

EU Succession Regulation: First Decade of Application, Strengths, Challenges, Future Outlooks

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NATIONAL REPORT

GREECE

prepared by

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Table of Contents

INTRODUCTION	3
SUMMARY	3
SETTING THE SCENE	4
SUCCESSION CASES IN YOUR MEMBER STATE	4
STATE OF DIGITALISATION OF THE SUCCESSION PROCEEDINGS	6
METHODOLOGY OF THE RESEARCH	10
QUESTIONS	13
GENERAL	13
JURISDICTION	16
APPLICABLE LAW	21
AUTHENTIC INSTRUMENTS AND COURT SETTLEMENTS	26
RECOGNITION AND ENFORCEMENT OF JUDGEMENTS	27
EUROPEAN CERTIFICATE OF SUCCESSION	28
OTHER ASPECTS	30

Introduction

This National Report was prepared within the *EU Succession Regulation: First Decade of Application, Strengths, Challenges, Future Outlooks* (EUSuccess) project. EUSuccess is focused on the assessment of the practical functioning of the EU Succession Regulation¹ during the first decade of its application in selected Member States: Poland, Italy, Germany, Spain, Lithuania, Greece and Finland.² Each National Report was prepared on the basis of a detailed Questionnaire and thorough research into case-law of domestic courts in a given Member State. EUSuccess has a practical focus on law in action, however when needed the research of EUSuccess Team was supplemented by findings presented in the legal literature, decisions of domestic authorities other than courts, conclusions resulting from the case-law of the Court of Justice of the European Union (CJEU) and data collected during National Seminars aimed at the exchange of experiences with legal professionals.

Summary

The research conducted for this project has revealed a growing body of Greek case law concerning the application of Regulation (EU) 650/2012, encompassing both first instance and appellate decisions. A total of forty-four judgments have been identified and analysed, originating from the Courts of major territorial units, including Athens, Piraeus, Thessaloniki, Crete, and the Aegean Islands. These judgments cover a broad range of issues including international jurisdiction, applicable law, recognition and enforcement of foreign succession documents and decisions, and the issuance of national and European certificates of succession. The study demonstrates that Greek courts, with few exceptions, have interpreted and applied the Regulation correctly with regard to its temporal, territorial and material scope. They have embraced the Regulation's autonomous concepts, particularly the criterion of the deceased's habitual residence, and have undertaken fact-based assessments of the deceased's personal, social and economic ties to determine jurisdiction and applicable law. The relevant rules on jurisdiction (Articles 4, 10, and 6), applicable law (Articles 21, 22, and 23), and recognition and enforcement (Articles 39 to 59) have been applied consistently and in line with the Regulation's objectives. Greek jurisprudence also shows increasing engagement with the recognition of foreign authentic instruments and European Certificates of Succession. Courts have clarified the distinction between the evidential acceptance of public documents and their recognition as enforceable titles and have underlined the automatic circulation of such instruments when accompanied by the form provided under Implementing Regulation 1329/2014. Furthermore, several decisions have explored the relationship between the European Certificate of Succession and the national succession certificate ("klironomitirio"), as well as the respective competences of judicial and non-judicial authorities to issue these instruments. Although systematic data on notarial practice remain limited, the available judgments provide a coherent picture of the Regulation's practical implementation in Greece and illustrate the judiciary's effort to integrate the Regulation's mechanisms into the national procedural framework while

¹ Regulation (EU) No 650/2012 of the European Parliament and of the Council of 4 July 2012 on jurisdiction, applicable law, recognition and enforcement of decisions and acceptance and enforcement of authentic instruments in matters of succession and on the creation of a European Certificate of Succession, OJ L 201, 27.7.2012, p. 107–134. See also Commission Implementing Regulation (EU) No 1329/2014 of 9 December 2014 establishing the Forms referred to in Regulation (EU) No 650/2012 of the European Parliament and of the Council on jurisdiction, applicable law, recognition and enforcement of decisions and acceptance and enforcement of authentic instruments in matters of succession and on the creation of a European Certificate of Succession, OJ L 359, 16.12.2014, p. 30–84.

² National Reports on Poland, Italy, Germany, Spain, Lithuania, Greece and Finland can be found on EUSuccess website at <https://eusuccess.project.uj.edu.pl>.

ensuring conformity with domestic provisions on non-contentious (voluntary) jurisdiction and succession law.

Setting the scene

Succession cases in your Member State

Please describe shortly how the succession cases are dealt with in your MS. Which authorities are competent and to what extent? Is it possible to handle a succession case without recourse to any public authority? Which legal professionals (e.g. notaries, legal advisors, attorneys, tax authorities, land registrars, civil status registrars) and at which stage (planning, liquidating, recognizing foreign decisions, etc.) might interpret or apply the Succession Regulation? Which authorities and legal professionals are considered ‘courts’ within the meaning of Article 3(2) Succession Regulation? Are there any other authorities, which are not ‘courts’, but do intervene in succession matters? How do such authorities establish their jurisdiction? Please explain shortly which authorities in your MS are competent to issue an ECS? What kind of authentic instruments³ within the meaning of Article 3(1)(i) Succession Regulation may authorities of your MS produce? What are their effects?

Succession in Greece is handled through a court-centred but multi-actor system that integrates the application of Regulation (EU) 650/2012 with domestic procedural and administrative mechanisms. The competent court of succession is the Justice of the Peace until 16 September 2024; from that date onwards, competence passes to the Single-Member Court of First Instance under Law 5134/2024. Jurisdiction is territorial and determined by the deceased’s last habitual residence or, failing that, by the capital. These courts exercise both non-contentious (voluntary) and contentious jurisdiction. They issue, amend, or revoke the national certificate of inheritance, supervise or remove executors, authorise acceptance or renunciation, and appoint administrators or curators of estates. They also rule on recognition and enforcement of foreign decisions or authentic instruments under the Succession Regulation. The same courts are the only authorities considered “courts” within the meaning of Article 3(2) and are competent to issue the European Certificate of Succession (ECS).

Greece allows certain successions to be handled without a formal lawsuit, provided there is no dispute among heirs. In such cases, heirs may complete the process through the preparation of notarial or lawyer-led documents and dealings with tax offices and registries. Even then, the process usually requires recourse to public authorities because land registries, banks, and tax offices typically demand a national certificate of inheritance, a ECS, or an authentic instrument meeting Regulation (EU) 650/2012 standards.

Several categories of professionals interpret or apply the Regulation. Judges apply the rules on international jurisdiction, applicable law, and the recognition and circulation of foreign instruments. Notaries prepare authentic instruments such as deeds of acceptance or renunciation of inheritance, deeds of partition, and authentic copies of wills. Lawyers represent parties before courts and also play an increasingly active role in the practical implementation of the Regulation, especially after the 2024–2025 procedural reforms. Tax authorities administer inheritance taxation, while land registrars and cadastral officials record ownership transfers based on judicial certificates or notarial deeds. Civil status registrars provide evidentiary documents such as death or family certificates but have no adjudicative function.

³ See case C–658/17 *WB* ECLI:EU:C:2019:444.

Following Law 5095/2025, the role of lawyers has been formally expanded through the amendment of Article 812 of the Code of Civil Procedure. This reform allows heirs to make a declaration of acceptance of inheritance directly before the court registry, with mandatory representation by a lawyer. This procedure replaces the need for a notarial act in many cases and formalises a practice that had already developed in regions such as Serres and Thessaloniki. It represents a structural change in the legal approach to succession because it integrates the acceptance process within the judicial system while assigning the lawyer a central role in both legal representation and estate management.

In practice, the lawyer drafts the declaration of acceptance, files it at the court registry, and appears together with the heir to lodge the declaration. The registry records the act, and it is then transcribed in the Mortgage Registry or Cadastre to complete the title transfer. Before filing, the lawyer conducts comprehensive due diligence: (a) checking for wills and verifying that any existing will has been validated; (b) identifying heirs through civil status and family documents; (c) mapping the estate's assets and liabilities, including movable and immovable property, bank accounts, claims, and debts; and (d) investigating encumbrances such as mortgages, seizures, or pending litigation. The lawyer also ensures fiscal compliance by assessing inheritance tax, submitting the tax declaration to the competent authority, and arranging settlement of any public debts of the estate. This process transforms the lawyer from a mere legal representative into a strategic coordinator responsible for the entire inheritance process.

Notaries continue to play a crucial role. They issue authentic instruments within the meaning of Article 3(1)(i) of the Regulation, including deeds of acceptance or renunciation, deeds of partition, and wills. These have full evidentiary force and may be enforceable if they contain an executory clause. When accompanied by the certificate required under Implementing Regulation 1329/2014, they circulate in other Member States with equivalent evidentiary and, where applicable, enforceable effect.

Other actors involved include tax offices, land registries, and cadastral offices, which implement administrative tasks rather than adjudicative functions. Their jurisdiction derives from domestic administrative law and is territorially based on the deceased's habitual residence or property location. These authorities act upon valid court or notarial instruments and do not determine substantive issues of inheritance. Civil status registrars issue certificates and record life events that underpin the judicial and notarial processes.

The European Certificate of Succession is issued exclusively by the court of succession, following the procedure of non-contentious (voluntary) jurisdiction and using the standard multilingual form prescribed by Regulation (EU) 650/2012. It is often used to facilitate cross-border administration of estates, recognition of heirship, and proof of powers of executors across Member States. The certificate has direct evidentiary effect without requiring separate registration for its validity, though registration is required under national property law for the actual transfer of title to immovable property.

In summary, Greece operates a hybrid but cohesive system combining judicial, notarial, and administrative mechanisms. Courts are the primary actors under the Regulation, while notaries and lawyers play increasingly active complementary roles. The recent reforms, the hybrid lawyer-based certificate procedure and the new acceptance declaration under Article 812, have significantly modernised Greek practice. The result is a framework where lawyers act as key facilitators of both national and cross-border succession, ensuring compliance with Regulation (EU) 650/2012 while coordinating tax, registration, and property formalities efficiently and in an integrated manner.

