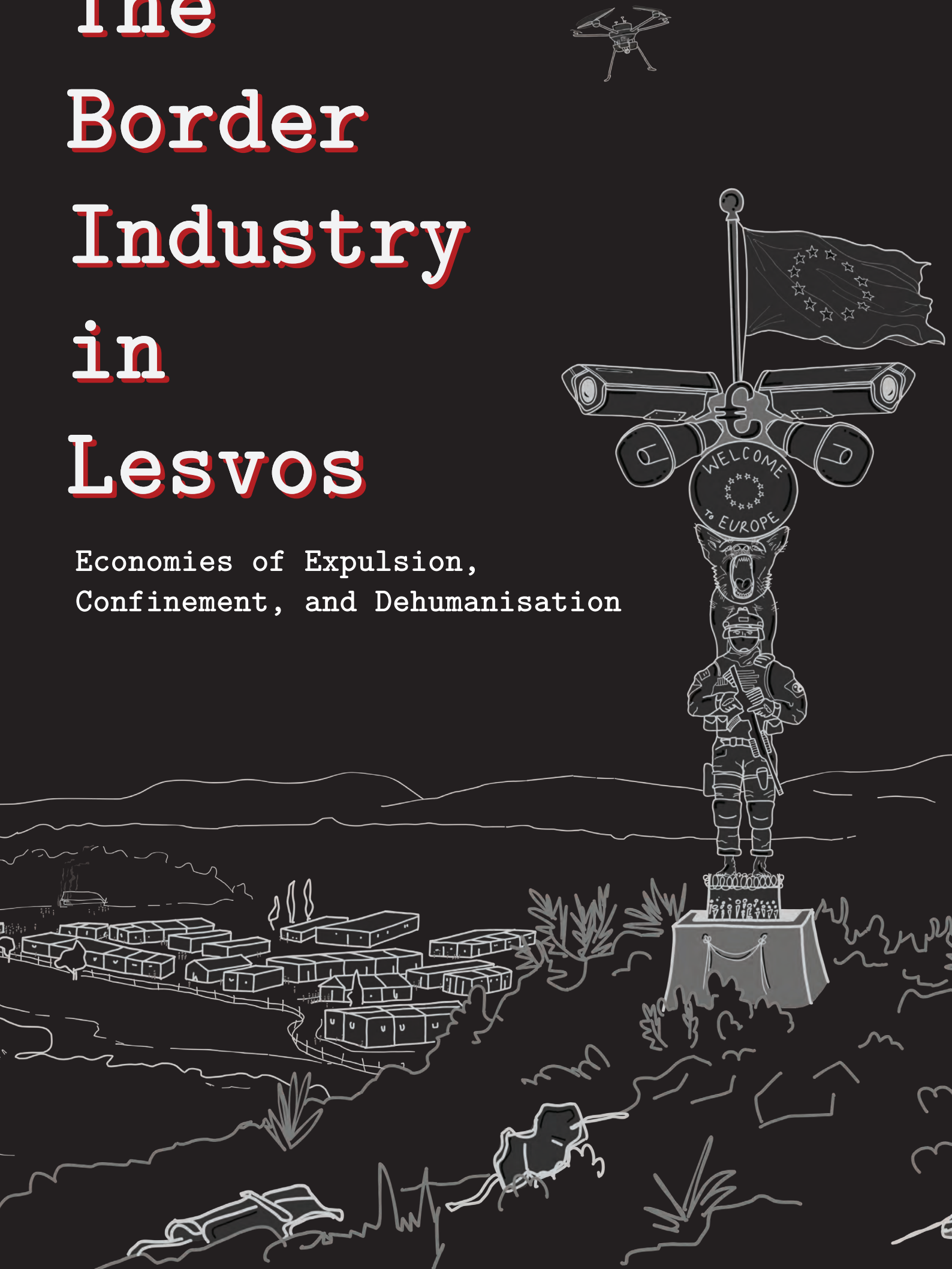
The Border Industry in Lesvos

Economies of Expulsion, Confinement, and Dehumanisation



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Spyros Galinos, Lorraine Leete, Marion Bouchetel, Aila Spathopoulou, Anna Carastathis, Lauren Martin and Geoff Boyce. *The Border Industry in Lesvos: Economies of Expulsion, Confinement, and Dehumanisation*. Legal Centre Lesvos. October 2026

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This publication was supported by the Rosa Luxemburg Stiftung Office in Greece.

ROSA LUXEMBURG STIFTUNG
OFFICE IN GREECE

Project initiated by **Legal Centre Lesvos**

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Summary

This report analyses **554 contracts** contained in the Border Industry database, involving EU agencies, Greek ministries, and **289 contractors** between 2020 to 2022, worth a total of **€1.115 billion** in framework agreements**.** This analysis provides granular insight into the state-corporate relationships that sustain border violence.

We focus on Lesvos, Greece, an island in the Aegean Sea close to Türkiye, a primary location for people on the move to enter the European Union. For over 25 years, Lesvos has served as a laboratory for carceral, militarised and increasingly deadly border control policies. In 2015, it was made into a key 'hotspot' in EU migration control; its migrant camps, including Moria, became notorious for the deprivation of fundamental human rights. In 2020, the Greek government's EU-backed practice of pushbacks became systematic throughout the Aegean. In parallel, 'Reception and Identification Centres' were converted to 'Closed Controlled Access Centres'.

By analysing how EU agencies and Greek ministries procured assistance from the private sector to further these policies, **we map the extensive financial relationships and mutually reinforcing incentives between public and private actors, forming a border-industrial complex.** Our report shows how services and supplies provided by these private actors are related to border violence in the Aegean region. Through the proliferation of increasingly securitised and militarised camps where migrants are made to live, as well as pushback operations during which migrants are killed and left to die, profit is extracted from the violation of migrants' rights and lives.

We have documented a range of small, medium, and large private actors that profit from—and become invested in—the normalisation and amplification of border violence in the Aegean region. We analysed contracts across EU, national, regional, and local scales. Whilst not exclusively carried out in Lesvos, all of the contracts we analysed are

relevant to migration 'management' and border control in Greece, and in Lesvos specifically. These contracts include:

- **At the EU scale**: 27 framework agreements worth €526 million, entered into by Frontex (the European Border and Coast Guard Agency) and EASO (the European Asylum Support Office). Additionally, we analysed 111 implementing and standalone agreements worth €239 million, entered into by Frontex.
- **At the national scale**: 15 framework agreements worth €589 million, entered into by the Ministries of Migration and Asylum and National Defence. Additionally, we analyse 401 implementing and standalone agreements worth €436 million, entered into by the Ministries of Migration and Asylum; Defence; Citizen Protection; and Maritime Affairs and Insular Policy.
- **At the local scale:** €152 million out of the above €436 million national level contracts were awarded for contracts to be carried out exclusively in Lesvos, and €62.5 million were awarded to Lesvos-based companies and individuals.

Our analysis identifies several trends in EU and Greek border privatisation:

- **The majority of funds go to large enterprises, and consortia of large enterprises, which are based outside of Lesvos.**
  - Among **EU contracts**, 83-86% of funds were awarded to large companies, or consortia including large companies. In **national level contracts,** 99% of funds awarded through framework agreements and 80% of funds awarded through implementing and standalone agreements were awarded to large companies, or consortia involving large companies.Corporations from wealthy states such as Germany, Poland, and the UK were awarded the largest contracts.

  - **Small and Medium-sized Enterprises (SMEs) account for around 70% of contractors** in both EU and Greek national standalone and implementing agreements, yet they received a much smaller percentage of the total procurement value, with most of the funds awarded to SMEs going to medium-sized companies.

- **Continued reliance on multinational corporations** like Airbus and G4S, who are also involved in contributing to violence, rights violations, and violent displacement overseas, including genocidal settler colonial violence in Palestine.

- **A shift towards techno-centric methods of border control and surveillance, with large-scale investment in technologies used to detect and monitor migrants at Greece's borders.** Contracts for border surveillance and operational technology comprised 44% (€234 million) of EU framework contracts awarded, which were largely purchases by Frontex of drones and piloted aircraft. At the national level, the Ministries of Defence, Maritime Affairs, and Citizen Protection all likewise bought drones, electro-optical and radar equipment used to detect, intercept, and violently return migrants in pushback operations.

- **Large scale outsourcing of labour and services integral to EU and Greek governmental functions.** Service contracts made up 70% the value of contracts analysed. At the EU level, the considerable outsourcing of staffing to private companies through these service contracts raises serious accountability and transparency concerns, given the integral role these staff members (who include interpreters, asylum experts, and consultants) play in implementing the EU's border policies.

- **Significant use of Closed Procurement Procedures.** While the majority of EU contracts were awarded following open tenders, significant, high-value contracts (worth approximately €120 million) were awarded in closed procedures. In Greece, two closed procedures accounted for 78.2% of expenditure by the various

Ministries involved in framework agreements. Amongst them, contractors who were found to be engaging in price fixing and restricted competition were nevertheless able to win multiple high-value contracts through these closed procedures.

- **In Lesvos, the border-industrial complex has produced documented, systematic patterns of human rights abuses, at a scale impossible without significant involvement of the private sector.** The contracts analysed here provide important details about how private actors are involved in border violence, and who is profiting from this involvement. The full picture of private actors' involvement in the border-industrial complex, however, remains incomplete. There are significant limitations on the disclosure of information about all the actors involved, particularly with regard to subcontracting arrangements.

To connect contracting arrangements to specific border control practices, we selected four Case Studies, each of which reveal how the border-industrial complex sustains human rights abuses in the Aegean region.

1. **Pushbacks:** Greece's EU-backed pushback policy, a systematic attack on migrants constituting crimes against humanity, relies on private provision of extensive surveillance technology, land vehicles, boats, life rafts, ropes, and cables. During the period under review, relevant contracts were identified with a total value of at least €370,835,791.
2. **Camps:** Camps on Lesvos proliferated during the period of our study (2020-2022). During this period, legal justification for 'Closed Controlled Access Centres' was also invented and codified, exploiting the status quo of perpetual 'quarantine' the state had instituted during the Covid-19 pandemic for encamped migrants. Focused on the Lesvos camps at Moria, Kara Tepe, Megala Therma, and Vastria, we identified 15 contractors whose companies were involved in the construction, operation, and management of these camps, and 22 landowners who leased land for camps on Lesvos, amounting to a total revenue of €123,609,455.

3. **Catering:** Our research found that through largely closed procedures, high-value contracts were awarded to provide meals in refugee camps around Greece, generating €56 million in revenue in Lesvos alone between 2020-2022. This is despite ongoing, documented shortcomings in food provision, contributing to the violation of human rights. In Lesvos, these lucrative catering contracts resulted in local catering company, Elaitis Catering, becoming one of the largest economic actors on Lesvos island, now managed through its parent companies by Luxembourg-based private equity firm CVC Capital Partners. This shows how the border industry has become one conduit for the massive transfer of public funding to private equity.

4. **Surveillance:** Closed Control Access Centres in Lesvos use Hyperion and Centaur surveillance systems, which operate biometric identification, app-based communications, and algorithmic behavioural analysis of CCTV, breaching privacy rights in violation of GDPR. Further investigation of the tenders process reveals how the Hellenic Ministry of Migration and Asylum, the contracting authority, failed to conduct a Data Protection Impact Assessment and include provisions that would require the companies ESA, ADAPT IT and Space Hellas to follow basic obligations under the GDPR, illustrating how these contracting arrangements reproduce the ability for states to resist compliance with laws that protect citizens and migrants from rights violations.

In sum, this report shows how revenue and profits are generated through border violence and pushbacks of migrants at sea, and through the segregation of people into ever-more militarised, carceral camps, where they are provided inadequate services and subject to other rights violations. Our analysis traces the wider, multinational corporate and financial interests sustaining Greece's border industry. In turn, these arrangements with private actors enable states to evade their own obligations under national and international human rights frameworks.

The report raises critical concerns about transparency, accountability of public and private entities, and human rights obligations. Under the EU's Corporate Sustainability Due Diligence Directive (CSDDD), companies have an obligation to identify and address actual and potential adverse human rights and environmental impacts in their own operations. Despite the widespread documentation of human rights violations in the Aegean, this obligation is not being met.

Glossary

Border-Industrial Complex: The synergy of public institutions, private companies, operational policies and practices involved in the expansion and maintenance of border enforcement systems. This includes state authorities, such as ministries, European Union agencies like Frontex, and private companies involved in construction, surveillance technologies, security services, logistics, and service provision.

Border Industry: The constellation of private and corporate actors, such as contractors, service providers, consultancies, security firms, and property owners, whose profit-making activities are structurally embedded in and sustained by states' control and containment of migration.

Border Violence: In this report we conceptualise border violence as a continuum of practices that are not limited to the geographical borders of nation-states but include forms of control, punishment, exposure, abandonment, and containment in camps.

Central Electronic Registry of Public Procurement (KIMDIS, also known as Prometheus): The Greek government's electronic platform for publishing and archiving public procurement notices and contracts. Contracting authorities are required to publish contract notices at the national level, and all contracts above a set threshold must be uploaded to this registry. It served as a key data source for identifying contractors and expenditures related to border violence in this report.

Closed Controlled Access Centres (CCACs): Fenced and surveilled facilities built on the Greek islands (Lesvos, Samos, Chios, Leros, and Kos) from 2021 onwards, replacing the earlier Reception and Identification Centres on these islands known as 'hotspots'. They are characterised by restricted entry/exit, enforced curfews, biometric and camera surveillance systems, and a securitised, prison-like architecture.

Common European System for Returns: An EU legislative framework, first proposed by the European Commission in March 2025, aimed at harmonising and accelerating the return of people without state authorisation to remain in the EU across Member States. It replaces the existing Return Directive, which dates back to 2008, and introduces common procedures for return decisions, alongside a European Return Order that records key elements of a national return decision allowing Member States to recognise and enforce the expulsion without starting a new return procedure. The European Parliament approved the regulation in June 2026.

Common Procurement Vocabulary (CPV):[1] A standardised system used across member states and EU agencies that classifies the specific product or service being bought in a government contract. The current CPV system, which was adopted by Regulation (EC) No. 213/2008, has been in use since 2008, and consists of about 9454 coded terms that list goods, works and services commonly used in procurement.

Criminalisation: The process by which racialised people entering the EU without state authorisation are rendered illegal, as well as acts of solidarity with people on the move and documentation and protest of human rights violations related to border enforcement are reframed as illegal, often through 'anti-smuggling' or 'facilitation laws' resulting in the prosecution, surveillance, imprisonment, deportation, and intimidation of people on the move and people or organisations supporting them.

Direct agreement: a type of standalone agreement whereby the contracting authority signs the agreement directly with the contractor without first having an open tender or competition to take offers.

EU Pact on Migration and Asylum: a series of reforms to the Common European Asylum System (CEAS) adopted by the European Parliament in 2024, which was to be enacted into all Member States' national law by June 2026. The Pact treats migration as a security problem, focusing on control, deportation, and externalisation. The reforms legalise discrimination based on nationality; broaden the grounds for detention of people on the move including of children; grant decision-making powers to the police and border guards within the newly introduced screening process; expand the collection of biometric data including facial recognition; and create a mechanism to deport people to countries with which they have no connection.

EU–Turkey Statement/Deal: An agreement announced on 18 March 2016 between the EU and Türkiye, which stipulates that people arriving without state authorisation on the Greek islands could be returned to Türkiye (readmissions) in exchange for EU financial support, visa liberalisation talks, and accelerated EU accession negotiations for Türkiye. This agreement solidified the sorting and containment logic of the hotspot system introduced in May 2015 and subsequent Greek legislation introduced geographical restrictions confining people on the move to the islands pending processing of their asylum claims.

European Union Agency for Asylum (EUAA), formerly European Asylum Support Office

[1] Commission Regulation (EC) No 213/2008 of 28 November 2007 amending Regulation (EC) No 2195/2002 of the European Parliament and of the Council on the Common Procurement Vocabulary (CPV) and Directives 2004/17/EC and 2004/18/EC of the European Parliament and of the Council on public procurement procedures,

(EASO): The EUAA is an agency of the European Union that facilitates the implementation of the Common European Asylum System. EUAA's (formerly EASO's) mandate includes providing Member States' Asylum Services with operational support by hiring asylum 'experts' and other personnel, providing practical, legal, technical, advisory, and operational assistance with the asylum procedure, as well as cooperation with other EU agencies (such as Frontex, Europol, and the Fundamental Rights Agency), international organisations, and national authorities on asylum-related matters.

Extraction: Used to describe how migration governance and border violence generates value (financial, political) for state and private actors, treating people on the move and their containment as a resource to be capitalised upon.

Framework Agreement: A framework agreement establishes the general principles, scope, and conditions for future cooperation between a national or supranational governmental body and a private company that is providing either supplies or services. Rather than specifying every operational detail, a framework agreement provides an overarching structure under which more specific implementing agreements will subsequently be concluded. A **Cascade Framework Agreement** is a framework agreement in which selected contractors are ranked in order of preference, where the first ranked is given first priority in any implementing agreement.

Frontex: The European Union's frontline Border and Coast Guard agency. Frontex works with EU Member States, Schengen-associated countries, and increasingly in operations outside the EU, to police the EU's external borders, including through joint operations, training, surveillance, 'intelligence' and data gathering, and other operations aimed to control migration.

GDPR (General Data Protection Regulation): An EU regulation governing the collection, storage, and processing of personal data, including biometric data such as fingerprints and facial images. In the migration governance and border enforcement context, GDPR is relevant to how the personal data of people on the move is collected, stored, and shared between private actors, state authorities and EU agencies, and potentially repurposed. This raises questions about consent, data protection, and accountability.

Hotspot: In May 2015, amidst a declared 'refugee crisis' by the EU, the EU Commission launched the hotspot approach and five Greek islands (Lesvos, Chios, Samos, Leros, and Kos) as well as several locations in Italy were termed 'hotspots'. EU agencies (EASO, Frontex, Europol, Eurojust) were embedded directly into national asylum decisions, fast-tracking registration, sorting people

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as regards the revision of the CPV. See also, Publications Office of the European Union, *Common Procurement*

arriving into those eligible for asylum and those marked for deportation, and targeting so-called 'smuggling networks'. Hotspots built the operational and legal infrastructure that would later, in March 2016, impose geographical restrictions on migrants, effectively confining them to the island on which they arrived.

Implementing Agreement: a contract or agreement designed to put an existing framework agreement into practice. It normally includes specific operational details, such as procedures, responsibilities, funding arrangements, delivery timetables, information-sharing mechanisms, and/or technical cooperation.

Long Summer of Migration: A term referring to the period of exceptionally high migrants' arrivals to Europe in 2015–2016, with Greece—particularly the Aegean islands such as Lesvos—serving as a major entry point. The period saw hundreds of thousands of people arriving by sea from Türkiye, followed by onward movement through Greece and the Western Balkans towards northern Europe. It also marked a significant turning point in European migration and border policies.

Migrants/People on the Move: We use 'migrants' and 'people on the move' throughout this report as an umbrella term to include all people who are forced to and choose to migrate and/or seek asylum, regardless of what legal status they have or are eventually granted by the Greek state. We use these terms interchangeably and to counter anti-migrant narratives that attempt to categorise those who are not afforded refugee status by law as 'irregular' or 'illegal' migrants somehow undeserving of human rights. The terms 'asylum seeker' and 'refugee' are used here in reference to individuals' particular legal status, when relevant, or to refugee camps, when described as such by authorities.

Migration Management: Activities including 'reception and identification' procedures, providing closed and controlled facilities to categorise people arriving into 'populations', managing camps in which people are made to live, and managing all asylum claims, and residency permits.

Pushbacks: The UN Special Rapporteur on Human Rights of Migrants defines 'pushbacks' as "various measures taken by States which result in migrants, including asylum seekers, being summarily forced back to the country from where they attempted to cross or have crossed an international border without access to international protection or asylum procedures or denied of any individual assessment on their protection needs which may lead to a violation of the principle

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Vocabulary (CPV) (2026).

of non-refoulement."[2] When we refer to pushbacks in this submission, we are referring to this definition. Pushbacks have become an important mechanism of border violence at EU borders and elsewhere. In the Aegean context, pushbacks have been widely documented by journalists, human rights organisations, and international bodies as a systemic practice involving the Greek security forces, and in some cases Frontex.

Reception and Identification Centre (RIC): The official term for the facilities established under Greek and EU law for the registration, identification and initial processing of people arriving at both the land and maritime border including the five Aegean islands, Lesvos, Chios, Samos, Leros and Kos, also known as 'hotspots'. RICs preceded the CCACs on these five islands and remain the formal legal category into which CCACs fall.

Small and medium-sized enterprises (SMEs):[3] The European Commission classification of business entity size, based primarily on the number of staff and annual budget:

Category	Micro	Small	Medium-sized
Staff	<10	<50	<250
Turnover	≤ €2 million	≤ €10 million	≤ €50 million
OR			
Balance Sheet	≤ €2 million	≤ €10 million	≤ €43 million

SOGIESC is the abbreviation of 'Sexual Orientation, Gender Identity and Expression, and Sex Characteristics', grounds for asylum and international protection claims made by individuals who face persecution, violence, or criminalisation because of who they are or how they express their gender identity, sexuality, and/or desire, including, but not limited to LGBTQIA+ people.

Standalone Agreements: A contract or agreement between a national or supranational governmental body and a private company, whereby the procurement of supplies and/or services and details regarding payment and delivery are specified directly, independent of a framework and implementing agreement.

[2] Special Rapporteur on the human rights of migrants, *Call for inputs for the Special Rapporteur's report on pushback practices and their impact on the human rights of migrants*, (United Nations Office of the High Commissioner for Human Rights, 12 May 2021).

[3] Based on the European Union framework (Recommendation 2003/361/EC), see European Union, *Commission Recommendation of 6 May 2003 concerning the definition of micro, small and medium-sized enterprises* (20 May 2003).

Statistical Classification of Economic Activities in the European Community / Nomenclature statistique des Activités économiques dans la Communauté Européenne (NACE):[4] NACE is a standard system, created by Eurostat, for classifying what industry a business belongs to. It classifies the business as a whole, not the specific product or service involved in a particular deal or contract. The current version, NACE Rev. 2.1,[5] was adopted by the European Commission in October 2022 and will be used for European statistics from 2025 onwards.[6]

Tenders Electronic Daily (TED) database:[7] The EU's official online platform for publishing and accessing public procurement notices, including information on tenders, contract awards, and other procurement procedures subject to EU public procurement rules.

[4] Eurostat, *NACE Rev. 2.1: Statistical classification of economic activities in the European Union* (2025).
[5] Eurostat, *Statistical Classification of Economic Activities in the European Community* (2026).
[6] Eurostat, *NACE* (2025).
[7] Publications Office of the European Union, *Tenders Electronic Daily (TED)* (2026).

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Photograph 1: *The Border Industry research team at Kara Tepe.*

Photographer: Anna Carastathis. Lesvos, January 2025

Introduction

Over the last decades, Lesvos has become a site where the criminalisation of freedom of movement and the broader regime of European border violence are enacted and normalised in a concrete material form: a border where people are pulled from the sea, pushed back into it, put into rescue boats and liferafts to 'driftback' and left to die, confined behind fences and barbed wire, counted, and made to wait indefinitely for asylum decisions along the lines of a prolonged, manufactured 'crisis'. This report engages with the fact that all of these practices of border violence are paid for, procured, tendered, and audited and that this administrative regime is not incidental to border violence but one of its infrastructures and enablers. Behind the technocratic language of 'interception at sea', 'Closed Controlled Access Centres', 'reception and identification services', 'catering provision', and 'surveillance systems' lie the conditions of pushbacks at sea, of indefinite confinement and organised abandonment in horrendous conditions in camps and of premature deaths at the borders. This report analyses data from the Border Industry database, a public database of 1,139 contracts issued by four Greek ministries: the Ministry of Migration and Asylum; the Ministry of Maritime Affairs and Insular Policy; the Ministry of Citizen Protection; and the Ministry of National Defence, as well as European Agencies, notably Frontex and EASO. These contracts constitute one entry point into the border regime; our analysis asks what the contracts can tell us about who profits from border violence, and how.

The research began with an attempt to trace the profits generated specifically around pushbacks, that is, the systematic practice of border violence documented by survivors, journalists, human rights organisations, and international bodies. In the Aegean Sea, pushbacks involve the Greek security forces and, in some cases, Frontex. As the analysis developed, it became clear that pushbacks could not be isolated from the wider infrastructure of containment and control on the island. Often, the same companies that profit from surveillance and interception at sea, also profit from the construction and provisioning of 'Closed Controlled Access Centres' (camps) on land. What emerged was

not a series of discrete violations but a continuum of border violence, in which the mapping of economic flows—from vessels and surveillance technologies, to fences, construction, security personnel and catering contracts—reveals a single, unified, sustained infrastructure for producing the confinement, exhaustion, and killing of people on the move. The four case studies in this report, examining pushbacks, surveillance, camps, and catering, should be read not as separate examples but as adjacent points along this carceral continuum of border violence.

We present the Border Industry database as a tool with which grassroots collectives, researchers, investigative journalists, and human rights organisations documenting border violence can engage, not as a complete or exhaustive record, but as a basis on which to expand in relation to the forms of border violence they are exposing and the specific geographical borders at which this violence takes place. Aligned with critical border studies approaches, we understand borders not as fixed territorial lines, but as dispersed and networked systems of governance operating across multiple spatial scales and institutional sectors. Notably, contract language is technocratic, whilst contracting is frequently consolidated at the national or transnational level in ways that make it difficult or impossible to isolate spending tied specifically to Lesvos. This opacity is not incidental to the border regime; rather, it is one of the conditions that enables it to function and to expand without accountability. Analysing the data in the Border Industry database, whilst acknowledging the limits of this tool, alongside documentation of border violence published in reports on pushbacks, shipwrecks, deaths at sea and in camps, is an attempt to counter that opacity.

This report is written from within and in solidarity with ongoing struggles against border violence and for freedom of movement. We do not approach the border industry as a technical or regulatory failure to be amended through better oversight—a notion reproduced through the technocratic language of the contracts that are included in the Border Industry database. The border industry is a manifestation of a border regime that is at its very core necropolitical; a regime organised around the exposure of racialised

people to dehumanisation and death,[8] in which the calculated abandonment of people at sea and in camps—the so-called 'migration crisis'—is neither an inevitable situation to which states are merely responding nor an unfortunate 'side effect' of policy, but its intended outcome. We understand bordering practices not only as mechanisms of territorial control, but also as sites of economic interest, racialised governance, and systematic rights violations. The question, in this sense, of who is stopped, detained, or left to die, is inseparable from the question of who profits from these carceral bordering practices.

