TRAINEESHIP REPORT AND SUMMARY

Identification of the participant

Surname: Janicot
First name: Thomas
Nationality: French
Country of traineeship: Greece
Functions: Auditor at the French Council of State, rapporteur at the 3rd chamber of the litigation section
Seniority: Two years

Identification of the traineeship

Host Court/Institution: Greek Council of State
City: Athens
Country: Greece
Dates of the traineeship: 4 to 11 October 2019

SUMMARY

This report presents the traineeship programme as well as the history and the missions of the Hellenic Council of State (I and II). It develops a comparative analysis of the law and the organisation of the administrative jurisdiction in France and Greece (III and IV), provides a few lessons pertaining to the recent case-law of the Greek Council of State (V) and formulates two suggestions (VI).

I. Programme of the traineeship

During this study visit, I participated in a hearing at the Plenary assembly of the Hellenic Council of State, in the deliberations of three of its sections and in the examination of a presidential draft order by the competent advisory section. There were several bilateral meetings with the Greek magistrates. They mainly pertained to the organisation and functioning of the Greek administrative court, the case-law of the Council of State during the financial crisis as well as the recent developments of the right of asylum and aliens.

II. The host institution

Just like the French Council of State, the creation of the Hellenic Council of State (Συμβούλιο της Επικρατείας) is closely connected with the political history of Greece. The King's Council under the reign of Othon Ist (1833-1843), before being abolished by the Constitution of 1844 and being reconstituted, for one year, between 1864 and 1865, in the form of a council called
upon to prepare and examine the bills, the Council of State, in its current form, was created by the Constitution of 1911. However, it had its first meeting only in 1929.\footnote{For an accurate historic account of the Greek Council of State refer to C-L. Chaniotis, “Le Conseil d’État en Grèce de 1830 à 1930”, Librairie du Recueil Sirey, 1930.}

Established in 1992 in the listed building of the Arsakion (Αρσάκειον), at the centre of Athens, it has 168 magistrates (53 state counsellors, 57 associate counsellors and 50 auditors), divided in six sections. Since 2018, the Council of State is presided over by Mrs Aikaterini Sakellaropoulou, appointed for four years by the government.

Its missions are defined by the present Constitution of 11 June 1975, revised in 1986, 2001 and 2008 (Σύνταγμα, Constitution called “Syndagma”).

In the context of its judicial missions, the Council of State is one of three supreme courts of Greece, with the Court of cassation (Αρειός Πάγος ou Αεροπάγιο) and the Court of Auditors (Ελεγκτικό Συνέδριο).\footnote{The Court of Auditors, having the administrative as well as legal competences, is part of the administrative jurisdiction. It has a subject-matter jurisdiction directly defined by the Constitution and there is no further appeal for its rulings.} The Council of State is thus the court of first and last instance for the illegality proceedings initiated against all the regulatory acts, court of cassation for the decisions delivered by the administrative courts of appeal and the administrative tribunals and appeal court for certain disputes, listed by the law.\footnote{Article 95 par. 1 of the Constitution: “The judgment of certain categories of cases coming under the Council of State can be entrusted by the law, depending on the nature and importance of these cases to the ordinary administrative courts. The Council of State hears cases in second instance, as provided for by the law”.} The “appeals of government officials”, of full jurisdiction, filed against a decision of dismissal, can also be “heard by it in the first and last instance.

As the Supreme administrative court, the Greek Council of State is also a full-fledged constitutional judicial authority. In fact, contrary to the French system, the Greek constitutionality check is “diffuse” and is similar to the American “judicial review of legislation”: all the courts, ordinary as well as special, of any jurisdiction (civil, administrative or criminal), have the right and the duty to examine the constitutionality of a legislative provision that they apply for a case brought before them (article 93 paragraph 4 of the Constitution). If this provision does not conform to the supreme text, it is then declared unconstitutional and becomes null and void. Moreover, the first decision of the history of the Greek Council of State pertained to the compliance with the Constitution of 1911 of the composition of a disciplinary council of public function (decision no. 1/1929). To ensure the unity of the constitutional case-law, the Constitution of 1975 created a special Supreme court (article 100). Consisting of four state counsellors, four counsellors of the Court of Cassation, their presidents and two law professors, it is in charge of settling the different interpretations

of the fundamental law that can result from the case-law of the three supreme courts of the country.

