

2025 UPDATE

EGYPT

COUNTRY
REPORT

Acknowledgements & Methodology

This report was researched and drafted by Refugees Platform in Egypt and edited by ECRE.

The report follows the AIDA methodology developed by ECRE. It draws on desk research, official statistics, and consultations with civil society organizations, academic experts, and legal practitioners in Egypt. It follows an integrated descriptive and analytical methodology to read Egypt's asylum landscape, focusing on its dual role as a destination and transit country and the resulting effects of the Egyptian-European agreements in migration and border security.

The information in this report is up-to-date as of 31.05.2025, unless otherwise stated.

The Asylum Information Database (AIDA)

The Asylum Information Database (AIDA) is coordinated by the European Council on Refugees and Exiles (ECRE). It follows a methodology developed by ECRE in 2012, which has been applied to the country reports in every annual publication cycle since then.

AIDA aims to provide up-to date information on asylum practice in 25 countries. This includes 19 EU Member States (AT, BE, BG, CY, DE, ES, FR, GR, HR, HU, IE, IT, MT, NL, PL, PT, RO, SE, SI) and 6 non-EU countries (Egypt, Serbia, Switzerland, Türkiye, Ukraine and the United Kingdom) which is accessible to researchers, advocates, legal practitioners and the general public through the dedicated website www.asylumineurope.org. The database also seeks to promote the implementation and transposition of EU asylum legislation reflecting the highest possible standards of protection in line with international refugee and human rights law and based on best practice.

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Glossary & List of Abbreviations

Illegal Migration	Due to the author's stance on the right to freedom of movement, we refrain from using the term "illegal immigration" and it is barred as it inappropriately criminalizes the act of migration itself and makes judgments about individuals and their inherent right to move. It nonetheless appears in the text because it is the term used in the title of policies and documents.
NCCPIM&TIP	The National Coordinating Committee for Combating and Preventing Illegal Migration and Trafficking in Persons.
The Illegal Migration Fund	The Fund for Combating illegal migration and Protecting Migrants and Witnesses
The National Council for Women	An Egyptian governmental body tasked with promoting and protecting women's rights across various sectors. Despite its general mandate on women's issues, the Council has shown limited engagement with the specific needs and challenges facing migrant and refugee women in Egypt.
The National Council for Childhood and Motherhood	An Egyptian governmental institution responsible for formulating policies and programs related to the protection of children's rights. The Council is expected to raise awareness of issues related to childhood and motherhood, including the protection of migrant and refugee children. It also monitors the legal and social conditions of children in diverse contexts.
The European Egyptian Strategy	A cooperation framework between the European Union and Egypt, aimed at strengthening bilateral relations in multiple sectors, including economic development, migration governance, and security cooperation.
The Egyptian Coast Guard	A security body operating under the Naval Forces of the Egyptian Ministry of Defense. It is responsible for securing Egypt's maritime borders, conducting coastal surveillance, combating irregular migration by sea, and protecting Egyptian ports and vessels from illicit activities.
Directorate of Passports and Immigration	The Egyptian government agency responsible for issuing passports, regulating residence permits, and overseeing immigration, visa issuance, and residency procedures. The Directorate operates under the supervision of the Ministry of Interior.
Social Welfare	Refers to the services and assistance provided by government bodies or humanitarian organizations to vulnerable individuals, including refugees and migrants, in order to ensure an adequate standard of living. These services may include financial support, healthcare, and access to education.
Community Schools	Non-formal educational institutions designed to serve marginalized populations, including refugees and residents of rural areas. In Egypt, such schools are supported by UNICEF and civil society actors to ensure access to education for children who are excluded from the formal education system.
Illegal Employment	Employment that occurs in violation of national labor laws, particularly involving migrants or refugees working without the necessary permits or in breach of legal residency conditions. In Egypt, Labor Law No. 12 of 2003 regulates the employment of foreign nationals, and the Foreign Asylum Law No. 164 of 2024 sets additional rules concerning the employment of refugees.
Lost Record	An official document issued by police departments or competent authorities to confirm the loss of a document or personal property. It is used as formal evidence in administrative or legal procedures.
Reference Number	A number issued by the Egyptian Ministry of Foreign Affairs that is essential for the official registration of refugees and asylum seekers. This number is used to track the status of asylum applications and to facilitate communication with relevant authorities. It is also required to complete certain legal procedures, including the issuance of residency permits.

