, (b) available, (c) safe and (d) accessible water. Furthermore, being concerned with the consequences of environmental damage on life, health or property and having dealt with environmental issues also in the past, the GNCHR issued a [\*Declaration on the protection of forests and the environment \(2008\)\*](#) recommending to the competent State authorities: (a) consistent implementation of the triptych ‘prevention-suppression management’, (b) effective environmental governance for sustainable development and (c) compliance with the relevant jurisprudence of the Council of State.

As far as the issue of protection of migrants, refugees and asylum seekers is concerned, the GNCHR attaches great importance to the international protection system and has adopted a number of relevant Statements and Recommendations<sup>3</sup>, while closely monitoring the issues rising during the procedures of granting international protection in Greece. Moreover, there has been a clear commitment on the occasion of the recent Belgrade Declaration of 25.11.2015 among National Human Rights Institutions to condemn and publicly oppose the violation of the rights of migrants and refugees<sup>4</sup>.

In the present contribution, the GNCHR would like to narrow its focus in the questions contained in the questionnaire provided for this purpose by the OHCHR:

**1. Please describe the relationship between the adverse effects of climate change and the rights of migrants, and any human rights obligations to mitigate and adapt to climate change that can be derived from them.**

The adverse effects of climate change can be divided into two categories, slow-onset environmental degradation, including sea level rise, increasing temperatures, glacial retreat, land and forest degradation and rapid-onset extreme weather events such as hurricanes, typhoons, floods and mudslides. The causal link between climate change and the currently observed increase of acute natural disasters has been an important issue and scientists continue to support

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<sup>3</sup> GNCHR, [Oral Statement on the Report of the UN Special Rapporteur on the human rights of migrants, François Crépeau, on his follow-up mission to Greece \(12-16 May 2016\)](#), *Report 2017*, [Statement in response to the recommendation of the European Commission to reactivate the refugee return mechanism under Dublin system](#), *Report 2016*, [Report on the Living Conditions in the reception and accommodation centers for migrants and refugees](#), *Report 2016*, [Report on the EU-Turkey Agreement of the 18th of March 2016 regarding the refugee/migration issue in Europe in light of Greek Law No. 4375/2016](#), *Report 2016*, [Statement regarding the serious dimensions that the refugee/migration problem has taken in Greece](#), *Report 2016*.

<sup>4</sup> Ombudsman/National Human Rights Institutions Declaration on the Protection and Promotion of the Rights of Refugees and Migrants, “5. Condemn and oppose publicly the violation of migrants’ or refugees’ rights and encourage the spirit of tolerance and compassion for refugees and migrants, including ensuring their protection in reception centers and other accommodation facilities.” [http://www.nchr.gr/images/pdf/nea\\_epikairothta/belgrade\\_declaration\\_en.pdf](http://www.nchr.gr/images/pdf/nea_epikairothta/belgrade_declaration_en.pdf).

that climate change has provided more fuel to the increase of the quantity and impact of natural disasters<sup>5</sup>.

The GNCHR notes with major interest that:

i) the United Nations Office for Disaster Risk Reduction has found that 90% of recorded major disasters caused by natural hazards from 1995 to 2015 were linked to climate and weather including floods, storms, heat waves and droughts<sup>6</sup>.

ii) the interrelation of climate change with human rights law has been affirmed by the Human Rights Council, which has expressed on multiple occasions through its resolutions that climate change has developed adverse effects on the full enjoyment of all human rights, such as the right to life, health, food, water, adequate housing etc.<sup>7</sup>. In more detail, the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights (ICCPR) and a number of other legal instruments, dictate that all States have committed to respect, protect, promote, and fulfil the right to life. This obligation, which calls for effective measures against the foreseeable and preventable loss of life, includes taking mitigation and adaptation measures related to climate change.