Please explain briefly also the state of digitalisation of cross-border succession proceedings⁴ in your Member State. May parties or their representatives communicate with competent authorities by means of electronic communication? May they file applications / claims by means of electronic communication? Is service of documents by means of electronic communication possible? Do documents send electronically have legal effects?

Electronic Communication with Succession Authorities

Greek courts are increasingly adopting electronic communication in succession cases. The Integrated System of Civil and Criminal Justice (OSDDY-PP) now connects major courts, including those of Athens, Piraeus, Thessaloniki, etc., enabling online interaction. Through the judiciary's portal solon.gov.gr, parties or their lawyers can file documents electronically, monitor case progress, access exhibits, and apply for court certificates online. In practice, this means that in probate or inheritance disputes, lawyers may submit petitions and evidence digitally to courts connected to the OSDDY-PP system. For courts not yet integrated, procedures remain more traditional, with filings still required on paper and inquiries often made in person or by telephone. Even so, the use of email or Citizen Service Centres as intermediaries is expanding. Recent civil procedure reforms have embraced the concept of the "electronic case file", which is expected to be fully implemented by 2026. This initiative aims to consolidate pleadings, evidence, and notifications in a secure digital environment, marking a strong shift towards online communication in all civil matters, including succession.

Greek notaries, who are central to inheritance settlements such as drafting deeds of acceptance, are also modernising their practice. While in-person attendance remains necessary for executing notarial acts, notaries now use electronic communication extensively during preparatory stages. Clients and lawyers frequently exchange documents via email, and many notaries employ digital platforms for filings. They have online access to the Hellenic Cadastre, and since 2023, both notaries and citizens have been able to submit notarial deeds for land registration electronically. This is especially relevant to successions, as inheritance deeds transferring real property can now be lodged digitally with the Land Registry. The Cadastre portal also enables notaries to obtain land certificates and conduct title searches online. As a result, much of the post-signature process has become digital. Notaries are also connected to the courts' electronic certificate platform, allowing them to verify an heir's status instantly by retrieving the new e-inheritance certificate rather than corresponding with multiple courts by post.

Communication with the tax authorities in inheritance matters has been entirely digitalised. The Independent Authority for Public Revenue operates the online platform myAADE, which hosts all inheritance-related tax filings and correspondence. Since 2022, inheritance tax declarations have been submitted exclusively through the myPROPERTY application, where heirs declare the estate's assets and values. Older cases can be processed through the "My Requests" portal, which allows the upload of scanned forms and supporting documents. All correspondence from the tax office, such as requests for additional documentation or issued tax assessments, is delivered digitally. Inheritance tax assessments are now sent via the taxpayer's digital inbox on myAADE, with email or SMS alerts replacing postal delivery. Tax clearance certificates needed

⁴ See Regulation (EU) 2023/2844 of the European Parliament and of the Council of 13 December 2023 on the digitalisation of judicial cooperation and access to justice in cross-border civil, commercial and criminal matters, and amending certain acts in the field of judicial cooperation PE/50/2023/REV/1 OJ L, 2023/2844, 27.12.2023.

for the completion of succession can also be obtained online, allowing heirs and their representatives to manage all fiscal matters remotely through secure electronic channels.

Cross-border succession also involves other registries, which are gradually becoming digital. Civil registry certificates, such as birth, death, or marriage records, can be requested via gov.gr, the national e-government portal, and are delivered electronically with a unique verification code. Greece participates in the European Network of Registers of Wills, which enables foreign notaries to make electronic inquiries with the Greek Central Registry of Wills. Additionally, the national business and ship registries offer online search functions. Overall, electronic communication is increasingly standard across courts, notaries, tax offices, and registries, although full adoption remains uneven. Major urban centres and national bodies are fully online, while some smaller courts and older administrative structures continue to rely on in-person procedures.

Electronic Filing of Applications and Claims

Electronic filing is available for many succession applications, though its scope varies by procedure. In 2023, Greece introduced the unified electronic inheritance certificate, known as the “e-beneficiary”, to streamline post-mortem administration. This digital certificate consolidates four separate attestations that were previously issued independently: confirmation of any renunciation of inheritance, publication of a will, existence of pending inheritance litigation, and formal declaration of heirs. Instead of visiting several courts, heirs or lawyers can now submit one online request through solon.gov.gr and receive the certificate electronically in PDF form. For courts already integrated with the OSDDY-PP system, both application and issuance are entirely electronic. The applicant authenticates their identity using the national electronic ID system, submits the request through the portal, and receives the document online. For courts not yet integrated, the request can be filed digitally, often via Citizen Service Centres, but the certificate may still be issued manually until those courts are connected. The e-beneficiary certificate is legally equivalent to traditional paper certificates and is accepted by notaries and tax authorities for settling estates.

Beyond certificates, full electronic filing of lawsuits or petitions in inheritance disputes is now possible in several courts. Lawyers may log into the Solon portal to upload signed pleadings, pay court fees electronically, and receive a filing number without visiting the courthouse. This system also allows electronic submission of evidence and procedural documents during the case. As of 2025, e-filing is primarily used by lawyers, as most succession cases require legal representation. Self-represented parties generally continue to file in person or through Citizen Service Centres unless they possess a qualified electronic signature.

Applications for the European Certificate of Succession (ECS) follow a partly digital process. The competent authority is the Single-Member Court of First Instance in non-contentious jurisdiction. Applications are submitted using the standard EU form, accompanied by supporting documents. Greek courts may accept ECS applications electronically if they are signed with a qualified electronic signature. In practice, a lawyer may prepare and digitally sign the application, then submit it by email or upload it through an e-filing system where available. The certificate itself, however, is still issued in paper form with an official multilingual format, as many foreign authorities continue to require certified paper originals. Courts can issue multiple originals, each valid for six months. Some courts now send ECS drafts or extracts electronically to applicants for review and can transmit the final certificate to foreign authorities via secure judicial communication channels.

The domestic certificate of inheritance issued by the Magistrate's Court remains largely paper-based. Although the Digital Governance Code permits electronic submission of applications and digital copies of orders, the process is not yet fully integrated into the online system. Pilot projects are expected to extend e-filing to these proceedings in the coming years.

In summary, electronic filing has become routine for many aspects of succession practice. Obtaining certificates online is standard, and e-filing for disputes operates successfully in the major courts. The European Certificate of Succession still combines digital submission with paper issuance, but complete online processing is anticipated as the justice system's digital infrastructure expands.

Electronic Service of Documents

Service of judicial documents by electronic means is legally recognised in Greece. Amendments to the Code of Civil Procedure introduced Article 122A, which permits electronic service of documents such as summonses and court notices. This takes place through the official "Electronic Service System", a secure national platform operated by the Federation of Court Bailiffs. Certified court bailiffs use the platform to transmit documents to recipients' official digital mailboxes. Every citizen and legal entity in Greece has such a digital address, accessible via gov.gr or myAADE. Once the document enters the recipient's mailbox, an electronic proof of service is automatically generated, time-stamped, and digitally signed. Recipients receive email or SMS alerts and may access the documents securely. If the document remains unopened for a set period, usually ten days, the service is deemed complete unless a technical fault is proven.

Electronic service is permitted in all civil and non-contentious cases, including succession, except where the law explicitly requires personal delivery. The addressee must have a registered electronic address; otherwise, traditional service applies. Electronic service has already become the norm in many courts and administrative bodies. By 2025, it is expected to be the default method for most judicial communications, drastically reducing reliance on postal or police delivery. In succession proceedings, court orders appointing executors or issuing inheritance certificates may now be served electronically on the parties involved. Notaries or lawyers may also use electronic service, through a bailiff, to notify heirs of the publication of a will.

Cross-border service remains governed by EU Regulation 2020/1784 and relevant international conventions. Electronic service under Article 122A is primarily domestic, although when a party abroad has appointed a Greek representative, documents can be served electronically on that representative. It is expected that domestic e-service will, in due course, connect with European systems such as e-CODEX for secure cross-border delivery.

Legal Effect of Electronic Documents

Greek law treats electronic documents as fully equivalent to paper in terms of legal validity, evidentiary force, and enforceability. Under the Digital Governance Code, which transposes the EU eIDAS Regulation, any document issued electronically by a public authority and bearing a qualified electronic signature or seal constitutes an original public document. It has the same probative and legal effect as a traditional paper document with handwritten signatures and seals. All public bodies, courts, and individuals must accept such documents.

Certified electronic copies of documents, such as court judgments or notarised wills, carry the same evidentiary value as authenticated paper copies. A scanned image certified by a public official with a qualified electronic signature is legally identical to the original. Digitally signed

court decisions and notarial acts are directly enforceable. Even simple digital documents without certification are admissible in court as evidence, though they may be evaluated with less weight.

Decisions and titles issued electronically are enforceable in the same manner as paper equivalents. For example, a notarial deed of acceptance of inheritance signed digitally by all parties and the notary is an enforceable public document. Enforcement officers may act upon a digitally signed copy of a judgment once its authenticity is verified. Documents issued via gov.gr include verification codes or QR identifiers that allow instant online validation by any authority, removing the need for further authentication.

Although the European Certificate of Succession is currently issued on paper, Greek law permits it to exist in digital form, and such an electronic version would carry identical legal effect. Foreign electronic probate documents transmitted to Greek authorities are accepted if their authenticity can be verified, with translation required only where necessary.

In summary, electronic documents and communications have the same legal and evidentiary weight as their paper counterparts. The digital framework ensures reliability, authenticity, and enforceability, reflecting Greece's alignment with European standards.

Digital Platforms and Systems in Succession Practice

Several national digital platforms support the handling of succession cases.