Statistics

Overview of statistical practice

Statistics on the total number of international protection applicants and beneficiaries, as well as data on the registration of the latter across provinces, are updated monthly and provided by the The United Nations High Commissioner for Refugees (UNHCR) in Egypt.

Registered international protection applicants and beneficiaries as of March 31, 2025

Total	941,625
Sudan	672,930
Syria	139,384
Others	129,311

Source: UNHCR Website, available [here](#).

Breakdown across 24 main provinces:

Province	Registered refugees
Cairo	262,974
Suez	3,852
Marsa Matrouh	1,205
Minya	1,052
The Red Sea	765
Asiyout	633
Beni Suef	488
Fayoum	413
Souhag	341
South Sinai	142
North Sinai	58
The New Valley	15

Province	Registered refugees
Alexandria	89,371
Beheira	1,962
Kafr Al Sheikh	972
Al Minoufiya	6,980
Qalyubia	27,295
Ismailia	1,288
Al Sharqiya	28,668
Port Said	265
Giza	481,402
Al Gharbiya	1,715
Al Dekhila	4,653
Damietta	10,341

Source: UNHCR Website, available [here](#).

Overview of the legal framework

Main legislative acts relevant to international protection and temporary protection

Due the author's stance on the right to freedom of movement, we refrain from using the term "illegal immigration" and it is barred as it inappropriately criminalizes the act of migration itself and makes judgments about individuals and their inherent right to move. It nonetheless appears in the text because it is the term used in the title of policies and documents.

Title (EN)	Original Title (AR)		Human Rights Commentary	Web Link
Asylum Law No 164 of 2024	قانون لجوء الأجانب، رقم 164 لسنة 2024.	On December 16, 2024, the law was issued via a presidential decree and was published in Official Gazette No. 50 (Supplement C). It is the first national legislation to regulate the asylum process in the country, more than 40 years after Egypt ratified the 1951 United Nations Refugee Convention and its 1967 Protocol.	<p>Human Rights organizations expressed concern that the lack of consultation with stakeholders has resulted in a law that fails to meet the needs of refugees and respects their fundamental rights. The law was first announced during a Cabinet meeting on June 7, 2023. On October 23, 2024, the Defence and National Security Subcommittee of the Egyptian House of Representatives announced having approved the government's draft Asylum Law. The Human Rights organizations called for an open and transparent dialogue on the draft law before its approval by Parliament. This process of issuing the law has resulted in numerous violations of refugees' fundamental rights, and rather than providing protection, the law exposes them to numerous risks.</p> <p>Seven United Nations Special Rapporteurs on human rights expressed concerns in a letter to the Egyptian government regarding the current implementation of the asylum law, urging amendments and warning that the law violates international law and Egypt's obligations under ratified refugee conventions.</p> <p>The Refugee Platform in Egypt, in collaboration with the Egyptian Initiative for Personal Rights, issued a joint paper titled "The New Asylum Law Undermines Basic Protections for Refugees and Represents a Regression from the Existing Legal Status." The paper addressed the Egyptian government's efforts to change the existing system and create a domestic legal framework. The new legislation was hoped to address the existing problems and bridge the protection gaps that refugees have suffered from for years. However, the law does not achieve</p>	here (AR)