iii) the fact that the World Health Organization has projected that between the years 2030 and 2050, climate change is expected to cause approximately 250.000 additional deaths per year, from malnutrition, malaria, diarrhea and heat stress<sup>8</sup>, should urge states to intensify their efforts of addressing climate change. In support to the above, the Human Rights Council has recognized<sup>9</sup> that climate change poses a threat to the right for “the enjoyment of the highest attainable standard of physical and mental health” as it is established under article 12 of the International Convention on Economic Social and Cultural Rights (ICESCR).

iv) climate change poses a threat to the right to food, as enshrined in the Universal Declaration of Human Rights, as well as in Article 11 of the ICESCR, which requires states to ensure an equitable distribution of world food supplies in relation to need. According to the World Bank, failing to avoid a 2°C increase in average global temperature would put “between 100 million and

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<sup>5</sup> NASA Earth Observatory, ‘The Impact of Climate Change on Natural Disasters’, 2017, available at: [https://earthobservatory.nasa.gov/Features/RisingCost/rising\\_cost5.php](https://earthobservatory.nasa.gov/Features/RisingCost/rising_cost5.php).

<sup>6</sup> United Nations Office for Disaster Risk Reduction, ‘Climate Change Adaptation’, available at: <https://www.unisdr.org/we/advocate/climate-change>.

<sup>7</sup> HRC Res 32/33, ‘Human Rights and Climate Change’ (July 2016) UN Doc A/HRC/RES/32/33.

<sup>8</sup> World Health Organization (WHO), *Climate Change and Health*, available at: <http://www.who.int/mediacentre/factsheets/fs266/en/>.

<sup>9</sup> HRC Res 29/15, ‘Human Rights and Climate Change’ (July 2015) UN Doc A/HRC/RES/2915.

400 million more people at risk of hunger and could result in over 3 million additional deaths from malnutrition each year”<sup>10</sup>.

v) the right to water, recognised in the General Comment No. 15 of the Committee on ESC rights, the 64/292 Resolution of the General Assembly and several other international instruments, is also found at risk due to climate change.

In fact, bearing in mind that climate change can and does result in water scarcity through floods and droughts, changes in precipitation and temperature extremes, the **GNCHR has pointed out the importance of the right to water, while recalling the State’s obligation to respect, protect and effectively implement it.** Using the normative content of the right, as derived from General Comment No.15, as a guide, **the GNCHR has issued recommendations based on the internationally formulated framework for its protection, stressing the need for guarantying (a) adequate, (b) available, (c) safe and (d) accessible water**<sup>11</sup>.

vi) climate change has already deprived people of their right to adequate housing, also found under Article 11 of the ICESCR, through extreme weather events as well as gradual periods of drought, erosion and flooding and has led a significant number of people to displacement.

The impact of climate change on migration was initially pointed out as early as in 1990, when the Intergovernmental Panel on Climate Change (IPCC) underlined that the “gravest effects climate change may be on those on human migration”<sup>12</sup>. In fact, studies have shown that since 2008, an average of 26.4 million people have been displaced by disasters each year, a number equivalent to one person abandoning their home every second<sup>13</sup>. The consequences of climate change have already violated the fundamental human rights of citizens of small island-states and off-shore countries while it has been estimated that 95% of displacement due to natural disasters is occurring in developing countries<sup>14</sup>. The obligation of states to mitigate and adapt to climate change, found under human rights law, if followed through, can effectively avoid an increase of the number of internally displaced persons and international migrants due to climate change.

Persons led to displacement either within national borders or across international borders due to the impacts of climate change are entitled to the full range of human rights

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<sup>10</sup> The World Bank, World Development Report 2010: Development and Climate Change, 2010, p. 5.

<sup>11</sup> GNCHR, Recommendations regarding the effective protection of the right to water, *Report 2014*, available at: [http://www.nchr.gr/images/English\\_Site/PERIVALLON/GNCHR\\_Right\\_to\\_water.pdf](http://www.nchr.gr/images/English_Site/PERIVALLON/GNCHR_Right_to_water.pdf).

<sup>12</sup> IPCC, *Climate Change: The IPCC Scientific Assessment (1990)*, Cambridge University Press, 1990, p. 20.