Procurement processes and contractual arrangements, in this way, are not secondary or merely technical dimensions of so-called 'migration management'; rather, they constitute core mechanisms through which border regimes are constructed, maintained, expanded, and normalised. The procurement data analysed at both the European and national level demonstrate that the border regime in Lesvos is not solely the product of state institutions or supranational EU agencies; rather, it is sustained through extensive relationships with private contractors. Substantial public expenditure is directed towards the infrastructure, technologies, and specialised services required for migration control and border management. The border-industrial complex should be understood not simply as a market that responds to migration policy, but as part of the material infrastructure through which that policy is produced, maintained and normalised. The construction and maintenance of securitised, carceral camps; the provision of surveillance technologies; the contracting of personnel and services; and the development of local supply chains all create institutional and economic relationships invested in the continuation of border control and border violence. These 'migration' agreements create profit; procurement is not merely an administrative mechanism for implementing migration policy. It provides a means through which the border becomes economically embedded, generating interests and dependencies that can contribute to the reproduction and expansion of the border regime. This conceptualisation is informed by critical scholarship documenting the economic interest for an increasingly expansive

[8] See Evgenia Iliadou, *Necroharms: The Normalisation and Routinisation of Social Death in Refugee Camps on the Greek island of Lesvos* (*Mortality*, Volume 28 (2), 2023), 299–313.

constellation of private actors involved in the border-industrial complex.[9] As highlighted by Nancy Hiemstra and Deirdre Conlon in their analysis of the US immigration detention system, "the economics of detention are not merely limited to prison corporations. Other kinds of businesses are poised to profit-those that provide food, medical care, commissary items, transportation, communication, to name the most obvious."[10]

The concentration of spending in a relatively small number of massive contracts illustrates the scale at which private actors have become embedded in the maintenance of the border regime. Tracing these companies leads far beyond Lesvos and beyond migration policy narrowly defined. Several corporate actors and companies identified in the Border Industry database are also involved in other regimes of confinement, surveillance, and colonial violence, including in the surveillance and military infrastructure sustaining Israel's ongoing genocidal settler violence against Palestinians[11]. This is not incidental. It reflects a wider political economy in which the same companies, technologies, logics of confinement, and policies of elimination, expand across borders, client states, and geographical locations—established in one site of violence and exported to another. States have become highly skilled at building, financing, and normalising infrastructures of border violence in ways that evade documentation, making it ever harder to hold them accountable. In documenting and analysing this political economy, we also reflect on our own implication and complicity as researchers, taxpayers, consumers, employees within universities and non-governmental organisations, and citizens/residents of states and the EU, which fund the border industry.

In the next section, we reflect further on the importance of focusing on Lesvos, its trajectories as a border island, whilst neither seeking to portray the island as an exceptional case, nor to disconnect it from the global border regime. We then present the methodology we used to create the Border Industry database and this report, and

[9] Mark Akkerman, *The Business of Building Walls: Corporate Profiteering from Immigration Detention and Deportation* (Transnational Institute, 2019).
[10] Nancy Hiemstra and Deirdre Conlon, *Immigration Detention Inc.: The Big Business of Locking Up Migrants* (Pluto Press, 2025).
[11] UN Human Rights Council, *From Economy of Occupation to Economy of Genocide: Report of the Special Rapporteur on the Situation of Human Rights in the Palestinian Territories Occupied since 1967, Francesca Albanese*, UN Doc. A/HRC/59/23, July 2, 2025, 4, *Office of the High Commissioner for Human Rights*.

discuss our quantitative and qualitative findings from the database. Four case studies follow, examining pushbacks, camps, catering, and surveillance—not as isolated instances of border violence, but as aspects of the continuum of border violence sustained by the border industry on Lesvos. With this report, we hope to contribute to collective struggles in solidarity with people on the move and to the movements resisting border violence on Lesvos and beyond, across and against borders.



***Photograph** 2: Close Moria/Smash Fascism, Unknown artists.*

Photographer: Anna Carastathis, Lesvos, October 2023

1. Why Lesvos

Lesvos, one of the largest islands in the Mediterranean and the administrative centre of the North East Aegean, has been, over the past 25 years, a main entry point for people on the move arriving in Greece and the European Union without state authorisation.[12] The wars and invasions unleashed by the so-called 'War on Terror' since the early 2000s rendered the Eastern Mediterranean one of the principal corridors for people seeking to migrate and seek asylum in Europe. The external border of Europe shifted east to the Aegean Sea, and to Greece's land border with Türkiye, when Greece joined the Schengen Area in 2000.[13] Since the early 2000s,[14] Lesvos has been used as a laboratory for implementing a wide range of carceral and racist migration policies that are subsequently implemented across the EU. [15] In the early 2010s, with the increased

[12] Since 2010, when official data become available by entry point, more than 700,000 people are recorded as having arrived in Lesvos by sea without state authorisation. During the 2015–2016 "Long Summer of Migration" alone, approximately 500,000 people arrived on Lesvos island, accounting for 58% of all people arriving in Greece that year (United Nations High Commissioner for Refugees [UNHCR]. *Situation Europe Sea Arrivals: Greece* [accessed 23 September 2026]). The significant fluctuations in arrivals over time should be considered in the context of EU and Greek border and migration policies, including changes in the operation of reception and detention facilities, the construction of the Evros border fence, pushbacks on land and at sea, Frontex operations, border controls, and other factors affecting migration routes.

[13] Greece's membership in the Schengen Area was implemented on 1 January 2000, Schengen rules began to be enforced by Greece on 26 March 2000, and internal controls with Greece ceased. For the following 25 years, until Bulgaria and Romania joined Schengen in 2024 and 2025, respectively, Greece was constructed as an "island in the system", divided geographically from the rest of the Schengen area, and connected only by sea or air. An EU member state since 1981 and part of the European Monetary Union, in 2001, Greece took the further step of joining the euro area, converting its currency (drachma) into the euro (European Commission, *History of Schengen* [2025]; European Union, *Greece: Overview* [2026]).

[14] In 2003, the first detention centre on the island opened in an industrial warehouse in Pagani. It was closed in 2009 after a long struggle by the people detained there and an international no-borders movement. In August 2009, 150 teenagers, of the approximately 300 held captive there, categorised as 'unaccompanied minors', went on hunger strike (Human Rights Watch, *Greece: Create Open Centres for Migrant Children* [2009]; Welcome to Europe, *Letters from Pagani* [2009]). Following protests on the inside and outside, 38 people were released from Pagani with no support, forcing them to stay on the street. A no-border camp, simultaneously practical solidarity and protest, started later that month (Welcome to Europe, *Prologue to the Lesvos no-border camp* [2009]; Welcome to Europe, *Noborder Lesvos '09 Welcomes You* [2009]). Police brutally suppressed an uprising inside Pagani later that fall, drawing further international condemnation; the facility was gradually closed in 2009–2010 (Welcome to Europe, *No to a New Pagani: the Detention Camp on Lesvos/Greece Near Moria is the Pagani of the Troika* [2013]). In 2013–2014, some of the people who were imprisoned in Pagani returned to Lesvos to protest the "Pagani of the Troika," Moria: "Many of us had been in the past imprisoned as well in what was called by a Greek minister 'Dante's Inferno' [...] The official plan to treat refugees on this island remains the same: to keep them behind barbed wire, isolated from the society. The only thing that has changed is the amount of money coming from the EU to finance it" (Welcome to Europe, *No to a New Pagani: the Detention Camp on Lesvos/Greece Near Moria is the Pagani of the Troika* [2013]).

[15] Spyros Galinos, Christina Karvouni, *How to build a detention centre: The case of Vastria in Lesvos* (Community Peacemaker Teams, 2025).

militarisation,[16] fencing,[17] and pushbacks at the land border at Evros, the geography of crossings shifted across the North Aegean Sea.[18] In 2013, detention centres were set up on the North Aegean border islands, including on Lesvos, in Moria at a former Greek Army barracks that served as a precursor to the subsequent 'hotspots' that were established in 2015–2016.

In May 2015, amidst a declared 'refugee crisis' by the EU, the EU Commission launched the hotspot approach as part of its European Agenda on Migration.[19] Five registration and identification centres termed 'hotspots' were set up on the Greek islands of Lesvos, Chios, Samos, Leros, and Kos, embedding EU agencies (EASO, Frontex, Europol, Eurojust) directly into national asylum decisions, fast-tracking registration, sorting people arriving into those eligible for asylum and those marked for deportation, and targeting so-called 'smuggling networks'.[20]

Processing at these hotspots classified people according to nationality, date of arrival, vulnerability, and perceived deservingness of 'protection'. These hotspots built the operational and legal infrastructure that would subsequently make it possible to impose geographical restrictions on the arriving migrant population. In particular, the EU-Turkey Statement of March 2016[21] formalised the hotspot's sorting, categorical, and containment logic, turning Lesvos overnight into one of five prison islands in Greece. The island was converted into a new border zone designed for the confinement, detention, and deportation of people reaching Greece by sea.

[16] In 2012, 'Operation Aspida' (Shield) mobilised 2000 Hellenic police to the Evros border, and made the border a focal point of Frontex. When, in 2020, Ursula von der Leyen visited the Evros border during the so-called 'border crisis' there, promising Greece €700 million, she referred to Greece as Europe's "shield" (Jennifer Rankin, *Migration: EU praises Greece as 'shield' after Turkey opens border*, [The Guardian, 3 March 2020]).

[17] In 2011–2012, the Greek state constructed a 10.5 kilometre, 4-metre-tall barbed wire border fence along the land border with Türkiye, which was reported to have cost €3 million, entirely paid by the Greek government, as the European Commission refused to fund the viewed the fence as an "ineffective deterrent" to undocumented migration (Ekathimerini, *EU will not fund Evros fence* [2011]; Ekathimerini, *Greece completes anti-migrant fence at Turkish border* [17 December 2012]).

[18] Newspapers at the time reported police statistics that showed a 96% decrease in arrests for 'illegal migration' at Evros, and an increase of 167.68% in Lesvos, 203.28% in Samos, and 2160.87% in Chios. (Kostas Onisenko, *Sea flows increased dramatically*, [Kathimerini, 5 June 2014]). These arrests were typically conflated with "arrivals"—also suppressing the push-backs occurring in the Aegean Sea (so-called 'Operation Poseidon'), the shipwrecks and drownings they caused, and the racist profiling in the so-called 'sweep' 'Operation Xenios Zeus' in the urban centres (2012–2015) (Amnesty International, *Greece: Frontier of hope and fear: Migrants and refugees pushed back at Europe's borders* [29 April 2014], 24-32). Net arrests around the country had a 44% decrease compared to the previous timeframe (2013) (Kostas Onisenko. *Sea flows increased dramatically*, [Kathimerini, 5 June 2014]).

[19] European Commission, *A European Agenda on Migration* (2015).

[20] European Commission, *Explanatory note on the 'hotspot' approach* (2015).

[21] European Parliament, *EU-Turkey Statement & Action Plan* (2015).

Lesvos' new status was inspired by offshore detention camps on islands of Nauru and Manus Island—the so-called 'Pacific Solution' of Australia.[22] The legal fiction of the 'hotspots' like Lesvos concentrated people seeking asylum into camps (Reception and Identification Centres or RICs) built on the islands and under geographical restriction. These camps enabled the imposition of cruel and inhumane conditions on migrants, and restricted freedom of movement anywhere outside of the 'hotspot' island. National authorities worked in tandem with EU agencies to categorise those deemed 'deserving' of international protection, and therefore the right to remain. The 'hotspot' logic also justified the Greek state's efforts to derogate from procedural rights within the asylum process at the borders through a series of legislative reforms, which successively eroded the right to seek asylum.

During this time, Lesvos gained an emblematic status as the 'hotspot of Europe': people arriving by inflatable boats to a backdrop of discarded life jackets, alongside the degrading and dangerous living conditions in the now-infamous Moria camp (widely known as a 'hell') were objectified in a media spectacle that lasted for years. Under international scrutiny, and publicly denounced for human rights violations, Greek authorities briefly made provision for alternate 'humanitarian' housing. This was only made available to a minority in structures outside of Moria, such as the municipally-run Kara Tepe accommodation centre, leased apartments for individuals deemed 'vulnerable' as well as facilities operated by civil society organisations, such as the International Rescue Committee (IRC) reception camp in the north of the island and the PIKPA camp south of the town of Mytilene. Although these facilities differed considerably in their purpose, organisation, and conditions, they ultimately functioned as complementary components of the same 'migration management' system. As long as 'humanitarian' camps served a function deemed expedient, they were used by authorities to 'manage' the population of migrants confined to the island. Once they had served their apparent purpose, these facilities were closed and their inhabitants evicted.

Border policies of containment, encampment, and 'management' became a major source of economic activity for the local economy, amidst the sovereign debt crisis and austere

[22] See the decisions of the UN Human Rights Committee in *M.I. et al. v Australia* and *Nabhari v Australia*, establishing States', in this case Australia's, responsibility for arbitrary detention of asylum seekers in offshore facilities, two complaints to which Australia maintained it was not responsible for human rights violations it outsourced to other jurisdictions and private actors.

structural adjustment measures applied to the Greek economy by the IMF, European Central Bank, and the European Commission (referred to as the 'Troika'). The involvement of local businesses, property-owners and landowners in what we term the 'border industry' on Lesvos has included the leasing of land for the construction of camps, the leasing of apartments to security personnel and humanitarian volunteers and workers, and the direct employment of local residents in migration management. This economic activity has contributed to making the island's economy increasingly inextricably linked to border management.

At the beginning of 2020, over 20,000 people were encamped in the now-infamous Moria camp on Lesvos, a facility built on a former military barracks with a stated capacity of 3,000 people. With the outbreak of the COVID-19 pandemic, the Greek government capitalised on the public health emergency to introduce new forms of emergency governance, discriminatory restrictions on movement—including perpetual quarantine—intensified policing practices—including racial profiling—suspension of asylum, and further violations of migrants' rights.[23]

The period from 2020 to 2022 was marked by the intensification of border violence, most notably the government's clandestine policy of pushbacks.[24] Although pushbacks had long been documented, particular in the northern land border between Greece and Türkiye along the Evros/Meriç river,[25] the election in July 2019 of a right-wing government and a preponderance of far-right parties in Parliament, led to even more aggressive surveillance and control of the borders.[26] In the Aegean region, pushbacks evolved into a widespread and systematic policy in early 2020,[27] which played a pivotal role in limiting the number of people surviving the crossing and arriving in Lesvos and other border islands.[28] Investigations by the European Parliament and the European Anti-Fraud Office (OLAF) have exposed how between 2020–2022 Frontex systematically

[23] Legal Centre Lesvos & Feminist Autonomous Centre for Research, *A pandemic of abuses: How Greece dismantled the right to asylum and normalised the violation of migrants' rights throughout the COVID-19 pandemic in Lesvos* (2023).
[24] Border Violence Monitoring Network, *Testimonies* (2026).
[25] 73 testimonies given to the Border Violence Monitoring Network in 2019–2020 show more than 3,600 people affected by this practice (Border Violence Monitoring Network, *The Black Book of Pushbacks, Vol. 1* (2020), 532–669; Forensic Architecture, *Pushbacks across the Evros/Meric River: Situated Testimony* (2020)).
[26] Yannis Souliotis, *Surveillance sealed the Aegean* (Kathimerini, 2020).
[27] Legal Centre Lesvos, *Crimes Against Humanity in the Aegean* (2021).
[28] Forensic Architecture, *Driftbacks in the Aegean* (2023).

covered up Greece's pushback operations and their own involvement in them[29] —leading to the resignation of then-Frontex director, Fabrice Leggeri.[30]

During the period on which we focus in this research (2020–2022), the 'migration management' model shifted from a fragmented governance model, characterised by the active involvement of numerous smaller local initiatives, national and international non-governmental organisations and supranational institutions, towards a far more securitised, militarised, and centrally administered approach. At the institutional level, the re-establishment of the Ministry of Migration and Asylum in January 2020[31] signaled an increased emphasis on centralised operational coordination of 'migration management.'

The destruction of the Moria camp in September 2020 was followed by the establishment of the 'temporary' Reception and Identification Centre (RIC) in Kara Tepe (also known as 'Mavrovouni'), which was later converted to the Lesvos Closed Controlled Access Centre (CCAC). These developments were followed by the decision of the Greek government to proceed with the construction of a new CCAC in Lesvos, in Vastria, which constituted a major reconfiguration of the island's carceral infrastructure and reflected a broader policy shift towards geographical containment, detention, and deportation.[32] This system anticipated the EU's Common European System for Returns, approved by the European Parliament in June 2026.

This policy shift was accompanied by a broader transformation in visibility and accountability. Lesvos had been at the centre of international attention from 2015 onwards, but increasing restrictions on documentation, bans on photography, non-disclosure agreements for camp staff, along with the criminalisation of reporting and solidarity work, progressively narrowed the space for independent scrutiny on the island. This process further intensified during the Covid-19 pandemic emergency in 2020, using pandemic related restrictions as a pretext to restrict access to the camp. It is within this context of diminishing transparency that we situate the aim of this report: to document

[29] OLAF, *Investigation of Frontex, CASE No OC/2021/0451/A1* (2021).
[30] Jennifer Rankin, *Head of EU border agency resigns amid criticisms,* (The Guardian, 29 April 2022).
[31] The Ministry of Migration and Asylum was established under the SYRIZA government in 2016, subsumed under the Ministry of Citizen Protection (security and policing) by the then newly elected New Democracy government in 2019, and in a reversal a few months later, re-established in 2020 as a separate, Cabinet-level ministry.
[32] Galinos and Karvouni, *How to build a detention centre*.

the border industry emerging from and enabled by this sustained 'state of emergency'.

By focusing on Lesvos, this report neither seeks to portray the island as an exceptional case, nor to disconnect it from the global border regime. Indeed, from the earliest stages of this project, it became evident that pushbacks, border violence, and the financial and political interests that sustain them cannot be adequately understood through an exclusively local lens. As demonstrated throughout this report, and particularly through the procurement contracts analysed, multinational corporations, Greek companies, individual contractors, property and land owners all participate in, and profit from, the implementation of border policies. Their involvement includes activities linked to pushbacks, detention, surveillance, and catering provisions, as explored in the four case studies. Border 'management' in the Aegean can therefore be best understood as part of a multi-scalar system of governance involving local authorities, national and EU institutions, European agencies, private firms and transnational capital—including multinational corporations—which form an interconnected border-industrial complex.

2. Methodology

This research adopts a mixed-methods approach to examine the state, corporate, and private actors involved in the border-industrial complex in the Aegean, with a focus on Lesvos island. The research was conducted through three stages: (1) definition of the scope of the research and data collection; (2) database construction; and (3) quantitative, qualitative, and spatial analysis to examine the economic relationships that sustain border governance.

This three-staged approach has not been a strictly linear process. In particular, the expansion of the geographical framework outside Lesvos island and the refinement of contractor classifications emerged through ongoing analysis of the data collected.

2.1 Scope of Research

Geographical Scope and Multi-Scalar Framework: Although initially focused on Lesvos, early stages of collecting data on private contracts related to border governance entered into by the Greek government and EU agencies made clear that it was not possible to separate relevant contracts geographically, as many were awarded for implementation on a national or international level. In our research, therefore, we adopted a multi-scalar analytical framework that included (1) the local context of Lesvos, where border infrastructures such as reception centres, detention facilities, and surveillance systems are physically located, and where border enforcement practices are directly experienced; (2) the Greek national context, including the ministries responsible for migration governance; policing; maritime surveillance; procurement; and operational coordination; and (3) the European Union, including the institutions and agencies that provide funding, operational support, and oversight to Greece's border management. Methodologically, this required integrating data from multiple sources at

various scales and developing a framework capable of tracing the relationships between actors, funding streams, and operational practices.

Temporal Scope: The study focuses on the period from January 2020 to December 2022. This timeframe was selected due to its significance in the evolution of migration management practices in the Aegean region. The transformations that took place during this period have had a profound impact on both the operational and institutional dimensions of border governance, as described in more detail in the previous section, *Why Lesvos?*

Data Collection: At the European level, procurement data were collected primarily from the Supplement to the Official Journal of the European Union and the Tenders Electronic Daily (TED) database,[33] which publishes private contracts entered into by EU agencies above specified financial thresholds and provides standardised information on contract notices and awards. We specifically examined procurement data from Frontex and the European Asylum Support Office (EASO), which was renamed the European Union Agency for Asylum (EUAA) in 2022.[34] This data was supplemented with data collected directly from the EU agencies' websites,[35] highlighting the need to combine multiple sources in order to achieve a more comprehensive dataset. Procurement by UN bodies, i.e. IOM and UNHCR, although very significant, are outside the scope of the current report and have not been part of the data collected.

National procurement data were primarily collected through the Central Electronic Registry of Public Procurement (KIMDIS/Prometheus).[36] Approximately 47,500 contracts issued by four ministries (Migration and Asylum; Maritime Affairs and Insular Policy; Citizen Protection; and National Defence) were manually screened in order to identify contracts relevant to border governance and migration management in Lesvos, using

[33] Publications Office of the European Union, *Tenders Electronic Daily (TED)* (2026).
[34] See also Juan Santos Vara, "The role of agencies in the management of borders and asylum: Frontex and the Asylum Agency," in *European Migration and Asylum Law*, ed. Juan Santos Vara (Edward Elgar Publishing, 2026), 193-223.
[35] See, i.e. Frontex, *Procurement and tender procedures* (2026).
[36] Greek Government, *Central Electronic Registry of Public Procurement (KIMDIS / Prometheus)* (2026).

predefined inclusion criteria based on keywords, contractor profiles, and functional relevance to border governance. Freedom of Information requests were submitted to obtain additional documentation; all of these requests were either rejected or remain unanswered. As a result, the research relied primarily on publicly available records from Prometheus, supplemented by information from national and local media sources and documentation by civil society organisations.

2.2 Data Classification and Database Construction

Once collected and manually filtered, the relevant procurement data was organised into a searchable database designed to facilitate analysis across institutions, geographical scales, and economic sectors.[37]

At the European level, we identified 510 relevant contracts, each of which was coded according to a set of variables, including: contracting authority; contractor identity; geographical location; procurement procedure; contract value; funding mechanism; procurement subject matter; and implementation period. At the national level, 629 relevant contracts were identified as related to border operations in Lesvos. To ensure consistency, the classification of both European and national level contracts subject matter was based on the Common Procurement Vocabulary (CPV).

In parallel, a second dataset was developed to map the contractors involved in the identified procurements. This involved the collection of information on company activities, structure, and—where available—financial data. This information was primarily collected through company websites, and national business associations. Contractors were further classified using the NACE Rev.2.1 statistical classification system, in order to identify the economic sectors most directly involved in border governance.

[37] The open-source database application Uwazi, designed by HURIDOCS, was used for the organisation and archiving of the data collected into the Border Industry database, which can be accessed at https://border-industry.uwazi.io/. Throughout the report, when specific contracts are cited, they can be found on this platform, searchable by contract number.

The research additionally applied the European Commission's framework for classifying small and medium-sized enterprises (SMEs), in order to assess the size distribution of contractors involved in the border-industrial complex. Together, these classification and coding processes enabled the development of a dataset capable of tracing institutional, financial, and economic relationships across multiple scales of border governance.

2.3 Data Analysis

Building on the database compiled through the methodology described above, the following section analyses how this data was analysed for the purposes of this report. Rather than treating the Border Industry database as a static record, we approached it as a starting point for identifying patterns, relationships, and case studies that could illuminate the broader political economy of border violence on Lesvos. This analysis combined three complementary approaches: quantitative, qualitative, and spatial. We then chose to focus on four Case Studies (pushbacks, camps, catering, and surveillance) that allowed us to examine in depth how specific aspects of border and migration 'management' are connected to documented human rights violations, and how contractors are implicated in those violations.

Whilst the Border Industry database contains 1,139 contracts and 600 contractors, the findings presented in this report are based on an analysis of 554 contracts and 289 contractors that were relevant to border operations in Lesvos. The smaller analytical subset reflects, in part, the exclusion of contracts that were included in the database but did not concern services or supplies provided in Greece and/or Lesvos. This was particularly the case for implementing agreements entered into by Frontex under broader framework agreements that may have included Greece but whose individual implementing agreements concerned services or supplies provided elsewhere.

Quantitative analysis was used to identify patterns in the distribution of the 554 relevant contracts, including sectoral concentration and funding levels. Particular

attention was paid to recurring contractors, and the concentration of contracts in specific geographic areas and in specific economic sectors.

Qualitative analysis focused on interpreting the role of specific contracts within broader border 'management' strategies, including their relationship to policy developments, operational practices, and documented rights violations. This involved examining how private contractors' activities intersected with broader political developments such as the expansion of closed controlled facilities, the increased use of surveillance technology in these facilities, and the role of EU agencies in financing and overseeing border operations, including the systemic practice of pushbacks.

Spatial analysis was additionally employed to map the geographical allocation of contractors, place of performance of contracts, and the geographic distribution of resources, infrastructures and operational investments—which are transnational—whilst our focus for the purpose of this report remains on Lesvos.

2.4 Limitations and Constraints

The research is subject to several limitations that reflect both methodological challenges and structural constraints on access to information.

Data availability and lack of transparency posed a significant limitation. Although EU and national procurement frameworks establish formal requirements for the publication of tenders and contracts, in practice, information is fragmented across multiple platforms, inconsistently published, and often difficult to access. The research therefore required extensive manual screening and filtering. Procurement thresholds, which differ across sectors, EU agencies and ministries, create additional gaps, as lower-value contracts and certain negotiated procedures are often published only on agency-specific websites, frequently with less detailed information.

Additional constraints arise from legal and institutional restrictions and regulatory

exceptions to disclosure, which limit public access and civic oversight. For example, procurement data may be withheld to protect personal data, sensitive operational or tactical information, or proprietary commercial interests. These restrictions are particularly significant in the case of implementing agreements under broader framework agreements, which are often not publicly disclosed at the EU level. Certain European funding instruments, such as the European Defence Fund and the European Peace Facility, also have restricted transparency provisions; thus, contracts financed through these mechanisms are largely inaccessible to the public.[38] At the national level, in Greece, many government expenditures are also classified. For example, the Ministry of Migration and Asylum established a 'secret fund' in 2020, from which €1.7 million was reportedly spent between May 2020 and December 2021.[39] Together, these restrictions created structural gaps in the dataset and limited the ability to comprehensively track funding to private actors.

A further limitation arises from the interoperability of border infrastructure and technologies. Equipment and infrastructure are frequently designed for use by multiple agencies or across different operation contexts. This creates analytical ambiguity, as procurements formally associated with civilian or environmental objectives, such as those funded through instruments like the European Maritime and Fisheries Fund, may, in practice, support broader border control and surveillance functions.

The widespread use of outsourcing and subcontracting creates still another layer of opacity. While primary contractors can often be identified through public procurement records, data on subcontractors generally remains inaccessible, limiting the ability to fully map the complete network of private actors actively involved in border maintenance.

Finally, one of the overarching challenges is the inherently diffuse and evolving nature of the border-industrial complex itself. Our research therefore adopts a pragmatic focus on

[38] While the EU Financial Regulations set a number of provisions related to procurement procedures, they also limit when this information must be published. See European Union, *Regulation (EU, Euratom) 2018/1046 of the European Parliament and of the Council of 18 July 2018 on the financial rules applicable to the general budget of the Union* (2018).

[39] Iliana Papangeli, Stavros Malichudis, and Apostolis Fotiadis, *Lack of transparency in the Greek Ministry of Migration's €1.7 million in secret funding* (Solomon, 2023).

specific sectors and types of expenditure, while recognising that these do not capture the full range of actors involved in bordering practices. Administrative services, training of personnel, and the humanitarian[40] and academic[41] sectors, for example, were outside the scope of the present report, despite their significant role in sustaining and normalising the border industry. Their exclusion was necessary at this stage to maintain a systematic and manageable research scope. However, these sectors could be included in further research.

[40] Deanna Dadusc and Pierpaulo Mudu, *Care without control: The humanitarian industrial complex and the criminalisation of solidarity* (*Geopolitics* 27(4), 2022), 1205–1230.

[41] Mark Akkerman, *Border Labs: How Universities Power Europe's Border Regime* (Transnational Institute & Stop Wapenhandel, 2026).



***Photograph** 3: When They Pay/No Borders, Unknown artists.*

Photographer: Anna Carastathis. Mytilene, June 2024

3. Mapping the Border-Industrial Complex on Lesvos

The border policies of the European Union and its Member States have been characterised over the past decade by two interconnected trends: the digitalisation of border surveillance, control and administration, and the massive growth of the border industry itself.