			its intended purpose and represents a regression from the existing legislative system. In addition to the law's contradictions in several places with the Egyptian Constitution and international conventions, it dismisses key protections for refugees and asylum seekers.	
Law No 172 of 1954, on the approval of the agreement concluded between Egypt and the United Nations High Commissioner for Refugees (UNHCR)	قانون 172 لسنة 1954 بشأن الموافقة على الاتفاقية الموقعة بين الحكومة المصرية ومكتب الأمم المتحدة لشؤون اللاجئين الموقع عليها بالقاهرة	The law was issued by the President of the Republic and published in the Official Gazette No. 71 on March 24, 1954, approving the agreement concluded between the Egyptian government and UNHCR, signed in Cairo. Under this agreement, UNHCR was entrusted with operational responsibilities for all aspects related to registration, asylum documentation, status determination procedures, resettlement, voluntary return, inter-agency coordination, and assistance to the most vulnerable groups. Accordingly, the first UNHCR office was established in Egypt.		here (AR)
Anti Human Trafficking Law, No 64 of 2010	قانون مكافحة الاتجار بالبشر رقم 64 لسنة 2010	On May 9, 2010, the law was issued by the President of the Republic and published in the Official Gazette No. 18 bis. It is the first law to criminalize human trafficking and sets penalties of up to life imprisonment and heavy fines. It aims to protect victims, especially women and children, from sexual or labor exploitation or forced recruitment, while establishing a mechanism to provide them with medical, psychological, and legal support. The law provides for the formation of the "National Coordinating Committee for Combating Human Trafficking."	Despite its importance in combating human trafficking, the law is criticised for its lack of effective measures to protect the rights of refugees and migrants in particular. The law's lack of clear mechanisms to identify victims and provide them with the necessary support is a major shortcoming.	here (AR)
Law No 82 of 2016, on Combating Illegal Migration and Smuggling of Migrants	قانون مكافحة الهجرة غير الشرعية وتهريب المهاجرين رقم 82 لسنة 2016	On November 7, 2016, the law was passed by Parliament and published in Official Gazette No. 44 (A). Its objective is to criminalize and combat irregular migration and migrant smuggling. The law included provisions for the establishment of the National Coordinating Committee for Combating and Preventing	Several human rights organizations concerned with refugee affairs have criticized this law. The Refugee Platform in Egypt commented on the law and its amendment, the resolution No. 22 of 2022, stating that irregular migration has deep-rooted causes that must be addressed first before imposing harsher penalties. Despite the harsher penalties in Law No. 82 of 2016, irregular migration has not been affected by this tightening. The RPE	here (AR)

		<p>Illegal Migration and Trafficking in Persons, outlining its mandate, membership, and basic operational framework. The committee was formally established under Prime Ministerial Decree No. 192 of 2017, with further details referred to the law's executive regulations.</p> <p>Article 32 provided for the creation of the "Fund for Combating Illegal Migration and Protecting Migrants and Witnesses," which was subsequently established through Prime Ministerial Decree No. 369 of 2023. The law also defined key terms and concepts used in its provisions and set out penalties for violations.</p>	<p>recommended some proposals to Parliament and relevant authorities, most notably amending the law to provide real guarantees for irregular migrants against criminal prosecution and protection against forced deportation, which threatens the safety and lives of refugees. The legislative system needs to reconcile the contradiction between Law No. 82 and Presidential Decree No. 444 of 2014, which defines areas adjacent to the border and treats them as military zones, which subsequently puts migrants at risk of military trials. Article 8 of this law must be repealed or amended to protect individuals and organizations from criminal prosecution for merely assisting victims.</p>	
Law No. 89 of 1960 on the Regulations of Entry, Residence, and Exit of Foreigners	قانون دخول وإقامة الأجانب رقم 89 لسنة 1960	<p>Issued by the President and published in Official Gazette No. 71 on March 24, 1960, the law regulates entry into, residence in, and exit from the territory of the United Arab Republic, which at the time comprised both the Egyptian and Syrian territories under the Interim Constitution. The law does not exempt refugees or asylum seekers from the penalties it prescribes, exposing them to the risk of detention, administrative detention, and deportation. While it exempts certain categories, such as members of the diplomatic corps, from residency card fees, it makes no provision for refugees.</p>	<p>Article 36 of the law was amended by Law No. 77 of 2016, resulting in a significant increase in residence card fees. The amendment raised the cost of residence permits for foreigners in Egypt. The law exempts certain categories, such as members of the diplomatic corps, from paying residence fees, but makes no mention of refugees or asylum seekers. By failing to include any consideration for these groups, the legislation imposes an additional financial burden on individuals already facing legal and economic vulnerability.</p>	here (AR)
Labour Law, No 12 of 2003.	قانون العمل، رقم 12 لسنة 2003.	<p>Issued by the President and published in Official Gazette No. 14 (bis) on April 7, 2003, the law concerns the regulation of employment.</p>	<p>The labour law's failure to account for the conditions and rights of refugees contributes to their marginalization in the labour market, exacerbating their hardship and undermining their chances of achieving a dignified standard of living. In the absence of clear legal protections, refugees are vulnerable to labour exploitation and are often forced to work in unsafe conditions without access to rights or social protections. This lack</p>	here (AR)