<sup>13</sup> Norwegian Refugee Council/Internal Displacement Monitoring Center (NRC/IDMC), ‘Global Estimates 2015: People Displaced by Disasters’, 2015, p. 8.

<sup>14</sup> *Idem*, p. 9.

guarantees, as described above. In cases of internal displacement, the 1998 Guiding Principles of Internal Displacement (GPID) highlight, inter alia, the rights of the displaced to life, dignity, liberty, security, medical care and attention, respect for family life and unity, an adequate standard of living, the right to not be discriminated against. The GPID, despite lacking legal bindingness, are widely recognized as a codification of guarantees in international human rights law, in relation to the protection of the internally displaced persons<sup>15</sup>.

Issues arise in the cases of persons moving across an international border due to climate change impacts. While these persons would also be entitled to the full range of human rights by the receiving State, they often face the obstacle of their entry to that State being denied. The category of a “climate refugee”, is not covered by the 1951 Refugee Convention and in fact, the Office of the United Nations High Commissioner for Refugees, the International Organization for Migration and other humanitarian organizations have advised that such a term does not have a legal basis in international refugee law and should be avoided in order not to undermine the international legal regime for the protection of refugees<sup>16</sup>. However, it has been supported that climate migrants crossing international borders could trigger the non-refoulement principle which requires states to protect people at risk of arbitrary deprivation of life, torture or cruel, inhumane or degrading treatment or punishment, by claiming that in case of their return to their home state the climate migrants would be in danger of face cruel, inhumane or degrading treatment due to the violation of their socioeconomic rights. This argument has faced several criticisms because the courts have deemed that the extent of cruel, inhumane or degrading treatment does not cover claims relating to generalized poverty, unemployment, or lack of resources and services<sup>17</sup>.

Being deeply concerned with the consequences of environmental damage on life, health or property, the GNCHR notes that:

i) from a human-rights point of view, displaced persons, either internally or internationally, are entitled to the fundamental human rights, independently of the cause of their migration, in accordance with the principle of equality and non-discrimination. International human rights law mandates that all persons should enjoy all human rights without discrimination, allowing for exceptional distinctions only if they serve a legitimate State objective and only if these distinctions are proportional to the achievement of said objective. The fundamental human rights which were described above, such as the right to life, health, adequate housing etc., do not move to a

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<sup>15</sup> UN GA Res 60/1, ‘2005 World Summit Outcome’, 24 October 2005, UN Doc A/RES/60/1.

<sup>16</sup> HRC Res 10/61, ‘Report of the Office of the United Nations High Commissioner for Human Rights on the relationship between climate change and human rights’, 15 January 2009, UN Doc A/HRC/10/61, p. 58.

<sup>17</sup> D. Bodansky, J. Brunnee, L. Rajamani, *International Climate Change Law*, Oxford University Press 2017, p. 320.

distinction between citizens and non-citizens and in fact, Article 2(1) of the ICCPR affirms that the human rights obligations of States-Parties are owed to everyone “without distinction of any kind, such as race, color, sex, language, religion, political or other opinion, national or social origin, property, birth or other status”.

ii) therefore, the human rights obligations to mitigate and adapt to climate change arise in the cases of climate migrants, under the general obligations of states to protect, respect and fulfil the fundamental human rights<sup>18</sup>. The obligation to respect requires States to not engage in behavior that deprives people of their human rights. In the context of climate change, the obligation to respect dictates that states should not engage in behaviors that accelerate climate change, such as emitting greenhouse gases, overexploiting natural resources or deforestation, because such behaviors can result in people being denied their right to life, health etc. and even create a situation where people are forced to migrate. Moreover, besides mitigating climate change, the obligation to respect can additionally be applied in the context of adaptation. States should take into account climate migrants when adopting policies of adaptation to climate change, such as planned relocations, which take place mostly within national borders. The obligation to respect, thus requires states to not execute policies responding to climate change, such as in-country resettlement schemes or immigration policies for climate migrants, in a way which would result in a lower level of human rights enjoyment by the climate migrants.