Digitalisation includes the use of a wide range of technologies, such as drones, surveillance cameras, social media monitoring tools, and satellite imagery not only used for control in the detention camps, but also for the detection, violent interception, and unlawful return of people on the move in pushback operations, and to criminalise people on the move for their own border crossing. It also involves the construction of extensive national and international databases containing biometric and personal data for those who succeed in reaching Europe.[42]

The European Union plays a leading role in financing the expanding global border industry.[43] As previous reports by StateWatch and the Transnational Institute have highlighted, EU spending on 'border governance', specifically the security and defence sectors, has increased twofold over the past half-decade.[44] The EU's Multiannual Financial Framework for 2021–2027 "allocates an unprecedented amount of European public money for security and defence purposes, more than doubling its budget from one spending cycle to the next."[45] EU "[f]unding for law enforcement, border control, military research and development and operations (€43.9bn) is 31 times higher than funding for rights, values and justice (€1.4bn)."[46]

As our research into procurements, contracts, and contractors shows, corporate involvement is a key feature of the expanding border industry on Lesvos, including direct

[42] Chris Jones, Romain Lanneau, and Yasha Maccanico, *Europe's Techno Borders* (EuroMed Rights and Statewatch, July 2023).
[43] Chris Jones, Jane Kilpatrick, and Yasha Maccanico, *At what cost? Funding the EU's security, defence, and border policies, 2021–2027: A guide for civil society on how EU budgets work* (Statewatch & Transnational Institute, April 2022).
[44] Mark Akkerman, *Financing Border Wars: The Border Industry, its Financiers and Human Rights* (Border Wars Briefing, Transnational Institute and Stop Wapenhandel, April 2021).
[45] Jones, Kilpatrick and Maccanico, *At what cost?* , 3.
[46] The latter, mentioned here for purposes of comparison, is disbursed primarily to states through the Citizens, Equality, Rights and Values (CERV) programme. Jones et al. (2022), 4; see also pp. 9–10.

participation in border security and control operations; the asylum procedure; and in the provision of equipment and personnel to EU and national authorities through the outsourcing of operational activities and services. In this report, we analyse €1.115 billion worth of framework agreements awarded by EU agencies and Greek ministries over the three year period from 2020 to 2022, in addition to their associated implementing agreements and several standalone agreements.[47] As we explore further below, public authorities' dependence on private actors through these contracts raises significant concerns regarding human rights, transparency, and accountability.

3.1 Procurement by European Agencies

At the EU level, we examined the private contracts of Frontex and EASO.

Frontex is a financially independent institution with its own funding and annual allocation from the EU budget, approved each year by the European Parliament and the Council of the European Union as part of the EU's annual budget procedure. Its annual budget has expanded rapidly over the past decade, from almost €140 million in 2015 to over €1.1 billion in 2025. This growth reflects and solidifies its role as a central actor in the European border regime.[48]

Frontex's budget finances activities such as coordinating border management operations at the EU's external borders, maintaining and deploying the agency's Standing Corps of border guards, supporting deportations, purchasing and operating surveillance equipment, aircraft, drones, and vessels, training border personnel, and 'cooperating' with non-EU countries on border security.[49]

In Lesvos and throughout Greece, Frontex has actively participated in border surveillance and enforcement through the funding of vessels and equipment to the Hellenic Coast Guard; covering operational costs of Hellenic Coast Guard vessels; deploying its own patrol vessels, aircraft, and personnel to the border regions; and

[47] While standalone agreements are not entered into under framework agreements, government contracts are not always clearly identified as either 'implementing' or 'standalone' agreements. To avoid double counting, the total value of €1.115 billion therefore refers exclusively to framework agreements.
[48] Frontex, *Budget 2025* (20 December 2024).
[49] Statewatch, *€2 billion in 15 years: how Frontex finances Fortress Europe* (8 September 2025).

actively participating in the registration and identification procedure of asylum seekers.[50] Until March 2020, when official readmissions to Türkiye were suspended,[51] Frontex personnel facilitated the transportations to Türkiye.

According to Frontex's latest available financial reports, about 75% of its budget is directed toward operational infrastructures and activities, whilst the remaining 25% is for administrative expenditure (e.g. staff costs).[52] Our current research examines only the security and operational elements that could be directly linked to border operations in Lesvos, including specifically the acquisition of surveillance and detection infrastructures and services used in the Aegean border region, including Lesvos. Administrative expenditure, which mostly concentrates at Frontex's headquarters in Warsaw, is beyond the scope of this report.

The European Asylum Support Office (EASO), now the European Union Agency for Asylum (EUAA), remains a much smaller EU agency than Frontex. Like Frontex, it is also annually funded directly from the EU budget. Its annual budget sharply increased in the past decade, from approximately €15 million in 2015 to approximately €200 million in 2025.[53]

While EASO/EUAA is mandated to provide only operational and technical support for Member States' asylum systems, over the last decade, EASO/EUAA has been integrated into all phases of the asylum procedure in Lesvos, carrying out so-called 'vulnerability' and nationality assessments, conducting interviews to determine the admissibility and eligibility of asylum claims, drafting 'expert' opinions on individual cases, providing interpreters for use by EASO/EUAA and the Greek Asylum Service, as well as drafting country-of-origin reports used to assess individual asylum claims.

[50] Frontex, *Operational Activities in Greece 2020-2021* (2023).
[51] European Union Agency for Asylum, *Asylum Report, Section 4.15. Return of former applicants* (2022). While 'readmissions' were suspended initially due to the COVID-19 pandemic, this suspension has since become indefinite.
[52] Frontex, *Budget 2025*.
[53] European Union Agency for Asylum, *Budget amendment 1/2025* (3 February 2026).

European Level Findings

Between 2020-2022 roughly €526 million in relevant framework agreements were awarded by EASO and Frontex (Fig. 1).[54] Many of these EU contracts were implemented across multiple European locations including Greece, rather than solely within Greece or in Lesvos (Figs. 5, 12). As such, it is impossible to determine how much funding was actually spent in Greece and specifically in Lesvos. Despite this limitation, the available data still reveals several significant patterns.

The scale of this spending shows that a substantial part of what these EU agencies do on the ground is not carried out by their own staff but outsourced to private companies and how deeply embedded private-sector involvement has become in the daily operation of the European border regime. Also, the considerable outsourcing of staffing to private companies (€211 million) raises serious accountability and transparency concerns (Fig. 3). The procurement data from the framework, implementing, and standalone agreements demonstrates a concentration of expenditure in a relatively small number of large framework and standalone agreements made with large companies (Figs. 7–8), with at least 22 percent (€120 million) of the amount awarded through closed procedures (Figs. 4, 11).[55] Additionally, many of the companies contracted are from outside Greece, even though their contracts were to be carried out in Greece (Figs. 5–6, 12–13). Within these agreements, the vast majority (81%) was for services, rather than supplies (Figs. 2, 9).

Frontex's private spending, in both framework agreements and standalone agreements, was mostly for surveillance technologies and equipment for personnel, including protective gear (Figs. 3, 10). Technology-related procurement by Frontex in framework agreements totalled more than €250 million, representing nearly half of the EU's total private expenditure for border management (Fig. 3).[56] The majority of the Frontex's

[54] Estimated by summing the total expenditures through the relevant framework agreements of both EASO and Frontex.
[55] €120 million awarded through closed procedures, includes the €116 million awarded through framework and €3.5 million awarded through standalone agreements.
[56] See also Case Study, *Pushbacks*.

private expenditure was for services, including €41.5 million awarded for contracting interpreters for Frontex's external EU border operations over a four year period to the Spanish company, Seprotec Traduccion e Interpretacion SL, and the Italian non-profit, Centro Informazione e Educazione allo Sviluppo,[57] whose mission, ironically, is to "to help increase processes of equity, social, economic inclusion and respect for human rights."[58]

Frontex is fully embedded into the wider Greek border-control apparatus used to carry out systematic pushbacks in the Aegean and at Evros: through joint operations, surveillance systems, information-sharing and co-financing. Their role in the Aegean notably expanded significantly during the time period when pushbacks became a systemic practice here: in March 2020, at the request of Greece, Frontex launched a Rapid Border Intervention in both Evros and the Aegean, increasing deployment of personnel, equipment and vessels.[59] Frontex's own role in pushbacks has been extensively documented. Forensic Architecture documented at least 106 pushback incidents in the Aegean between 2020 and 2022 in which Frontex was involved—either through direct participation or with Frontex's knowledge.[60] Frontex's complicity, involvement, and coverup of Greece's pushback policy in the Aegean was also exposed in the OLAF report of 2023, which documented several pushback incidents directly involving Frontex, and others in which Frontex-funded Greek Coast Guard vessels carried out the pushback.[61] Frontex's own Fundamental Rights Officer recommended the withdrawal of Frontex from Greece, given systemic fundamental human rights violations associated with its activities in Greece.[62]

Additionally, Frontex has long been integrated into the registration and identification procedure for new asylum seekers in the hotspot islands, including Lesvos, where faulty assessments of nationality[63] and the registration of children as adults in breach of the

[57] Contract no. 494348-2022
[58] CIES, *Who We Are: Mission* (2026).
[59] Frontex, *Frontex launches rapid border intervention on Greek land border* (13 March 2020).
[60] Forensic Architecture, *Driftbacks in the Aegean* (2023).
[61] OLAF, *Investigation of Frontex CASE No OC/2021/0451/A1* (2021).
[62] Thodoris Chondrogiannos, *Frontex official recommended agency shutdown in Greece due to illegal refoulement practices*. (Govwatch.gr., 20 March 2023).
[63] Legal Centre Lesvos, *Lesvos regional asylum office forcing displaced Eritreans to change their nationality*

presumption of minority persist, with Frontex staff and contracted interpreters directly involved in these procedures.[64]

EASO's private spending was primarily in personnel, awarding €144.5 million in two separate framework agreements to provide the agency with 'interim staff' for their operations in Greece, with one agreement awarded to a consortium of private companies, including the HR consulting firm, LMW S.A.[65], and the second in a cascade framework agreement awarded to the HR consulting firm, Atlas HR Ltd. as first priority.[66] These consulting firms were responsible for hiring asylum 'experts' who were fully integrated into the Greek Asylum Service's operations, which was fraught with delays, problems of interpretation, and issuance of rejections—including on the legally flawed ground that Türkiye is a safe third country. EASO staff members' conduct in Lesvos has been the subject of repeated complaints for exceeding its mandate and for systemic abuses, including for using hostile interrogation-like techniques whilst questioning of survivors of abuse and sexual violence, and invasive and inappropriate questioning to asylum seekers with claims based on their sexual orientation or gender identity (SOGIESC grounds).[67] EASO also contracted the private company, ONCALL Europa Language Services, to provide interpretation to support the asylum process, which was also repeatedly denounced as inadequate.[68]

A further €12 million was also awarded by EASO to G4S to provide security for its offices in Greece over a four year period.[69] G4S was also the world's largest security company until its acquisition by Allied Universal in 2021. Notably, it was the target of a successful boycott campaign due to the company's integral role in providing equipment and security

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to Ethiopian (29 January 2024).

[64] Refugee Support Aegean, *The Workings of the Screening Regulation* (January 2021); Fenix Humanitarian Legal Aid, *Frontex Fundamental Rights Officer Confirms Obligation of Registration Authorities to Respect the Presumption of Minority* (7 November 2022).

[65] Contract no. 526409-2021

[66] Contract no. 160694-2020

[67] The EU Ombudsman found maladministration by EASO, due to behaviour of EASO contracted asylum 'expert' and interpreter during a 2018 asylum interview, which ultimately led to deportation and possible death. (European Ombudsman, *Decision of the European Ombudsman in case 1139/2018/MDC on the conduct of experts in interviews with asylum seekers organised by the European Asylum Support Office* [30 September 2019]; see also: European Center for Constitutional and Human Rights, *European Ombudsperson should not close inquiry into maladministration by EASO in Greek Hotspots* [9 September 2018]; HIAS, *EASO's Operation on the Greek Hotspots: An overlooked consequence of the EU-Turkey Deal* [March 2018]).

[68] Contract no. 96952-2022, see ibid.

[69] Contract no. 78620-2021

services to Israeli prisons, checkpoints, and illegal settlements in which Palestinians are systematically abused.[70]

Framework Agreements

Based on data primarily collected through the Tenders Electronic Daily (TED) website, we identified **27 Framework Agreements** entered into by Frontex and EASO between 2020-2022 for border operations that included Lesvos and Greece, amounting to €**526 million** in planned spending. The distribution of funds within these contracts is outlined below.

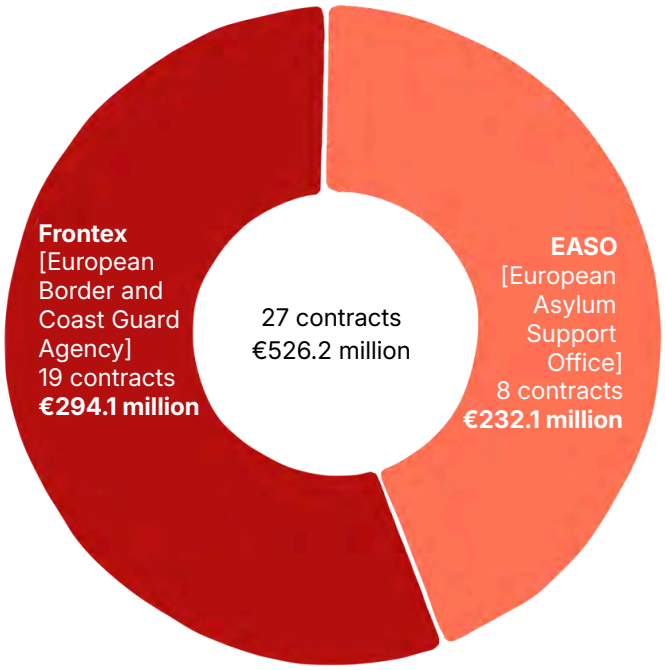


Figure 1: *Distribution of Framework Agreements and the Amount Awarded by Agency*

[70] BDS Movement, *Under BDS Pressure, G4S Ends Most Illegal Business with Israel* (12 January 2016).

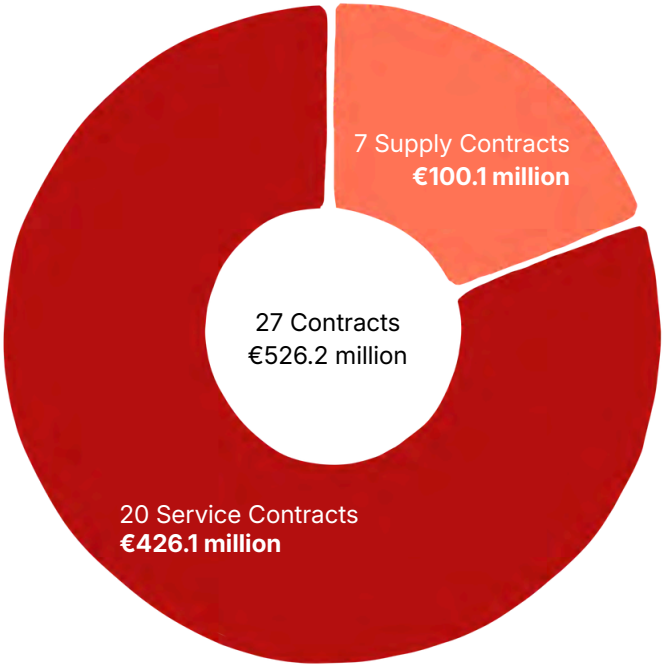


***Figure** 2: Distribution of Frontex and EASO Framework Agreements by Type of Provisions*



***Figure** 3: Distribution of Frontex and EASO Framework Agreements by Category*



***Figure** 4: Distribution of Frontex and EASO Framework Agreements by Type of Tender Procedure*

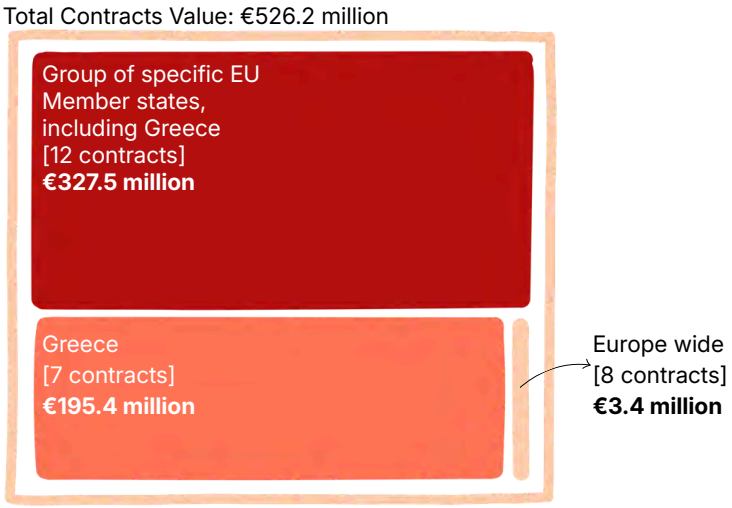


Figure 5: *Distribution of Place of Contract Performance (Framework Agreements)*

The Contractors (EU Framework Agreements)

The 27 relevant framework agreements entered into by Frontex and EASO involve 51 different corporations. The companies are based in 17 different countries, demonstrating the multinational character of the procurement system, with the largest number of awarded companies based in Greece, followed by Poland, likely due to the location of Frontex's central offices in Warsaw. Amongst these 51 companies, 30 companies were awarded the contracts directly or were listed as first priority in cascade framework agreements, with an additional 21 companies named as approved alternative contractors, in case the first ranked supplier was unable to fulfill the contract. The majority of the awarded amount was awarded to large companies or consortia with large companies, showing the nature of these agreements, in which small-medium (SME) sized entities are rarely contracted, and if so, normally in consortium with large companies (Fig. 8).

Standalone and Implementing Agreements

Framework Agreements entered into between 2020 and 2022 demonstrate EU agency priorities and plans during this period, as well as which sectors of operations were privatised. Standalone and implementing agreements show actual private expenditures during this time period and reveal more specific details. Arguably because implementing

agreements include these more specific operational details, they are more often excluded from public disclosure than the framework agreements on which they are based. In our search for relevant public procurement data, we identified **111 implementing and standalone agreements** entered into by Frontex**,** worth a total contract value of **€239 million**. The EASO implementing agreements do not appear to have been made public.[71] It is therefore important to read the following data together with the above data on framework agreements for a comprehensive understanding of private expenditure by the EU institutions.

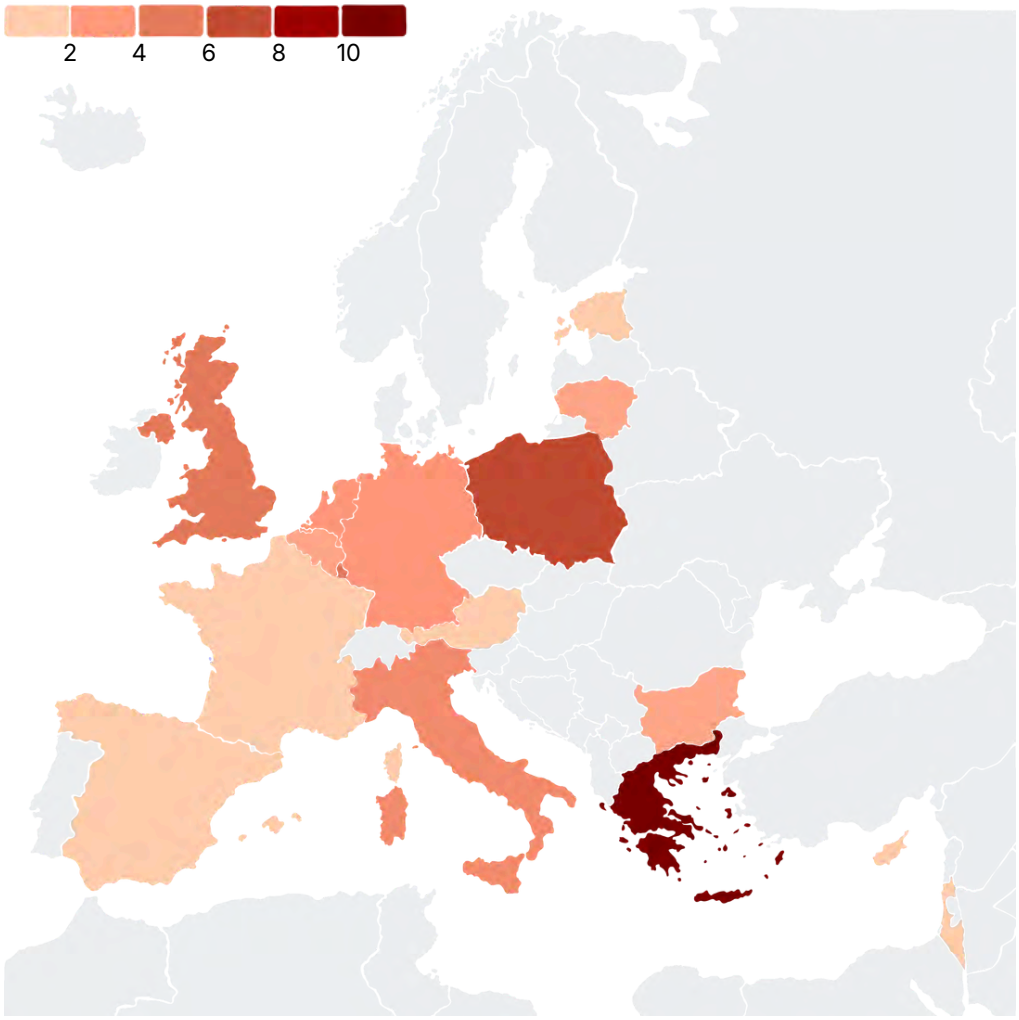


***Figure** 6: Headquarters of Companies Contracted by Frontex and EASO (Framework Agreements)*

[71] While we do not have access to EASO's implementing agreements, we have empirical evidence to suggest that framework agreements were in fact implemented. For example, EASO awarded €64.5 million for temporary personnel through a cascade framework agreement in 2020 in which Atlas HR Ltd was the first-ranked contractor, for which no implementation agreements were published. We are aware from personal communication with former EASO 'experts' that they were, indeed, hired by Atlas HR Ltd. in 2020, indicating that the agreement was, in fact, implemented.



***Figure** 7: Size Classification of Contractors (Frontex and EASO Framework Agreements)*



***Figure** 8: Amount Awarded by Size of Companies (Frontex and EASO Framework Agreements)*

[72] Whilst the humanitarian sector is beyond the scope of the current report, two-non profit entities are exceptionally included, due to their appearance in the corpus of our data, since they are named in framework agreements as partners in corporate consortia. Together with Spanish corporation Seprotec Traduccion e Interpretacion SL, Centro Informazione e Educazione allo Sviluppo ONLUS, an Italian non-profit, entered into a framework agreement with Frontex to provide interpretation services to support their activities in Albania, Bulgaria, Cyprus, Greece, Spain, Italy, Lithuania, and Romania. The second non-profit appears in our database because we found that the limited liability company, Hilfe Zur Selbsthilfe Ltd, a wholly owned subsidiary of the German non-profit, Hilfe Zur, together with the HR consulting firms, HCL Management Ltd and HCL Consultants Ltd, was ranked second in a cascade framework agreement with EASO to provide temporary personnel services. Because we only have access to the framework agreement, we cannot estimate how much, if any, funds were finally awarded to this consortium.

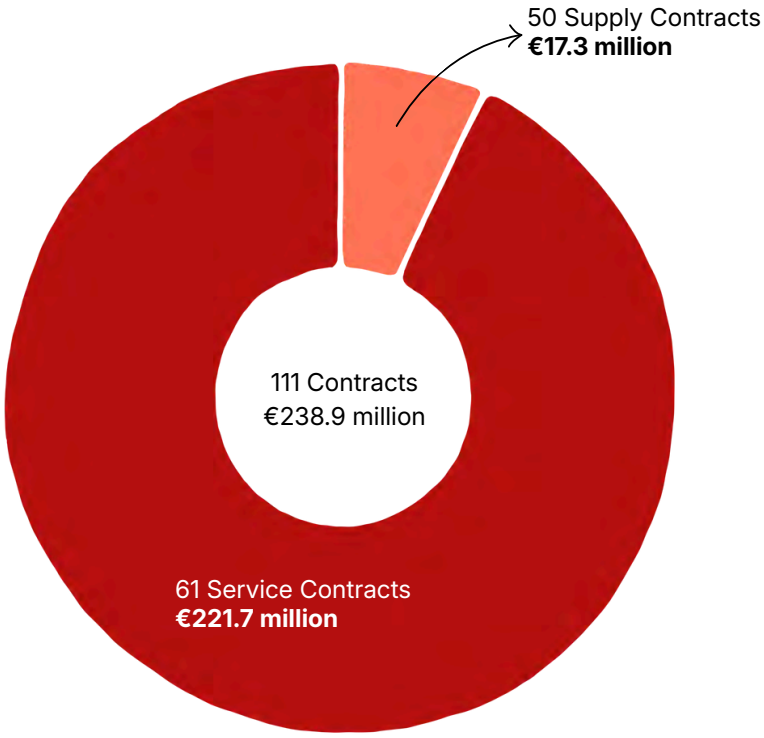


Figure 9: *Distribution of Implementing and Standalone Agreements by Type of Provision*

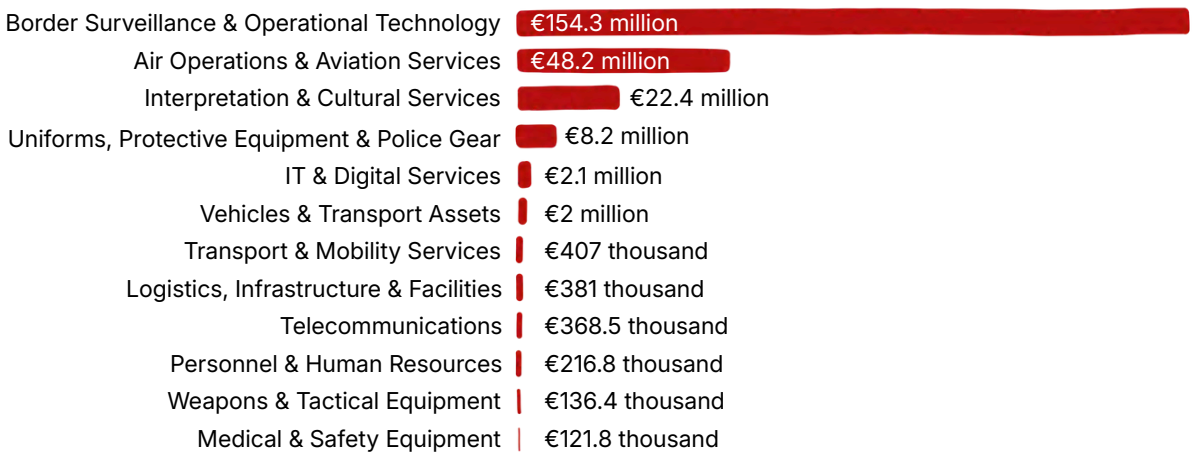


Figure 10: *Distribution of Implementing and Standalone Agreements by Category*

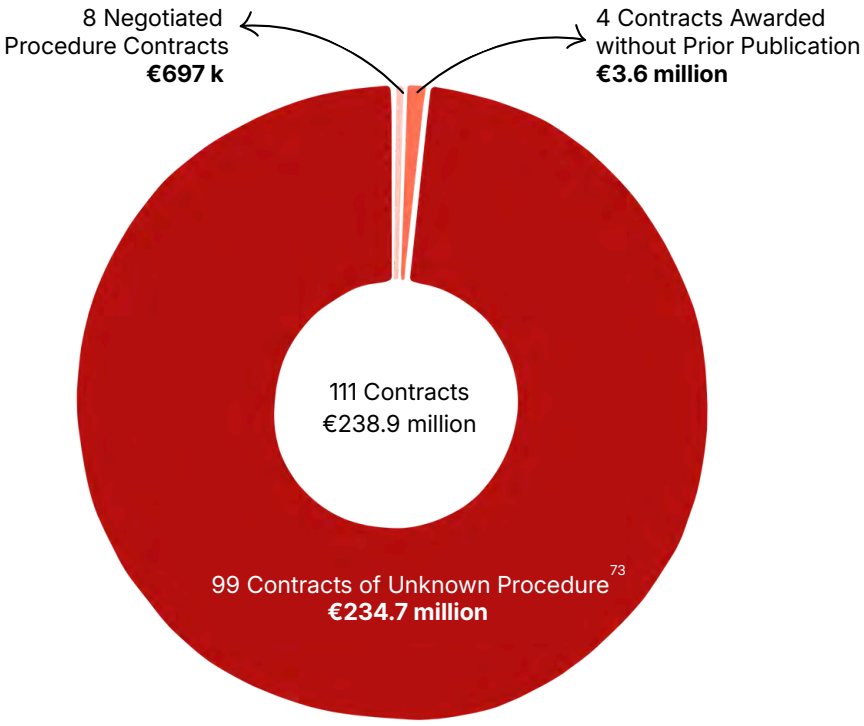


Figure 11: *Distribution of Implementing and Standalone Agreements by Tender Procedure*

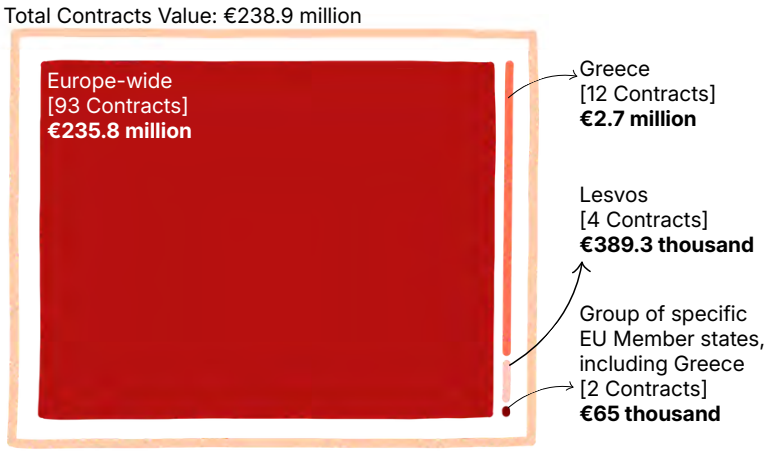


Figure 12: *Distribution of Implementing and Standalone Agreements by Place of Contract Performance*

[73] 98 out of 99 of the 'unknown' procedures were for implementing agreements. For many of the implementing agreements of Frontex, the information was collected through its own platform (Frontex, *Public Register of Documents* [2026]), which provides limited information on procurement procedure. However, the procedure for the Framework Agreements that these implementing agreements are executing is likely public, as seen in the previous section.