			of protection increases their social vulnerability and limits their ability to integrate effectively into the host community.	
Law 149 of 2019 on the Regulation of Civil Work and Non-profit Organizations.	قانون تنظيم ممارسة العمل الأهلي رقم 149 لسنة 2019		<p>The law regulates the status of foreign nationals, including refugees and migrants, in relation to civil society work in Egypt, whether as founders, members, or employees of associations. Article 5 stipulates that non-Egyptians with permanent or temporary legal residency in Egypt may join the membership or board of directors of an association, provided that their representation does not exceed 25 percent of the total membership. The executive regulations specify the conditions governing such participation. Article 6 further authorizes the competent minister, subject to the principle of reciprocity, to grant licenses for the establishment of associations by foreign communities in Egypt.</p> <p>Regarding employment within foreign non-governmental organizations, Article 72 affirms that all employment relationships in these organizations are subject to Egyptian labour law, and that Egyptian courts have sole jurisdiction over any disputes arising from such relationships. Any agreement to the contrary is considered null and void. The same article stresses that civil society organizations may not engage foreign nationals, whether as experts, permanent or temporary workers, or even volunteers, without obtaining prior authorization from the competent minister, in accordance with procedures outlined in the executive regulations.</p>	here (AR)
Law 175 of 1950 on the agreement between Egypt and the United Nations Relief and Works Agency for Palestine Refugees in the Near East (UNRWA).	الاتفاق بين مصر وبين وكالة الاغاثة التابعة للأمم المتحدة اللاجئين الفلسطينيين في الشرق الأدنى.			here (AR)

Main implementing decrees and administrative guidelines and regulations relevant to international protection and temporary protection

Due the author's stance on the right to freedom of movement, we refrain from using the term "~~illegal~~ immigration" and it is barred as it inappropriately criminalizes the act of migration itself and makes judgments about individuals and their inherent right to move. It nonetheless appears in the text because it is the term used in the title of policies and documents.

Title (en)	Original Title (ar)	Introduction	Human Rights Commentary	Web Link
Cabinet Resolution No 192 of 2017 on the Formation of the National Coordinating Committee for Combating and Preventing Illegal Migration and Trafficking in Persons, NCCPIM&TIP.	قرار رئيس الوزراء بتشكيل اللجنة الوطنية التنسيقية لمكافحة ومنع الهجرة غير الشرعية والإتجار بالبشر	<p>The decision was issued by the Prime Minister and published in Official Gazette No. 3 (B) on January 23, 2017, in accordance with Chapter Five, Articles 28 to 31 of Law No. 82 of 2016, which provides for the formation of the National Coordinating Committee for Combating and Preventing Illegal Migration and Trafficking in Persons. The committee is mandated to coordinate, at both national and international levels, the development and implementation of policies, plans, and programs aimed at combating and preventing illegal migration and human trafficking, and to ensure the provision of care and services to victims of trafficking.</p> <p>The Coordinating Committee for Combating and Preventing Human Trafficking was originally established in 2007 by Prime Ministerial Decree No. 1584 of 2007. The National Coordinating Committee for Combating and Preventing illegal migration was later established on March 9, 2014, by Prime Ministerial Decree No. 380 of 2014. On November 7, 2016, the two committees were merged under Law No. 82 of 2016 on Combating illegal migration. The unified committee reports directly to the Prime Minister and is headquartered at the Ministry of Foreign Affairs.</p>		here (AR)
Presidential Decree No 444 of 2014 on the Designation of	قرار رئاسي رقم ٤٤٤ لسنة ٢٠١٤	The Decree was published in Official Gazette No. 48 (A) on November 29, 2014. It concerns the designation of areas adjacent to the borders of the	The Cairo Institute for Human Rights Studies issued a position paper titled " <i>The National Strategy: Two Years of Denying the Ongoing Human Rights Crisis.</i> " The paper notes that although the Egyptian	