1. Gov.gr serves as the central portal for citizens to access certificates and administrative services, including death certificates, family records, and inheritance-related attestations. It also links users to tax and land registry services and facilitates online appointments with Citizen Service Centres.
2. Solon.gov.gr functions as the judiciary's electronic portal integrated with the OSDDY-PP system. It enables lawyers and citizens to file court documents, monitor cases, and obtain certificates. The unified e-inheritance certificate is requested and issued through this portal.
3. OSDDY-PP itself is the internal case management system used by courts for both civil and criminal matters. It allows judges and clerks to manage digital case files, sign decisions electronically, and coordinate with other public services. In succession matters, it facilitates cross-checking for wills and pending disputes and links directly to national registries for verification purposes.
4. myAADE is the tax authority's online platform, used to file inheritance tax declarations, pay taxes, and obtain clearance certificates. It also serves as the recipient's digital mailbox for official notices.
5. The Hellenic Cadastre provides an online system for registering property transfers and accessing land records. Since 2023, heirs may upload notarial deeds, pay fees, and monitor registration status entirely online. The system issues electronically certified documents that have full legal effect.

These interconnected platforms create a largely interoperable ecosystem that allows heirs and their representatives to complete almost every stage of a succession digitally, from obtaining certificates and filing tax returns to registering inherited property.

Limitations and Compliance with Regulation (EU) 650/2012

Despite the progress achieved, the digitalisation of succession proceedings in Greece is not yet complete. The main limitation lies in the uneven implementation of electronic systems across all courts and authorities. Large urban courts operate fully within the OSDDY-PP framework, while smaller or rural magistrates' courts still rely on paper filings. As a result, hybrid procedures remain common, particularly in cross-border cases that involve multiple jurisdictions.

The European Certificate of Succession procedure remains partly manual. Although applications may be filed electronically, courts continue to examine original documents, such as wills, before issuing the certificate. Moreover, the ECS is typically issued in Greek, with multilingual forms attached, and translations are often required for use abroad. Awareness and training among practitioners are improving but not yet uniform, leading occasionally to inconsistent handling of foreign certificates or documents.

Nevertheless, Greece complies in substance with the provisions of Regulation (EU) 650/2012. Courts apply its rules on jurisdiction, applicable law, and recognition of foreign decisions. The ECS, when presented in Greece, is accepted directly by courts, land registries, and financial institutions without the need for further formalities. The introduction of the unified electronic inheritance certificate has further simplified the documentation process, facilitating both domestic and cross-border procedures.

The use of digital technology for cross-border cooperation continues to expand. Greece participates in the European Network of Registers of Wills and in the e-CODEX system for secure judicial communication, which is expected to include succession matters in the near future.

In conclusion, Greece in 2025 offers a steadily advancing, semi-digital framework for succession proceedings that reflects both technological progress and compliance with European legal standards. Parties and their representatives can communicate electronically with most competent authorities, file applications and documents online, and receive legally effective electronic communications and decisions. While some regional and procedural limitations remain, the trajectory is clearly towards full digital integration, ensuring that cross-border successions are managed efficiently, transparently, and securely in accordance with Regulation 650/2012.

Methodology of the research

Please explain briefly how the research for the purpose of the National Report was made. How was the case law collected? Is it publicly available? How many decisions/cases were identified? What kind of effects, if any, country specific framework had for data collection?

Research design and sources used

The Greek National Report was prepared through a systematic search in leading Greek legal databases and law journals, combined with targeted outreach to courts and practitioners. Primary electronic sources were the commercial databases Nomos, Sakkoulas-online, and Qualex for legislation and secondary materials. Case law was gathered from Sakkoulas-online's curated repositories and journal archives, Nomos headnotes and full texts, and from open judicial portals where available. Scholarly commentary was reviewed in major periodicals that regularly publish first instance and appellate decisions relevant to cross-border succession, including Armenopoulos, Elliniki Dikaïosyni, Efarmoges Astikou & Astikou Dikonomikou Dikaïou, Epitehorisi Politikis Dikonimias, Lex&Forum, and Epitehorisi Emporikou Dikaïou.

Collection of unreported material

Because publication of first instance non-contentious orders is uneven in Greece, the database review was supplemented by direct communication with registries of major Courts of First Instance and Justices of the Peace in Athens, Piraeus, Thessaloniki, Patras, and other district seats, with requests for anonymised copies of non-reported orders in succession matters. Parallel outreach was made to local bar associations and selected practitioners who had acted in cross-border succession proceedings, in order to identify unreported holdings on jurisdiction, applicable law, authentic instruments, and the European Certificate of Succession. Where appropriate, counsel provided redacted copies or citation details that enabled retrieval from court archives.

Public availability and access conditions

Sakkoulas-online and Nomos are subscription services. Qualex (also under paywall) provides comprehensive legislative material and selected jurisprudence but is not a complete repository for first-instance civil decisions. High court decisions are generally publicly accessible, while publication of first- and second-instance decisions depends on editorial selection by journals and database providers. Many orders in non-contentious (voluntary) jurisdiction, including certificates of inheritance and European Certificate of Succession matters, are not systematically published and must be obtained from the issuing registry or the parties.

Volume identified

The research underlying this Report (version 1) identified approximately 44 Greek judgments and orders that apply Regulation 650/2012 or discuss its inapplicability. The corpus includes appellate judgments, first-instance contentious decisions, and a significant number of non-contentious succession orders. Within this set, the majority apply the Regulation on jurisdiction, applicable law, recognition or the European Certificate of Succession. A smaller subset cites the Regulation to delimit or exclude its application in particular fact patterns. This quantitative range reflects both reported and newly retrieved unreported materials.

Country-specific factors affecting data collection

Several features of the Greek framework influenced the research process.

1. Fragmented publication practices. There is no single public repository for all first-instance civil and non-contentious (voluntary) jurisdiction decisions. Publication is selective and varies by district, which necessitated direct inquiries to court registries and reliance on practitioner networks.
2. Anonymisation policies and registry workload. Turnaround times and the scope of redaction differ among courts, which affected the speed and completeness of responses to requests for unreported orders.
3. Procedural posture of succession matters. Many issues arise in non-contentious (voluntary) jurisdiction, which often produces short orders that are filed locally and not submitted to journals, making database coverage incomplete.
4. Ongoing digitalisation. Rollout of electronic case management has improved traceability in larger courts but remains uneven nationwide, which in turn affects searchability and electronic access to first-instance materials.

5. Language and citation practice. Greek-language publication and non-uniform citation of registry numbers required cross-checking across multiple sources to confirm identity of decisions and to avoid duplicates.

Methodological safeguards

To ensure completeness and reliability, the team used parallel searches across multiple databases with harmonised keywords in Greek and English, triangulated journal headnotes against full texts where available, verified unreported items with issuing registries, and built a consolidated index to detect duplicate reports of the same decision across sources. Where only a note or headnote existed, the underlying order was requested from the court registry or the parties' counsel.

Statement regarding version 1 of the Report

The Greek case law set for this National Report was assembled through a blended methodology that combined commercial databases, journal archives, court and bar outreach, and verification with issuing registries. Access is partly public and partly subscription based. Approximately 44 decisions and orders were identified. The principal constraints were the lack of a unified public repository for first-instance materials, heterogeneous publication practices, and uneven digitalisation, all of which were addressed through direct institutional contacts and practitioner cooperation.

Questions

General

1. Were there any doubts in your MS as to the scope of application⁵ (substantive– Article 1(1), temporal – Article 83(1), territorial – Recitals (82), (83)) Succession Regulation?

a) Substantive Scope (Article 1(1))

Greek case law has examined with precision the limits of the Regulation's substantive scope, particularly in cases concerning minors. The District Court of Athens (Decision No. 339/2024, 21 February 2024) held that an application by parents or guardians for judicial authorisation to renounce an inheritance on behalf of a minor does not fall within the substantive field of succession law. Such a request was characterised as a measure for the protection of the minor's property, rather than a matter relating to succession, and thus lies outside the material scope of Regulation (EU) 650/2012. The same conclusion was reached in an earlier decision of the District Court of Athens (No. 434/2021), which stated that an application submitted by parents seeking authorisation to renounce an inheritance on behalf of their minor child constitutes a question of personal status and legal capacity, and more specifically an issue of parental responsibility and parental authority. Consequently, these applications are governed by Regulation (EC) No. 2201/2003 and not by the Succession Regulation.

b) Temporal Scope (Article 83(1))

Greek courts have consistently applied the temporal limitation established by Article 83(1). The Athens Court of Appeal, in Decision No. 420/2024 (1 February 2024), explicitly confirmed that Regulation (EU) 650/2012 applies only to the succession of persons whose death occurred on or after 17 August 2015. The court emphasised that this date constitutes an absolute threshold for the Regulation's temporal application. The decisive criterion is the date of death: if the deceased passed away before 17 August 2015, the Regulation does not apply. In such instances, the applicable law and jurisdiction are determined by national private international law provisions, notably Article 28 of the Greek Civil Code.

c) Territorial Scope (Recitals 82 and 83)

Greek jurisprudence has not revealed significant uncertainty regarding the territorial scope of the Regulation. In practice, the territorial reach of Regulation (EU) 650/2012 has not been a matter of contention before Greek courts.

2. Are there any challenges caused by the fact that Ireland and Denmark (and the UK – before its withdrawal from the EU) are not applying the Succession Regulation?

No case law has been identified in Greece addressing difficulties linked to the non-application of Regulation (EU) No. 650/2012 by Ireland and Denmark, or by the United Kingdom following its withdrawal from the European Union. Greek courts have not yet been called upon to resolve

⁵ See case C–98/24 *Koda* (pending), case C–618/24, *Isergartler* (pending).

any disputes or procedural complications arising from successions connected with these jurisdictions.