The Contractors (EU Standalone and Implementing Contracts)

The 111 standalone and implementing contracts were awarded to 58 entities, assigned either to individual ones or under 5 formed consortia. Entities based in Poland and Greece had the highest number of contractors (16 and 9 respectively), whilst the rest were distributed across fifteen other countries.

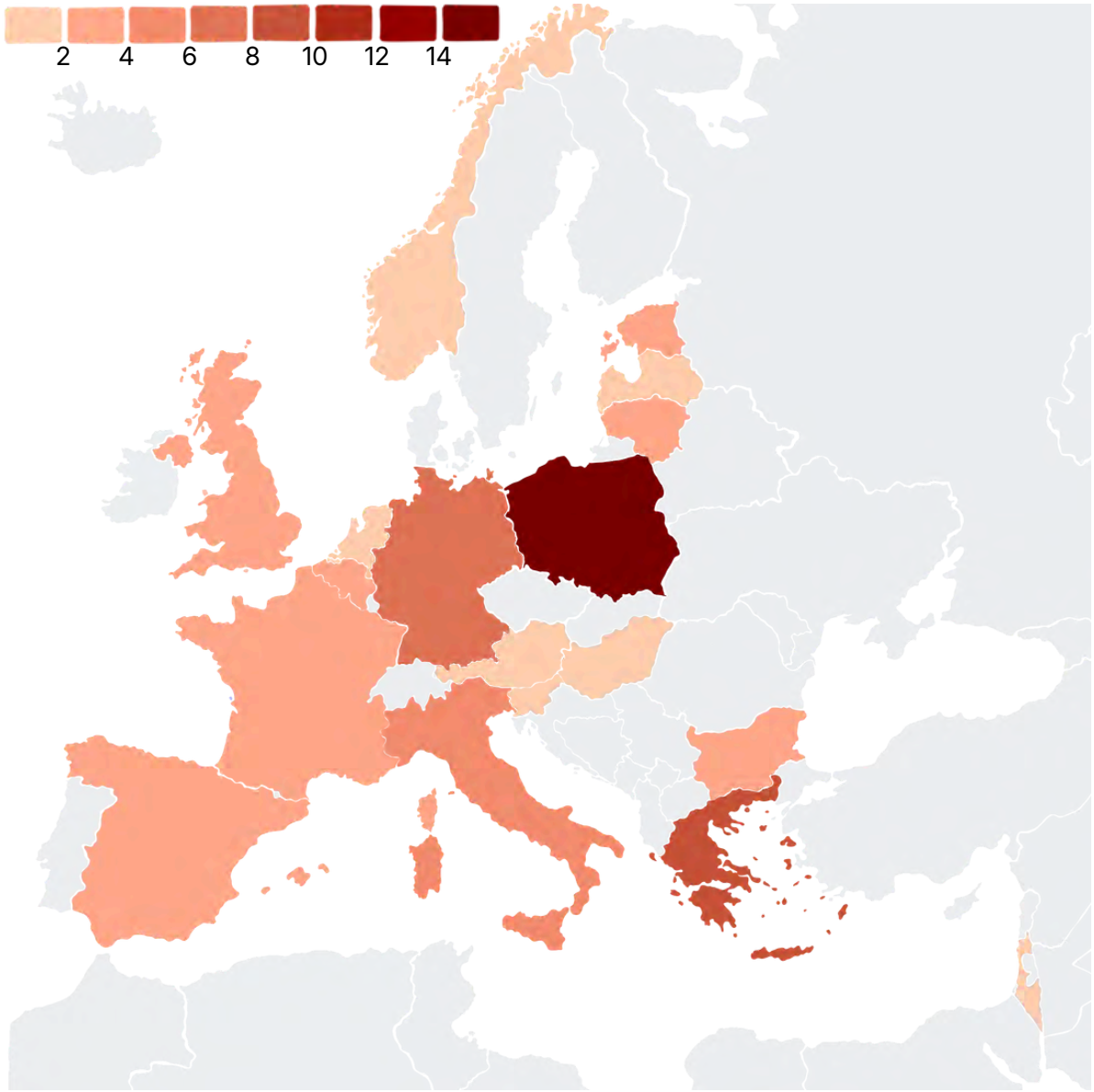


Figure 13: *Location of Frontex Contractors in Framework Agreements*



Figure 14: *Size Classification of Contractors (Implementing and Standalone Agreements)*

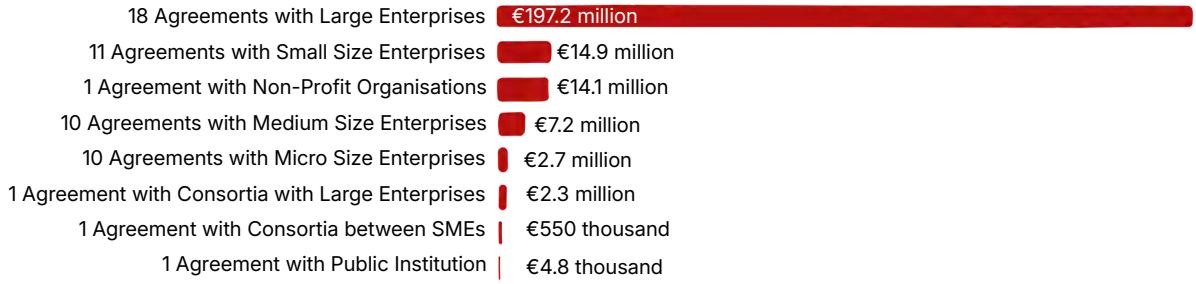


Figure 15: *Distribution of Standalone and Implementing Agreements and Amount Awarded by Size of Companies*

3.2 Procurement by National Authorities

Four Greek ministries serve as the primary channels for EU funding entering local and national economies, through the private procurement of goods and services: the Ministry of Migration and Asylum, the Ministry of Citizen Protection, the Ministry of Maritime Affairs and Insular Policy, and the Ministry of National Defence. Since 2016, when the Government founded the Ministry of Migration Policy (temporarily subsumed under a different Ministry in 2019 and re-established under the name "Ministry of Migration and

[74] The public institution in question is a local agency that has leased space for the Frontex offices at the Port of Mytilene.

Country	Company	Contract Value
United Kingdom	DEA Aviation Limited	€62 million
Germany	Airbus DS Airborne Solutions GmbH	€50 million
Poland	eTravel S.A.	€34 million
The Netherlands	EASP Air B.V.	€20 million
Italy	Centro Informazione e Educazione allo Sviluppo Onlus, now Centro Informazione e Educazione allo Sviluppo ETS (CIES ETS)	€14 million
Norway	AS Aircontact	€11 million

Figure 16: *Top Contractors of Frontex Standalone and Implementing Agreements*

Asylum" in 2020, see note 31, above), its core mandate has been the steady accumulation of migration-related powers, drawing an increasing range of functions under its remit, including: reception; processing of asylum claims; the operation and maintenance of facilities such as the CCACs under its exclusive authority; and serving as the political authority responsible for managing hundreds of millions of euros allocated by the European Union to Greece for so-called 'migration management'.'Migration management' is defined as conducting 'reception and identification' procedures; providing closed and controlled facilities to categorise people arriving into 'populations,'; managing camps in which people are made to live; and managing all asylum claims and residency permits. The Ministry of Migration and Asylum and its predecessors have been the subject of numerous complaints for the inhumane and degrading treatment people face in Greece's refugee camps, in particular on the Greek islands, including Lesvos.[75] Systemic procedural violations have also been documented within the asylum system.[76]

[75] Syria Justice and Accountability Centre, *SJAC Calls on ICC Prosecutor to Investigate Crimes Against Humanity Committed by Greece Against Refugees* (28 January 2021); Legal Centre Lesvos, *Litigation Initiatives Against Inhuman and Degrading Treatment in Hotspot camps* (2026).

[76] See, for example, Greek Council for Refugees, *AIDA Country Report Greece: Fast-track border procedure (Eastern Aegean islands)* (last updated, 2026); Equal Rights Beyond Borders, et al., *The state of the border procedure on the greek islands* (October 2022).

The **Ministry of Citizen Protection's** main responsibility is the supervision and management of the Hellenic Police ('EL.AS.'). Relevant migration-related responsibilities include: border control and enforcement; managing the 'pre-removal' (i.e. deportation) centres; organising and implementing both forced 'return' and 'readmission' procedures; and security screenings in cooperation with other European agencies such as Frontex. There are numerous reports documenting racial profiling targeting migrants in border regions; violence by EL.AS. within Greece' refugee camps; direct involvement of EL.AS. with the use of police personnel and assets in pushback operations.[77]

The **Ministry of Maritime Affairs and Insular Policy** is responsible for the Hellenic Coast Guard (HCG), a critical and deadly player in maritime 'migration management'. Its responsibilities include maritime border control, search and rescue operations, reception of arrivals, and combating 'migrant smuggling', usually in cooperation with other European and third country agencies. The HCG is also responsible for the readmission of migrants to Türkiye; however, these readmissions have been suspended since March 2020. There is extensive documentation showing the HCG is instrumental in Greece's systematic, illegal, and deadly pushback policy in the Aegean region.[78]

The **Ministry of National Defence** also plays a critical role in the border regime given its responsibility for the Hellenic Armed Forces. The latter's related responsibilities range from border surveillance and control to the provision of personnel and technical assets to support the HCG and EL.AS. Until the establishment of the Ministry of Migration and Asylum, the Ministry of National Defence was also responsible for the management of the reception centres on the islands. It still provides transportation services during migration-related emergencies or periods of increased arrivals. The Hellenic Armed Forces personnel constitute a mixture of professionals and men/people assigned 'male' at birth who are completing their mandatory military service. They have been implicated in actively participating in incidents of border violence and pushback operations in particular in the Evros region, but also in the Aegean.[79]

[77] Solomon, *100 Days: Refugees forced to return refugees to Evros,* (May 2026); Legal Centre Lesvos, *Crimes Against Humanity in the Aegean* (2021); Katy Fallon, *Revealed: Greek police coerce asylum seekers into pushing fellow migrants back to Turkey* (The Guardian, June 2022).
[78] OLAF, *Investigation of Frontex CASE No OC/2021/0451/A1* (2021); see also, Case Study, *Pushbacks*.
[79] European Center for Constitutional and Human Rights, *Analyzing Greek Pushbacks: Over 20 Years of Concealed State Policy Without Accountability* (February 2022).

National Level Findings

Between 2020 and 2022, the Greek government entered into 401 standalone and implementing agreements, worth €**435 million** (Fig. 23).[80] While the data analysed for this report concerns contracts entered into by Greek ministries, it is important to situate the analysis within the broader context of EU funding. The vast majority of relevant funding available to these ministries come from EU sources, including the Asylum, Migration and Integration Fund (AMIF) and the Internal Security Fund (ISF). An analysis of the specific funding streams to these ministries, however, falls outside the scope of this report.

Hellenic Ministry of Migration and Asylum

The highest amount of migration related funds spent in the private sector were, as might be expected, by the Ministry of Migration and Asylum. In 2020–2022 the Ministry entered into 39 contracts, worth €187 million total (Fig. 23).

From the €187 million, €132 million in funds were for one contract with the construction company, TERNA S.A., to construct two new Closed Controlled Access Centres (CCACs) in Lesvos and Chios, and the renovation of the old reception centre of Fylakio in Evros.[81] Another €10 million were awarded to Greek construction giants AKTOR S.A, GEK Services S.M.S.A., and TERNA S.A., who in addition to the contracts awarded for the preparation, construction, and expansion of the camps, were awarded contracts for security and cleaning services of the same facilities (See Case Study, *Camps*). Whilst construction contracts made up only a small percentage of the total number of contracts awarded by the four Ministries (4 out of 401 contracts), the amount awarded was nearly one-third of all private expenditures (Fig. 24).

[80] The Ministries of Migration and Asylum and National Defence also awarded €589 million in framework agreements between 2020-2022 (Fig. 17). However, our findings in this section, unless otherwise noted, focus on the data from implementing and standalone agreements, rather than framework agreements, as these reflect actual expenditure, and can often be more specifically located to Lesvos.

[81] Contract no. 21SYMV009800187. From the three planned CCACs, the renovation of the CCAC in Fylakio has been finalised, the construction of the CCAC in Vastria, Lesvos is almost completed, but the construction of the third CCAC in Chios was cancelled, resulting in compensation paid to the construction company by the Greek government. Chios News Online, *TERNA "snipped" 1,840,814 euros for the non-existent refugee infrastructure in Chios* (15 April 2026).

In 2020–2022, the Ministry of Migration and Asylum also entered into contracts for over €2 million in rent to 22 local land owners (Fig. 29; see Case Study, *Camps)* who own the land where three camps in Lesvos were constructed and operated: at Kara Tepe/Mavrovouni, Megala Therma, and Vastria. Lease renewals provided for up to ten years, and a potential total in rent to these landowners of €9.4 million. Rent paid to these land owners, all of whom are natural persons, collectively represents the second largest private expenditure related to camp construction and operation, an important point of local integration into the border industry (See Case Study, *Camps*).

Large amounts were also awarded for maintenance and operation of the camps, as well as for surveillance. The installation of the Centaurus and Hyperion systems in the CCACs of the Aegean islands cost €2.8 million (See Case Study, *Surveillance*). The development of the IT and communication infrastructures for the camps by Greece's main telecommunications provider, Hellenic Telecommunications Organization S.A. (commonly known as OTE or COSMOTE), cost an additional €15.7 million.[82] One of the main operational costs that is being outsourced to the private sector are catering services to provide meals for people forced to live in the camps (first in Moria, and then the 'temporary' RIC in Kara Tepe/Mavrovouni). Between 2020 and 2022, €56 million was awarded to be spent on catering and meal services in Lesvos alone, mainly provided by a consortium of companies. This included local company Tzanetos E.E. (known as Elaitis Catering), first contracted through the Ministry of Defence, and later the Ministry of Migration and Asylum (See Case Study, *Catering*).

Hellenic Ministry of National Defence

The Ministry of Defence's largest expense to the private sector in the contracts under study was for the purchase of €72.3 million in fuel for the vessels and boats of the HCG from the petrol company, Hellenic Petroleum S.A., renamed HELLENiQ ENERGY in 2022,[83] following the signing of a framework agreement worth up to €90 million in 2020.[84]

[82] Contract no. 21SYMV008864342
[83] Contract nos. 22SYMV011145709, 22SYMV010813815, 22SYMV011358366, 22SYMV010490169, 21SYMV009692848, 20SYMV007738016, 20SYMV007818925, 21SYMV009260287
[84] Contract no. 20SYMV006801742

Additionally, the Ministry of Defence entered into eight contracts worth €3 million, to provide boats for the navy and trucks that can be used for migration control purposes.[85] Another €4.6 million was used for the procurement of surveillance equipment (i.e. drones, thermal vision cameras, etc).[86]

The Ministry of Defence also entered into a number of contracts for the operation of the Lesvos RICs (prior to this role being taken over by the Ministry of Migration and Asylum), spending €2.4 million on fuel for heating to three local companies, P. Vounatsos S.A., Ch. Politi Bros. G.P., and N Koraka Bros. S.A.; €1.2 million on cleaning and sewage from five local and national companies; and more than half a million to GEON WC to lease chemical toilets (see also Case Study, *Camps*).

During the period under examination (2020–2022), the headquarters for the Unified Border Surveillance Body, which was established under the Ministry of National Defence for the "control and surveillance of the land and sea borders of the Greek Territory,"[87] were also constructed in the military camp of Papagos, Athens. This project alone cost an initial €2.5 million, awarded to construction company Vasko S.A. (see Case Study, *Pushbacks*).[88]

Hellenic Ministry of Citizen Protection

The Hellenic Ministry of Citizen Protection's relevant private expenditure related to border maintenance was mainly spent in the acquisition of new vehicles (i.e. vans, trucks, motorcycles) for use by EL.AS., worth €32.7 million. These vehicles were procured centrally by the ministry, making it impossible to identify how many, and which vehicles will be used in border operations in Lesvos, or elsewhere. Freedom of Information requests the Legal Centre Lesvos submitted to obtain the number and types of vehicles used in specific border areas were rejected on national security grounds.

EL.AS. spent another €29 million on telecommunications and surveillance equipment. One contract in particular stands out: a €24 million award to Space Hellas S.A., one of

[85] See Case Study, *Pushbacks*
[86] Ibid.
[87] Greece, *Law 4650/2019, Regulations on matters concerning the Ministry of National Defence and other provisions* (17 December 2019), Article 12.
[88] Contract no. 21SYMV009033920

Greece's largest IT and Cybersecurity companies, for the development of the IT and telecommunications systems for the control and surveillance of the external borders of Greece.[89]

A total of €3.4 million was also awarded to two different private actors for carrying out deportations: charter flight operator Aeolian Services and the tourist travel agency, Aktina Travel.[90]

The rest of the contracts awarded concern mainly the provision of clothing and police equipment, as well as logistical costs for the operations of the police facilities in Lesvos.

Hellenic Ministry for Maritime Affairs and Insular Policy

The role of the Ministry for Maritime Affairs and Insular Policy (also known as the Ministry of Shipping) in border management is significant; in particular, its role in the violent and unlawful border enforcement carried out by the HCG. Yet, we were able to identify a relatively small number of relevant private contracts into which the Ministry entered during the period we studied (2020–2022), totalling only €30 million and only one contract for the acquisition of vessels: for the purchase of 5 ambulance boats, amounting to €2.5 million.[91]

The Ministry for Maritime Affairs' highest relevant private expenditure was to the Hellenic Telecommunications Organization S.A. (OTE) for the development of coastal infrastructures for a Maritime Risk and Safety System (€13 million),[92] and for the repair and equipment for the existing HCG's fleet (€9.4 million). In addition, 10 contracts were awarded (totalling €4.9 million) for the acquisition and development of portable and stable radar systems and surveillance equipment. Amongst them was a contract with Byte Computer S.A. and GRIVAS S.A. to upgrade the HCG's computer room, for half a million euros.[93] This would enable the acquisition of AI-enabled social media monitoring

[89] Contract no. 21SYMV009021256
[90] Contract nos. 21SYMV008854726, 20SYMV007838123, 20SYMV006872295
[91] Contract no. 20SYMV006596498
[92] Contract no. 22SYMV010115441
[93] Contract no. 22SYMV011685686

software, raising serious concerns about the fundamental rights of those targeted and surveilled.[94]

Procurement of Local Companies within the Border Industry

Lesvos is part of the North Aegean region, which has consistently ranked as the region with the lowest GDP per capita in Greece, at around 41–42% of the EU27 average (2022–2023),[95] well below the Greek national average, which itself is around 67% of the EU27 average in 2023—meaning that Greece's economic output per person is 32% below the EU average.[96] Lesvos island's economy is characterized by a predominance of small and family-owned businesses operating mainly in livestock farming and agriculture, food processing, tourism, retail, and local services.[97] Economic activity on the island is highly seasonal and geographically dispersed. Unlike other Greek islands, large-scale or high-end tourism has not been developed on Lesvos.

This absence of large Lesvos-based companies operating in the border industry is reflected within the contracts examined. From the €62.5 million that was awarded to contractors based in Lesvos (Fig. 31), the lion's share, approximately €54 million (86%) was awarded to one local catering company, Elaitis Catering, either individually or as part of consortia with other companies (Fig. 35). Thus, Elaitis Catering's development represents a particularly interesting example of the economic dynamics generated by the border industry: the company's economic growth and expansion occurred in parallel to the awarding of these contracts, transforming it into one of the biggest private economic actors on the island (see Case Study, *Catering*).

The remaining local contractors consist of two 'small' entities who provided fuel, sewage treatment, and the maintenance of fire safety equipment, a number of micro-enterprises consisting of local companies and professionals, and natural persons leasing land.

[94] Eleftherios Chelioudakis, *Beyond the Border: How AI-enabled Surveillance Tools Turned Social Media into a Migration Control Apparatus* (Interdisciplinary Migration Research Unit, 27 July 2026).
[95] Eurostat, *Gross domestic product (GDP) at current market prices by NUTS 2 region* (10 February 2026).
[96] Eurostat, *PPPs for GDP per capita in 2025: preliminary estimates* (25 March 2026).
[97] Nikos Manavis, *Individual Businesses Dominate in the North Aegean* (Stonisi, 8 September 2026).

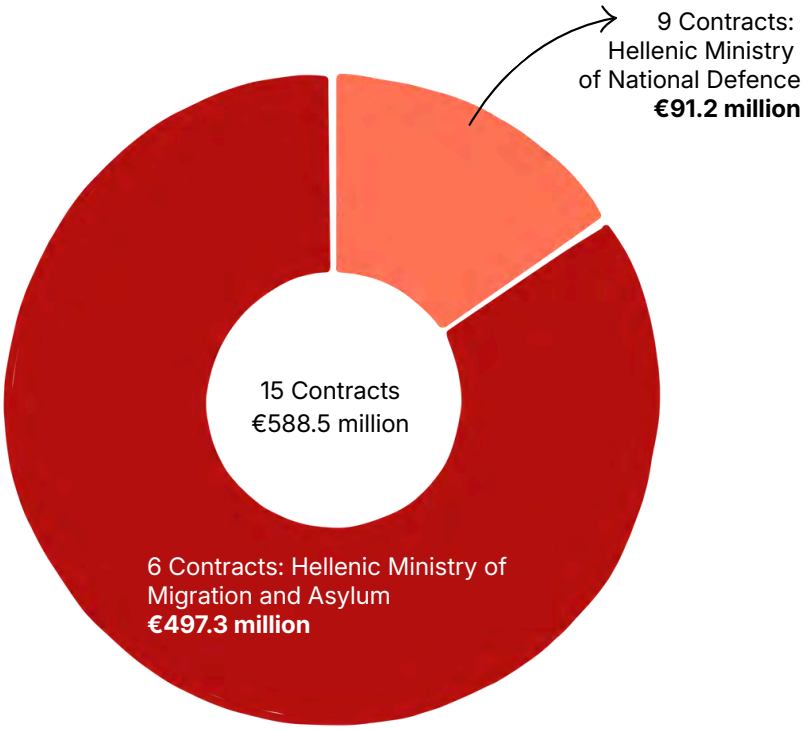


Figure 17: *Distribution of National Framework Agreements by Ministry*

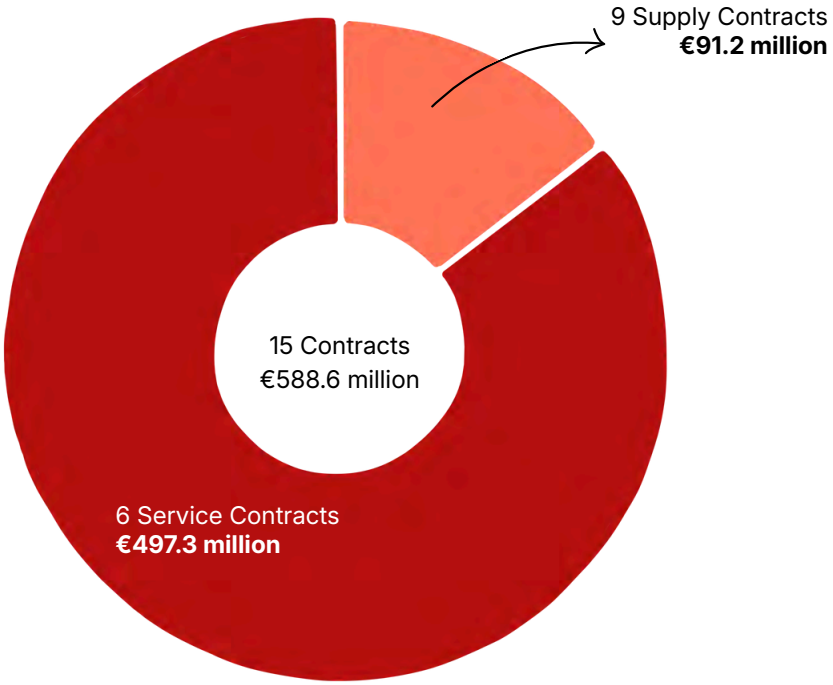


Figure 18: *Distribution of National Framework Agreements by Type of Provision*

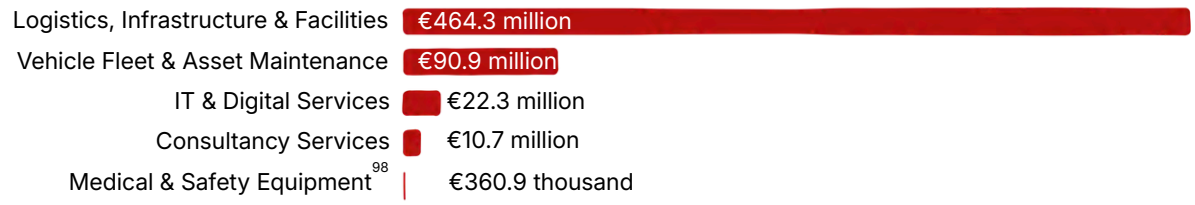


Figure 19: *Distribution of National Framework Agreements by Category*

Framework Agreements

For the time period examined, 15 framework agreements were identified that the Ministries of Migration and Asylum and National Defence entered into with 30 different entities, for a total value of **€**588 million. No relevant framework agreements were found with the Ministries of Citizen Protection and Maritime Affairs.