iii) the obligation to protect, as an obligation of conduct, requires States to prevent human rights violations either directly caused by the states or by the activities of third parties within the State’s jurisdiction. This obligation, in the context of climate change, is two folded. On the one hand, States have a duty to protect by preventing the causes of climate change that lead persons to migrate and on the other hand, States have a duty to take remedial action in situations where climate migration has already taken place. Thus, the obligation to protect entails the duty of States to adopt legislations which prohibits or regulates activities that can lead to a climate-induced displacement as well as legislative pieces which aim at protecting climate migrants from further human rights abuses, besides the violation of their right to adequate housing.

iv) lastly, the obligation to fulfil, as an obligation both of conduct and result, requires States to provide individuals with the opportunities to fully enjoy their fundamental human rights. According to Article 2(1) of the ICESR the “each State-Party to the Covenant undertakes to take steps, individually and through international assistance and co-operation, especially economic and technical, to the maximum of its available resources, with a view to achieving progressively the

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<sup>18</sup> B. Mayer, F. Crepeau, *Research Handbook on Climate Change, Migration and the Law*, Edward Elgar 2017, p. 146.

full realization of the rights recognized in the present Covenant by all appropriate means, including particularly the adoption of legislative measures”. Therefore, States must create the necessary conditions to ensure a range of socioeconomic rights for climate migrants, such as the right to health, food and adequate housing.

The GNCHR shares the view that climate change poses a serious threat to human rights. Some of adverse effects of climate change have already taken place but more will unavoidably follow. Addressing climate change is a human rights priority, and action cannot be delayed any further. It is clear that international human right law does not include specific provisions for climate migrants, who seem, at a first glance, unprotected. Nonetheless, State-Parties to core human rights instruments have human rights obligations towards all people, especially towards vulnerable groups such as migrants. Consequently, mitigation and adaptation measures to climate change must be equitable, non-discriminatory, considerate of human rights of all at risk groups, including migrants.

**2. Please describe any relevant commitments, legislation and other measures that you have taken to adapt to and mitigate climate change and / or protect migrants affected by climate change. Please also note and identify any relevant mechanisms for ensuring accountability for these commitments including about their means of implementation for these commitments.**

Greece has supported all the international and European climate protection instruments, as it is a country which, despite its limited responsibility regarding climate change, is heavily affected by it. The GNCHR, in the context of its advisory function, encourages ratification or accession to human rights instruments, including instruments promoting environmental protection, and advises the Government on the precise nature of the obligations the State would assume upon ratification. In order to support this work, the GNCHR systematically reviews existing as well as draft legislation to ensure compatibility with human rights norms and has drawn up for this purpose a comprehensive table of all international, regional and European human rights instruments the Greek State has signed and ratified or should sign and ratify.

Furthermore, the GNCHR notes with emphasis that the report on the impact of climate change of the Committee Studying the Impacts of Climate Change, established by the Bank of Greece<sup>19</sup>, has highlighted the threats climate change poses to Greece’s natural and human

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<sup>19</sup> Committee Studying the Impacts of Climate Change, ‘The Environmental, Economic and Social Impacts of Climate Change in Greece’, Bank of Greece, June 2011.



environment. Greece is a country with an extremely long coastline, about 16.300 km, 1.000 km of which about are areas of high vulnerability to climate change. According to the abovementioned report, the vulnerability of the coastline lies in the risk of an increase of the average sea level, which is estimated to range between 0,2 and 2 meters. Based on the simulations covering the anthropogenic intervention to climate, analyzed in the relevant sections of the report, it is expected that at the end of the 21st century rainfall will diminish between 5% and 19%. It also appears that the temperature will rise between about 3°C and 4,5°C. The simulations predict significant changes in many climatic parameters, such as humidity, cloud coverage, etc.