3. Are there any international agreements binding your MS, the application of which Succession Regulation ‘shall not affect’ (Article 75(1), Succession Regulation)? Were there any challenges caused by the interplay between international agreements and the Succession Regulation (Article 75(1), Article 75(3) Succession Regulation)⁶? Please outline the main problematic issues briefly.

Greece is bound by certain international agreements whose application is expressly preserved under Article 75(1) of Regulation (EU) No. 650/2012. The most relevant of these is the 1961 Hague Convention on the Conflicts of Laws Relating to the Form of Testamentary Dispositions, which was ratified by Greece through Law 1325/1983. The Convention establishes that a testamentary disposition is formally valid if it complies with the law of the place where the testator made it, or with the law of the testator’s nationality, domicile, or habitual residence, or, in the case of immovable property, with the law of the location of that property.

The coexistence of the 1961 Hague Convention and the Succession Regulation has not caused difficulties in Greek practice. This is because the Regulation itself, in Article 27, adopts a conflict-of-laws rule for the form of dispositions of property upon death that largely mirrors and complements the Convention’s pro-validity approach. Both instruments aim to uphold the validity of testamentary dispositions wherever possible by providing multiple connecting factors. As a result, their interaction is harmonious, and Greek courts have not reported interpretative or practical conflicts between them.

To date, no other international conventions binding Greece have been found to create friction or overlap with the Succession Regulation under Article 75(1) or (3). Nor has Greek case law identified any challenges stemming from the concurrent application of international agreements and the Regulation. The regulatory framework operates coherently, ensuring that the objectives of both the Regulation and the relevant conventions are respected in Greek judicial and notarial practice.

4. Were there instances in your MS where the notion of ‘habitual residence of the deceased at the time of death’⁷ was interpreted for the purpose of the application of the Succession Regulation? What factors were considered? Are there any factors to which more weight is given than to the others? Is this expression understood the same way as for the purpose of establishing jurisdiction and designating applicable law? Please outline the main problematic issues briefly?

Greek courts have consistently treated the concept of “habitual residence of the deceased at the time of death” under Regulation (EU) No. 650/2012 as an autonomous concept of EU law, applied uniformly for both international jurisdiction (Article 4) and applicable law (Article 21). There is no dual or divergent interpretation of this notion in Greek jurisprudence.

The Athens Court of First Instance, in Judgment No. 10001/2025, explicitly confirmed that the determination of habitual residence must be based on a holistic, factual assessment of the deceased’s overall life circumstances. The court underlined that the decisive criterion is the centre of gravity of the deceased’s personal, family, social, and economic relations. The

⁶ See case C-21/22 *OP* ECLI:EU:C:2023:766.

⁷ See case C-80/19 *EE* ECLI:EU:C:2020:569.

analysis includes continuous and stable physical presence, social and professional integration, location of family life, management of assets, and demonstrable *animus manendi* (intention to remain). Formal indicators such as nationality, tax residence, or declared address are not decisive unless they reflect substantive reality. The court emphasised that the concept must be interpreted in light of Recitals 23 and 24, which define habitual residence as the place with which the deceased had a close and stable connection reflecting the centre of their vital interests.

The Three-Member Court of Appeal of Piraeus, in Decision No. 375/2024, undertook a detailed analysis of the constituent elements of habitual residence. It observed that, since the Regulation provides no formal definition, Recitals 23 and 24 of its Preamble acquire particular interpretative importance. According to these recitals, habitual residence requires two cumulative elements: a material element denoting factual establishment and stable presence in a given place, and a volitional element reflecting the expressed intention to make that place the principal and enduring centre of one's life. The Court clarified that the volitional element cannot consist merely of internal intention but must be objectively demonstrated through concrete acts, such as the relocation of family, the establishment of a professional base, or long-term social and economic ties. It also underlined that stability of residence does not require permanence throughout life. In an era of mobility and globalisation, habitual residence is understood as the place to which a person habitually returns and where their core personal and social life is centred, even if they work or reside temporarily elsewhere. Hence, seafarers, students, and employees on long-term foreign assignments do not automatically acquire habitual residence abroad.

Greek courts give predominant weight to factual and objective elements revealing the deceased's actual social and family integration. The most influential factors include duration and continuity of residence, location of the family home and close relatives, social and professional links (employment, business, community participation), location of principal assets and their management, and tangible indications of intent to remain, such as the purchase of property, long-term leases, or permanent registration with local authorities. By contrast, secondary or formal factors, such as nationality, place of birth, or fiscal residence, are viewed as indicative but not determinative. The courts' approach aligns with the EU principle of favouring substantive connection over formal criteria.

Greek jurisprudence recognises that the expression "habitual residence of the deceased at the time of death" carries the same meaning for both jurisdictional purposes under Article 4 and for determining the applicable law under Article 21. Courts expressly reject any dual or independent construction of the notion. The habitual residence at the time of death constitutes a single, unique connecting factor, determining both the competent forum and the *lex successionis*.

The determination of habitual residence is highly fact-sensitive and may give rise to complex evidentiary assessments, particularly in cases involving individuals with multi-centre lifestyles, retirees or expatriates alternating residence between Greece and another Member State, seafarers, seasonal workers, or persons with transnational employment patterns, and attempts at forum shopping by heirs invoking multiple jurisdictions. Despite these complexities, no divergence or inconsistency has been observed in the Greek courts' interpretation. The guiding principle remains the identification of the deceased's centre of vital interests at the time of death. Habitual residence, therefore, serves as the decisive and unifying connecting factor in both jurisdictional and conflict-of-laws analysis under Regulation (EU) No. 650/2012.

5. Are there any other decisions / doubts / challenges, which do not fit within any of the above questions, but are related to the application of the Succession Regulation, and therefore, should be signalled within the National Report?

No additional decisions, doubts, or challenges have been identified in Greece that fall outside the issues already addressed above. Greek courts have not reported further interpretative or procedural difficulties relating to the application of Regulation (EU) No. 650/2012 beyond those discussed in the preceding sections.

Jurisdiction

6. Are you aware of any doubts / challenges to the application of the rules on jurisdiction of the Succession Regulation in your MS⁸? Are there any voices suggesting any amendments to these rules?

In the Greek legal order, the jurisdictional framework established by Regulation 650/2012 has been broadly accepted without substantial controversy. Greek courts have applied the Regulation's system of general, subsidiary, and prorogated jurisdiction consistently and in line with its autonomous EU-law meaning. In particular, the subsidiary jurisdiction provided under Article 10 has been recognised as a legitimate and necessary safeguard to ensure access to justice and the effective administration of estates that include assets located in Greece, even when the deceased's habitual residence at the time of death was outside the European Union.

Greek judicial practice regards Article 10 as an essential mechanism to prevent denial of justice in cases involving cross-border successions with assets in multiple jurisdictions. Courts have exercised such subsidiary jurisdiction cautiously, ensuring that a sufficiently close connection exists between the estate and the Greek forum.

Any interpretative challenges identified in Greek legal doctrine concern primarily the factual determination of the deceased's habitual residence under Article 4 and Recitals 23 and 24, particularly in cases involving complex mobility patterns, multi-state residence, or fragmented estate structures. The risk of forum shopping in borderline cases has been discussed in academic commentary, but the prevailing view is that the Regulation's jurisdictional scheme, including Article 10, provides adequate safeguards against such practices.

To date, no Greek authority, court, or major academic voice has proposed amendments to the jurisdictional rules of the Regulation. The general consensus in Greek legal scholarship is that the jurisdictional framework of Regulation (EU) No. 650/2012 functions coherently and effectively. The focus remains on the uniform and autonomous application of the connecting factors and on maintaining a consistent, abuse-preventive approach in both judicial and notarial practice.

7. Were there instances in your MS where the court or another authority established its jurisdiction based on Article 10(1) Succession Regulation⁹, namely on the basis of location of assets and nationality or previous habitual residence? What were the assets and what was their value? Were there any doubts or challenges to the application of these provisions in practice?

Greek courts have applied Article 10(1) in cases where the deceased was habitually resident in a third (non-EU) State but had assets located in Greece. The Three-Member Court of Appeal of Piraeus, in Judgment No. 375/2024, constitutes a clear example of this practice. In that case, the deceased, a Greek national born in the Dodecanese in 1932, had been habitually resident in Pennsylvania, USA, from 1963 until his death there on 27 May 2020. He was married to the

⁸ See case C-20/17 *Oberle* ECLI:EU:C:2018:485.

⁹ See case C-645/20 VA, ZA, ECLI:EU:C:2022:267, case C-55/23 *Jurtukala* ECLI:EU:C:2023:599, case 291/23 *Hantoch*, ECLI:EU:C:2024:938.

appellant and had three children, including the first respondent. The deceased maintained immovable property in Karpathos, Greece, which served as the connecting factor for subsidiary jurisdiction under Article 10(1)(a) of the Regulation.

The lower court had erroneously dismissed the action as inadmissible for lack of international jurisdiction, holding that the deceased's habitual residence in the United States excluded the jurisdiction of the Greek courts. The Court of Appeal reversed that finding, ruling that Greek courts have subsidiary jurisdiction where the deceased, though habitually resident outside the European Union, was a Greek national and owned assets located in Greece. The presence of immovable property in Karpathos was sufficient to establish the necessary connection, irrespective of the deceased's foreign habitual residence. Accordingly, the appellate court set aside the first-instance decision and retained the case for adjudication.

The Court further clarified that the deceased's periodic visits to Greece, particularly during the summer months, did not constitute habitual residence within the meaning of Regulation 650/2012. Such temporary stays neither represented the centre of his vital interests nor demonstrated a manifested intention to transfer them back to Greece. The appellant's claim of dual residence was therefore rejected as unfounded.

