



Brussels, 23<sup>rd</sup> April 2021

Dear Commissioner Johansson,  
Dear Vice-President Schinas,

Since the opening of the new Mavrovouni camp in Lesbos in September 2020, several concerns have been raised over the risk of lead poisoning in a camp built partially on top of a repurposed military firing range.<sup>1</sup> The Greek Government is aware of this risk since results of testing conducted in December 2020 confirmed lead contamination in parts of the Mavrovouni camp which currently house around 6,000 migrants and asylum seekers. It is well known that pregnant women and children are those most at risk when living on and playing with soil and dust contaminated by lead.

On January 27, 2021, the Greek government published the results<sup>2</sup> of limited soil testing that were conducted by the Greek Institute of Geology and Mineral Exploration (EAGME) in November 2020. 12 samples were taken in the camp and only 3 samples were taken from the area of the camp most at risk: the shooting range. No comprehensive testing has taken place assessing the risks for people living in the camp.

These results were examined by two environmental and one medical expert specialised in lead consulted by Human Rights Watch who said that the reported testing was not sufficient in scope to fully assess the extent and severity of lead contamination at the Mavrovouni camp. Moreover, they reported that the methodology used by the EAGME was not clearly described.<sup>3</sup> Experts were also concerned that wrong standards have been applied to some of the test results.

According to the results of the testing, elevated lead levels were found in two samples: “MAV-1” (with very elevated lead levels of 2,233 mg lead/soil) and “MAV-12” (with elevated lead levels of 330 mg lead/kg soil). “MAV-1” was collected near an administrative area with structures that are in direct proximity of the location where elevated lead levels were found.

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<sup>1</sup> Lead poisoning fears at Greek refugee camp built on military site; Al Jazeera, 2 October 2020 - <https://www.aljazeera.com/news/2020/10/2/lead-poisoning-greece>; Greece: Lead Poisoning Concerns in New Migrant Camp, Test Soil, Clear Firing Range; Human Rights Watch, 8 December 2020 - <https://www.hrw.org/news/2020/12/08/greece-lead-poisoning-concerns-new-migrant-camp> ; Question for written answer E-007073/2020 to the Commission.

<sup>2</sup> Technical Report Geochemical Investigation Lesbos Island by Hellenic Ministry of Migration and Asylum; Hellenic Authority for Geological & Mineral Exploration (EAGME); 23 January 2021 - <https://migration.gov.gr/kato-apo-ta-diethni-oria-ta-epipeda-molyvdoy-sto-mavrovouni/>; Letter from Andreas Tsokos, director-general to Manos Logothetis, Secretary-General, Secretary-General of the Ministry of Migration and Asylum; 26 January 2021 - <https://www.scribd.com/document/492488760/26-01-2021-Technical-Report-Geochemical-Investigation-Lesvos-Island>

<sup>3</sup> Greece: Government Downplays Lead Risk at Migrant Camp Results Highlight Urgent Need for Further Testing, Safety Measures; Human Rights Watch, 17 February 2021 - <https://www.hrw.org/news/2021/02/17/greece-government-downplays-lead-risk-migrant-camp>

“MAV-12” was collected in a residential area where there are about 55 tents in direct proximity of the soil sample with elevated lead levels.<sup>4</sup>

We are concerned that the Greek government downplays the risk of elevated lead levels that were found in these two samples. Greek standards foresee three typologies of areas<sup>5</sup>: playground (maximum acceptable is 100 mg/kg), residential (maximum acceptable is 500 mg/kg) and industrial areas (maximum acceptable is 4000 mg/kg). Yet the government has applied standards that are applicable to industrial areas and not for a residential area in the case of “MAV-1” where residents regularly visit for services. While in the case of “MAV-12”, Greek residential standards instead of playground standards were applied although people living in tents and children playing can be expected to be exposed very acutely to soil and dust which make the ‘playground’ standard more appropriate.

We are highly concerned with the limited number of samples taken, especially in the areas at the base of the Mavrovouni hill and the entire area around the hill, which is at high risk because the direction of the firing at the range was such that projectiles with lead would have landed there. The EAGME in its [report](#) on the site identified the area at the base of the hill as an area at high risk of lead contamination and recommended taking it “into account in the design and location of the tents in the [camp] as well as in taking measures to avoid possible dust generation during periods of drought and strong winds.” However, dozens of families are still accommodated in these areas.<sup>6</sup> Therefore, we call on the Commission to ensure that Greek authorities clarify when new comprehensive soil testing will take place and genuinely consult with independent experts about testing plans. We would also call on the Commission to use the most protective standard of acceptable level of lead in soil of 100 mg/kg, most appropriate given the reality faced by residents at risk in the Mavrovouni facility.

Moreover, we call on the Commission to urgently work with the Greek authorities to ensure that all residents living near the lead-contaminated areas, in particular at the base of Mavrovouni hill, will be removed until comprehensive tests are conducted, in order to protect the health of residents and of staff in the camp. We are seriously concerned about the possibility that residents will spend another winter in the camp. The health and safety of anyone accommodated or working in the temporary facility cannot wait any longer.

We stress the Commission to ensure that the authorities of the camp should inform all camp residents and staff about the risks of lead poisoning, including information about risks for pregnant women and children, also. Greek authorities should also provide for free blood testing giving priority to children under two years old who are those most at risk of severe lead poisoning.

Yours sincerely,

1. Tineke Strik (Greens/EFA)
2. Sophie in ‘t Veld (Renew)
3. Cornelia Ernst (The Left)

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<sup>4</sup> Q&A: Lesbos Lead Contamination; Human Rights Watch, 17 February 2021 - <https://www.hrw.org/news/2021/02/17/qa-lesbos-lead-contamination#> What were the

<sup>5</sup> See Geochemical quality control of soil, Technical Report.

<sup>6</sup> Greece: Lead Contamination Threat to Migrants Unresolved; People Still Accommodated in Camp’s Contaminated Area; Human Rights Watch, 1 April 2021 - <https://www.hrw.org/news/2021/04/01/greece-lead-contamination-threat-migrants-unresolved>

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