In response to the emerging evidence that climate change will have a major global and regional impact, the GNCHR notes that Greece has set climate change as one of its priorities and has been consistent in its support of the international developments relating to climate change. The United Nations Framework Convention on Climate Change, adopted on 9 May 1992, was signed by Greece and ratified in 1994 (Law 2205/94). Furthermore, Greece ratified the Kyoto Protocol in 2002 (Law 3017/2002) and adopted a National Program for achieving its commitments through a decision of the Council of Ministers (DCM5/2003). Under the 3017/2002 Law, the Ministry for the Environment and Energy (MEEN) was designated as the governmental body responsible for the coordination, within its responsibilities, of all other competent ministries and possibly any other public and/or private entities involved, for the implementation of the provisions of the Kyoto Protocol and the formulation and monitoring of the National Program for achieving the national targets set under the Kyoto Protocol. Under this law, all issues related to the implementation of the provisions of the Kyoto Protocol, including among others, the establishment of the necessary administrative structures and procedures, enforcement rules, etc. are to be resolved and adopted by the Common Ministerial Decisions of the MEEN, and other, as appropriate, competent Ministers. The same procedure is to be followed in order to introduce into the national legislation any decisions of the COP and/or CMP or any necessary modifications to the National Program. In Doha, Qatar, on the 8<sup>th</sup> of December 2012, the “Doha Amendment to the Kyoto Protocol” was adopted which included new commitments for Annex I Parties to the Kyoto Protocol, thus establishing a second commitment period from 1 January 2013 to 31 December 2020. Greece submitted its instrument of acceptance of the Doha amendment to the Kyoto Protocol to the United Nations Framework Convention on Climate Change on the 21<sup>st</sup> of December 2017.

In addition to the above, Greece ratified the Paris Agreement on the 13<sup>th</sup> of November 2016 (Law 4426/2016). The Paris Agreement requires all Parties to submit their “nationally determined contributions” (NDCs) and to commit to progressing and strengthening their

contributions with every cycle of NDCs. The EU and its Member States are committed, according to their submission to the Interim NDC Registry, to achieve jointly, a binding target of an at least 40% domestic reduction of greenhouse gas emissions by 2030 compared to 1990, as was set out in the decision of the European Council of October 2014. In 2018, and every 5 years after that, the Parties will take stock of their collective efforts regarding their progress towards the goal set in the Paris Agreement and share information regarding the preparation of their NDCs.

At a national level, the MEEN, designated as the main governmental body entrusted with the development and the implementation of environmental policy in Greece, has undertaken the responsibility of creating policies concerning environmental protection, energy, climate change and forestry, coordinating the implementation and the compliance with said policies. Therefore, according to the relevant legislation, the MEEN should cooperate both with other competent ministries as well as with regional, prefectural and local authorities. All respective ministries are responsible for integrating environmental policy and climate change targets within their respective fields. As was clearly stated in Greece's 7<sup>th</sup> National Communication and 3<sup>rd</sup> Biennial report Under the UNFCCC, mitigating climate change is one of the main targets identified in the Greek strategy for a sustainable development launched by the MEEN in 2002. The objective of the strategy is the development of a set of principles for the formulation of an action plan in line with international challenges, and in accordance with EU policy directions, adjusted to the specific national circumstances. Policies and measures, as well as all other issues and actions regarding mitigation should be discussed within the framework of an inter-ministerial committee, comprising representatives from all competent Ministries.

The most recent development of Greece's national legislation regarding climate change was the establishment of the "National Adaptation Strategy to Climate Change" (NAS) (Law 4414/2016, OGG 149/A/9.8.2016) which sets out the general objectives, guiding principles and implementation tools of a modern, effective and growth-oriented adaptation strategy in line with the EU directives and the international instruments. The GNHCR observes that the referred goal of Greece's adaptation strategy is to strengthen the country's resilience to the impacts of climate change, and to create conditions for well-informed and farsighted decisions that address risks and opportunities resulting from a changing climate. The NAS provides an initial five-year timeframe for building the capacity for adaptation and implementing an initial set of actions. The first draft of the NAS provides an opportunity for developing a strategic approach to adaptation to climate change, which sets in motion an ongoing process of revision, updating and realignment. The key objectives of the NAS are to: improve the decision-making process, drawing on more thorough