While the above case did not raise issues of *renvoi*, it is acknowledged that future cases may involve the interplay between Article 10(1) and the *renvoi* mechanism under Article 34 of the Regulation. This could occur, for instance, where the deceased was habitually resident in a third State that applies the *lex rei sitae* as its conflict rule for immovable property, thereby referring the matter back to the law of the place where the property is situated, in this instance, Greece. In such situations, *renvoi* could operate constructively to achieve a coordinated outcome, aligning the solutions reached under both legal systems.

In sum, Greek courts have applied Article 10(1) coherently and in line with the Regulation's objectives. Subsidiary jurisdiction has been recognised as an essential mechanism to ensure access to justice in cross-border successions involving Greek assets held by nationals habitually resident in non-EU States. Although no systemic difficulties have emerged, questions of *renvoi* may arise in future cases involving immovable property situated in Greece and foreign conflict rules referring back to the *lex rei sitae*.

Nevertheless, Greek courts were held to have international jurisdiction pursuant to Article 10(1)(a) of Regulation 650/2012. The deceased was habitually resident in a third State outside the EU, but at the time of death retained Greek nationality and owned immovable property in Greece. The possible acquisition of U.S. citizenship and the existence of assets abroad did not affect this conclusion.

8. Were there instances in your MS where the court or another authority established its jurisdiction based on Article 10(2) Succession Regulation, namely on the basis of the location of assets / asset? What were the assets / asset and what was their / its value? Were there any doubts or challenges to the application of this provision in practice?

In Greece, there are no reported cases in which courts have expressly relied on Article 10(2) to establish jurisdiction solely on the basis of the location of assets. Greek judicial practice has so far focused primarily on the general jurisdiction provided under Article 4 of the Regulation, which links jurisdiction to the habitual residence of the deceased at the time of death, and, in some cases, on the subsidiary jurisdiction under Article 10(1). Although Greek courts routinely recognise the theoretical possibility of applying Article 10(2) where no other basis of jurisdiction exists, no decision has been identified in which this provision was determinative.

In practice, cases involving assets located in Greece usually fall under Article 10(1)(a), as the deceased often retains Greek nationality or another sufficient connection with Greece in addition to ownership of local property. To date, therefore, no judicial decision or administrative practice has reported jurisdiction established exclusively under Article 10(2). Nor have any interpretative or procedural challenges arisen in Greek case law regarding its application. The absence of such cases reflects the predominance of habitual residence as the main jurisdictional link in Greek cross-border succession proceedings.

9. Were there instances in your MS where the court exercised jurisdiction or declined jurisdiction based on one of the mechanisms provided for in Articles 5 – 9 Succession Regulation?¹⁰ If yes, could you please explain which mechanism was used and whether there were any doubts or challenges to their application in practice?

No reported Greek judicial decision has been identified in which a court exercised or declined jurisdiction on the basis of the mechanisms provided in Articles 5–9 of Regulation (EU) No. 650/2012. In particular, there are no known cases concerning a valid prorogation of jurisdiction under Article 5, transfer of jurisdiction under Article 6, acceptance of jurisdiction under Article 7, or any coordination mechanism under Articles 8 and 9. Greek courts have so far applied the Regulation’s general rule under Article 4 and, where relevant, the subsidiary jurisdiction under Article 10, without resorting to these alternative mechanisms.

10. Were there cases in your MS where the court exercised jurisdiction based on Article 11 Succession Regulation on *forum necessitatis*? If yes, what were the reasons justifying the need of exercising jurisdiction? What circumstances were considered to justify the sufficient connection with your MS?

There are no known cases in Greece in which a court has exercised jurisdiction on the basis of Article 11 of the Succession Regulation (*forum necessitatis*). No decision has been reported where a Greek court found itself compelled to assume jurisdiction on the ground that proceedings could not reasonably be brought or conducted in another State, nor where it relied on a sufficient connection with Greece to justify such exceptional jurisdiction.

11. Were there cases in your MS where the court limited its jurisdiction based on Article 12 Succession Regulation? If yes, please explain which third state was considered and how the need of limiting jurisdiction was justified?

No cases have been identified in which Greek courts limited their jurisdiction under Article 12 of Regulation (EU) No. 650/2012. In particular, no decision has been located in which a Greek court declined to hear a succession matter in favour of a third-State forum or found that the courts of a non-EU country were better placed to rule on the succession as a whole. Greek judicial practice remains focused on the Regulation’s principal jurisdictional grounds, notably habitual residence under Article 4 and subsidiary jurisdiction under Article 10, and has not yet developed case law on the exceptional mechanisms provided in Articles 5–12.

12. Are courts in your MS competent to receive a declaration mentioned in Article 13 Succession Regulation (namely, ‘a declaration concerning the acceptance or waiver of the succession, of a legacy or of a reserved share, or a declaration designed to limit the liability of the person concerned in respect of the liabilities

¹⁰ See case C–422/20 *RK* ECLI:EU:C:2021:718.

under the succession’)? Are any other authorities competent to receive such declarations (for example, notaries)? Are you aware of any challenges related to making such declarations in your MS¹¹ in cases where jurisdiction in succession matters was with the courts of another MS?

In Greece, the competent authority to receive declarations referred to in Article 13, such as declarations of acceptance or waiver of succession, of a legacy, or of a reserved share, and declarations designed to limit liability in respect of succession debts, is the succession court, namely the Single-Member Court of First Instance of the region where the deceased had their domicile at the time of death, or, in its absence, their residence. If neither domicile nor residence existed in Greece, jurisdiction lies with the Single-Member Court of First Instance of Athens, pursuant to Articles 30 and 810 of the Code of Civil Procedure. In practice, these declarations are filed with the secretariat of the succession court. The main categories of declarations recognised under Greek law are the following.

Firstly, declarations of waiver of succession or legacy by any heir, whether testate or intestate, are submitted to the secretariat of the competent succession court. According to Article 812 of the Code of Civil Procedure and Articles 1847–1859 of the Civil Code, this declaration must be made within four months from the date the heir became aware of the opening of the succession and of their entitlement to inherit. If the deceased or the heir resided abroad, the period for waiver is extended to one year. Waiver is a formal act and, once declared, it is irrevocable.

Secondly, declarations of acceptance of inheritance under benefit of inventory are submitted in the same manner, pursuant to Article 812 of the Code of Civil Procedure and Articles 1902–1912 of the Civil Code. Acceptance with benefit of inventory allows the heir to limit personal liability to the value of the estate’s assets, protecting them from assuming the deceased’s debts beyond that amount. The declaration must be accompanied by an inventory drawn up under judicial supervision.

Thirdly, declarations concerning the acceptance or waiver of the office of executor of a will, or the relinquishment of such an office, are made before the same court in accordance with Article 812 of the Code of Civil Procedure and Articles 2017–2031 of the Civil Code. These declarations ensure clarity regarding the execution of testamentary dispositions and are essential for the administration of the estate.

Fourthly, declarations accepting or relinquishing the appointment as guardian of a vacant succession (that is, a succession with no known heirs) are also filed before the secretariat of the succession court, as provided by Article 812 of the Code of Civil Procedure and Articles 1865–1870 of the Civil Code.

In addition to the judicial authorities, Greek notaries and consular officers are competent to draw up and preserve wills, and, under specific conditions, to record declarations of acceptance or waiver of inheritance when performed abroad by Greek nationals. Such declarations made before a Greek consular authority have the same legal effect as those submitted domestically.

To date, no particular challenges have been reported in Greek practice regarding the making of such declarations in cases where jurisdiction over the succession lies with the courts of another Member State. In such circumstances, Greek procedural law allows the declaration to be made before the competent authority in Greece and subsequently transmitted, if necessary, to the foreign court or authority handling the succession proceedings. Greek courts and notarial authorities recognise and facilitate the exercise of these rights in conformity with Article 13 of

¹¹ See case C–57/24 *Ławida* ECLI:EU:C:2025:217.

the Succession Regulation, ensuring that heirs may validly express their acceptance or waiver before a Greek authority even when the principal succession proceedings are conducted elsewhere in the European Union.

13. Are you aware of any challenges in your MS when it comes to accepting a declaration mentioned in Article 13 Succession Regulation (namely, ‘a declaration concerning the acceptance or waiver of the succession, of a legacy or of a reserved share, or a declaration designed to limit the liability of the person concerned in respect of the liabilities under the succession’) made in other MSs?

Greek judicial and administrative practice has not identified systemic or substantive obstacles regarding the acceptance of declarations made in another Member State under Article 13. In principle, such declarations, including acceptance or waiver of succession, of a legacy, or of a reserved share, as well as declarations limiting liability, are recognised in Greece provided they meet the formal and substantive validity requirements of the Regulation and are duly evidenced by official documentation.

However, practical difficulties may occasionally arise in cases where jurisdiction over the succession lies with the courts or authorities of another Member State. In such situations, Greek courts and registries may request proof of jurisdiction under Article 4 of the Regulation, confirmation that the declaration was made before a competent authority of the other Member State, and verification that it complies with the formal validity requirements of Article 27. Where necessary, parties may be advised to obtain a certified copy or an extract of the declaration issued by the foreign authority, accompanied by a translation into Greek.

While no doctrinal or legislative controversy has emerged concerning the validity or recognition of such foreign declarations in Greece, coordination issues occasionally result in procedural delays. These mainly concern the formalities of translation, authentication, or apostille of foreign documents, as well as communication between authorities to ensure that the declaration has been made in conformity with the law of the Member State of origin.

Overall, Greek practice accepts and facilitates the recognition of declarations made in other Member States under Article 13, and no cases of refusal or substantive challenge have been reported. The difficulties encountered are practical and administrative in nature rather than legal, and they do not undermine the general operability of Article 13 within the Greek legal order.

14. Are there any other decisions / doubts / challenges, which do not fit within any of the above questions, but are related to jurisdictional rules of the Succession Regulation, and therefore, should be signaled within the National Report?