Parallel to its judicial missions, the Council of State has an advisory role with respect to the Greek government. Its advisory activity is however more restricted than that of its French counterpart, as its fifth section, which is the only one competent to exercise this advisory role, is referred to only for an opinion for presidential draft orders. The practice also enables it to provide an opinion on the bills concerning the organisation and the functioning of the Council of State (Hellenic Council of State, Ass., opinion no. 15/2011). Its simple opinion, that the president Pikrammenos describes as “a guideline for the administration”, is nearly always followed by the government.

III. The law of the host country, the European and compared aspect of the traineeship.

IV.

Though the French and Greek administrative laws converge on numerous aspects (3.1), the organisation of the Greek administrative jurisdiction (3.2) and the exercise of the consultative missions of the Council of State (3.3) present non-negligible differences with the French model.

3.1. The Greek administrative law is provided with familiar principles and concepts from the French jurist.

As highlighted by Jean Rivero in 1921: “few administrative laws in Europe are as close to each other as those of Greece and France”. In fact, the Greek administrative law is largely built based on the case-law of the French academic doctrine and Council of State, as can be seen from the significant collection of recueils Lebon (Collection of decisions of the Council of State) of the library of the Hellenic Council of State. The French and Greek legal systems thus share numerous common points.

On the one hand, the Greek public persons are similar to those known in French law. Beyond the State and territorial collectivities, Greece has administrative public establishments as well as numerous independent public service authorities whose legal system is directly influenced by the French system. We thus find an Office of Fair Trading, a National Council of Radio

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9 Hellenic Council of State, Plenary assembly, no. 930/1990, 872/1992, 2279/2001, where the Greek Council of State identified the characteristics of the independent public service authorities by drawing inspiration from those listed by the annual study of the French Council of state of 2001 “Les autorités administratives indépendantes”.

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Television, Commission nationale des Communications et des Postes (National commission of Communication and Post), Authority for the Protection of personal data and even a Citizen advocate.

On the other hand, these similarities are illustrated in the *fundamental principles of the Greek administrative law*. The latter accords a central place to the hierarchy of the norms and the principle of legality (articles 26, 43 and 50 of the Constitution). It includes the well-known distinctions of the French jurist, just like those between the unilateral administrative act - fully enforceable - and the administrative contract, between the regulatory acts, that do not have to be justified, the individual decision, that should be justified and preceded by an adversarial procedure when they are unfavourable, and the case decisions. The Greek law also identifies acts that are not likely to be subject to appeal like the internal measures and preparatory acts. Like in France, the concept of public service serves the entire Greek administrative law. For example, it is a key criterion to assess the existence of an administrative contract\(^\text{10}\) or a request of stay of execution of an administrative decision\(^\text{11}\). The laws of public service - continuity, equality, adaptation, equality - also define the administrative activity, as is illustrated by the greatly discussed dispute of the dissolution by the government of the private sector providing television and Greek public radio in the midst of an economic crisis\(^\text{12}\).

As regards the office of the administrative judge, we mainly see the classic distinction between the illegality proceedings (largely open, which also allow the judge to make substitutions of legal basis and reasons) and the remedy of full jurisdiction, the possibility of regulating over time the effects of the annulment of an administrative decision or the existence of emergency procedures (pre-contractual and contractual summary procedure as well as the "stay of execution", mix between the summary procedure-suspension from article L. 521-1 of the CJA (Code of Administrative Justice) and the appropriate measures summary procedure from article L. 521-3). However, they are less frequently used than in French law. As regards the office of the judge of cassation, it mainly focuses on the questions of law and only checks the assessment of the facts by the trial courts under the angle of distortion. The cases of settlement on the merits of the case are just as rare as in France. Finally, if the questions referred for a preliminary ruling to the Court of Justice of the European Union (CJEU) are regular, one does not, on the other hand, find any mechanism of question referred for a preliminary ruling to the ordinary judge. Note that Greece has ratified, like France, Protocol no. 16 to the Convention on the protection of human rights and fundamental freedoms.

On the other hand, the Greek administrative law differs from the French law with respect to several aspects.

\(^{10}\) Hellenic Council of state, 4th section, decisions no. 878, 1232, 2389/2016

\(^{11}\) "Service(s) public(s) en Méditerranée", work of the symposium of Athens of 19 and 20 October 2017, Laboratoire méditerranéen de droit public.