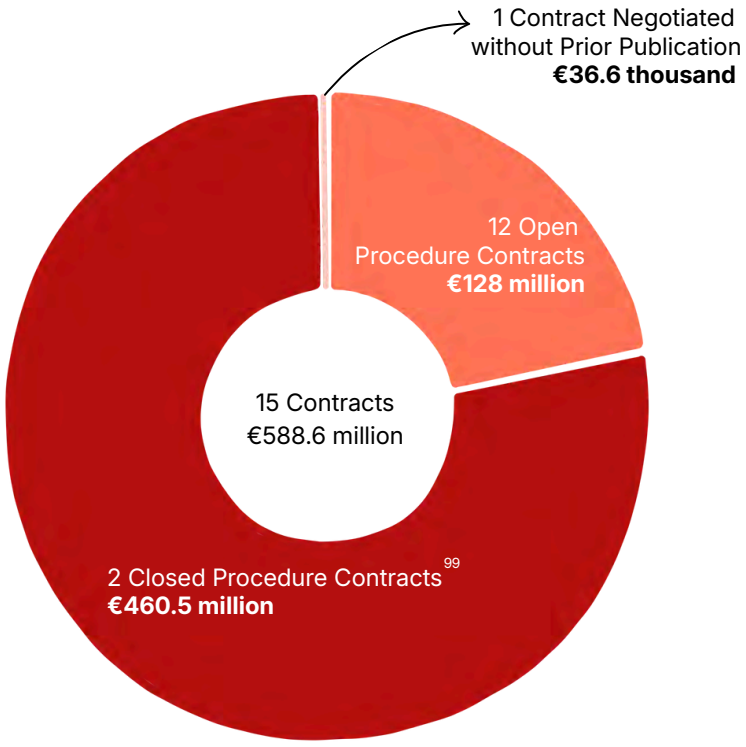


Figure 20: *Distribution of National Framework Agreements and Amount Awarded by Type of Tender and Procedure*

[98] Including three framework agreements with a single company, Lalizas, for the provision of life-rafts and life-jackets to the Navy (€266,324); contract nos. 21SYMV009061053, 21SYMV009320788, 20SYMV007909151 (see Case Study, *Pushbacks*).

The Contractors (National Framework Agreements)

The 15 framework agreements entered into involve 30 different companies, all of which are based in Greece. Notably, many of the contracted Greek companies are part of large Enterprise Groups, which are owned by multinational firms with cross-national operations. Eleven of the 30 entities listed (Fig. 21) are from one single framework agreement to provide catering in the migrant camps around Greece.



***Figure** 21: Size Classification of Contractors in National Framework Agreements*



***Figure** 22: Distribution of National Framework Agreements and Amount Awarded by Size of Companies*

[99] Greek financial regulations governing contracts between private and public entities, at least in theory, remain quite strict with regard to the scope of the competitive bidding process under Law 4412/2016, which regulates public works, supply and service contracts in Greece, incorporating the European Directives 2014/24/EU and 2014/25/EU. Especially for agreements concerning EU fund allocations, normally competitive procedures should be followed and should be open to both local and international entities. The disproportionate amount of funds awarded through closed procedures includes approximately €400 million awarded through the framework agreement for providing catering to refugee camps, (Contract no. 21SYMV009246455, see also Case Study, *Catering*), and approximately €50 million awarded for providing maintenance in refugee camps (Contract no. 21SYMV009290080, see also Case Study, *Camps*) .

National Standalone and Implementing Agreements

In total, 401 relevant standalone and implementing contracts were identified, amounting to more than €435 million awarded, which also corresponds to nearly €7.7 million in taxes (i.e. value-added tax (VAT) and other taxes).[100]

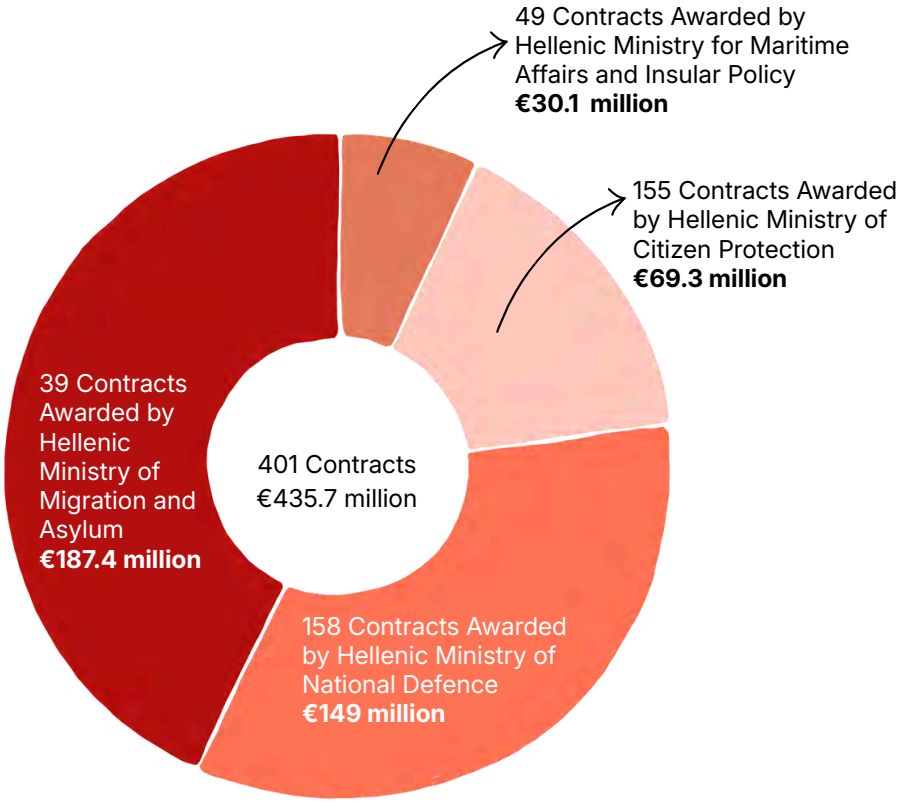


***Figure** 23: Distribution of National Standalone and Implementing Agreements by Ministry*

[100] The total expenditure of the standalone and implementing agreements examined and uploaded to our searchable database are less than that for the framework agreements identified in the national context. This is due in part to the fact that several relevant framework agreements covered multiple locations and involved separate contractors operating in those different locations. In examining implementing and standalone agreements, we were able to further narrow down individual contracts to the local context on Lesvos. For example, the €412 million framework agreement entered into by the Ministry of Migration of Asylum to provide catering services was made with 11 different contractors, covering 6 different camps throughout Greece. Given the scope of our research, only the agreements associated with catering in Lesvos were included in our findings here. Additionally, as discussed further above, implementation agreements are more likely to be excluded from public disclosure than their more general parent framework agreements.

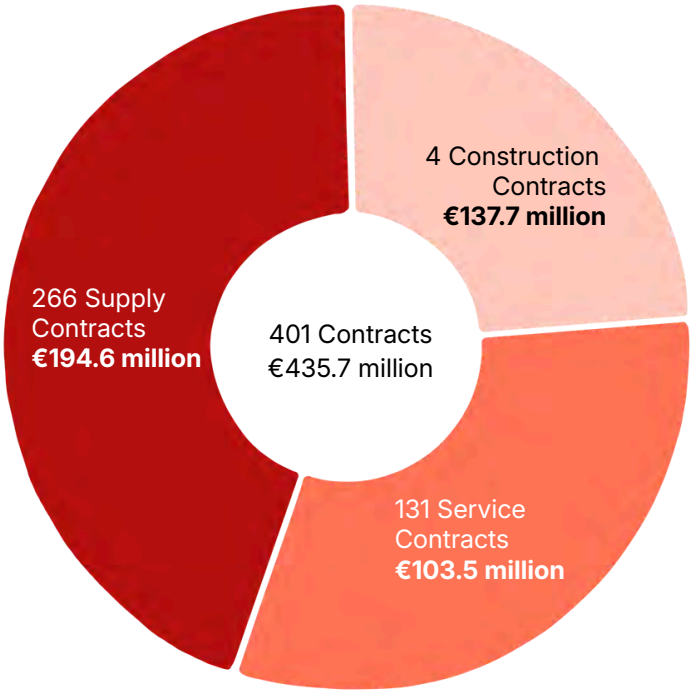


***Figure** 24: Distribution of National Standalone and Implementing Agreements by Type of Provision*

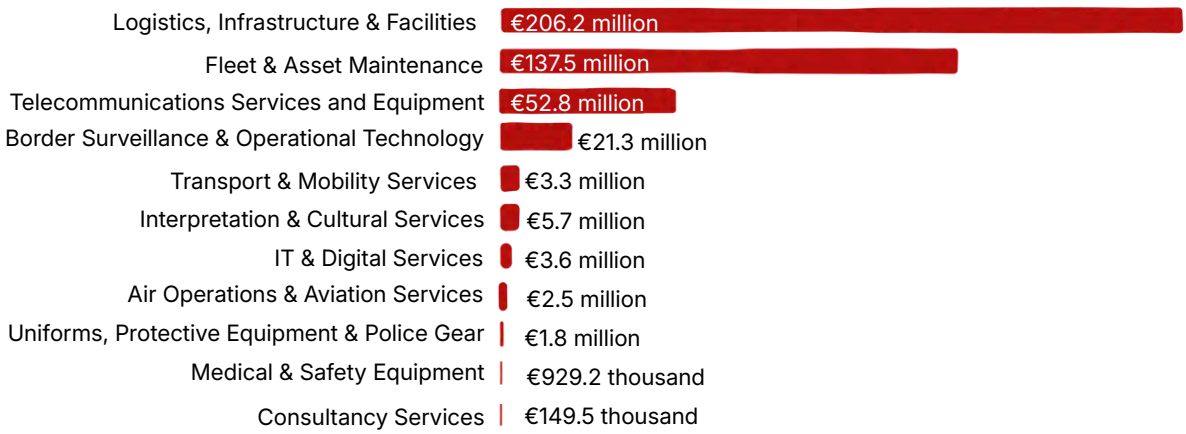


***Figure** 25: Distribution of National Standalone and Implementing Agreements by Category*

[101] Direct agreements are allowed by the Greek financial regulations for contracts under foreseen threshold values, or in exempted cases under a state of emergency.



***Figure** 26: Distribution of National Standalone and Implementing Agreements by Type of Tender Procedure*

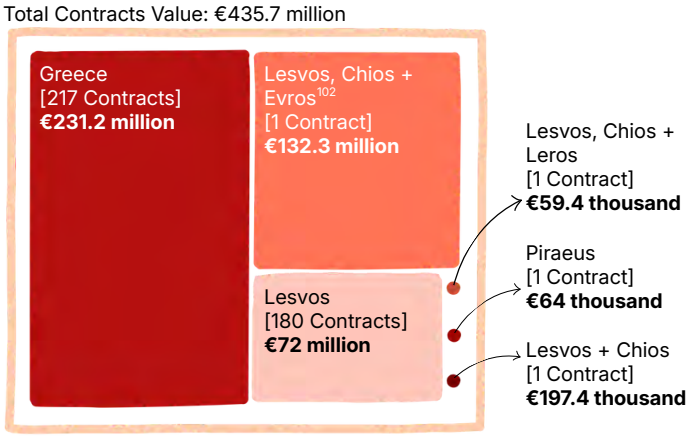


***Figure** 27: Distribution of National Standalone and Implementing Agreements by Place of Contract Performance*

The Contractors (National Standalone and Implementing Agreements)

The 401 standalone and implementing agreements awarded involve 185 different individual contractors, 182 of them based in Greece, 60 of which are based in Lesvos. While **SME**s constitute the majority of participating contractors, procurement expenditure remains highly concentrated among a relatively small number of large enterprises. (Fig. 27-31)

[102] This contract is regarding the construction of two new Closed Controlled Access Centres (CCACs) in Lesvos and Chios, and the renovation of the old reception centre of Fylakio in Evros, of which nearly €80 million was allocated for the construction of Vastria CCAC in Lesvos (Contract no. 21SYMV009800187, see Case Study, *Camps*).

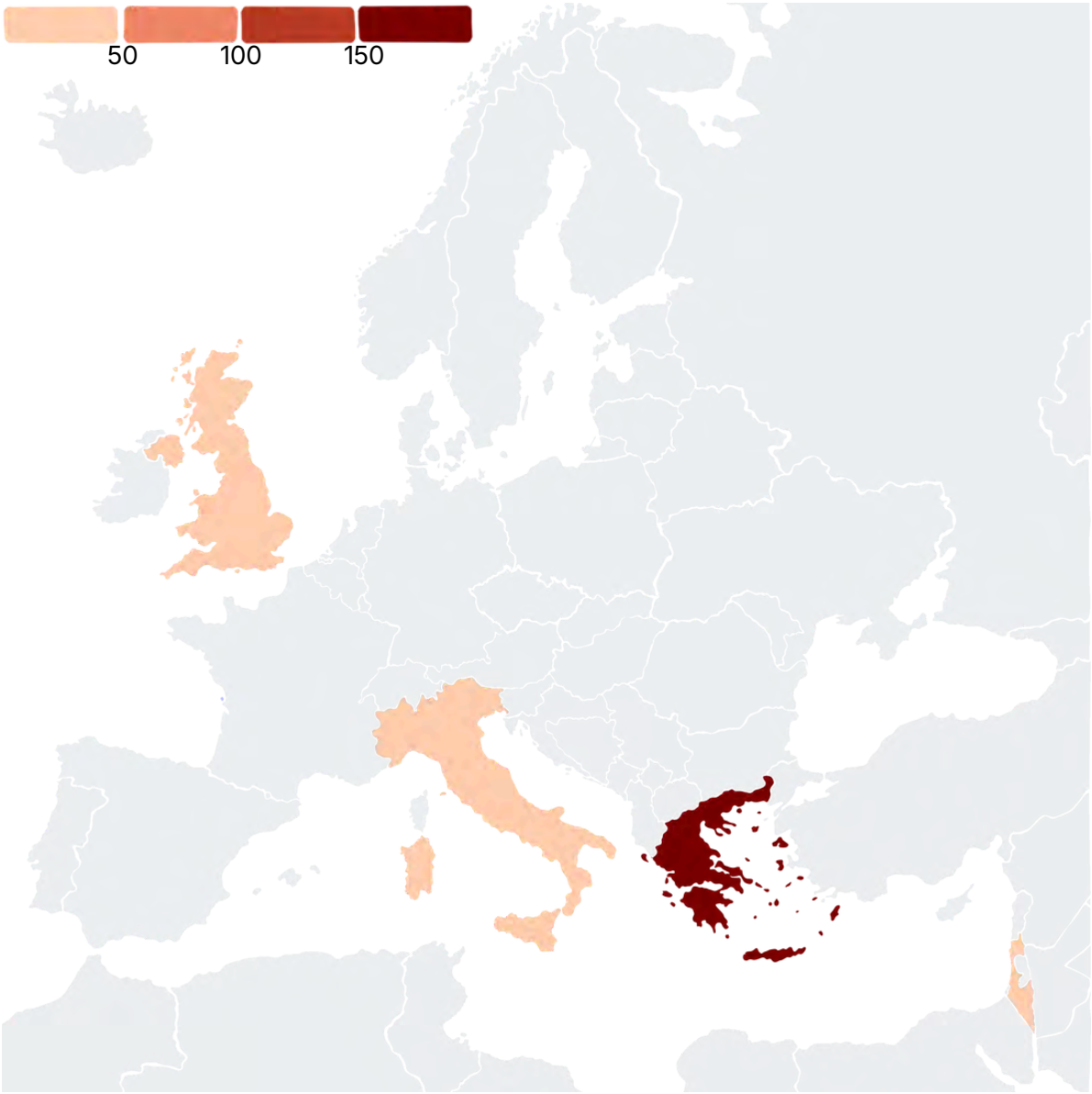


Figure 28: *Location of Greek Ministry Contractors*

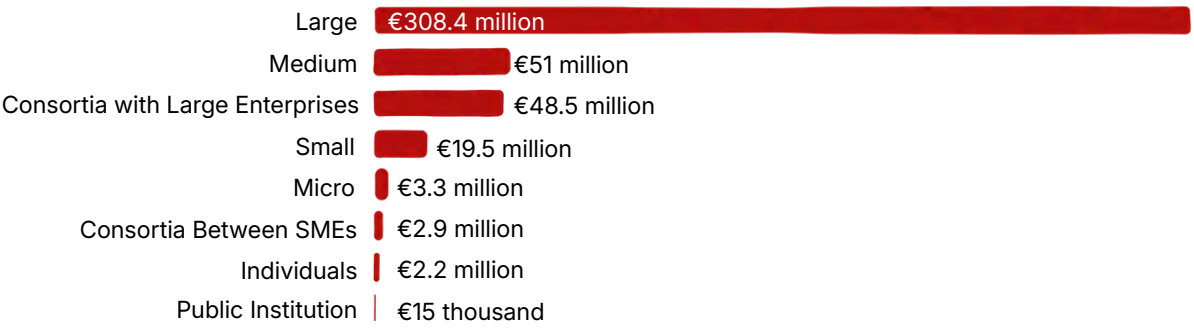


Figure 29: *Distribution of National Standalone and Implementing Agreements and Amount Awarded by Size of Companies*

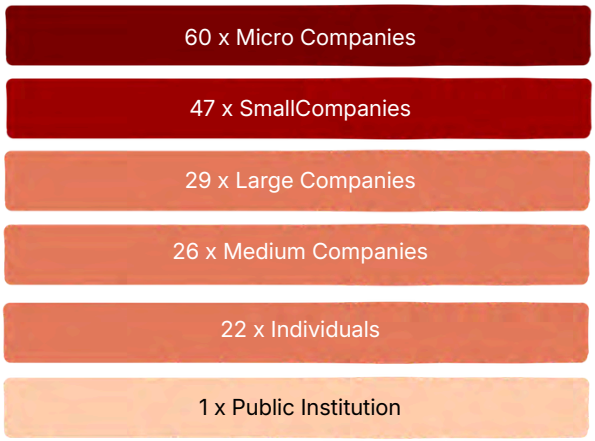


***Figure** 30: Distribution of National Standalone and Implementing Agreements by Size of Company*



***Figure** 31: Distribution of Contracts to Lesvos-based Companies*

3.3 Trends in EU and Greek Border Privatisation

In this Chapter, we described the anatomy of the border industry on Lesvos at a key moment in time. From our analysis of these 554 of contracts and 289 contractors, we found:

A clear shift towards technological forms of border control and surveillance: Surveillance, digital technologies to 'manage' the movement of people, and security infrastructure are a major sector of privatisation within border governance (Figs. 3, 10, 19, 25), which are increasingly linked to tech corporations. Indeed, at the European level, Frontex's private contracts are mainly for surveillance technologies and operational equipment, including airborne surveillance. National procurement includes surveillance technologies in addition to telecommunications, digital systems, radar, and border monitoring equipment (Figs. 3, 10; Case Studies, *Pushbacks* and *Surveillance*).

Largescale outsourcing of labour and services integral to the functioning of the EU and the Greek government. The data demonstrate the extent of outsourcing within the

border regime in Lesvos, in particular for the provision of services to public authorities (Figs. 2, 9, 18, 24). Private companies increasingly provide a variety of services, including consultancies, security, transport, catering, and interpretation—large scale staffing that is integral to maintaining the border regime (Figs. 3, 10, 19, 25).

Millions awarded to private actors in closed procurement procedures. Although open procurement procedures were widely used at both the European and the national level, a significant proportion of expenditure was awarded through closed, negotiated, direct, or other procedures that did not involve open competition (Figs. 4, 11, 20, 26). At the national level, 12 of the 15 framework agreements were awarded through open procedures; however, these represented only 21.8% of the total euro value of framework agreements (Fig. 20). The two closed procedures accounted for 78.2% of planned expenditure, largely because one contract—the €412 million catering framework agreement —was made through a closed procedure. The use of such closed procedures, whether justified by invoking 'emergency' exceptional circumstances or other legal provisions, raise serious questions of transparency and fairness (See Case Study, *Catering*).

Funds were concentrated in Large Companies and Multinational Corporations: At both the national and European level, funds are concentrated in large corporations. In EU contracts, 83-86% of funds were awarded to large companies or consortia including large companies (Figs. 7-8, 14-15). In national level contracts, the concentration of funds in large companies is even more apparent, with 99% of funds awarded through framework agreements awarded to large companies or consortia involving large companies (Fig. 21-22), and 80% in national implementing and standalone agreements (Figs. 29-30). SMEs constitute the majority of suppliers to the Greek ministries, but are primarily involved in lower-value contracts and collaborative consortia (Figs. 21-22, 29-30). These findings reveal a clear distinction between participation and economic benefit. SMEs account for around half of the contractors in EU procurements and more than 70% in Greek implementing contracts, yet receive a much smaller percentage of the total procurement value, with most of this latter amount going to medium-sized companies. Micro and small enterprises received only a marginal proportion of total expenditure.

The border regime in Lesvos generates revenues and profits for companies that are neither Lesvos-based nor Greek-owned. A vast majority of the privatised funds allocated to border operations go to companies that are not based in Lesvos (Figs. 6, 13, 16, 28, 31). EU agencies contracted companies from numerous European countries and Israel, with the largest contract values awarded to companies headquartered in economically stronger Member States, like Germany and Poland, while firms from peripheral regions mainly participate through lower-value operational services (Figs. 6, 13, 16). The Greek Ministries, on the other hand, largely contract Greek companies (Fig. 28). However, whilst one-third (60) of the 185 Greek companies and individuals identified are based in Lesvos, they receive only a small proportion (14.3%) of the total funds awarded by the Greek government (Fig. 31).

€152 million were directed for implementation in Lesvos, with €62.5 million invested in locally based businesses and entities. Because the border-industrial complex operates across multiple geographic scales, local economic impact is difficult to accurately assess. EU agencies and national ministries enter into contracts with multinational corporations and with local actors alike on Lesvos. However, publicly available procurement data do not reveal the full chain of relationships between contracting authorities, primary contractors, and subcontractors, making it difficult to trace where public funds ultimately flow, as well as the extent of participation of local actors. Subcontracting is very common in the border industry, covering areas from construction and maintenance to the provision of health care; anecdotal information indicates that the number of local companies and professionals who benefited from the border economy is considerably higher than the figures reported here.

Similarly, because the place of performance of many contracts is across several countries, or on a national scale, it is difficult to establish precisely how much expenditure ultimately reaches Greece and, more specifically, Lesvos. The figures for contracts identified as locally implemented in Lesvos are therefore a low estimate of the private economic activity associated with the border regime on Lesvos, rather than a comprehensive account of its total value. Nevertheless, expenditure of nearly €152 million[103] implemented exclusively on Lesvos indicates the significant scale of local

[103] This includes €72 million awarded in contracts whose place of performance was Lesvos, in addition to nearly €80 million awarded to build the Vastria CCAC in Lesvos, as part of a larger contract to build closed camps around Greece.

economic activity generated by border governance on the island (Fig. 27). This economic investment, which includes contracts worth approximately €62.5 million with local businesses and individuals (Fig. 31), contributes significantly to the local economy, and to local economic investment in the continuation of border management policies.



***Photograph** 4: HCG Vessel on the seafront of Mytilene at night.*

Anonymous photographer. Courtesy Aegean Migrant Solidarity

4. Analysis: Case Studies

This section offers four examples of how the Border Industry database might be used to enable analysis of specific incidents, practices, or locations. Lesvos has served as a staging ground for various iterations of encampment, enclosure, compulsory expulsions, and selective abandonment. We selected four Case Studies, each one demonstrating a different way of using the database to document and challenge state-business complicity in human rights violations in Lesvos: Pushbacks, Camps, Catering, and Surveillance.

4.1 Case Study 1: Pushbacks

This case study has two aims: first, to demonstrate how the Border Industry database can be used to connect private sector procurement to documented incidents of human rights infringement; second, to provide empirical evidence of private sector complicity in illegal pushbacks on and around Lesvos.

Connecting distinct contracts to enforcement actions and to specific events allows us to make visible the wider webs of complicity involved in human rights abuses at sea in the Aegean. To map these connections, we searched the Border Industry database for terms related to materials and staff documented in Greek government pushback cases between Lesvos and Türkiye. We then identified service and supply contracts delivering these items, excluding framework agreements to prevent double counting (see Section III, *Mapping the Border Industry*). We then added the total contract values for each category type. Below, we describe the components of this wider pushback infrastructure documented in the Border Industry database, totalling **€370,835,791.**

Contextual Background

For several decades, Greek authorities have carried out clandestine and illegal pushbacks, or collective expulsions of migrants towards Türkiye, be it across the

Evros/Meriç river land border or in the Aegean sea.[104] This illegal practice intensified drastically in March 2020 in the Aegean region, and has become consistent and systematic since then, occurring on a regular basis as a routine and widely tolerated border policy.[105]

Documented cases of pushbacks consistently reveal a pattern of multiple human rights violations, in addition to the summary and forced removal of a person seeking asylum. Collective expulsions frequently expose migrants to fatal and life-threatening situations through activities that include the disabling of migrants' vessels, the towing of damaged boats, abandoning individuals in motorless, inflatable life rafts, and leaving them adrift in the Aegean Sea without a means to navigate or call for rescue. These practices violate the state's positive obligation to protect the right to life under Article 2 of the ECHR. Pushback operations are frequently accompanied by physical violence, including beatings, kicking, choking, threats with firearms or batons, and the use of excessive force, as well as degrading treatment and intimidation. Survivors consistently report deprivation of food, water, sanitation, shelter, medical care, and exposure to extreme weather conditions and prolonged abandonment at sea. This state conduct constitutes deliberate inhuman treatment causing significant and cruel suffering with the purpose to punish, intimidate or discriminate against migrants at Greece's border, amounting to a form of torture under Greek and international law.[106] Individuals are denied access to any domestic legal procedures, including registration of their arrival in Greece, asylum procedures and any individual assessment of their protection needs, in violation of the prohibition of collective expulsion and the principle of non-refoulement.[107]

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[104] See Amnesty International, *FRONTIER EUROPE: Human Rights abuses on Greece's border with Turkey* (July 2013); ProAsyl, *Pushed back: systematic human rights violations against refugees in the Aegean sea and the Greek–Turkish land border* (November 2013); Human Rights Watch, *Greece: Attacks on Boats Risk Migrant Lives* (22 October 2015); Human Rights Watch, *Greece: Violent Pushbacks at Turkey Border – Summary Returns, Unchecked Violence* (18 December 2018); Greek Council for Refugees, ARSIS-Association for the Social Support of Youth, and HumanRights360, *The New Normality: Continuous Push-backs of Third Country Nationals on the Evros River* (2018); Mobile Info Team, *Illegal Pushbacks at the Border: Denying Refugees the Right to Claim Asylum* (2019); Forensic Architecture, *Pushbacks Across The Evros/ Meriç River: The Case Of Ayşe Erdoğan* (2020); Legal Centre Lesvos, *Collective Expulsions Documented in the Aegean Sea: March-June 2020* (2020); Legal Centre Lesvos, *Crimes Against Humanity in the Aegean* (2021).