Judgment No. 3348/2017 of the Single-Member Court of First Instance of Thessaloniki constitutes an important precedent for the application of Article 19 of Regulation (EU) No. 650/2012, which governs provisional and protective measures in cross-border succession matters. Under this provision, the courts of a Member State may adopt provisional or protective measures relating to succession property located within their territory, even if jurisdiction over the substance of the inheritance dispute lies with the courts of another Member State.

In this case, the deceased had her habitual residence in Italy, making the Italian courts competent to rule on the merits of the succession under Articles 21, 23, and 24 of the Regulation. Nevertheless, the Greek court correctly relied on Article 19 of the Regulation to assume jurisdiction for issuing provisional measures limited to property located in Greece. The

court ordered the judicial sequestration of immovable assets situated in Greek territory, thereby preventing their disposal and preserving the inheritance rights of the interested parties pending resolution of the main succession proceedings in Italy.

The jurisdiction of the Greek court was thus properly founded on Article 19 of the Regulation, as the protective measure concerned property within the Greek territory. The parallel reference to Article 683(3) of the Greek Code of Civil Procedure, which regulates provisional measures at the domestic level, was unnecessary from the standpoint of establishing jurisdiction but may be understood as a procedural complement indicating the internal procedural framework for the enforcement of the measure.

Applicable law

15. Are you aware of any doubts / challenges to the application of the rules on applicable law of the Succession Regulation in your MS? Are there any voices suggesting any amendments to these rules?

In Greece, there have been very limited doubts or challenges concerning the interpretation or application of the rules on the applicable law under Regulation (EU) No. 650/2012. Both Greek courts and legal scholarship uniformly acknowledge the primacy of Articles 21–25 of the Regulation, which provide that the law governing succession is that of the Member State in which the deceased had their habitual residence at the time of death, while allowing for the testator's choice of the law of their nationality under Article 22. The challenges encountered in practice have been factual rather than legal. They generally concern the establishment of the deceased's habitual residence, particularly in complex circumstances involving multiple residences, long-term professional assignments abroad, or frequent cross-border mobility. In such cases, uncertainty may arise as to whether the deceased's life was more closely connected with Greece or another Member State, requiring courts to conduct a detailed factual assessment. Greek courts apply these provisions consistently with Recitals 23 and 24 of the Regulation and the developing body of Greek case law, which emphasises a comprehensive evaluation of the deceased's family, professional, and social ties to determine the centre of their vital interests. The Greek legal community has not expressed any criticism or proposals for amendment to the applicable law provisions of the Regulation. The general consensus is that Articles 21–25 form a coherent and functional system, adequately balancing predictability, flexibility, and respect for party autonomy through the mechanism of *professio iuris*.

16. Were there cases where the escape clause of Article 21(2) Succession Regulation was applied? If yes, please explain which laws were considered and what circumstances of the case were considered to justify that the deceased was manifestly more closely connected with another law?

No cases have been identified in Greece in which courts have applied the escape clause provided for in Article 21(2). Greek judicial practice has so far adhered strictly to the general rule of Article 21(1), according to which the law applicable to the succession is that of the State in which the deceased had their habitual residence at the time of death. To date, no decision has been reported where a Greek court found that the deceased was manifestly more closely connected with another State, nor where it replaced the law of habitual residence with another law on that basis. The absence of such cases suggests that Greek courts favour legal certainty and predictability, applying the general connecting factor of habitual residence without resorting to the exceptional mechanism of Article 21(2).

17. Were there instances of doubts as to choice of applicable law under Article 22 Succession Regulation? Were there instances where a tacit choice ('demonstrated by the terms of a disposition of property upon death') within the meaning of Article 22(2) Succession Regulation was identified?

To date, there are no reported decisions in which a Greek court has recognised or rejected a tacit choice of law, nor any case law analysing the formal or substantive requirements for such a choice. Consequently, the issue remains largely theoretical in Greek jurisprudence, with scholarly commentary acknowledging the potential relevance of Article 22(2) but noting the absence of practical application in national case law.

18. Were there any instances where the substantive validity of a choice of applicable law was discussed? What was the exact doubt?

To date, Greek courts have not been confronted with disputes questioning whether a testator's express or implied choice of law met the conditions of validity required by the Regulation. Accordingly, no doubts or divergent interpretations have been reported in Greek judicial or academic practice regarding this issue.

19. Were there any instances where the modification / revocation of a choice of applicable law within the meaning of Article 22(4) Succession Regulation was discussed?

No instances have been recorded in Greek case law concerning the modification or revocation of a choice of applicable law within the meaning of Article 22(4) of the Succession Regulation.

20. Are there any doubts in your MS as to which matters are governed by the law applicable to succession (*lex successionis*)? Are there any doubts in delineating the scope of the law applicable to succession (*lex successionis*) and other matters¹² (for example, law applicable to rights *in rem*, law applicable to matrimonial property regimes, legal capacity)?

Based on the research conducted, no reported Greek court decisions have directly addressed doubts concerning the scope of the *lex successionis* under the Regulation 650/2012 or its distinction from related areas of law. Greek courts and legal doctrine generally accept that matters governed by the *lex successionis* include all issues concerning the transmission of assets, rights, and obligations of the deceased, as well as the determination of heirs, their shares, and any succession rights arising from testate or intestate succession.

No jurisprudence has indicated difficulties in differentiating between the *lex successionis* and the laws governing other connected matters, such as rights *in rem*, matrimonial property regimes, or the legal capacity of persons. The prevailing view in Greek doctrine is that the Regulation's framework, as reflected in Articles 1, 23 and 31, provides adequate guidance to delineate the scope of succession law from these adjacent fields, ensuring coherent and consistent application in practice.

21. Were there cases concerning a choice of law made prior to 17 August 2015, which triggered application of Article 83(2) Succession Regulation?

¹² See case C–218/16 *Kubicka* ECLI:EU:C:2017:755, case C–558/16 *Mankopff* ECLI:EU:C:2018:138.

No instances have been recorded in Greek case law concerning this matter.

- 22. Were there instances in which Article 83(4) Succession Regulation was applied¹³ (and the law in accordance with which ‘a disposition of property upon death was made prior to 17 August 2015’ and ‘which the deceased could have chosen in accordance with this Regulation’ was found to ‘have been chosen as the law applicable to the succession’)? How was the requirement of being made ‘in accordance’ with the given law understood?**

No instances have been recorded in Greek case law concerning this matter.

- 23. Were there instances where Article 83(3) Succession Regulation concerning the validity of a disposition of property upon death made prior to 17 August 2015 was applied? Please elaborate?**

No instances have been recorded in Greek case law concerning this matter.

- 24. Were there any cases in your MS concerning the ‘substantive validity’ of a disposition of property upon death within the meaning of Article 26 Succession Regulation and Articles 24–25 Succession Regulation? Where there any doubts as to the designation of applicable law for this purpose or with respect to the notions of ‘admissibility’, ‘substantive validity’, ‘binding effects between the parties’ or ‘conditions of its dissolution’?**

No instances have been recorded in Greek case law concerning this matter.

- 25. Were there any doubts as to the delineation of ‘substantive validity’ and ‘formal validity’?**

No instances have been recorded in Greek case law concerning this matter.

- 26. Were there any challenges to the application of Article 28 on validity as to form of ‘a declaration concerning the acceptance or waiver of the succession, of a legacy or of a reserved share, or a declaration designed to limit the liability of the person making the declaration’?**

No instances have been recorded in Greek case law concerning this matter.

- 27. Is there an institution of an administrator whose appointment is mandatory or mandatory upon request in your MS within the meaning of Article 29 Succession Regulation? Were there instances where foreign applicable law (*lex successionis*) interfered with the powers of administrator exercised under the law of the forum?**

Under Greek succession law, there is no universally mandatory personal representative comparable to the English executor. This is because Greek law adheres to the principle of immediate universal succession, enshrined in Article 1710 of the Greek Civil Code, according to which the heir automatically and directly assumes the legal position of the deceased at the moment of death, without the interposition of an administrator or executor. Nonetheless, Greek procedural and substantive law provides for the appointment of an administrator or curator of

¹³ See case C–80/19 *EE* ECLI:EU:C:2020:569.

the estate (*diacheiristis klironomias* or *epitropos klironomias*) pursuant to Articles 814 et seq. of the Code of Civil Procedure and Articles 1913 et seq. of the Civil Code. This appointment is not automatic but becomes legally mandatory once requested by an interested party. Such a request may arise in cases of conflict among heirs, absence or incapacity of heirs, risk of dissipation of assets, liquidation of the inheritance under benefit of inventory, or insolvency of the estate. Greece therefore falls within the second category envisaged by Article 29, namely systems in which the appointment of an administrator is *mandatory upon request*. Greek courts treat the appointment of an administrator and the procedural consequences of such appointment as matters governed by the *lex fori*. Accordingly, they have jurisdiction to appoint an administrator for assets located in Greece, even when the applicable *lex successionis* is foreign. The underlying rationale is that the administration of justice and the preservation of assets within Greek territory fall within the procedural sovereignty of the forum. However, where the applicable *lex successionis* is that of a foreign jurisdiction that recognises a personal representative with exclusive authority over the estate (for example, under English law), Greek courts have shown deference to that system. In such cases, they may limit the powers of the locally appointed administrator to avoid conflict with the authority conferred under the foreign succession law. Conversely, when the foreign law does not provide for an institution equivalent to the administrator, Greek courts have proceeded with such appointments to ensure effective protection and management of the estate's assets situated in Greece. While Greek law does not impose a universal or automatic system of estate administration, it provides a mechanism that becomes compulsory upon request. Greek courts apply the *lex fori* to the act of appointment and its procedural framework, while respecting the substantive powers and limits established by the applicable *lex successionis*. Instances of interaction with foreign law have confirmed the courts' balanced approach, upholding domestic procedural safeguards while maintaining harmony with the foreign law governing the succession.