Areas Adjacent to the Borders of the Arab Republic of Egypt and the Regulations Governing Them		<p>Arab Republic of Egypt and the regulations governing them, based on a proposal submitted by the Commander-in-Chief of the Armed Forces and the Minister of Defense and Military Production.</p> <p>The scope of designated border areas under this decree was significantly expanded compared to previous definitions. Prior to the issuance of Decree No. 444 of 2014, the extent of these adjacent areas had been governed by Resolution No. 204 of 2010, which provided the earlier legal framework for identifying and regulating border zones.</p>	<p>Constitution stipulates that the state may only expropriate private property in the public interest, with respect for human rights and the provision of fair compensation, thousands of residents in Sinai were forcibly displaced between 2013 and 2020 under the pretext of counterterrorism operations. Cabinet Decree No. 420 of 2021, widely criticized as unjust, led to the evacuation of approximately 3,000 square kilometers in northeastern Sinai by designating the area as a border zone subject to heightened restrictions.</p> <p>The Sinai Foundation for Human Rights stated that the amendment of Decree No. 444 of 2014 through Decree No. 420 of 2021 resulted in the expansion of restricted zones under ambiguous military plans that appear aimed at depopulating the region. These restrictions have had a severe impact on the lives of remaining residents. The Resolution was issued without public consultation or media scrutiny, despite its far-reaching consequences. It includes numerous villages, residential areas, and major towns still inhabited by thousands of civilians within the designated restricted areas.</p>	
Cabinet Resolution No 369 of 2023 establishing the Fund for Combating Illegal Migration and Protecting Migrants and Witnesses.	قرار تنظيم صندوق للهجرة غير مكافحة وحماية للشرعية المهاجرين والشهود		<p>The Egyptian Commission for Rights and Freedoms issued a report commenting on the Decree, stating that, like other special funds, this fund's budget is excluded from the state budget and is not subject to parliamentary oversight by the House of Representatives. It is only nominally overseen by the Central Auditing Organization.</p> <p>The report further noted that the decision to establish the fund lacked a clear national plan for combating illegal migration and failed to outline how the fund's resources would be allocated. It criticized the absence of standardized procedures governed by ordinary law, warning against reliance on exceptional</p>	here (AR)

			<p>legislation and ad hoc decisions that vary according to time, place, and the nationalities involved.</p> <p>The ECRF also emphasized that there is no justification for establishing such a fund in the absence of comprehensive legislation defining refugees, migrants, and victims, and setting out clear legal procedures for entry, stay, and access to rights. Without a legal foundation and institutional oversight, the creation of such funds risks facilitating corruption and mismanagement of public resources, especially since they fall outside the scope of the state budget and are not subject to oversight by official or public accountability mechanisms.</p>	
Presidential Decree No. 10 of 2019	قرار رئاسي رقم ١٠ لسنة ٢٠١٩	On approving the financing agreement between Egypt and the European Commission on the programme to strengthen the response to migration challenges in Egypt, signed in Brussels on 17 October 2018.		Here (AR)
Presidential Decree No. 331 of 1980	قرار رئاسي رقم ٣٣١ لسنة ١٩٨٠	On approving the United Nations Convention relating to the Status of Refugees.		Here (AR)
Presidential Decree No. 332 of 1980	قرار رئاسي رقم ٣٣٢ لسنة ١٩٨٠	On approving the Organization of African Unity Convention governing the various aspects of refugee issues in Africa.		Here (AR)
Presidential Decree No. 333 of 1980	قرار رئاسي رقم ٣٣٣ لسنة ١٩٨٠	On the approval of the Protocol amending the 1951 Convention relating to the Status of Refugees, signed in New York in 1967.		
Cabinet Resolution No. 1050 of 2024	قرار مجلس الوزراء رقم ١٠٥٠ لسنة ٢٠٢٤	On extending the period for regularizing the status of foreign nationals residing illegally in the country.		Here (AR)
Foreign Ministers Resolution No 39 of 1981	قرار وزارة الخارجية رقم ٣٩ لسنة ١٩٨١	On the publication of the approval of the Protocol amending the 1951 Convention relating to the Status of Refugees.		
Interior Ministry Resolution No 181 of 1964	قرار وزارة الداخلية رقم ١٨١ لسنة ١٩٦٤	Issued by the Minister of Interior, the Resolution concerns the issuance of temporary travel documents to Palestinian refugees upon recognition of their refugee status.		Here (AR)