[105] National Commission of Human Rights, Recording Mechanism of Informal forced returns, *Annual Report 2024* (August 2025); Greek Ombudsperson, *National Mechanism for the Investigation of Arbitrary Incidents (EMIDIPA), Special Report 2022* (2023); Office of the High Commissioner for Human Rights (OHCHR), *Greece: UN experts call for safe, impartial border policies and practices* (2023); Human Rights Council, *Human rights violations at international borders: trends, prevention and accountability: Report of the Special Rapporteur on the human rights of migrants, Felipe González Morales* (2022); UNHCR, *UNHCR warns of increasing violence and human rights violations at European borders* (2022); Forensic Architecture, *Driftbacks in the Aegean* (2023).

[106] Legal Centre Lesvos, *Submission to the UN Special Rapporteur on Torture about Pushbacks in the Aegean* (2022)

[107] ECCHR, *Analyzing Greek Pushbacks: Over 20 Years of Concealed State Policy Without Accountability* (2022).

Despite the mounting available evidence, the illegal practice of pushbacks remains largely unchallenged and continues until today. Greek authorities, supported by EU institutions, have unconvincingly tried to deny and cover-up the reality of pushbacks, often instrumentalising and displaying examples of life-saving activities of the Hellenic Coast Guard (HCG) . Two recent decisions of the European Court of Human Rights found that Greece is carrying out pushbacks in both the Aegean and Evros/Meriç region in a systematic way.[108] In March 2026, French courts opened an investigation into former Frontex director (2015–2022) Fabrice Leggeri, for crimes against humanity, including systematic support for pushbacks.[109] Despite growing judicial recognition of human rights violations in Greek border and Frontex operations, the ongoing and routine nature of these violations underscores the limitations of existing accountability mechanisms in challenging the *modus operandi* of collective expulsion.

Calculating the Cost of Pushbacks

Pushbacks often occur out of sight, at night and at sea; nevertheless, several incidents have been well-documented through forensic reconstructions, including one by two individuals who were unlawfully detained and forced to support the Greek police (EL.AS.) in carrying out pushbacks in the Evros/Meriç region over a three month period.[110] The Legal Centre Lesvos has collected over 50 testimonies during this period, giving us detailed descriptions of how pushbacks happen and what materials are used. Whilst pushbacks carried out in the Aegean region may include two to three HCG vessels, each operation relies on a broader persistent infrastructure of aerial and land surveillance, rescue dinghies, additional HCG ships (with all of their equipment), and fuel and tow ropes, all of which is required to enable the pushback to take place. Pushbacks of landed asylum-seekers require further support: police vans, detention spaces, communication and surveillance technologies, arms, ammunition and fuel. From detection to expulsion, pushbacks rely on a wide range of contracts between Frontex,

[108] European Court of Human Rights, *A.R.E. v. Greece, App. No. 15783/21, Judgment of 7 January 2025*; European Court of Human Rights, *G.R.J. v. Greece, App. No. 15067/21, Decision of 3 December 2024*.

[109] Julia Pascual, *Why former Frontex chief Fabrice Leggeri is under investigation for complicity in crimes against humanity* (Le Monde, 25 March 2026). "During [Leggeri's] tenure, 25,000 civilians were killed by drowning in the Mediterranean; tens of thousands of others were abducted from EU soil and abandoned at sea by EU agents; tens of thousands of others were captured and forcibly transferred to torture camps in Libya. This mass violence amounts to the crimes against humanity of murder, rape, torture, enslavement, deportation, persecution, enforced disappearances, imprisonment, and other inhuman acts." (front-LEX, *front-LEX files to join the case against Fabrice Leggeri, former Head of Frontex, accused of Crimes Against Humanity* [2026].) Leggeri is currently a Member of the European Parliament with the French far-right party *Rassemblement National*.

[110] Solomon, *100 Days: Refugees forced to return refugees to Evros* (21 May 2026); see also Bashar Deeb, *Samos And The Anatomy Of A Maritime Push-Back* (Bellingcat, 20 May 2020); Anna Gruber, Joana Blau Vilagrasa Palares, and Noah Hatchwell, *Aegean Sea Border Incidents Report* (Collective Aid, 25 March 2026).

the Ministry of Migration and Asylum, the Ministry for National Defence, the Ministry of Civil Protection, and the Ministry of Maritime Affairs and Insular Policy. Below, we calculate the cost of these components and show how the Border Industry database allows us to document private sector complicity in pushback operations.

Surveillance and Detection

Frontex, the HCG, EL.AS., the Greek Army and Navy cooperate through a vast surveillance infrastructure that includes but far exceeds Lesvos and its surrounding waters. Unmanned and manned aerial surveillance across the region can be used to identify migrants at sea. Supply contracts for unmanned aerial surveillance equipment totalled €4,635,800,[111] while service contracts for unmanned aerial surveillance totalled €128,043,770, including a €50 million cascade framework agreement with German company Airbus, which listed Israeli company Elbit Systems as second ranked approved contractor.[112] Manned aerial surveillance primarily consisted of remote operation of aircraft and included service contracts totalling €212,174,830.[113]

On the land and in the water, Frontex and Greek authorities patrol and manually search for arriving boats. Contracts in the database documented spending €12,257,082 in additional surveillance systems, including electro-optical systems mounted on vessels, thermal cameras for medium- and long-range detection, handheld thermal cameras, night vision goggles, carbon dioxide detectors, underwater drones, mobile units that scan vehicles to detect hidden persons, and service contracts to operate them.[114] This capacity is supported by a consolidated border surveillance command centre at Camp Papagos in Athens, overseen by the Greek military (€2,493,995).[115] Detection technologies require analysis and visualisation software, such as upgraded geoinformatics software costing €313,260.[116]

[111] Contract nos. 234545-2021, 21SYMV009068769, 22SYMV011100998, 21SYMV009490052,21SYMV008553457, 20SYMV007358051, 22SYMV010264742, 22SYMV011105056, 22SYMV011102136, 20SYMV007670279, 21SYMV008539399, 20SYMV006926086, 21SYMV009461520, 20SYMV007607108, 21SYMV009183540.

[112] Contract nos. 696738-2022, Frontex/OP/888/2019/JL/C G, Frontex/OP/888/2019/JL/ CG, Frontex/OP/888/2019

[113] Contract nos. 395424-2021, 395423-2021, 345667-2022, Frontex/OP/694/2020 Lot 2 and 3 (4 contracts), Frontex/OP/932/2018 Lot 1,2,3,5,6 (3 contracts).

[114] Contract nos. Frontex/OP/48/2019, Frontex/OP/48/2019, 577/2020, 20SYMV006161065, 21SYMV008013779, 21SYMV009065654, 22SYMV010527015, 22SYMV010537622, 22SYMV010591417, 21SYMV009145545, 21SYMV008309344, 22SYMV010638235, 22SYMV010593450, 20SYMV007201931, 21SYMV009417285, 22SYMV010583734, 20SYMV007184791 ,20SYMV007209208, 20SYMV007196940 , 22SYMV011566327, 22SYMV011028115, 20SYMV007673821.

[115] Contract no. 21SYMV009033920

[116] Contract no. 22SYMV010134670

In addition, communication infrastructure links these technologies and enables pushback operations from beginning to end. Whilst telephones, mobiles, radios, and satellite phones are part of 'normal' Coast Guard and Navy operations, the number and scale of contracts in the Border Industry database point to a rapid expansion of capacity during the period under study (2020–2022). Alongside the expanded surveillance capacity enabled by the contracts summarised above, this communications infrastructure is a critical component of the infrastructure of pushbacks in the Aegean Sea.

Land Vehicles

In the Aegean region, migrants have been apprehended on Greek islands and returned to sea to drift until rescued by the Turkish Coast Guard. Vans, trailers and other vehicles are used to move HCG, Frontex staff, and EL.AS. around the island, and they are important infrastructure for containing and excluding migrants arriving by sea. Procurement during our period of research included purchase of sedan-style patrol cars (€117,013), vans and trailers explicitly purchased to transport migrants (€1,814,000), as well as lease agreements (€1,666,327), transfer services between locations (€313,374), and blue-light bars to identify these vehicles as law enforcement (€55,000).[117]

Boats

HCG and Navy ships serve many purposes in the Aegean Sea, from rescue to 'national security'. But they also are the central actors in Greece's pushback infrastructure in the Aegean. HCG ships have been documented attacking migrant boats including by using live ammunition, using their wake to push rafts back into Turkish maritime territory, in addition to transporting migrants back towards Türkiye and abandoning them at sea.[118] The HCG has been implicated in the deaths of hundreds of migrants attempting to cross the Aegean, including the over 600 people killed in the deadly Pylos shipwreck (14 June 2023), widely denounced as a state crime.[119]

Our research revealed a host of contracts procuring equipment for HCG and Navy ships,

[117] Sedan-style cars contract no. Fontex/OP/529/2017 Lot 1. Vans and trailers contract nos. Frontex/OP/810/2018 (3 contracts). Lease agreements contract nos. 2022/0483, 2022/0436. Blue-light bars contract no. 805/2021.

[118] Niamh Keady-Tabbal and Itamar Mann, , *Tents at Sea: How Greek Officials Use Rescue Equipment for Illegal Deportations* (Just Security, 22 May 2020); Gruber at.al., *Aegean Sea Border Incidents Analysis Report*; see also, note 105.

[119] Legal Centre Lesvos, *Pylos Shipwreck: Criminal Prosecution on Felony Charges against the Current Head of the Coast Guard and Senior Members of Its Leadership* (November 9, 2025); BBC, *Dead Calm: Killing in the Med* (2024); Legal Centre Lesvos, *Mapping Fatal Border Crossings* (Google My Maps, accessed September 14, 2026).

as well as procuring more boats and ships for the explicit purpose of policing migration and borders. These included small patrol boats and inflatable rafts with outboard motors, as well as larger vessels, totalling €1,087,570.[120] It is expected that if our research was to be expanded to subsequent years, spending on vessels would significantly increase, as over the last number of years there has been a remarkable renewal and expansion of the HCG's fleet.[121] Supply contracts for spare parts, electrical systems, and maintenance totalled €5,587,681.[122]

Life Rafts

Life rafts and life jackets are ubiquitous on coast guard and navy vessels, but our team found contracts for specific "wind life rafts," which refer to the tent-style rafts documented in pushbacks during this period. Images of liferafts used in documented pushbacks[123] match advertising images on Lalizas website,[124] indicated by the position of the brand-name and person limits printed above the raft opening. Previous reports have also linked Lalizas to pushbacks in 2020.[125] Contracts in the Border Industry database document spending of €19,800 on Lalizas life rafts.[126]

Ropes and Cables

Once refugees are apprehended, the HCG places them on life rafts and uses ropes and cables to tow them towards Turkish waters. The Department of Defence signed two supply contracts for cables for Navy vessels in April and October of 2020 totalling €137,734,[127] whilst the Hellenic Coast Guard also signed two supply contracts for ropes and cables in February and August 2020 totalling €118,555.[128] Aligning with the documented increase in pushbacks in early 2020, the contracts were assigned to two different companies with the same company, Katradis VEP S.A. and D.Koronakis AVEE.

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[120] Contract nos. 22SYMV010456167, 20SYMV006596498, 21SYMV008577290, 21SYMV008577223.
[121] Hellenic Coast Guard, *Hellenic Coast Guard: The Way Forward* (2025), 3–5; DEFEA, *Hellenic Coast Guard Requests Information for Two Offshore Patrol Vessels over 80m* (May 2025).
[122] Contract nos. 20SYMV007688856, 20SYMV007687540, 20SYMV006664424, 20SYMV006664109, 20SYMV007289358, 20SYMV006469243, 20SYMV006471351, 20SYMV007642215, 20SYMV007660493, 20SYMV007671674, 21SYMV008755006, 21SYMV009425847, 21SYMV008751720, 20SYMV006959938, 20SYMV007446733, 20SYMV006800560.
[123] Turkish Coast Guard Command, *25 Irregular Migrants Were Rescued Off the Coast of İzmir* (May 15, 2020).
[124] LALIZAS, "Liferafts"(accessed September 14, 2026).
[125] Keady-Tabbal and Mann *Tents at Sea*.
[126] Contract no. 22SYMV011633517
[127] Contract nos. 20SYMV007228208, 20SYMV006697490.
[128] Contract nos. 20SYMV006348435, 20SYMV007203051.

Connecting the Contracts

The Border Industry database enables us to trace funding sources for materials used in pushbacks, as well as contractors benefitting from these procurement and service contracts. Using rafts, flares, food packets, and flotation devices in pushbacks, the HCG and Navy have weaponised materials traditionally used in life-saving and search-and-rescue to service anti-migration geopolitics in Europe. Thus, a broad range of contractors and industries are drawn into pushback operations that continue to cause deaths at sea.[129] These service and supply contracts, entered into when contractors knew or should have known of their intended unlawful use, implicate the companies themselves in documented human rights abuses. While outside the scope of the current report, future research and litigation could explore corporate liability for participating in known and documented harms.

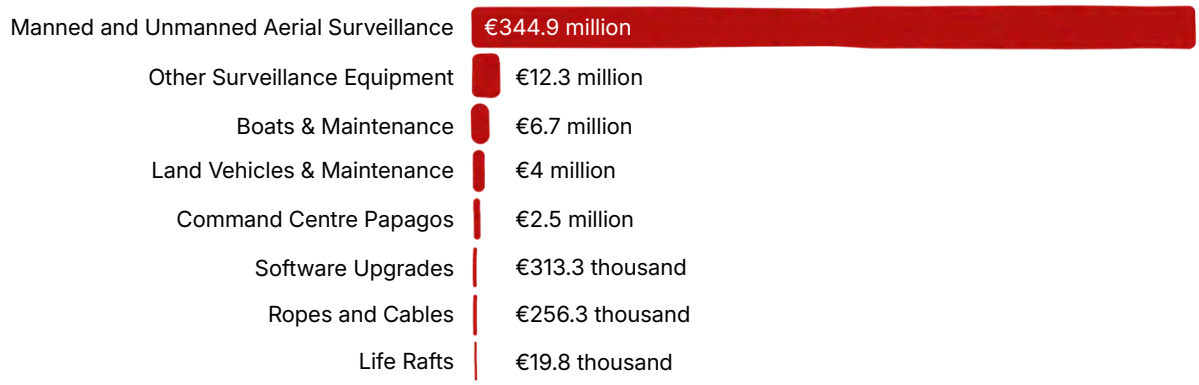


***Figure** 32: Allocation of funds contributing to Greece' pushback operations*

[129] Gruber at.al., *Aegean Sea Border Incidents Analysis Report*; see also note 120.



***Photograph** 5: Vastria camp, aerial view.*

Anonymous photographer. Courtesy Aegean Migrant Solidarity

4.2 Case Study 2: Camps

It has become a taken-for-granted aspect of our social reality that people crossing borders without state authorisation, whether to seek asylum or not, and those who are found residing without state authorisation, are segregated in ever-more-remote, prison-like camps, where they are controlled, surveilled, and exposed to dangerous and degrading conditions, denied access to food, safe shelter, basic amenities, health care, education, and subject to violent policing. This case study analyses the contracts through which the expansion of containment on Lesvos is financed, constructed, governed, and legitimised. It becomes clear from this and the next case study on catering in the camps, that people encamped on Lesvos are commodified with huge profits going to corporations, companies, and private persons from the deprivation of freedom and the violation of migrants' lives and rights.

Camps on Lesvos proliferated in the period 2020-2022, and the legal justification for 'Closed Controlled Access Centres' was invented and codified,[130] exploiting the status quo of perpetual 'quarantine' the state instituted during the Covid-19 pandemic for encamped migrants.[131] We focus, in this case study, on three camps that officially operated during 2020-2022 on Lesvos: Moria, Kara Tepe/Mavrovouni, and Megala Therma; and one, now nearly built, whose construction was announced in 2021: Vastria. Importantly, other sites on the island have also been used as reception and/or detention centres during these years.[132] The pretext of the Covid-19 pandemic was used to operate unofficial 'quarantine' sites, for which contracts appear not to exist, and that are not included in this Case Study.[133] At the same time as this carceral infrastructure was being expanded, the state destroyed solidarity housing on Lesvos—including the PIKPA camp operating under a Non-Governmental Organisation (NGO)—and nationally—violently evicting self-organised housing squats in Athens and Thessaloniki and elsewhere—as well as closing the municipality-run Kara Tepe camp. It was also at

[130] Presidential Decree 77/2022, Government Gazette 212/A/17-11-2022, Establishment of Closed Controlled Structures (CCS) and suspension of Reception and Identification Centres (RICs) - Amendment of p.d. 106/2020 "Organization of the Ministry of Migration and Asylum" (A' 255), published on 17 November 2022 (in Greek).

[131] LCL and FAC, *A Pandemic of Abuses*.

[132] The operation of these 'unofficial' carceral sites was justified by the state under the pretext of different 'crises', such as the 'border crisis' at the Greece-Turkiye land border at the end of February 2020 and the subsequent one-month suspension of the right to asylum.

[133] LCL and FAC, *A Pandemic of Abuses*.

this time that the Ministry of Migration and Asylum gradually defunded and eventually closed the ESTIA housing support, which it had taken over from UNHCR by December 2020 and terminated in December 2022. The Ministry cited the 33 camps to which the more than ten thousand people in ESTIA apartments (60% of them in Athens) would now be forced to go, if they lacked other means.[134] The criminalisation of migrants and of solidarity on Lesvos (and nationally) lends an additional dimension to the policy of encampment, since providing housing or organising transport of people arriving on Lesvos to safe shelter became defined and prosecuted as criminal acts of facilitation.[135] Furthermore, the enactment of L. 5226/2025 turns undocumented entry/stay from an administrative infraction to a crime punishable by at least two years in prison and a fine of at least €5,000.[136]

Our analysis focuses on camps as a key geographic strategy for facilitating the EU's segregation and deportation projects and as an extractive mechanism of value. In what follows, we provide a systematic, albeit incomplete, picture of the financial flows underpinning containment on Lesvos, 2020–2022 (see *Methodology*). Specifically, we focus on the framework agreements and leases that were signed by corporate, private entities and natural persons, mainly with the Ministry of Migration and Asylum in this period (2020–2022), which give a durational understanding needed to analyse the economy of encampment and segregation on the island. In cases where only standalone agreements or service contracts exist, such as the contracts for chemical toilets and the provision of heating, we have included those. This analysis is based on our findings from searching the Border Industry database for keywords related to camps, such as: construction; fencing; camp management; infrastructure; security; cleaning; waste collection; heating; financial auditing; environmental consultancy; plumbing; electrical

[134] Ministry of Migration and Asylum, *The 'ESTIA' Asylum Seeker Accommodation Programme in Urban Apartments Has Been Completed* (2023).

[135] The publicised case of Dutch journalist Ingeborg Beugel, who was charged in June 2021 with facilitating the illegal stay of Fridoon, an asylum seeker from Afghanistan waiting to appeal a negative decision, who was later given asylum, whom she hosted in her home in Hydra. (Katy Fallon, *Greek Police Arrest Dutch Journalist for Helping Afghan Asylum Seeker* [The Guardian, June 24, 2021]). Ingeborg Beugel was initially found guilty and sentenced to suspended prison term in December 2024, and in November 2025 was acquitted on appeal of charges of facilitation and membership in a criminal organisation (NL Times, *Dutch Journalist Acquitted in Greece after Sheltering Afghan Refugee* [November 14, 2025]). It was reported that other islanders notified police that Ingeborg Beugel was 'harbouring' Fridoon, even though they never attempted to hide their relationship. As a journalist, she had confronted Prime Minister Kyriakos Mitsotakis in November 2021 about pushbacks, which he dismissed by telling her she had "not been to Samos," and attacked her, leading to further attacks on the street and threats that forced her to leave the country temporarily for her own safety, at the advice of the Dutch consulate (Thodoris Chondrogiannos, "*Dutch Journalist Subjected to Intimidation and Attacks after Questioning the Prime Minister about Pushbacks of Refugees,*" Govwatch, November 16, 2021]).

[136] L. 5226/2025 modifies the law of 2005 (Gov. Gazette A' 154/08.09.2025).

supply; chemical toilets; fire protection systems; and the lease of land on which camps are built and operated.

We found **15 contractors** whose companies were involved in the construction, operation, and management of the camps and **22 landowners** who leased land for camps on Lesvos amounting to a total of €**123,609,455** (see Fig. 33 below).[137]

Unsurprisingly, the lion's share of this amount, €109,283,621, went to three Large companies (GEK-TERNA Consortium, AKTOR S.A., and Grant Thornton Certified Public Accountants S.A.), with Natural Persons (the 22 individual landowners) collectively coming in second, were set to receive €9,384,627 in rent (over the foreseen span of up to a decade). Small enterprises were the most numerous classification represented amongst contractors (seven), valued at €3,869,114, whilst four Micro enterprises were contracted for €975,443 (see Figure 34 below).

As staggering a figure as €123,6 million is, this number is but a partial glimpse of the camps' financial landscape. In some cases, it was not specified in the contract the exact amount that was allocated to a camp on Lesvos; therefore, this amount was not included in our total calculations. Moreover, although we identified contracts for certain goods and services for some camps, such as chemical toilets, they are missing for others. We also did not locate contracts for other key elements, including containers, tents, or Rubb halls. This may reflect either limitations in the database (see Methodology) and/or the limitations of our own research process using the database. Furthermore, the figure we report does not include possibly the largest expense in camp operation: the salaries of personnel involved in camp operation and management (as the Border Industry database only includes contracts for public procurement) or procurement and salaries directly paid by UN bodies, such as UNHCR or IOM. These organisations, despite the central role they play in the developing border regime, are beyond the current scope of the Border Industry database and this research (see Methodology). What follows is an overview of the contracts and our analysis of our findings for each camp, in relation to the contract values for each category type and the broader human and environmental rights violations linked to them.

[137] Excluding VAT, which we estimate at approximately €29,320,612 for the contracts analysed in this Case Study. The standard rate for VAT in Greece is 24%; however, for certain economic activities on the island of Lesvos (as on the other so-called 'hotspot' Aegean islands), a lower rate of 17% applies.

Contractor	Amount (rounded to nearest euro)	Purpose	Classification of Enterprise size
GEK/TERNA CONSORTIUM	€104,381,660 [138]	Facilities management (cleaning, electrical, and plumbing) and security of KARA TEPE/MAVROVOUNI and MEGALA THERMA and construction of VASTRIA.	Large
22 individuals in Lesvos	€9,384,627 [139]	Leasing land for camps for up to 10 years VASTRIA (13 individuals); KARA TEPE (8 individuals); MEGALA THERMA (1 individual).	Natural persons
AKTOR S.A.	€4,879,361 [140]	Construction at MORIA (via a vague/unclear contract title) and KARA TEPE during the years 2020-2021.	Large
P. Vounatsos S.A.	€2,171,348 [141]	For the supply of litres of diesel and oil (drive) for KARA TEPE	Small
Kalales, Alexandros	€708,774 [142]	Cleaning and treatment of sewage systems lease of sewage vehicles	Micro
Express Facility Services Chaltsios	€633,832 [143]	Cleaning and waste collection services at KARA TEPE	Small
GEON WC	€567,225 [144]	Rental of chemical toilets for MORIA and KARA TEPE.	Small
Green Construction S.A.	€472,323 [145]	Fire protection system in VASTRIA.	Small
Ch. Politi Bros., G.P.	€210,071 [146]	For the supply of diesel and heating oil to MORIA	Micro
PLANET, S.A.	€96,650 [147]	Consultancy for the construction of KARA TEPE. Part of a total €5.000.000.00 contract for consulting on camp	Medium
Vareltzis, Dimitrios N. Earthworks, Building Materials	€50,598 [148]	Construction of MORIA Health Unit (fencing), never operational.	Micro
Grant Thornton Certified Public Accountants S.A.	€22,600 [149]	Financial auditing.	Large
K. Georgiou S.A.	€15,600 [150]	Fencing of KARA TEPE.	Small
N Koraka Bros. S.A.	€6,000 [151]	For the supply of biomass (olive seeds) for 3 heating burners at MORIA.	Micro
Stavrou Petros and Co. L.P.	€4,588 [152]	Consultancy for environmental issues posed by camp construction in VASTRIA. Part of a total €22.940,00 contract.	Small
N. Karagianni Bros./Samos Express	€4,198 [153]	Transfer of 500 mattresses from Samos KYT to KARA TEPE.	Small
TOTAL	**€123,609,455**		

***Figure** 33: Amounts (€) Awarded to Contractors/Lessors in Descending Order of Value (2020--2022)*

Moria Camp

2013--2020

Originally a Greek Army barracks, Moria was built and initially used as a reception and identification centre, which could fit approximately 180 people. Following the declaration of the so-called 'refugee crisis' in 2015, Moria was converted into an EU-funded hotspot for registration and detention from 2015 until 2020. At the start of 2020, there were 22,780 people made to live in Moria camp. Even as conditions deteriorated at Moria, the European Asylum Support Office (EASO) issued a procurement notice for further enclosure: a 2019 contract covered approximately 80 metres of NATO-type fencing with barbed wire at the hotspot.[154] Alongside the investment in perimeter enclosure, the allocation of resources for heating reveals a situation of calculated neglect. For the whole of 2020, a year in which the camp's population peaked at 22,780 people and during a global pandemic, the two contracts identified for heating fuel at Moria totalled €216,071 with two local, Lesvos-based micro-sized companies: €210,071 to Ch. Politi Bros. G.P.[155] and €6,000 to N. Koraka Bros S.A.[156] During the winter months on Lesvos, it

[138] Contracts nos. 21SYMV009290080, 22SYMV010124239, 21SYMV009800187.
[139] Contracts nos. ΩΙΑ046ΜΔΨΟ-3Χ6, ΩΗΑΝ46ΜΔΨΟ-051, ΨΥΓΝ46ΜΔΨΟ-ΤΛΒ.
[140] Contracts nos. 20SYMV007273417, 20SYMV007632067, 20SYMV007543263.
[141] Contracts nos. 21SYMV009829382, 21SYMV009103152, 21SYMV008683871, 21SYMV008533283, 21SYMV008492733, 21SYMV008354138, 21SYMV008163497, 21SYMV009339893, 21SYMV009480975, 21SYMV009658164, 21SYMV009013306, 21SYMV008848706, 20SYMV007938288, 20SYMV007929661, 20SYMV00737763.
[142] Contracts nos. 20SYMV007405348, 20SYMV007591304, 20SYMV006134888, 20SYMV006552712, 20SYMV006192673, 20SYMV006364940, 20SYMV006628779, 20SYMV006930593, 20SYMV007237311, 20SYMV007936972, 21SYMV008845317, 21SYMV008998217.
[143] Contracts nos. 20SYMV007738340, 21SYMV008321008, 21SYMV008516964, 21SYMV008685266, 21SYMV009124758, 21SYMV009414025, 21SYMV009489283.
[144] Contracts nos. 20SYMV006128943, 20SYMV006234176, 20SYMV006498512, 20SYMV006621573, 20SYMV006791686, 20SYMV006929115, 20SYMV007246690, 20SYMV007404281, 20SYMV007723858, 20SYMV007902190, 21SYMV008328766, 21SYMV008517052, 21SYMV008683839, 21SYMV008842542.
[145] Contract no. 25SYMV017769124.
[146] Contracts nos. 20SYMV006366184, 20SYMV006624332, 20SYMV006543114, 20SYMV007135898, 20SYMV006231526, 20SYMV006963755, 20SYMV006128862.
[147] Contract no. 21SYMV008003569.
[148] Contract no. 20SYMV007191159.
[149] Contract no. 21SYMV008163539.
[150] Contract no. 20SYMV007632115.
[151] Contract no. 20SYMV007774780.
[152] Contract no. 21SYMV008249051.
[153] Contract no. 20SYMV007743915.
[154] EASO, *Negotiated procedure for the procurement of construction works for a safe passage and emergency exit in Moria (hotspot), Lesvos | European Union Agency for Asylum* (2019).
[155] Contracts nos. 20SYMV006366184, 20SYMV006624332, 20SYMV006543114, 20SYMV007135898, 20SYMV006231526, 20SYMV006963755, 20SYMV006128862.
[156] Contracts nos. 20SYMV006366184, 20SYMV006624332, 20SYMV006543114, 20SYMV007135898, 20SYMV00006231526, 20SYMV006963755, 20SYMV006128862 and 20SYMV006134953,

is normal for temperatures to fall close to or below freezing. Despite these allocations of funds, people contained in Moria were not provided with adequate heating and were forced to rely on hazardous practices such as open fires, gas canisters, and improvised stoves to survive the cold and often freezing temperatures. This was not a novel or unforeseen risk, but was known to be dangerous as early as January 2017, when Ahmed Elgamal died of carbon monoxide poisoning from a makeshift heating device he had built to warm his tent; two other people died of the same cause in the same week. His family's subsequent lawsuit against the Greek state made explicit that the absence of adequate, safe heating in Moria was a foreseeable and foreseen cause of death.[157] The humanitarian response of 'winterisation',[158] in this context, functioned as a technology of governance in its own right: the systematic under-provision of heat, operating to keep people alive but exposed to premature death, transferred the burden and the risk of surviving winter and dying in it onto the camp residents themselves. This is one further, intimate aspect of the necropolitical logic that runs through Moria's history, a form of governance that operates not only through walls, fences, and detention, but through the calibrated administration of cold and the technocratic language of 'winterisation'.