\(^{12}\) Mr Touzeil-Divina and Mrs Charikleia Vlachou, "Ecran noir pour la télévision grecque : les lois du service public par-delà la Méditerranée", AJDA 2013, p. 1708.
First, certain substantive laws not existing in France are regularly applied by the Greek judge, just like the law of worship. In fact, article 3 of the Constitution of 1975 enshrines the orthodox religion as the “dominant” religion of the country, article 16 lists among the objectives of education, “the development of a religious conscience”, while article 33 provides for the President of the Republic to take an oath in the name of “the Holy, Consubstantial and Indivisible Trinity” at the time of taking office. The orthodox church thus has the status of a public legal body and its ministers are public agents. The administrative courts thus developed a significant case-law relating to the law of religion, like the newsworthy Plenary assembly ruling no. 2399/2014 relating to the public financing of a mosque at the centre of the city of Athens.\textsuperscript{13}

In addition, the scope of the administrative law is not identical, while the organic criterion is nearly the only one used to determine the competence of the administrative judge (the private persons in charge of a public service mission being quite rare). Thus, all the disputes of social security come under the administrative jurisdiction, including the decisions of the Social Insurance Institution, main insurance organisation of the country.

Finally, the system of “civil responsibility of the State” (article 105 and 106 of the Greek civil code), which recognises a specificity of the administrative action as well as the principle of culpable illegality, borrows more from the German law non-contractual liability.

3.2. The French and Greek administrative courts: a common structure, significant organisational differences.

As the Greek legal system is characterised by a legal duality\textsuperscript{14}, there is a separate administrative jurisdiction of the fully autonomous and judicial courts. Like in France, it is divided in three levels: the administrative courts of first instance, the administrative courts of appeal and the Council of State. On the other hand, there are no specialised administrative courts, just like our Refugees Appeals Board.

The organisation of the Greek Council of State converges on several aspects of its French counterpart. Its members belong to a specific body, divided into four grades: auditor, associate councillor, state counsellor and section president. Similarly, to respond to the inflow of judicial appeals and the need to give justice within a reasonable period, which has led to several condemnations of Greece by the ECHR\textsuperscript{15}, the legislator created two familiar procedures of the French jurist\textsuperscript{16}.

\textsuperscript{13} See the very clarifying article of Vassilis Androulakis on this point, “6ème commentaire grec des décisions des Conseil d’État français et grec”, Laboratoire méditerranéen de droit public, 30 November 2017.

\textsuperscript{14} Article 93 of the Constitution: “the courts are distinguished between administrative, civil and criminal and are organised by special laws”.

\textsuperscript{15} See for example ECHR, 9 June 2005, Aggelopoulos contre Grèce, par. 17-18

First, a meticulous filtering of the appeals and cases filed before the Council of State\textsuperscript{17}. The latter are acceptable if the amount of the case is greater than 40,000 Euros (for public contracts 200,000 Euros) and if the case poses a new question or that the contested judgment is contrary to the case-law of a supreme court. If the appeal does not meet these criteria, it is examined by a formation of three judges, which can dismiss the same without a hearing. This filtering, which consists of examining the merits of the appeal after its filing, has allowed to considerably reduce the number of recorded cases (approx. 5,000 per year) and their stock (6,000 cases judged per year). This mechanism has been validated by the Council of State and the ECHR (Council of State, hell., no. 2598/2015 and 4015/2015 and ECHR, 2 June 2016, Papaionannou / Greece, no. 18880/15).

In addition, the procedure of “the pilot ruling”, based on the one implemented by the ECHR, enables the applicants involved in a case raising important legal questions to request that it be examined on a priority basis by the Council of State. An administrative court can also directly refer this type of case to it for a preliminary ruling, following a procedure similar to the request for opinion of our article L. 113-1 CJA.

Even with these established similarities, the organisational differences between the two systems remain significant\textsuperscript{18}.

The most significant one pertains to the difference of status between the members of the French and Greek Council of State. Our Hellenic colleagues are magistrates belonging to the judicial system and not government officials. The Constitution thus guarantees the “personal” independence of the magistrates (article 87-91): the latter are irremovable, appointed for life till the age limit and the management of their career is handled by the Supreme Judicial Council of administrative justice. However, the promotion to the grades of president and vice-president of the Council of State is decided by the Council of Ministers. In addition, the Constitution (article 88 par. 6) does not allow a magistrate to change jurisdiction, e.g. moving from one court to another. The single accepted exception pertains to the appointment of administrative judges of first instance or appeal to the grade of state counsellor. Finally, and this is a major difference with respect to the French Council of State, it is formally prohibited for the magistrates to have a post in the active administration (art. 89 par. 3 of the Constitution), even if it is possible to have teaching activities or be part of, on an exceptional basis, an administrative commission or a disciplinary council.