28. Were there cases where the *renvoi* provided for in Article 34 Succession Regulation operated? If yes, please explain the laws of which states were considered? Is partial *renvoi* possible?

Greek judicial practice includes at least one notable case demonstrating the operation of the *renvoi* mechanism under Article 34, namely Judgment No. 277/2019 of the District Court of Athens. This judgment represents a significant example of the practical application of the Regulation in Greece, particularly concerning the issuance of a certificate of inheritance and the interaction between subsidiary jurisdiction and the *renvoi* mechanism. The case involved the estate of a deceased UK national who was domiciled and habitually resident in London at the time of death but owned immovable property in Greece, specifically, a 50% share of an apartment, a storage unit, and a parking space in Attica. Although the deceased neither possessed EU nationality nor had habitual residence in a Member State, the Greek court correctly assumed subsidiary international jurisdiction under Article 10 of the Regulation. This provision allows a Member State's courts to exercise jurisdiction when the deceased left assets within its territory, thereby ensuring that heirs can obtain a valid inheritance certificate in the Member State where the assets are located, even when the principal succession is governed by the law of a third country. The court determined that English law was the applicable law under Article 21(1) of the Regulation, as the deceased's habitual residence was in the United Kingdom. However, the court also recognised the operation of *renvoi* under Article 34(1)(a), since English private international law refers succession in respect of immovable property situated abroad to the *lex situs*. Consequently, Greek substantive succession law applied to the immovable property located in Greece. This decision constitutes a textbook example of the proper and effective use of *renvoi* under Article 34, achieving harmony between the Regulation's conflict-of-law system and that of a third State. The court confirmed that the heirs,

the surviving spouse and three children, had not renounced the inheritance and declared them intestate heirs, each entitled to a one-quarter undivided share of the Greek property. The judgment demonstrates that Greek courts are capable of applying the Regulation's jurisdictional and conflict-of-law provisions coherently, coordinating subsidiary jurisdiction under Article 10 with the *renvoi* mechanism under Article 34 to ensure a consistent and equitable outcome. Accordingly, Judgment No. 277/2019 stands as clear evidence that Greek courts recognise and correctly apply the *renvoi* mechanism in cross-border successions involving third States whose private international law refers to the *lex rei sitae*. It confirms that the acceptance of *renvoi* can lead to the application of Greek succession law where the assets are located in Greece, thereby ensuring coordination between EU conflict rules and those of third States. The question of whether partial *renvoi* is admissible remains theoretical in Greek practice, but academic opinion supports a pragmatic and coordinated approach designed to maintain consistency and legal harmony.

29. Were there cases where the rule on *commorientes* of Article 32 Succession Regulation was applied? If yes, please describe.

No instances have been recorded in Greek case law concerning this matter.

30. Were there cases where the rule on estate without claimant of Article 33 Succession Regulation was applied? If yes, please describe.

No instances have been recorded in Greek case law concerning this matter.

31. Were there cases in your MS, in which certain provisions of the law of your MS or another state were qualified as special rules mentioned in Article 30 Succession Regulation (namely as 'special rules which, for economic, family or social considerations, impose restrictions concerning or affecting the succession' in respect of certain specific assets, which 'are applicable irrespective of the law applicable to the succession')? If yes, please describe which rules and relating to what kind of assets were considered? How did the court establish that these rules are indeed applicable irrespective of applicable law?

No instances have been recorded in Greek case law concerning this matter.

32. Were there cases in your MS in which an adaptation of a foreign right *in rem* was performed in accordance with Article 31 Succession Regulation? Please provide details of such adaptation. What was the original right and what was the equivalent?

No instances have been recorded in Greek case law concerning this matter.

33. Were there instances in your MS where the public policy clause of Article 35 Succession Regulation was applied or considered but not applied? If yes, please describe the context of the case and the reasoning of the court.

No instances have been recorded in Greek case law concerning this matter.

34. Were there instances in your MS where 'mechanisms designed to tackle the evasion of the law, such as *fraude à la loi*' were applied as suggested in Recital

(26) Succession Regulation? If yes, please explain the circumstances and outcome of this application?

No instances have been recorded in Greek case law concerning this matter.

35. Were there instances where the rules on territorial conflict of laws (Article 36) or inter–personal conflict of laws (Article 37) were applied in your MS? Were there any doubts / challenges to their application? Please elaborate.

No instances have been recorded in Greek case law concerning this matter.

36. Does your MS comprise several territorial units each of which has its own rules of law in respect of succession within the meaning of Article 38 Succession Regulation? If yes, are domestic rules or the Succession Regulation applied to resolve conflicts of laws arising between such units? Please explain.

No instances have been recorded in Greek case law concerning this matter.

37. Are there any other decisions / doubts / challenges, which do not fit within any of the above questions, but are related to the rules on applicable law of the Succession Regulation, and therefore, should be signalled within the National Report?

No instances have been recorded in Greek case law concerning this matter.

Authentic Instruments and Court Settlements

38. Are you aware of any doubts / challenges to the application of the rules on Authentic Instruments and Court Settlements of the Succession Regulation in your MS? Are there any voices suggesting any amendments to these rules?

Research on this topic is particularly challenging in Greece, as there is no centralised database or public registry of authentic instruments or court settlements. Consequently, the available information relies primarily on judicial decisions in which such instruments have been invoked or examined as part of succession proceedings. No reported cases have revealed substantive doubts or interpretative challenges concerning the application of Articles 58–60 on authentic instruments and court settlements. Greek courts have generally recognised and accepted the evidentiary and, where applicable, enforceable effects of foreign authentic instruments presented in succession cases, provided they comply with the formal requirements set out in the Regulation and are accompanied by the appropriate certificate. Greek notarial practice continues to treat the recognition and circulation of authentic instruments primarily as an evidentiary matter, while the enforcement of such instruments follows the procedural safeguards prescribed by the Regulation. No legal or institutional voices in Greece have suggested amendments to these provisions, which are widely viewed as functional and consistent with domestic legal traditions regarding notarial acts. The main limitation remains the lack of a systematic public database of authentic instruments and court settlements, which restricts empirical research and comprehensive monitoring of their application in practice.

39. Are you aware of any challenges to the use of authentic instruments produced in your MS in another MS?

Greek authentic instruments in succession matters, for example, notarial deeds of heirship, acceptance of inheritance, partition, or transfer of inherited property, are, in principle, readily usable across the EU under Articles 59–60. Greek practice does not reveal systemic legal challenges to their circulation or probative force. Where enforcement is sought, attaching the appropriate certificate under the Implementing Regulation ensures their recognition for enforceability; where only evidentiary use is intended, they circulate with the evidential effects accorded by the Regulation and the law of the Member State of origin. Practical frictions do occur and are procedural rather than substantive. They typically arise from differences in national formalities and document design. Greek deeds often bundle succession, tax, and property effects in a single instrument, while some foreign authorities expect discrete instruments with explicit constitutive statements. This can prompt requests for supplementary clarifications, certified translations, or, in edge cases outside the Regulation’s certificate framework, formal authentication. Once these practical points are satisfied, Greek authentic instruments are generally accepted and used abroad with the same probative and, where applicable, enforceable effect as in Greece.

40. Are you aware of any challenges to the use in your MS of authentic instruments within the meaning of Article 3(1)(i) Succession Regulation, which were produced in another MS?

No challenges have been identified in Greece concerning the use or recognition of authentic instruments, within the meaning of Article 3(1)(i), that were produced in another Member State. Greek courts and notarial authorities generally accept foreign authentic instruments submitted in succession proceedings, provided they meet the formal requirements established by the Regulation and are accompanied by the appropriate certificate issued under Implementing Regulation (EU) No. 1329/2014. In practice, foreign authentic instruments are treated as having the same evidentiary value as domestic public documents, subject to the standard procedural formalities such as translation and, where necessary, verification of authenticity. No judicial or administrative disputes have been reported challenging their validity, probative force, or enforceability. Consequently, Greece’s approach to the use of foreign authentic instruments remains consistent with the principles of mutual recognition and free circulation underpinning the Succession Regulation.

41. Were there any challenges to the enforcement in your MS of a foreign court settlement under Article 61 Succession Regulation?

No instances have been recorded in Greek case law or practice concerning this matter.

42. Were there any other decisions / doubts / challenges, which do not fit within any of the above questions, but are related to circulation of authentic instruments and court settlements under the Succession Regulation, and therefore, should be signaled within the National Report?

No instances have been recorded in Greek case law or practice concerning this matter.

Recognition and Enforcement of Judgements

43. Were there cases in your MS, in which the rules on recognition and enforcement caused doubts / were analyzed and discussed?

The recognition and enforcement of foreign authentic instruments under Regulation 650/2012 have been the subject of judicial analysis in Greece, notably in Judgment No. 1347/2025 of the Athens Court of First Instance. In that case, the applicant submitted a French notarial certificate of inheritance in order to prove their status as the sole heir of a deceased person who owned assets in Greece. The Court examined whether the French notarial act qualified as a “decision” under Article 3(1)(g) of the Regulation or as an “authentic instrument” under Article 3(1)(h). It held that the document did not constitute a decision, as the French notary had not exercised judicial authority but had merely certified a declaration of heirship based on the law. Consequently, the act was classified as a foreign authentic instrument within the meaning of Article 3(1)(h), capable of producing cross-border evidentiary effects in Greece, specifically, proof of authenticity and validity, but not eligible for recognition or enforcement as a judicial decision. The Court further clarified that such an instrument may not be declared enforceable in Greece unless it contains directly executable provisions, in accordance with Articles 43–58 and 60 of the Regulation. This distinction underscores the dual nature of cross-border documents under the Succession Regulation: those of declaratory or evidentiary effect, and those that confer executory rights. The judgment demonstrates that Greek courts do not presume automatic recognition of foreign instruments but instead engage in a structured assessment of the issuing authority’s competence, the legal nature of the instrument, and the rights it purports to create or confirm. In doing so, Greek jurisprudence reaffirms the principle that recognition and enforcement under the Regulation must be determined by the legal character and effects of the foreign act, thereby ensuring procedural safeguards and consistency with the Regulation’s framework.