***Figure** 34: Distribution of Contractors by Size and Amount (€)*

In July 2020, amidst the Covid-19 pandemic, the MSF health unit was forced to close by municipal authorities, after local authorities imposed fines and threatened criminal charges under urban planning regulations, shutting down the only Covid-19 isolation

20SYMV006366184.

[157] Yiannis Papadopoulos, *Seeking justice for Moria death,* (Kathimerini, 1 December 2018); Marion MacGregor, *Greek authorities accused over death in migrant camp*, (Infomigrants, 27 November 2018).

[158] Eric Reidy, *Winter warnings for Europe's largest refugee camp* (The New Humanitarian, 14 November 2019).

facility on the island.[159] A further illustration of the pattern of spending on containment at the expense of (health) care was the contract awarded on 17 August 2020 to Vareltzis N. Dimitrios Earthworks, Building Materials, a local, Lesvos-based company that specialises in wire fencing for €50.598,29, which indicates the purpose as a "health unit" at Moria.[160] Three days later, on 20 August 2020, another health clinic, managed by the Greek state and funded by the Dutch government, was *inaugurated* in Moria by the President of the Hellenic Republic, the Minister of Migration, and the Dutch ambassador. The so-called 'Dutch Hospital' never operated and burnt in the fire that engulfed Moria on 8–9 September 2020.[161]

Just prior to Moria's destruction, on 2 September 2020, a Greek construction company with a multinational presence, AKTOR S.A., signed a contract worth €689,025 for additional fencing works at Moria.[162] The following day (3 September 2020), the Greek authorities announced the total lockdown of Moria refugee camp, with entry and exit explicitly prohibited for the following 14 days for all persons other than security personnel, after the first person had tested positive for Covid-19 in the camp.[163] These expenditures of perimeter control, directly enabling the arbitrary detention and deprivation of liberty of tens of thousands of people in violation of Article 5 of the ECHR, compounded the organised abandonment of encamped people: inadequate sanitation despite more than €76,849 allocated to a local company, Kalales A., for the cleaning, waste collection, and maintenance of the sewage system; non-existent healthcare; violating rights to health and to life during the time of a global pandemic.[164]

[159] Medecins Sans Frontieres, *Greece: MSF forced to close COVID-19 centre on Lesbos* (30 July 2020).
[160] Contract no. 20SYMV007191159
[161] Legal Centre Lesvos, *Confirmation of Covid-19 in Moria camp leads to immediate transformation to a closed centre, following five months of deliberate failure of European member states to respond to foreseeable and preventable disaster* (3 September 2020).
[162] Contract no. 20SYMV007273417 and Stonisi, *Moria is being fenced in and closing* (3 September 2020).
[163] Legal Centre Lesvos, *Confirmation of Covid-19 in Moria camp*.
[164] Andriani Fili and Evgenia Iliadou, 'Unhealthy Immigration Detention: Exploring the role of public health structures in sustaining the Greek detention system' in F Esposito, A Lindberg and T Degenhardt (eds.), *Detention and Deportation in Europe: Analyses, Contestations, and Radical Visions in the Aftermath of COVID-19* (Bristol University Press 2026).



***Photograph** 6: Kara Tepe/Mavrovouni.*

Anonymous Photographer. Courtesy Aegean Migrant Solidarity

Lesvos CCAC (Formerly the `Temporary' RIC) in Kara Tepe/Mavrovouni 2020-present

Immediately after the Moria fire, Greek authorities established a replacement site for Moria at Kara Tepe/Mavrovouni, on a former military firing range beside the sea. This camp was erected in record time through 'constant construction works, despite knowledge that the site is *contaminated with lead* and therefore poses an acute health risk to all contained there."[165] Residents who had survived the fire at Moria were initially unwilling to enter the new site. Authorities distributed flyers and sent text messages in attempts to persuade people to move in. When this proved insufficient, EL.AS. launched a coercive operation, dispatching 'female officers' in protective suits to move 'women and children' into the tented camp and blocking roads to prevent departures from the island.[166] Residents who refused to register at the new camp faced the prospect of being left without any shelter or food assistance and were left fearing their exclusion from the asylum application process. During the police transfer operation, MSF tweeted that it was being denied access to its clinic at the site by Greek police.[167] By the time people began entering Kara Tepe/Mavrovouni, it was being described as 'the largest prison in Greece'.[168]

Less than 14,000 people ended up registering in the newly constructed camp in Kara Tepe/Mavrovouni, due to people leaving or being transferred off the island in the aftermath of the fire. Conditions in the new camp fell short of minimum standards of dignified living under Greek and international law, according to Refugee Support Aegean (RSA).[169] Residents also complained to the LCL team about "the frequent presence of dust in the air created by the permanent construction works and movement of trucks passing through the camp, which also contaminates their food and water."[170]

[165] Legal Centre Lesvos, *One year of Mavrovouni camp* (14 September 2021).
[166] Al Jazeera, *Greece: Police move refugees to new Lesbos camp after Moria fire* (17 September 2020) and BBC, *Lesbos: Greek police move migrants to new camp after Moria fire* (17 September 2020)
[167] "UPDATE: After several hours, we are finally able to reopen our clinic. The movement of people to the camp continues and we hope the situation won't degenerate. It's highly concerning that during police operation, MSF's provision of medical care was forced to interrupt." MSF Sea, "*Post*," (Twitter (Now 'X') 17 September 2020).
[168] Efsyn, *Kara Tepe: Overcrowding and complaints as Greece's largest prison fills up* (17 September 2020).
[169] Refugee Support Aegean, *Lesvos: What is happening today in the refugee structures on the Aegean islands* (2023).
[170] Legal Centre Lesvos, *One year of Mavrovouni camp*.



***Photograph** 7: Aktor at Kara Tepe, Funded by the EU.*

Anonymous photographer. Courtesy Legal Centre Lesvos

AKTOR S.A., already a prominent contractor at Moria, received €4,190,336 to upgrade facilities and infrastructure at Kara Tepe/Mavrovouni.[171] From the Border Industry database, we see how the actors profiting from the logic of containment move from one site to the other. The European Commission separately awarded €5.36 million to finance comprehensive upgrades to the 'temporary' camp.[172] Construction consultancy for the camp was provided by PLANET for €96,650, as part of a total €5,000,000 national consultancy contract covering camps across Greece.[173]

The contract landscape of Kara Tepe/Mavrovouni reveals how human rights violations and financial extraction operated in parallel. The main facilities management contract (including cleaning, electrical, plumping and security services/provisions) for Kara Tepe/Mavrovouni was awarded through a framework agreement to the consortium of 'GEK TERNA A.E.- GEK YPIRESIES MONOPROSOPI ANONYMOS EMPORIKI KAI TECHNIKI ETAIREIA' for the excessive amount of €49,651,39[174]. Heating was contracted separately: a local company, P. Vounatsos A.E, was awarded €2,171,348 to provide heating for the camp from late 2020 through the whole of 2021, channeled into what remained by design a temporary camp.[175] GEON WC was paid €567,225 across at least 16 contracts for chemical toilet rental at Moria and Kara Tepe/Mavrovouni between January 2020 and July 2021, a recurring expenditure that reveals the deliberate withholding of permanent sanitation infrastructure within this 'emergency management' context. Express Facility Services Chaltsios received €633,832 across seven contracts for cleaning and waste collection at Kara Tepe/Mavrovouni. The micro-enterprise Kalales A. received €631,925 across five contracts for sewage system cleaning and treatment at Kara Tepe/Mavrovouni.

The dependence on chemical toilets and outsourced waste management illustrates the violence of the camp's constructed permanent temporariness. These conditions were recognised by the European Court of Human Rights in June 2021 as constituting

[171] Contract no. 21SYMV008623341

[172] Installations and infrastructures upgrading of the temporary reception facility in the region of Kara Tepe—Mavrovouni, Municipality of Mytilene, in accordance with Article 8, Law 4375/2016. European Commission, Directorate-General for Migration and Home Affairs, *EU Budget: Financial Support to Greece* (February 2022)

[173] Contracts nos. 21SYMV008003569, 20SYMV007866052

[174] Contract no. 21SYMV009290080

[175] Contracts nos. 21SYMV009829382, 21SYMV009103152, 21SYMV008683871, 21SYMV008533283, 21SYMV008492733, 21SYMV008354138, 21SYMV008163497, 21SYMV009339893, 21SYMV009480975, 21SYMV009658164, 21SYMV009013306, 21SYMV008848706, 20SYMV007938288, 20SYMV007929661, 20SYMV007377630.

inhuman and degrading treatment, in violation of Article 3 of the ECHR.[176] Yet, none of the companies that profited from these conditions have been held accountable for their complicity in human rights violations.

The right to adequate housing was structurally violated by an economic system that generated profit for contractors and lessors. A total of eight private landowners on Lesvos signed 4-year lease agreements on the 31st of December 2020 for the Kara Tepe/Mavrovouni plots, amounting to €1,864,287 over the lease period of one year, with the possibility of a one-party extension of one year up to 31st December 2025. The total duration was provided at five years, confirming that the 'temporary' camp might remain operational at least until 2025 (it is still operational at time of publication, October 2026). This fact was also solidified legally, in November 2022, when the Kara Tepe/Mavrovouni facility was officially transformed from a temporary 'Reception and Identification Centre' (RIC) into a 'Closed Controlled Access Centre' (CCAC),[177] cementing in this way the logic of containment that had characterised the site since its construction.

Financial auditing for the upgrading of the facilities of Kara Tepe/Mavrovouni temporary RIC and the completion of the national reception system (which includes construction of hosting facilities on the islands of Lesvos, Chios, Samos, Leros and Kos) was contracted directly by the Greek Ministry of Migration and Asylum, without competitive tender, to Grant Thornton Certified Public Accountants, S.A., member of a multinational corporation operating in 180 countries including Greece, for €22,600. This direct agreement extends beyond Lesvos and what is contained within the Border Industry database: Grant Thornton was also the appointed financial contractor for the Malakasa and Serres camps on the Greek mainland. These facilities are now under investigation by the European Public Prosecutor's Office for contracts awarded without competitive bidding at costs approximately fifteen times higher than comparable EU-funded projects.[178] That the same auditor was involved, through direct agreements, in all three sites, including the sites on the other four islands, raises the question of whether financial auditing functioned as a genuine accountability mechanism, which could provide an independent oversight of the construction of camps in Greece.

[176] Legal Centre Lesvos, *European Court of Human Rights recognises Greek authorities' persistent disregard for migrants' health and lives in Mavrovouni camp* (2021).
[177] Refugee Support Aegean, *Lesvos: What is happening today in the refugee structures on the Aegean islands* (2023).
[178] Nektaria Stamouli, *European prosecutors probe €11M cost of Greece's migrant camps* (Politico, 18 May 2026).

Megala Therma Quarantine Site

2020-2022

West Lesvos Controlled Hospitality Structure for Asylum Seekers

2022-2023

One landowner on Lesvos received a lease payment of €4,200 per month (€50,400 for 12 months) for the Megala Therma quarantine facility/camp on the northwestern coast of Lesvos. The contract was signed in July 2020. As the MSF project coordinator in Lesvos highlighted, "Megala Therma camp is emblematic of the cruel and dysfunctional approach adopted in CCACs, supported by EU member states and funded by the European Commission."[179] Megala Therma, moreover, is a key example of the contractual and financial controversies that are ultimately connected to how direct agreements, leases, and state contracts are managed in detention projects financing on Lesvos (and beyond). The government secured the site through emergency procurement structures during the height of the Covid-19 pandemic and Megala Therma initially operated as a government Covid-19 quarantine centre in the time-period 2020–2022.[180] After a Joint Ministerial Decision on 17 November 2022[181] de-accredited the camp for quarantine purposes, it was repurposed as the "West Lesvos Controlled Hospitality Structure for Asylum Seekers".[182] People arriving on the island were frequently detained in Megala Therma under dire and inhumane conditions, in some cases for up to two weeks, before being transferred to and registered at Kara Tepe/Mavrovouni camp.[183] Human rights organisations documented how despite human rights violations, overlapping funding and periods of administrative closure, the government continued using Megala Therma as an unofficial, unregistered holding/waiting centre until May 2023.[184] Investigations revealed, moreover, how the Greek government continued issuing contractual payments for the lease even when the facility had stopped operating in May 2023.[185] Specifically, on 21 March 2025 the Ministry of Migration and Asylum announced the closure of the site would allow an

[179] Medecins Sans Frontieres, *Pushbacks, detention and violence towards migrants on Lesbos* (2023).
[180] LCL and FAC, *A Pandemic of Abuses*, 56-57.
[181] Article 34 of the Presidential Decree 77/2022 of 17 November 2022, *Gov. Gazette 212/A/17-11-2022*.
[182] LCL and FAC, *A Pandemic of Abuses*, 57.
[183] Ibid.
[184] Ibid; MSF, *Greece: MSF condemns abuses against migrants on Lesbos* (2023).
[185] Thrasos Avraam, *How Much Did the Facility at Megala Therma Cost?* (StoNisi, 22 March 2025).

annual savings of over €600,000[186] In a follow-up clarificatory statement, the ministry claimed that until March 2025, operational costs (maintenance, security, rents, etc.) of this particular facility exceeded €600,000 annually, and that a facility closes when its operating expenses reach zero.[187] The question that arises is: if the annual rent amounted to only €50,400 per year, what were the specific maintenance, security, and other costs that pushed the total amount to over €600,000 per year, as the Ministry claimed—particularly for a site that had not been operational for almost two years?

Vastria CCAC

Under construction since 2021

The Vastria CCAC, which has been under construction for the last five years, has been described as the second-largest public expenditure on Lesvos in decades, with a structure designed to bypass legal safeguards.[188] Its construction epitomises how the expansion of the border industry has been designed to continue and be sustained well into the future. In May 2021, a Joint Ministerial Decision approved the construction of Vastria in an isolated pine forest 30 kilometres from Mytilene.[189] Sited on approximately 240 acres, in a remote district adjacent to the local landfill, the facility carries a budget of nearly €80 million and is 100% funded by the EU through the Emergency Support Mechanism.[190] TERNA was selected as the final contractor for the project.[191]

Thirteen private landowners lease land for the Vastria site at €62,250 per month, totalling €3,361,473 over the contract's approximate 4.5-year duration, with a potential total of €7,469,940 should the lease be renewed for another five years (to a total of ten years). As we have seen, across all three sites, Kara Tepe/Mavrovouni, Vastria, and the Megala Therma quarantine facility, between 2020-2022, a total of 22 private individuals profited as lessors, collectively expected to accumulate over €9 million (€9,384,627) in rent over a ten year period.

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[186] This announcement by the Ministry of Migration and Asylum came even though the mayor of West Lesvos had already announced its closure in August 2024. See StoNisi, *The End of the Line for the Quarantine Facility at Megala Therma* (13 August 2024).
[187] Avraam, *How Much Did the Facility at Megala Therma Cost?* .
[188] Galinos and Karvouni, *How to build a detention centre*, 45.
[189] 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.
[190] Galinos and Karvouni, *How to build a detention centre*, 46.
[191] Contract no. 21SYMV009800187

Information has circulated that migrants encamped at Kara Tepe/Mavrovouni were employed in the construction of the Vastria camp, thereby building the future site of their own detention.[192] Further documentation is needed to support concerns about how such a labour contract might violate the right to liberty, the prohibition of forced labour, and the right to just conditions of work; more generally, research is needed into how labour exploitation involved in the construction of this superstructure has generated huge amounts of profits extracted by private companies, as well as rent paid to individual lessors.

The legal history of the Vastria construction project is one of repeated circumvention of judicial oversight. The Ministry of Migration and Asylum submitted a retroactive Environmental Impact Assessment (EIA) following the Council of State's annulment of the construction permit in August 2023, and temporarily reduced the facility's stated capacity to 2,952, before raising it again to 5,001, "a manoeuvre that was undertaken specifically to maintain eligibility for continued European funding."[193] Part of the EIA includes the opening and development of a new, 4.6 kilometre-long escape road that passes through ecologically sensitive areas including Natura 2000-protected zones, important bird habitats and a wildlife refuge; its construction involved widening existing forest roads and clearing numerous trees.[194] The road, moreover, even if constructed, may not comply with safety standards for rapid evacuation, making it insufficient as an emergency route, and risking the lives of people who would eventually be detained inside.[195]

Fire protection works at Vastria were contracted to Green Construction for €472,323,[196] in a site that, contrary to expert recommendations, is embedded in a highly flammable pine forest.[197] Environmental consultancy for Vastria was contracted to Stavrou Petros and Co. for €4,588[198]—a pittance when compared to the other funds relating to the construction and surveillance of the site that we encounter in the Border Industry database, which highlights the procedural rather than substantive character of environmental concern and review. Like with the Kara Tepe/Mavrovouni camp, the arbitrary evaluation of the water supply requirements, generation of liquid waste, and fire safety measures has been reactive rather than preventative.[199]

[192] Dario Antonelli, *On Lesbos, refugees help build their own prison* (OneWorld, 18 September 2023).
[193] Galinos and Karvouni, *How to build a detention centre*, 5.
[194] Ibid. 11-12.
[195] Ibid.
[196] Contract no. 25SYMV017769124.
[197] Galinos and Karvouni, *How to build a detention centre*, 34.
[198] Contract no. 21SYMV008352691.
[199] Also, Galinos and Karvouni, *How to build a detention centre*.

Vastria's construction as a closed pre-removal facility situates it within a more recent phase of the border regime: one toward accelerating and enforcing return. Its function anticipates the EU's Common European System for Returns, which seeks to harmonise and expand member states' capacity to detain and deport people whose asylum claims have failed. Together, Moria, Kara Tepe/Mavrovouni and Vastria trace an evolving architecture of encampment on Lesvos; from emergency hotspot, to permanently temporary site, to purpose-built deportation centre, with each phase generating its own contracts, contractors (in some cases, involving the same actors), and its own infrastructure of exposure, confinement, and removal.

4.3 Case Study 3: Catering

Malnutrition and high levels of food insecurity in Greek refugee camps have long been documented as central features of the deplorable living conditions imposed on people forced to reside in Reception and Identification Centres (RICs) and, more recently, Closed Controlled Access Centres (CCACs). Numerous reports have highlighted both the very poor quality and inadequate quantity of food distributed to people forced to live there. There have also been concerns expressed about the way food is accessed, including reports of overcrowded lines and prolonged waiting times that frequently lead to tensions and violent clashes among camp residents.[200]

Food insecurity has at times been exacerbated by governmental decisions restricting access to food and water distribution based on legal status. Following a legislative reform adopted in March 2020,[201] humanitarian organisations estimated that, by early 2022, approximately 40% of residents in Greek refugee camps no longer had access to sufficient or appropriate food.[202] The detrimental effects and risks of food insecurity in the Lesvos RIC were addressed by several UN Special Rapporteurs in an official letter to the Greek government in July 2023, without (until now) resulting in any improvement or measures taken.[203]

[200] See, for example, Yannis Hamilakis, *Food as affirmative biopolitics at the border: liminality, eating practices, and migration in the Mediterranean* (World Archaeology, 53(3), 2022) 531-546; *Food Cell Task Force and Assessment: Greece : July - September 2016* (2016); UN Special Rapporteur on the Human Rights of Migrants, *Report on his mission to Greece* (2017) paras. 63, 66, 91, 128; Intersos Hellas, HIAS Greece & GCR, *Being Hungry in Europe: An analysis of the Food Insecurity experienced by Refugees, Asylum Seekers, Migrants and Undocumented People in Greece* (2023) 11-21; RSA, *Rhodes: Newly arrived refugees with no shelter and adequate food, at the mercy of winter* (21 December 2023); Legal Centre Lesvos, *As heat wave hits Greece, Lesvos CCAC residents continue to be denied access to clean water and food* (2 July 2024).

[201] The Greek government decided first in October 2021 and again in May 2023 to exclude certain categories of camp residents from state-provided food assistance in camps, including recognised refugees, beneficiaries of subsidiary protection, and asylum seekers whose applications had been rejected at second instance.

[202] International Rescue Committee et al., *Joint open letter: Denying food - instead of receiving protection people go hungry on EU soil* (26 October 2021); Ministry of Migration and Asylum, *Press Release, Response to an NGO's letter regarding the feeding of asylum seekers* (18 October 2021); Helena Smith, *Greek government blamed for hunger crisis in refugee camps* (The Guardian, 24 January 2022); IRC, *People in Greece are going hungry, as over one third of those living in refugee camps are denied food* (24 January 2022); Legal Centre Lesvos et al., *Open letter: Forced Food Insecurity at the Lesvos CCAC* (20 June 2023).

[203] UN Special Rapporteur on the right to food, Special Rapporteur on adequate housing as a component of the right to an adequate standard of living, and on the right to nondiscrimination in this context and Special Rapporteur on the human rights of migrants, *Joint Letter to the Greek Government* (3 July 2023).



***Photograph** 8: Inedible food, pita, Kara Tepe/Mavrovouni.*

Anonymous photographer. Courtesy Legal Centre Lesvos

Malnutrition and unhealthy food served to camp residents

At the former Moria RIC and the current CCAC on Lesvos, residents reported receiving basic and often inedible meals (such as stale bread, flatbread, boiled eggs, and undercooked or poorly seasoned dishes) after waiting for hours in line.[204] Accounts described daily queues forming early in the morning, sometimes from 5 a.m. for breakfast, with residents spending up to eight hours per day waiting for food distribution.[205] Nutritionists have also noted that the meals provided frequently fall below minimum caloric requirements.[206] The situation was further aggravated by the severe lack of medical care and sanitation in the camp. In this context, the food situation in Lesvos was described as "explosive" by the Commissioner for Human Rights of the Council of Europe.[207] Concerns regarding food provision extend beyond the island camps. The inability of children and individuals with specific dietary needs, including those arising from medical conditions, to access appropriate diets has remained a persistent issue, including in mainland reception facilities.[208] In 2025, an MSF medical team diagnosed six cases of severe or moderate acute malnutrition among children aged six months to six years in the CCAC of Samos.[209]

This food context is compounded by broader structural constraints, such as the discontinuation and scarcity of cash assistance; the limited access of asylum seekers to legal employment; the geographical isolation of camp facilities from urban centres and markets; movement restrictions and the lack of safe cooking infrastructure within camps, which have placed residents in situations of near-total dependence on state-provided

[204] See, for example, Women in Solidarity WISH and Legal Centre Lesvos, *A short report from the Kara Tepe / Mavrovouni CCAC situation, Lesvos. February 2025* (Instagram, 2025); Episkopou, M., Venables, E., Whitehouse, K. et al., *In island containment: a qualitative exploration of social support systems among asylum seekers in a mental health care programme on Lesvos Island, Greece* (Confl Health, 2019) 13, 34.
[205] Chico Harlan, *Migrants wait in bread lines, while tourists dine on grilled octopus in Greece* (The Washington Post, 23 February 2020).
[206] Hanaa Benjeddi, et al., *Nutritional status of displaced children including unaccompanied minors on Lesvos, Greece* (Journal of Migration and Health, 13, 2026) 10039; Abdalla, L., Goulao, L.F., *Food security and nutrition in refugee camps in the European Union: Development of a framework of analysis linking causes and effects* (*Food Sec. 16, 2024*) 735–755.
[207] Council of Europe Commissioner for Human Rights, *Greece must urgently transfer asylum seekers from the Aegean islands and improve living conditions in reception facilities* (31 October 2019).
[208] Refugee Support Aegean, *Human Rights Day: The unseen reality of refugee camps in Greece* (10 December 2025).
[209] Medecins Sans Frontieres, *Press Release, Children diagnosed with malnutrition on Greece's Samos island*, (7 April 2025).

catering. Such dependence is particularly acute for unaccompanied minors, persons with medical conditions, and individuals with reduced mobility, who face additional barriers to accessing food supplies.

The human right to adequate food is recognised in several international human rights instruments.[210] Greece has been repeatedly condemned for inhumane or degrading conditions in migrant detention and reception facilities, where inadequate and inappropriate food provision constitutes a key component for the assessment of living conditions, in addition to severe overcrowding, insufficient sanitation, lack of security and limited access to medical care. The European Court of Human Rights has found violations of Article 3 of the European Convention on Human Rights in several cases concerning living conditions in RICs and CCACs on the Greek islands.[211]

It also ordered several interim measures to the Greek authorities to urgently accommodate people living in CCACs in safe and suitable accommodation and "to ensure they are provided with adequate food, water, clothing and medical care".[212]

Revenues generated by the catering services in Lesvos refugee camps

The inhumane and inadequate provision of food inside the RICs and CCACs is in stark contrast with the extraordinary revenue that local companies on Lesvos have obtained via catering contracts to provide this food, as revealed by the Border Industry database.

Between January and March 2020, when Moria camp's population was at its peak, the Ministry of National Defence entered into a series of short-term catering contracts with a consortium of companies—Tzanetos Emmanouil E.E. (known as Elaitis Catering) as the lead contractor, together with Pot & Pan Foodservice A.E., and Salas Intergroup EKD. A.E.—for the preparation and delivery of meals and water to the Moria RIC.

[210] Office of the United Nations High Commissioner for Human Rights, *The Right to Adequate Food - Factsheet no. 34* (1 April 2010); Committee on Economic, Social and Cultural Rights (CESCR), *General Comment 12 on Article 11 of the International Covenant on Economic, Social and Cultural Rights* (1999).
[211] See, for example, European Court of Human Rights (ECtHR) *M.A. And Others v. Greece*, App. Nos. 15192/20, 15728/20, 16094/20, 16511/20, 3 October 2024, para. 12; ECtHR, A.D. v. Greece, App. No 55363/19, 4 April 2023, paras. 17-18.
[212] See, for example, I Have Rights, *Degrading conditions in Samos CCAC: The European Court of Human Rights grants Interim Measures* (2024).

Each of these contracts covered the provision of meals and water during a 4 days-period, for a **value of nearly half a million euros each,** which was renewed at least 16 times until March 2020.[213] Each contract provided for the distribution of 3 meals a day per person (calculated at €5.01 + VAT per person/day) for 22,780 persons (with the possibility of serving up to 23,700 people) against payment of a maximum amount of €**497,776** including VAT (or €456,675 without VAT).