The second difference, which directly results from the first one, is related to the recruitment of members of the administrative court. Till the creation of the Ecole Nationale de la Magistrature of Thessaloniki (by law no. 2236/1994), the Council of State, the administrative courts and the ordinary courts organised their own recruitment exams. Now, there is a single entrance exam for the Ecole nationale de la magistrature, which includes two sections: an

\textsuperscript{17} Law no. 3900/2010 of 17 December 2010

\textsuperscript{18} For this paragraph, I drew inspiration from the article of Vassilis Androulakis, “La justice administrative en Europe, rapport hellénique”.

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administrative section and a civil and criminal section. The students ranked highest in the administrative section generally join the Council of State as auditors.

Finally, there is a striking difference observed with respect to the career of the Greek magistrates in the Council of State. The auditorship lasts longer here than in the French Council of State (between eight and ten years) and mainly includes assisting a state counsellor in the preparation of a case, by drafting a report including the essential elements of the legislation and the relevant case-law and proposing a response to each of the pleas raised. In addition, if the associate councillors are allocated to a specific chamber, prepare the reports on their own cases and are sitting at the public hearing, they have no right of discussion and vote at the time of the deliberations. Only the state counsellors have such a vote, even if, in practice, the associate councillors regularly take over to present their opinion. The progress by grade is merit-based and is limited. Thus, to join the grade of associate councillor, it is necessary to wait for one of the latter to become a state counsellor and leave a place vacant in this grade.

Particularly as regards the organisation of work at the Hellenic Council of State, it differs from the French model at the level of the public hearing, deliberations and the drafting of the decision.

On the one hand, the public hearing involves neither the public rapporteur nor the Advocate-General. On the contrary, it gives a predominant role to the rapporteur of the case. If he made his report public three days before the hearing, in which he expressed his opinion on the outcome of the litigation, the Kress ruling of the ECHR 19 and the necessity to avoid later withdrawals have modified his role. Now, he limits himself to the statement of facts and the pleas raised by the applicants. The public hearing also gives a more important place to oral proceedings, including before the court of cassation (see below).

On the other hand, the deliberations are the first and last time where the case is examined and discussed by the members of the section, contrary to the French system where it is discussed beforehand during investigation. Often taking place a few days after the hearing, the deliberations enable the rapporteur to first present to his section the main issues of the case and the conclusions of his report before the collective discussion starts later. The function of reviser, found in the section of the French litigation, does not exist.

Finally, the justification of the decisions of the Hellenic Council of State is, as a general rule, longer than the one of its French counterpart. It is similar in many respects to the one adopted by the CJEU, by recalling for example the previous case-law applicable to the dispute or the arguments of the parties. This extensive justification is partly explained, according to the magistrates that I met, by an increased necessity of “convincing” the citizens about the

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retained solution, taking into account, on the one hand, the relative young age of Greek democracy and, on the other hand, the practice of the dissenting opinion, enshrined in article 93 of the Constitution.

3.3. Confined advisory functions

Like numerous European administrative supreme courts, the Hellenic Council of State has advisory powers. It also pertains to its historical mission, as the successive constitutions of the XIXth have always attributed an advisory role to it. Nevertheless, the exercise of this mission, to which the magistrates who I met during the study visit are very committed, does not take the same features as its French equivalent.

The main difference pertains to the nature of the texts examined by the Council of State. The latter provides its opinion only on presidential draft orders and not on bills, before their submission to the Parliament. This hasn’t always been the case. The Constitution of 1864, inspired by the founding father of the Greek constitutional law, professor N.I Saripolos, provided for “an advisory body instituted with a view to prepare and examine the bills in detail, called Council of State that was sitting in Athens”. The Constitution of 1911 had also considered granting such functions to the Council of State. This solution was however abandoned at the time of the constitutional amendment of 1927, which allowed for the existence of a Senate in charge of contributing to “good law-making”.20

The second difference pertains to the nature of the advisory mission. Like in France, the Greek Council of State examines the legality of the draft order as well as the compliance with the legislative rules. It can also formulate “remarks of opportunity” to alert the administration about the rules that would not be easily compatible with others or risk creating practical difficulties during their implementation. There is also a very meticulous control of the compliance with the legislative authorisation. In fact, the regulatory power, which belongs to the President of the Republic, is particularly limited by article 43 §2 paragraph 1 of the Constitution, which states: “the enactment of regulatory decrees pursuant to a special legislative delegation, and within the limits of the same, is allowed upon the proposal of the competent minister”. Thus, the advisory formations pay very close attention to ensure that the limits outlined by the enabling law are not exceeded under penalty of disjoining the impugned provisions. Originally, the Council of State can also declare the unconstitutionality of an enabling law that would provide a significant leeway to the regulatory power.