44. Were there any cases in your MS, in which a decision on succession matters originating from another MS faced refusal of recognition / enforcement? If yes, please provide details.

No instances have been recorded in Greek case law or practice concerning this matter.

45. Does the Succession Regulation have any influence on the recognition and enforcement of decisions coming from third states (for example, when it comes to the assessment of indirect jurisdiction of the foreign court)?

No instances have been recorded in Greek case law or practice concerning this matter.

46. Are there any other decisions / doubts / challenges, which do not fit within any of the above questions, but are related to the recognition and enforcement of judgements under the Succession Regulation, and therefore, should be signalled within the National Report?

No instances have been recorded in Greek case law or practice concerning this matter.

European Certificate of Succession

47. Where there any doubts or challenges with respect to the issuance / use of an ECS¹⁴ in your MS?

¹⁴ See case C–301/20 *UE, HC*, ECLI:EU:C:2021:528, case C–354/21 *RJR* ECLI:EU:C:2022:587, case C–187/23 *Albausy* ECLI:EU:C:2025:34, case C–240/24, *BNP Paribas Fortis* (pending), case C–873/24 *Marwanek* (pending).

Greek jurisprudence demonstrates a coherent and steadily developing approach to the issuance and use of the European Certificate of Succession (ECS) under Regulation (EU) No. 650/2012. Two notable decisions, Judgment No. 170/2019 of the District Court Chania and Judgment No. 93/2021 of the District Court of Kos, illustrate both the practical application of the ECS in Greece and the absence of major interpretative controversies regarding its implementation. In Judgment No. 170/2019, the District Court of Chania examined the estate of a deceased Greek national who had died intestate in 2018, leaving a surviving spouse and children from a previous marriage. The applicant sought the issuance of an ECS to certify inheritance rights over assets located in Greece and Germany. The court confirmed that, pursuant to Articles 4 and 64 of the Regulation, jurisdiction was based on the deceased's habitual residence in Greece, and that the competent authority for issuing the certificate is the Court of First Instance acting in non-contentious (voluntary) jurisdiction. The applicable law was Greek law, determined under Articles 21 and 22 of the Regulation. The decision highlighted several procedural and substantive aspects of the ECS in Greek practice. The application may be submitted using either the EU's standard form or a national equivalent, but the certificate itself must follow Form V, ensuring uniform validity and recognition throughout the EU. The court stressed that the ECS has a comprehensive character, it must include all heirs and their respective shares and cannot be issued partially or for selected heirs. The court also applied Articles 1847–1850 of the Greek Civil Code to recognise that the deceased's children, residing abroad, had implicitly accepted the inheritance by authorising a Greek lawyer to submit the inheritance tax declaration and the ECS application on their behalf. This interpretation affirmed that the ECS serves as a reliable and harmonised tool for certifying inheritance rights across Member States. In Judgment No. 93/2021 of the Kos court, the court reaffirmed and elaborated upon the principles established in the Chania decision. It confirmed that the ECS may be issued upon the request of a single heir but must list all beneficiaries and their inheritance shares. The court distinguished the ECS from the national certificate of inheritance (*klironomitirio*), noting that the European Certificate is issued by judicial decision without the requirement of public posting of the application. This procedural difference reflects the Regulation's transnational nature and its aim to facilitate efficient and uniform recognition across the EU. The Kos court also addressed the renunciation of a legacy, observing that it may occur tacitly, without a formal declaration before the court registry, provided the facts objectively demonstrate an intention to renounce. The court further confirmed that the ECS must include all property belonging to the estate, including assets located in other Member States, in this instance, assets situated in the Netherlands. Finally, the court appointed an executor to ensure compliance with the terms of the will and the effective administration of the estate, consistent with both national law and the Regulation's objectives. Taken together, these judgments illustrate that Greek courts have integrated the ECS into domestic practice in full conformity with the Regulation. The courts have clarified its procedural autonomy, comprehensive scope, and probative force, while ensuring the protection of heirs' rights and the enforceability of the certificate across Member States. No significant doubts or challenges have been reported in Greek case law regarding the issuance or use of the ECS, and judicial practice demonstrates consistency, legal certainty, and adherence to the principles of uniform application and mutual recognition that underpin Regulation 650/2012.

48. Are there any statistics on ECSs made in your MSs available?

There are no official statistics available in Greece regarding the number, frequency, or distribution of European Certificates of Succession (ECS) issued by the competent courts. Neither the Ministry of Justice nor the judiciary's electronic case management systems currently maintain a centralised registry or statistical record dedicated to ECS issuance.

49. Are there any statistics on 'foreign' ECSs used in your MSs available?

No statistical data are available concerning the use, registration, or recognition of European Certificates of Succession issued by other Member States and presented before Greek courts or authorities. The absence of a centralised database for incoming or outgoing ECSs reflects the decentralised nature of the procedure and the relatively recent integration of the ECS into Greek succession practice.

50. Are there any other decisions / doubts / challenges¹⁵, which do not fit within any of the above questions, but are related to the issuance or use of the ECS, and therefore, should be signaled within the National Report?

Judgment No. 277/2019 of the District Court of Athens represents a significant example of the practical application of Regulation 650/2012 in Greece, particularly regarding the issuance of a certificate of inheritance and the interaction between subsidiary jurisdiction and the mechanism of *renvoi* under Article 34. The case concerned the estate of a deceased UK national who was domiciled and habitually resident in London at the time of death but owned immovable property in Greece, specifically, a 50% share of an apartment, a storage unit, and a parking space in Attica. Although the deceased neither possessed EU nationality nor had habitual residence in a Member State, the Greek court correctly assumed subsidiary international jurisdiction under Article 10 of the Regulation. This provision allows a Member State's courts to exercise jurisdiction when the deceased left assets within its territory, thereby ensuring that heirs can obtain a valid inheritance certificate in the Member State where the assets are located, even when the principal succession falls under the law of a third country. The court applied English law as the applicable law to the succession, in accordance with Article 21(1) of the Regulation, since the deceased's habitual residence was in the United Kingdom. However, the court also recognised the operation of *renvoi* under Article 34(1)(a), as English private international law refers succession in respect of immovable property situated abroad to the *lex situs*. Consequently, Greek substantive succession law applied to the immovable assets located in Greece. This constitutes a textbook example of the proper and effective use of *renvoi* under Article 34 of the Regulation, ensuring harmony between the Regulation's conflict-of-law rules and those of a third State. The court verified that the heirs, the surviving spouse and three children, had not renounced the inheritance and declared them intestate heirs, each entitled to a one-quarter undivided share in the Greek property. The judgment demonstrates the Greek courts' ability to apply the Regulation's jurisdictional and choice-of-law provisions coherently, coordinating subsidiary jurisdiction under Article 10 with the *renvoi* mechanism under Article 34 to achieve a consistent and fair outcome. Accordingly, this decision should be noted both as an illustration of the practical use of Article 10 in conjunction with the operation of *renvoi* and as a confirmation that, despite the inherent complexities of Article 34, Greek courts have applied the mechanism correctly to align the Regulation's framework with the private international law rules of third States.

Other aspects

51. Are there any other decisions / doubts / challenges, which do not fit within any of the above headings and questions, but are related to the application of the Succession Regulation, and therefore, should be signaled within the National Report?

No additional judicial decisions, doubts, or challenges have been identified in Greece that fall outside the issues already addressed above. However, the overall analysis of Greek

¹⁵ See case C-102/18 *Brisch* ECLI:EU:C:2019:34.

jurisprudence and doctrine reveals several noteworthy developments that reflect the deeper influence of Regulation 650/2012 on both judicial interpretation and legislative decision-making. Greek courts have consistently treated the Regulation as an autonomous and coherent legal instrument that forms part of the broader European system of private international law. Judicial reasoning demonstrates a thorough understanding of its aims and structure, particularly in relation to habitual residence, subsidiary jurisdiction, and the coordination of applicable laws. The reasoning adopted in the decisions thus far analysed confirms that Greek courts interpret the Regulation in a uniform and purposive manner. They give priority to substantive connection over formal criteria and interpret *renvoi* as a mechanism that ensures harmony between the Regulation's rules and the conflict-of-law systems of third States. Beyond judicial practice, the Regulation has exerted a noticeable positive influence on Greek legal doctrine and legislative debate. In particular, it has encouraged a renewed discussion on the possible modernisation of domestic succession law, especially regarding the legalisation of succession contracts and other instruments of anticipatory estate planning. Greek civil law traditionally prohibits such contracts on grounds of public policy and the principle of freedom of testation. However, exposure to the more flexible systems of other Member States through the operation of the Regulation has prompted parts of the legal community to reconsider this rigidity. The Regulation's acceptance of *pacta successorialia* under certain conditions has been viewed by many Greek scholars as evidence of a broader European tendency to recognise private autonomy in succession matters, which could serve as a model for future domestic reform. This emerging doctrinal debate illustrates how the Regulation functions not only as a conflict-of-laws instrument but also as a vehicle for legal convergence and modernisation within Member States. By facilitating the recognition of foreign instruments and enhancing legal certainty in cross-border successions, it has indirectly encouraged Greek jurists to explore ways of aligning national law with the evolving European paradigm of testamentary freedom and contractual planning. In conclusion, Greek experience with Regulation 650/2012 reveals a stable and coherent judicial application accompanied by a growing intellectual openness towards the harmonisation of substantive succession law. The Regulation has deepened the European dimension of Greek private international law and inspired reflection on the future development of domestic succession institutions under its positive influence.