information and accurate scientific data on adaptation issues, to promote the development and implementation of regional/local action plans that are compatible with the present strategy, to initiate adaptation actions and policies across all sectors, with an emphasis on the most vulnerable ones, to create a mechanism for monitoring and evaluating adaptation actions and policies, and to raise public awareness and disseminate information. The next step is the development of the Regional Climate Change Adaptation Plans (ΠΕΣΠΑ), which, based on the climatic conditions and vulnerability of each region, will precisely define appropriate policies and measures for each specific region.

With regard to legislation and other measures aiming at protecting migrants affected by climate change, Greece is making considerable effort to conform to the international human rights regime. Nonetheless, in order to fully comply with its international obligations, it has yet to adopt a specific policy concerning migrants of climate change. As it is widely known, Greece accepts an important number of migrants and refugees for a combination of reasons, due to its geographic position. While climate change might be an aggravating factor to the decision of the migrants to relocate to Greece, it currently is not the main reason why the migrants Greece has been accepting, were forced or chose to leave their country.

**3. Please share a summary of any relevant data as well as any related mechanisms to measure and monitor the impacts of climate change on the enjoyment of human rights for migrants, especially for vulnerable groups such as children, women or migrants living with a disability and the allocation of resources to address these impacts.**

To date, Greece has not faced the issue of migration due to climate change, at a large scale. The GNCHR recognises that the impacts of climate change shall continue to affect migrants globally and the need for a specific international legal framework focusing on protecting these vulnerable groups.

Greece has signed and is party to almost all the major international instruments in the field of human rights and humanitarian law, such as: the International Covenant on Civil and Political Rights (1997) and its First and Second Optional Protocols (1997), the International Covenant on Economic, Social and Cultural Rights (1985), the International Convention on the Elimination of All Forms of Racial Discrimination (1970), the Convention on the Elimination of All Forms of Discrimination against Women (1983) and its Optional Protocol (2002), the Convention Against Torture and Other Cruel Inhuman or Degrading Treatment or Punishment (1988) and its Optional Protocol (2014), the Convention on the Rights of the Child (1993) and its Optional

Protocol on the involvement of children in armed conflict (2003), the Convention of the Rights of Persons with Disabilities and its Optional Protocol (2012), and the Convention for the Protection of All Persons from Enforced Disappearance (2015). However, there are other human rights instruments, of crucial importance to the protection of migrants, which remain to be ratified, such as for instance the ILO Migration for Employment Convention (Revised), 1949 (No. 97). For this purpose, the GNCHR monitors closely the effective implementation at the national level of international, regional and European human rights standards regarding the above mentioned matters and reports to the competent international and regional human rights system.

Despite the fact that Greece has not, as of yet, been receiving migrants voluntarily or forced to leave their homes due to the adverse effects of climate change, it does recognize that this is and will become a rather pressuring issue. Therefore, and in accordance with its previous stance of ratifying and implementing relevant international human rights instruments, the GNCHR stresses that Greece should fully cooperate with the competent treaty bodies, contribute in any discussions relating to the protection of the rights of migrants affected by climate change and maintain its standing invitation to the Special Procedures.

#### **4. Please identify and share examples of good practices and challenges in the promotion, protection and fulfilment of the human rights of migrants in the context of the adverse impacts of climate change.**

The preparation of an integrated multidisciplinary approach towards the adaptation to climate change and the safeguarding of the human rights of migrants affected by its adverse effects is a major challenge in Greece, especially in the current period characterized by a severe growth recession in conjunction with the substantive migration flows Greece has been receiving for the past few years.