Finally, the organisation of the advisory mission differs from the French model on several points. This mission does not fall to several specialised sections but to the single fifth section, parallelly competent to examine les judicial appeals as regards urban planning, environment or public investments. It examines the draft order in a formation of three or five judges. In compliance with the case-law of the ECHR Procola21, special attention is given to ensure that

21 ECHR, 28 September 1995, Procola v. Luxembourg no. 4570/89
the Judge-Rapporteur of the draft order withdraws if the latter is examined in the context of a judicial appeal brought before the fifth section. The latter can also decide to send its examination to the Plenary assembly if the draft sent or the enabling law do not conform to the Constitution (article 100§5). Moreover, contrary to the French system, this examination is not carried out in the presence of Government commissioners but only involves the members of the Council of State.

V. The “best practices” aspect in the visited court

While the legal section of the French Council of State is considering the development of orality during the public hearing, it could be interesting to draw from the Greek practice in this regard.

As in our legal procedure, the investigation here is written, inquisitorial and adversarial. But the hearing is often the time when the formation of the Court (restricted to three judges, ordinary formation with five judges, extended formation with seven judges or the Plenary assembly consisting of 27 judges) asks questions to the lawyers of the parties, who must have at least ten years of professional experience and be authorised to address the supreme court by their bar. These questions pertain to factual and legal questions and seek to remove uncertainty, test the solidity of the arguments of the parties and enable stating the scope of their writings. The orality is all the more developed that the administration can communicate with the bar, mainly through the members of the body of the “State lawyers”, ministerial public agents recruited following a reputed and challenging examination. The orality extends outside the courtroom, as the rapporteur has regular communication with either of the parties. While our procedures of investigation (R. 623-2 of the CJA) are quite heavy, like the bar investigation, it could be useful to simplify and improve the flow of the existing communication between the parties and the rapporteur during the investigation, like the Greek experience.

VI. Benefits of the traineeship

VII.

Apart from the inherent richness of the comparative approach, which enables pondering upon our own decision-making practice, I have especially marked the main role of administrative justice as guarantor of balance between the protection of rights and public interest. This issue, which crosses across all the European supreme courts, is particularly illustrated in the case-law of the Hellenic Council of State rendered at the time of two exceptional crises: the crisis of sovereign debt (1) and the migratory crisis (2).

5.1. The Hellenic Council of State at the time of the financial and economical crisis

The crisis of the Greek sovereign debt led to the Hellenic Council of State to rule on the lawfulness of major reforms for the future of the country, like the delegation of management of airports and ports to private operators, social security reform, organisation of the referendum of 5 July 2015 pertaining to the draft agreement concluded with the troika
(European Commission, ECB, IMF) or even the partial default of the State (Council of State, Hellenic, Plenary assembly no. 1507/2014). This exceptional period led to the Council of State to develop its case-law and reflect on the methods of its monitoring of the law. The first development appeared at the time of the famous (and debated) Plenary assembly decision pertaining to the measures of application of the first memorandum, to which was conditioned a first aspect of international and European financial aid. This retrenchment programme mainly provided for a high reduction of salaries of government officials and retirement pensions as well as increases in retroactive social contributions. If the Council of State reiterated its traditional case-law refusing to recognise “the cash requirement of the State” as capable of constituting, by itself, reasons of public policy justifying the violation of the acquired rights, it used the basis of the new concept in its case-law “of financial interest of the State” to uphold the constitutionality and the conventionality of the considered measures: “this programme, as a whole, seeks to meet the economic requirements of the country, assessed by the legislator as emergency measures aimed towards the improvement of the financial situation of Greece (...) it thus pertains to urgent reasons of public policy, which are identified with the financial interests of the country; at the same time, these reasons constitute objectives of common interest of the Member states of the Euro zone, taking into account the obligation established by the EU to conform to the budgetary discipline” (§38). This reason has been included in several subsequent decisions and is confirmed by the ECHR (ECHR, 7 May 2013, Koufaki and Adedy v. Greece, no. 57665/12, 57657/12).