Under these arrangements, the number of meals prepared and paid depended on the camp population. Given that during that time period, the population of Moria RIC ranged between approximately 19,000 and 25,000 people, it can be assumed that the full amount provided in these contracts was paid every 4 days. On that basis, in just over two months between January and early March 2020, the above-mentioned catering consortium likely received nearly **€8 million** for the preparation, delivery and distribution of food in Moria RIC (Fig. 35).

Violation of anti-trust regulations and mounting revenue for catering industry

It should be noted that the contracts with the Elaitis Catering-led consortium were awarded without the publication of a tender notice, in derogation from the regular requirements for public contracts, a fact that was justified by the stated need "to cover an urgent and unforeseen need (migrant – refugee flows) taking into account reasons of national security and public order, which make it impossible to meet the deadlines provided for the tender procedures of the current legislation."[214] This exact language, justifying the use of an emergency negotiation procedure, is repeated in each of the short-term contracts entered into during this period.

During the same time period, between 2018 and 2020, the Hellenic Competition Commission carried out an *ex officio* investigation, and in 2022 the Commission found

[213] Contracts nos. 20SYMV006127811, 20SYMV006134708, 20SYMV006140689, 20SYMV006148561, 20SYMV006167706, 20SYMV006178637, 20SYMV006195315, 20SYMV006207896, 20SYMV006226275, 20SYMV006241533, 20SYMV006256105, 20SYMV006284389, 20SYMV006307267, 20SYMV006324943, 20SYMV006338190, 20SYMV006361713, and 20SYMV006380269

[214] See, for example, contract no. 20SYMV006127811, para 1(a).

that the Elaitis Catering led consortium and other catering companies had infringed anti-trust regulations, after the companies admitted that they had engaged in a common agreement to set the prices for the contracts to provide catering to Moria and other hotspot camps.[215] The companies were found liable for price fixing and preventing open market competition in contracts made between 2017–2019, in violation of Article 1(1) of Law 3959/2011. In total, Elaitis Catering (operating in Lesvos) was fined €125,254; Pot & Pan Foodservice (operating in Chios and Lesvos) was fined €120,938; Salas Intergroup (operating in Chios and Lesvos) was fined €56,103; and Pleiades (operating in Lesvos) was fined €2,132. These fines, however, were minimal and unlikely to deter repeated violations, as they covered less than a day of their earnings when Moria RIC was at its highest population in late 2019 to early 2020**.**

As indicated in several of the contracts, in early 2020 a competing consortium (the joint venture of Myron S.A. Technical Company, Houtos Catering S.A., and Giannitsis Logistics A.E.) submitted bids to provide meals to Moria RIC residents.[216] Their bids, however, were rejected under the justification that the members of that joint venture did not meet the financial and technical selection criteria.

Without access to the full proposals submitted by these companies, it is not possible to assess the merits of their rejection. However, the Greek Army's prolonged reliance on contracts covering a total period of over two months, through an emergency procedure intended only as a short-term stop-gap, appears problematic, as it created a *de facto* monopoly of profits from catering services within the camps, as the same consortium was subsequently granted contracts for catering over the next several years.

Indeed, on 5 March 2020, the Greek Army entered into a year-long contract with the same Elaitis Catering-led consortium. This contract was awarded following an open tender process, and was to provide up to 3,102,500 daily food distributions in Lesvos' RIC throughout the year, with a daily price per person increased to €6.67 including VAT, making the total contract value worth up to **€28.4 million**.[217] In 2021, the Army shifted

[215] Hellenic Competition Commission, *Decision 767/2022* (2022).
[216] See, for example, contracts nos. 20SYMV006148561, para. 3; 20SYMV006167706, para. 3.
[217] Contract no. 20SYMV006390171

back to shorter-term 20-28 day contracts at the lower €5.01/person/day plus VAT.[218] In these three contracts, the Army contracted only with Elaitis Catering, providing up to 6,500 meals a day, worth **€2.2 million**.[219] This rate was later reduced to €4.98 plus VAT/meal, and longer term 3 month contracts were signed in the summer of 2021, again with Elaitis Catering, worth **€3.4 million**[220] The only time period during 2020-2022 in which Elaitis Catering was not part of the companies awarded catering contracts to provide food to Lesvos' refugee camps was in April to May 2021, when Anostro Hotel Operations S.A. and Trofo Larsou S.A. were awarded two 20 day contracts to provide meals to the Lesvos RIC at Kara Tepe/Mavrovouni, worth **€1.4 million** total.[221]

Shift of responsible ministry but sustained revenues for the same local companies

In September 2021, responsibility for food provision to the residents of Lesvos RIC (now in the 'temporary' Reception and Identification Centre in Kara Tepe/Mavrovouni) shifted from the **Ministry of Defence** to the **Ministry of Migration and Asylum**.

On 22 September 2021, Elaitis Catering joined a consortium of companies led by Hellenic Catering, who signed a massive framework agreement with the Ministry of Migration for **€102,959,200** annually for the "provision of services for the preparation, transport and distribution of meals in accommodation structures for third-country nationals or stateless persons who have applied for international protection" over a four year period.[222] Within the framework agreement, the Ministry of Migration awarded several contracts for catering services to be provided in refugee camps across Greece - with an increased per/meal rate of €6.83 plus VAT. This contract followed a closed tender procedure, meaning that only pre-selected companies were invited to submit proposals. Notably, Elaitis Catering was invited to join the tender process, even though there was an open investigation against it at the time by the Hellenic Competition Commission.

[218] Contracts nos. 21SYMV008622597, 21SYMV008730227, 21SYMV008824673
[219] Ibid.
[220] Contract no. 21SYMV008975076
[221] Contracts nos. 21SYMV008422445, 21SYMV008548725
[222] Contract no. 21SYMV009246455

Following this framework agreement, the Hellenic Catering-led consortium was awarded **€12.5 million in three implementing agreements** to provide meals to Lesvos' refugee camp in Kara Tepe/Mavrovouni between September 2021 and December 2022.[223]

Time Period Covered	Contractor	Contract Type	Contract Value Excluding VAT
January - March 2020	Elaitis Catering-led consortium with Pot & Pan Foodservice A.E., and Salas Intergroup EKD. A.E.	Seventeen short-term 4-day emergency contracts, following closed procedure	€7.8 million
March 2020 - March 2021	Elaitis Catering-led consortium with Pot & Pan Foodservice A.E., and Salas Intergroup EKD. A.E.	One year contract, following open tender	€28.5 million
April - May 2021	Anostro Hotel Operations S.A. and Trofo Larsou S.A.	Two 20 day contracts, following closed negotiated procedure	€1.4 million
May - July 2021	Elaitis Catering	Three 20-28 day contracts, following closed negotiated procedure	€2.2 million
July - Sept 2021	Elaitis Catering	Three-month contract, following open tender	€3.4 million
September 2021- December 2022	Hellenic Catering-led consortium with Gefsinus S.A. Industrial and Commercial Company, Gefsinus Limited Liability Company, Elaitis Catering, Olympic Catering S.A.	Three implementing agreements to September 2021 Framework Agreement (entered into through a closed procedure)	€12.5 million
		TOTAL	**€55.7 million**

***Figure** 35: Contracts awarded for catering to Lesvos' refugee camps 2020-2022*

In total, between January 2020 and December 2022, a staggering amount of nearly €56 million was awarded to provide meals in the Moria and Kara Tepe/Mavrovouni RICs/CCAC.

[223] Contracts nos. 21SYMV009292158, 22SYMV010300288, 22SYMV011695497

From Local Catering to Global Capital

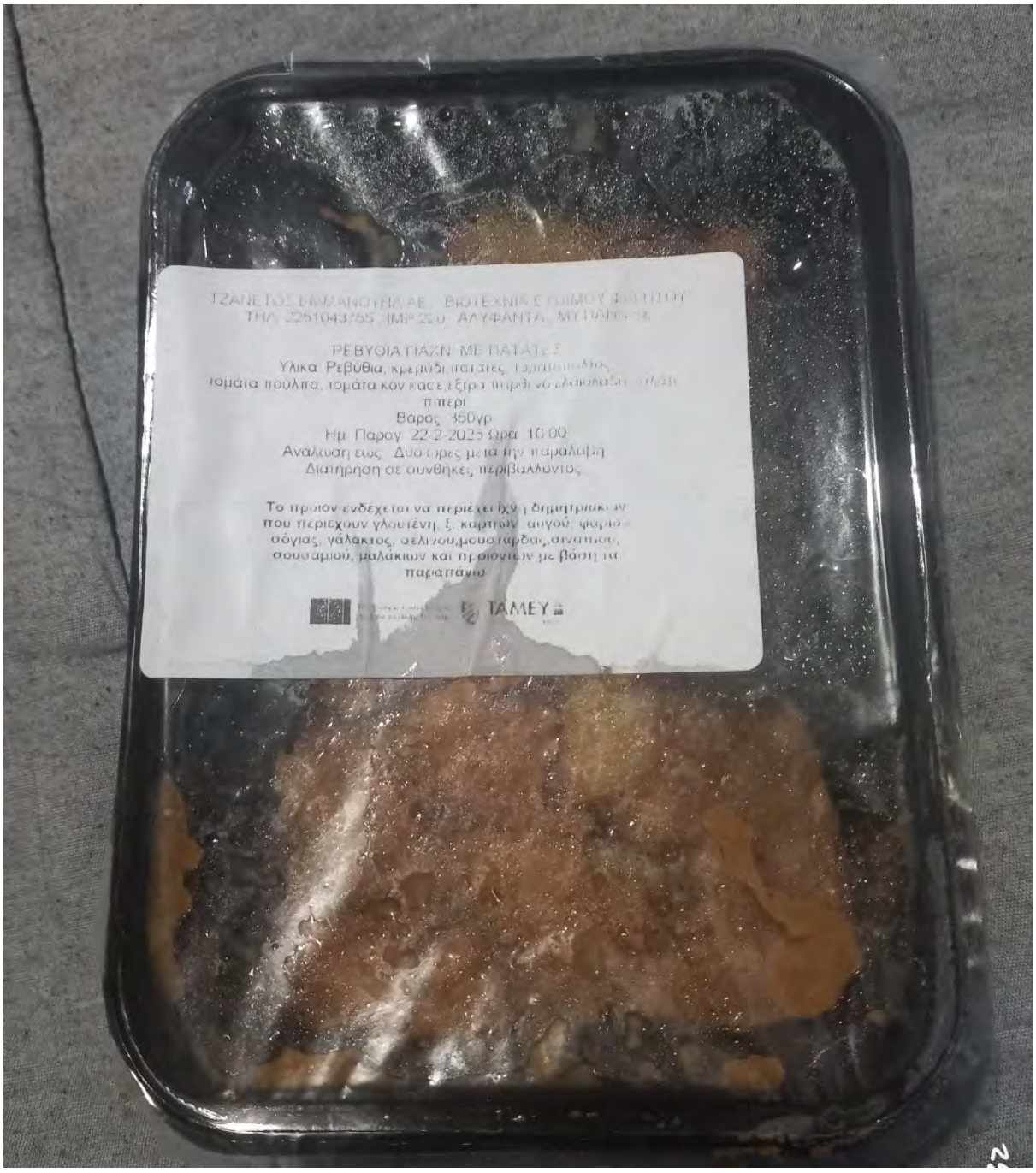
Between 2018 and 2020, as the camp population in Moria RIC increased, Elaitis Catering saw not just an increase in revenue, but a marked increase in profit margin.[224] While it is impossible from public records to track which of Elaitis Caterings' various ventures generated the most profit, in December 2021, a few months after the €400 million framework agreement was signed, Elaitis Catering (Tzanetos Emmanouil E.E.) reincorporated as a publicly traded corporation, Tzanetos Emmanouil S.A., indicating the company's growth.[225] A few years later, in November 2024, Hellenic Catering, the consortium lead in the 2021 framework agreement, acquired a 70% share of Elaitis Catering, worth €4.1 million.[226]

Hellenic Catering, in turn, is a subsidiary of Vivartia Holding S.A., Greece's largest food conglomerate and one of the top ten companies in Greece.[227] Vivartia was acquired by CVC Capital Partners in 2001,[228] for more than €147 million.[229] CVC Capital Partners is a Luxemburg-based private equity firm domiciled in Jersey and, in 2024, ranked as the fourth-largest private equity firm in the world, with approximately €200 billion in assets under its management.

The significance of the contracts awarded to Elaitis Catering therefore extends well beyond the local company profiting from the provision of food that has been repeatedly denounced as inedible to a marginalised population concentrated into camps. This local Greek catering operation and its owners, like many other contractors implicated in the

[224] General Commercial Registry (GEMI), *Company 126782442000* (Business Publicity, accessed 13 September 2026).
[225] Ibid. E.E. stands for Eterorithmi Etairia, which translates to limited partnership. A.E. stands for Anonymi Eteria, which translates to a Societe Anonyme (S.A.), which is a publicly traded incorporation. From at least 2020 through 2021, before it became a publicly traded company, the partners of Tzanetos Emmanouil E.E. were Emmanouil (Manolis) Tzanetos (50%) and Athanasios and Efstratios Karachalias (25% each), with Manolis Tzanetos listed as general partner. For local context, Elaitis Catering, in addition to providing food to the Moria and Kara Tepe camps, is one of the largest economic actors on the island, providing catering services to kindergartens and private events, including weddings and baptisms.
[226] Vivartia Holdings S.A., *Financial Statements for the Year Ended December 31, 2024: Corporate and Consolidated Financial Statements According to International Financial Reporting Standards (IFRS), as Adopted by the European Union* (September 2025), 108.
[227] For reference, Goody's Burger House - of which Elaitis Catering director, Manolis Tzanetos, is the owner of the Mytilene franchise - also belongs to Vivartia Holdings.
[228] European Commission, Directorate-General for Competition, *Case M.10111 – CVC / Vivartia Holdings: Commission Decision Pursuant to Article 6(1)(b) of Council Regulation (EC) No 139/2004* (March 2021).
[229] Aleksandra Gitsi, *'Green Light' for the Sale of Vivartia at MIG's General Meeting* (Capital.gr, 27 February 2021).

border industry, is embedded within a multinational corporate structure that is inseparable from the wider capitalist and financial interests that profit from the perpetuation of systems of control and containment imposed on people on the move.



***Photograph** 9: Inedible food, closeup, Kara Tepe/Mavrovouni.*

Label shows caterer, ingredients, weight, and source of funding, the European Union.

Anonymous photographer. Courtesy Legal Centre Lesvos



Photograph 10: *Inedible food, meal, Kara Tepe/Mavrovouni.*

Anonymous photographer. Courtesy Legal Centre Lesvos

4.4 Case Study 4: Surveillance

Platforms in the CCAC Detention Camps and Greece's Failure to Comply with GDPR

Observers have long commented on Greece's use as a "testing ground" for new surveillance platforms and technologies aimed at facilitating population governance and migration control across Europe.[230] These include the Hyperion and Centaur surveillance systems used at the **Closed Control Access Centres** (CCACs)—detention camps on the Greek islands and on the mainland—which respectively administer a system of biometric identification and app-based communication that asylum-seekers, NGO workers, and private contractors are all required to use to access services and facilities. These systems also provide behavioral analysis of CCTV video surveillance mediated through an Artificial Intelligence algorithm. Three companies in the Border Industry database are involved in delivering these platforms, with contracts documented worth **a total of €10,200,479** (without VAT), divided into three different lots. The first two contracts[231] are with a consortium comprising ESA Security and ADAPT IT, and concern the development of Hyperion and Centaur in the CCACs of the islands of Aegean and in Northern Greece (Lots 1 and 2), and are worth €3,809,629 and €2,797,597 (without VAT), respectively. The third, with the company Space Hellas,[232] concerns the development of these systems at the migrant facilities of Southern Greece (Lot 3) and is worth €3,593,253. A large part (75%) of these expenses are funded under the Internal Security Fund.

Hyperion and Centaur have both been the subject of considerable controversy, including a 2022 complaint brought before the Hellenic Data Protection Authority (HDPA) by a coalition of civil society organisations (Hellenic League for Human Rights, HIAS Greece, Homo Digitalis, and Dr. Niovi Vavoula of Queen Mary University of London), alleging systematic violations of the European Union's General Data Protection Regulation (GDPR). This law imposes binding rules and safeguards intended to protect the fundamental rights and freedoms of 'data subjects' across Europe. Specifically, in their

[230] Petra Molnar, *Technological testing grounds: Migration management experiments and reflections from the ground up* (European Digital Rights and Refugee Law Lab, 2020).
[231] Contracts nos. 21SYMV009283886 and 21SYMV009283749
[232] Contract no. 21SYMV009283822

complaint against the Hellenic Ministry of Migration and Asylum, Homo Digitalis et al. flagged three primary issues: first, the failure of the Ministry to implement a Data Protection Impact Assessment (DPIA) prior to the rollout of each platform; second, the failure of the Ministry to identify the legal basis for establishing the database of biometric and biographical data, and for the behavioral analytics algorithm necessary for each system to operate; and third, the Ministry's failure to provide transparent information to, or to obtain consent from those subject to biometric data collection and surveillance, about the character of the data being collected, how this data will be stored and used, and with whom it will be shared.[233]

In 2024, the HDPA ruled that the Ministry of Migration and Asylum was in violation of the principles of lawfulness, fairness and transparency enshrined in article 5(1)(a) of the GDPR, fining the ministry €175,000 and ordering compliance by July of that year.[234] As of June 2026 the Greek Government has still failed to comply with this compliance order, and the data protection rights and transparency issues raised in the civil society organizations' initial complaint remain unresolved.[235]

When examining the ESA Security / ADAPT IT and Space Hellas contracts in the Border Industry database, at first blush the information each contains may appear somewhat banal, focusing mostly on legalistic language regarding the names and details of each company (including their tax information); delivery benchmarks and the duration of the contract; methods of payment; definition of terms; dispute resolution and penalty clauses; and various other conditions.

It is only by scrolling to the "Tenders Announcement", and then using this to search the website for tenders of the Greek government[236] that more information is revealed about the details of the services that ESA Security, ADAPT IT, and Space Hellas are contracted to provide. Specifically, scraping information about the details and specifications of the

[233] Homo Digitalis, *The Hellenic DPA is requested to take action again the deployment of ICT systems IPERION & KENTAUROS in facilities hosting asylum seekers in Greece* (February 2022).
[234] Homo Digitalis, *The Hellenic Data Protection Authority fines the Ministry of Migration and Asylum for the "Centaurus" and "Hyperion" systems with the largest penalty ever imposed on a Greek public body* (April 2024).
[235] I Have Rights and Homo Digitalis, *"They never tell us anything" Ongoing Data Rights Violations in the Samos CCAC* (2025).
[236] Greek Ministry of Development, *National Electronic Public Procurement System (ESIDIS), "Prometheus" Public Procurement Portal* (accessed 23 September 2026).

contract from the tenders website shows how the Hellenic Ministry of Migration and Asylum, the contracting authority, failed to include provisions that would require ESA, ADAPT IT, and Space Hellas to follow basic obligations under the GDPR, including the range of issues that remain unresolved under the compliance order of the HDPA.

To obtain the full picture of how these surveillance platforms and privacy abuses are being implemented within detention facilities in Greece, one must consider the smaller contractors that supply IT support and the surveillance equipment that allow the Hyperion and Centaur systems to work. These include, for example, contract 21SYMV008864342 with Hellenic Telecommunications Organization SA (OTE) for €15,699,478.19 (VAT excluded) for the "design, implementation, installation, configuration and operation of telecommunications infrastructure in the structures for temporary reception and hosting of asylum seekers/refugees and immigrants" at 39 separate "accommodation centers" across Greece. The infrastructures explicitly mentioned in the contract include cabling infrastructure for internet and wifi to support surveillance cameras and remote access control systems.

The above is a good example of how to use the Border Industry database, including how to connect the information it contains to other public archives of government documents, and to explore the various actors contributing to the violation of basic guarantees of privacy, freedom and fundamental rights within the European Union. Such issues are especially pressing as the footprint for biometric surveillance and detention expands under the EU Pact on Migration and Asylum.

Conclusion

In analysing pushbacks, camps, catering, and surveillance, the four Case Studies provide examples of how researchers can use the Border Industry database to investigate the financial relationships sustaining border violence and the systematic violation of human rights in the Aegean Sea. We have situated these in a longer history and broader geography of struggles over mobility, borders, carceral and punitive approaches to people on the move. Using procurement procedures and publicly available contracts, we have documented the emergence of a border-industrial complex, an increasingly co-dependent relationship between state enforcement agencies, Frontex, EASO, and private sector suppliers.

In addition to the specific findings presented in this report, we have also shared a methodology for documenting the financial geographies of complicity in systematic border violence. Using our collective knowledge and experience of border enforcement on and around Lesvos, we used the Border Industry database to map transfers of public funding to private companies in exchange for services and infrastructure. These examples offer a starting point for future research, showing how contracts can be used to document public-private involvement in specific incidents and ongoing practices of border violence. Our aim is to provide a useful tool for human rights advocates, researchers, and the public to hold both state agencies and private corporations accountable for their complicity in, and profiting from human rights abuses.

This report has provided new data and analysis mapping the emerging border-industrial complex in the Aegean region at a significant moment in time, focusing on the period between 2020 and 2022, which overlaps with the global Covid-19 pandemic and, therefore, with the proliferation of ‘hygienic borders’ and public support for enclosure and containment. Legal Centre Lesvos and other organisations have continued to document the expansion of Greece’s border infrastructure and border violence in subsequent years and future research could expand the Border Industry database’s temporal scope.

Likewise, the report and the Border Industry database are focused on Lesvos. Future

research could expand the locations included in the database and analysis, which would allow researchers to make connections between policies, contractors, and places. In turn, this would allow legal experts and researchers to ascertain patterns in human rights abuses, potentially identifying additional systematic abuses in border and asylum policy. We wish to highlight that the Border Industry database is therefore useful for documenting capacity for particular enforcement actions and agencies' intentions, above and beyond calculating the specific cost of particular approaches.

Future research may therefore explore the potential for—and difficulties of—corporate accountability frameworks in the context of human rights violations and abuses. For example, under the EU's Corporate Sustainability Due Diligence Directive (CSDDD), companies have an obligation to identify and address actual and potential adverse human rights and environmental impacts in their own operations. Despite the widespread documentation of human rights violations in Greece's CCACs and through its pushback operations, this obligation is not being met. We think that the Border Industry database may also prove useful in documenting private sector contributions and support for activities that violate the values of shareholders or corporate social responsibility frameworks. Where corporate accountability regulations and strategic litigation fall short, public campaigns may find this information useful for boycott and divestment campaigns.

We close with an invitation to researchers, journalists, academics, and the public to utilise the Border Industry database as a tool for investigating the border-industrial complex. With the horizon of abolishing borders and border violence, the Border Industry research team aims to foster collaborations for further research and analysis into the financial ties and corporate networks that sustain border violence; to strengthen the documentation of the involvement of public and private entities in human rights violations; and, in doing so, to contribute to holding accountable those who are responsible for–or who profit from–the border regime. Through the broader use of this database, we seek to support advocacy efforts of and by people on the move in the Aegean and beyond.



***Photograph 11**: Azadi/No Borders, unknown artist(s).*

Photograph by [WISH: No Borders]

Who We Are

Spyros Galinos is a researcher and human rights advocate specialising in the political economy of the border-industrial complex and the social impacts of migration management policies. His work on the Border Industry Project examines the companies, technologies, and institutions shaping contemporary border governance. Drawing on years of engagement in grassroots solidarity initiatives and collaboration with human rights organisations in the North East Aegean, he has documented and monitored the development of the border regime and advocated against practices of border violence and human rights violations. His work has a particular focus on the criminalisation of people on the move and the growing criminalisation of solidarity.

Lorraine Leete is a human rights lawyer. She has been based in Lesvos, Greece, since 2016, where she is a coordinator of Legal Centre Lesvos working on litigation, advocacy, and legal representation on behalf of people on the move. Since 2001, Lorraine has worked with immigrants in the USA and with people forcibly displaced and subject to human rights violations as a result of US imperialist and military policies in Iraq, Jordan, Syria and Palestine. She previously worked in Colombia, investigating and litigating human rights and environmental cases against multinational corporations in the extractive industry and mega-agriculture sectors.

Marion Bouchetel is a lawyer and researcher specialising in migration and international human rights law. Since 2017, she has worked alongside legal aid organisations and solidarity networks in Greece, including the Legal Centre Lesvos, to challenge border violence and the human rights impacts of European migration and containment policies. Her work has focused on documenting and litigating cases involving refoulement, enforced disappearances, arbitrary detention, inhuman and degrading treatment and barriers to international protection before national and European courts. She has contributed to expert reports, collaborative research and human rights fact-finding missions focusing on state violence, repression and the criminalisation of dissent and solidarity.

Aila Spathopoulou is a researcher and lecturer at the University of Stirling. She has been engaged in research and solidarity practices on Lesvos since 2014. She is the author of *Bordering and Governmentality Around the Greek Islands* (Palgrave, 2023). Her work interrogates border violence from a feminist abolitionist perspective, an approach informed by her engagement with the Feminist Autonomous Centre for research in Athens. Her research has focused on the emergence and expansion of carceral sites in the North East Aegean and on how bordering practices shape people's relationships with themselves and one another. Lesvos and the relationships Aila has developed on the island over the years have profoundly shaped the ethical and political horizons of her research.

Anna Carastathis is a political philosopher, author of *Intersectionality: Origins, Contestations, Horizons* (2016) and co-author of *Reproducing Refugees: Photographia of a Crisis* (2020), which analyses the visual economy of the so-called 'refugee crisis' declared by Fortress Europe in 2015, with a focus on photographic representations of Lesvos. Anna lived on Lesvos in 2014–2015 and became active in struggles for freedom of movement there, returning to the island ever since. Her work engages with Black feminist thought, intersectionality, refusal, and abolition, to confront the racialised-gendered violence of border regimes. As Co-Director of the Feminist Autonomous Centre (FAC), she co-organised the annual Feminist No Borders Summer School with an international collective into its 7th year. She is currently Adjunct Senior Research Fellow at University College Dublin (UCD) School of Geography.

Lauren Martin is a professor at Durham University. She has researched carceral economies of migration and border control since 2007, with a particular focus on the financialisation of deportation infrastructure and humanitarian frontiering. Her approach prioritises place-based analysis and critique of state and supranational attempts to exclude, deport, and diminish migrant lives. In addition to the Border Industry Project, her recent research projects analysed the rise of refugee cash assistance in the governance of displaced Syrians and the everyday politics of belonging and home in Stockton-on-Tees, UK.

Geoff Boyce is assistant professor in the School of Geography at University College Dublin. His research is organized around collaboration with grassroots communities and

social movements to interrogate political economies of migration policing and their contributions to the uneven dissemination of harm across scale. He has previously collaborated with the Mexican indigenous O'odham organization Gente de I'Itoi, the American Civil Liberties Union of Michigan, and the southern Arizona humanitarian and migrant rights organization No More Deaths. His current research probes how migration deterrence policies in North America and Europe increasingly target peoples' everyday access to those infrastructures and resources necessary to sustain life, and the creative practices people mobilize to address these resource gaps.

Contributing Organisations

Legal Centre Lesvos, Durham University ,University of Stirling, Feminist Autonomous Centre for research, University College Dublin











Funding Organisations

This research has been funded by: Durham University, University of Stirling, Antipode, and the Rosa Luxemburg Office in Greece.



by a Durham University Seedcorn grant and a Department of Geography Research Development Grant.



by the Stirling Social Science Impact Acceleration Account (SSSIAA), supported by the Economic and Social Research Council (ESRC), Grant Reference ES/X004546/1.



by a Right to the Discipline grant.



by the Rosa Luxemburg Stiftung Office in Greece.