In fact, the main challenge Greece is currently facing is the migratory flux. While it has established a framework protecting the human rights of migrants, its policies are not directed specifically at migrants created and affected by climate change. Greece has been facing a particularly strong migratory pressure due to its geographic position at the external border of the EU, its extensive land and sea borders and its proximity with main countries of origin and transit of irregular migration.

With regard to the serious dimensions the refugee/migration problem has taken in Greece, which has been among GNCHR's priorities, the latter attaches great importance to the

international protection system and has adopted a number of relevant Statements and Recommendations<sup>20</sup>, while continues to closely monitor the issues rising during the procedures of granting international protection in Greece.

Greece is facing a number of challenges in the field of migration. However, the migration crisis is not an issue that can be efficiently dealt by Greece alone. A European Union-wide approach is needed to develop a human-rights based policy, which, in order to be inclusive of all the existing categories of migration, should explicitly mention provisions regarding the protection and promotion of the rights of “climate change migrants”.

**5. Please provide any additional information you believe would be useful to understand efforts made and challenges faced as well as the necessary means of implementation for climate change adaptation and mitigation related to the protection of migrants and persons displaced across international borders because of the sudden-onset and slow-onset adverse effects of climate change.**

Greece has yet to adopt a cohesive policy or strategy providing adaptation and mitigation measures specifically related to the protection of migrants and persons displaced across international borders because of the sudden-onset and slow-onset adverse effects of climate change. Despite the fact that Greece is not one of the countries characterized as a major emitter, the adverse impacts of climate change will continue to affect Greece as well and therefore there is a pressing need for Greece to develop and implement a strategy safeguarding the fundamental human rights of the “climate change migrants”.

According to the IPCC the main consequences that may arise in the Mediterranean as a result of climate change include a temperature rise of 2 ° C, along with an increase of periods of droughts, reduced forest productivity and increased fires and floods. Furthermore, the rise of the sea level shall lead to a significant change in the morphology of the coasts, contribute to their erosion and increase the frequency and intensity of floods, thus threatening the coastal settlements. Specifically, in Greece, 33% of the population live in areas 1-2 km away from the coast, while 85% of the population reside in areas less than 50 km away from the coast. It is therefore evident that, in the not so far future, people residing in coastal areas, may have their properties and residencies at risk due to climate change. Consequently, Greece has to set relevant strategies in motion in order to prevent or adapt to the aforementioned situation. The necessary adaptation measures include a gradual retreat of coastal building in vulnerable areas, planning

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<sup>20</sup> See *supra*, note no 3.

infrastructure of coastal areas based on the assumption that the sea level will rise by 0,5 m, and generally protecting the coastal ecosystems as they can function as a natural flood defense<sup>21</sup>.

Moreover, the GNCHR notes the fact that the impacts of climate change will be more pronounced for low-income social groups who do not have the resources to deal directly with the problems posed by climate change. Measures to adapt to climate change or to mitigate its impacts would require households to spend part of their already limited income to eco-friendly practices, practices which are not feasible for a significant number of households in Greece. Therefore, households living in poverty, as well as minorities and migrants already living in deprived areas will face even more serious violations of their rights to housing, nutrition, health, education. Consequently, it is clear that the mitigation and emission reduction legislations adopted by Greece should be accompanied by a policy addressing effectively the issue that low-income households are unable to make the necessary costs to tackle the impacts of climate change at their own micro-level and that they are in need of the help of the state. Additionally, the state must create the conditions for funding infrastructure projects on a large scale to improve housing conditions and create appropriate spaces for future environmental migrants.

In conclusion, the revision of Greece's institutional framework in a way which takes into account the dimension of the adverse effects of climate change should be a top priority. The proposed review should especially take into consideration the most vulnerable groups at risk due to climate change, the elderly, the children, people with disabilities, residents of low-income households and of course, the migrants.

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<sup>21</sup> Dianeosis, 'The Impacts of Climate Change on Development' (June 2017) available at: [https://www.dianeosis.org/wp-content/uploads/2017/06/climate\\_change10.pdf](https://www.dianeosis.org/wp-content/uploads/2017/06/climate_change10.pdf).