In addition, the economic crisis enabled the Council of State to confirm its rather distanced control of the proportionality of the budgetary measures decided by the Government. In most of the cases, the Council of State validated the measures taken by the legislator to reorganise public finances, based on not only the reason drawn from “the financial interest of the State” but by refusing to examine whether the legislator could attain the same objective by measures that are less severe for the citizens (Hellenic Council of State, Plenary assembly, no. 1283/2012). This “autolimitation” position, which divides even within the supreme court (evidenced by the dissenting opinion of six state counsellors under the aforementioned case no. 668/2012) does not prevent the Council of State from ensuring that the stated measures mainly provide each citizen with “a decent standard of living” (article 25 of the Constitution), respect the principle of the equality of citizens before the tax law (Hellenic Council of State, Plenary assembly, no. 4021/2012) or comply with the principle of continuity of public service (for the closing of the public audiovisual group see Hellenic Council of State, ord. no. 236/2013).

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23 As an example, refer to X. Kontiadis, A. Fotiadou, “ Droits sociaux, proportionnalité et crise financière, remarques à propos de l’arrêt Conseil d’État Assemblée plénière 668/2012 “, DeA no. 53, 2012, p. 27-51;
24 Council of state, Hellenic, Plenary assembly, no. 668/2012.
26 Council of state, Hellenic, Plenary assembly, no. 1285/2012
5.2. The Greek Council of State and the migratory challenge.

particularly exposed to the arrival and the prolonged presence on its territory of foreigners arriving directly from countries that are not members of the European Union. Greece greatly reformed the organisation of its right of asylum in March 2016. This reform mainly followed from two rulings of the ECHR and the CJEU questioning its system of admission of refugees and the processing of requests of asylum, in view of articles 3 and 5 of the European Convention on Human Rights and the Charter of Fundamental Rights of the EU. Each asylum seeker coming to one of the “hotspots” is now put up in “open centres of temporary admission for applicants of international protection”, where their admission and identification are processed by a single administrative department of asylum, “l’agence d’identification et d’accueil (office of identification and admission)” (AIA) whose decisions can be challenged before an independent administrative authority.

The meticulous procedure of filtering of appeals in cassation leads the Greek Council of State to give a ruling relatively less often in matters pertaining to asylum, quite contrary to the courts of first instance and appeal. On the other hand, it delivered several important decisions that are widely discussed in public debate in this domain, like those validating the composition of the authority in charge of examining the appeals filed against the AIA, or upholding the refoulement procedure provided for by the EU-Turkey Statement of 18 March 2016, which allows the return to Turkey of all the migrants who have entered Greece illegally or are intercepted before their entry by the establishment of an expedited procedure. More recently, the Council of State partially annulled the restriction of movement imposed on the migrants having come to the hotspots from 20 March 2016 by the administration.

Finally, the economic crisis and the migratory inflow consistently placed the Hellenic Council of State at the heart of public debate for long months. It was mainly led to reconsider its communication procedures around its decisions, work on their teaching method and thus show all the originality and specificity of the mission of the administrative judge, i.e. the constant quest for a balance between the effectiveness of the administrative action and the guarantee of rights.

VI. Suggestions.

At the end of this study visit, I can’t help but encourage the multiplication of exchanges between French and Greek administrative magistrates; the similarity between our laws is almost unique in Europe.

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28 Law no. 4375/2016
29 ECHR, 21 January 2011, MSS v. Belgium and Greece, no. 30696/09 and CJEU, 21 December 2011, Secretary of State and ME v. Refugee Applications Commissioner, C-411/10
30 Hellenic Council of state, Plenary assembly, no. 1237/2017
31 Hellenic Council of state, Plenary assembly, no. 2347/2017
32 Hellenic Council of state, Plenary assembly, no. 805/2018
Numerous members of the Greek Council of State speak fluent French and can access French case-law. However, it would be even better to increase the number of translations, in French or English, of the main rulings of the Hellenic Council of State that deserve to be widely spread to the European and French jurist. This effort of translation and distribution could obtain specific support from the ACA; it would undoubtedly participate in the building of a common identity between the administrative supreme courts of the European Union.

Place: Paris, Date: 12 November 2019