Interior Ministry Resolution No 1888 of 2023	قرار وزارة الداخلية رقم ١٨٨٨ لسنة ٢٠٢٣	Regarding the implementation of certain provisions of Law No. 89 of 1960 concerning the entry, residence, and departure of foreigners from the territory of the Arab Republic of Egypt.		Here (AR)
Presidential Decree No. 349 of 2024 regarding the regulation of the Fund for Assisting Victims of Human Trafficking.	قرار رئاسي رقم ٣٤٩ لسنة ٢٠٢٤			Here (AR)
Presidential Decree No 556 of 2016	قرار رئاسي رقم ٥٥٦ لسنة ٢٠١٦	Presidential decree approving the agreement signed in Berlin on 11 July 2016 between the Government of the Arab Republic of Egypt and the Government of the Federal Republic of Germany on cooperation in the field of security.		Here (AR)
Cabinet Resolution No 3326 of 2023	قرار مجلس الوزراء رقم ٣٣٢٦ لسنة ٢٠٢٣	Issued by the Prime Minister, the Resolution requires foreign nationals residing irregularly in the country to regularize their status and mandates the submission of proof confirming the conversion of the equivalent fees, including residency fees, overstay penalties, and residency card issuance costs, from US dollars or other convertible foreign currencies into Egyptian pounds through an accredited bank or licensed exchange company.		Here (AR)
Cabinet Resolution No 2879 of 2024	قرار مجلس الوزراء رقم ٢٨٧٩ لسنة ٢٠٢٤	Regarding the reconstitution of the National Coordinating Committee for Combating and Preventing Illegal Migration and Trafficking in Persons.		
Cabinet Decree No 1123 of 2017	قرار مجلس الوزراء رقم ١١٢٣ لسنة ٢٠١٧	The Resolution concerns adding representatives from various ministries and entities to the membership of the National Coordinating Committee for Combating and Preventing Illegal Migration and Trafficking in Persons, established by Resolution No. 192 of 2017, starting with the Ministry of Health and Population and ending with the National Council for Childhood and Motherhood.		

Cabinet Resolution No 803 of 2017	قرار مجلس الوزراء رقم ٨٠٣ لسنة ٢٠١٧	The Resolution concerns adding a representative from the Ministry of State for Emigration and Egyptian Expatriates' Affairs to the membership of the National Coordinating Committee for Combating and Preventing Illegal Migration and Trafficking in Persons, established by Decree No. 192 of 2017.		
Cabinet Resolution No 739 of 2017	قرار مجلس الوزراء رقم ٧٣٩ لسنة ٢٠١٧	The Resolution concerns adding a representative from the Administrative Control Authority to the membership of the National Coordinating Committee for Combating and Preventing Illegal Migration and Human Trafficking, established by Decree No. 192 of 2017.		

Introduction to the asylum context in Egypt

Legislative Background

Egypt participated in the drafting of the Universal Declaration of Human Rights and voted in favor of its adoption at the United Nations General Assembly on December 10, 1948.¹ It signed and later acceded to the 1951 Convention relating to the Status of Refugees,² with reservations on certain provisions, as well as to its 1967 Protocol.³

The first step toward implementation of the Refugee Convention in Egypt was the establishment of a UNHCR office, which began operations in 1954.⁴ This was based on a Memorandum of Understanding signed with the Egyptian government, represented by the Ministry of Foreign Affairs. The UNHCR office has since been responsible for providing a range of services to asylum seekers, including registration, refugee status determination, protection, resettlement, voluntary return assistance, and other forms of support.

The first formal incorporation of refugee law into Egyptian domestic legislation occurred in 1980, when the Parliament ratified three key international instruments signed by Egypt. These were enacted through Presidential Decrees No. 331, 332, and 333 of 1980, and included the following conventions:

- The 1951 Convention relating to the Status of Refugees⁵ and the 1967 Protocol relating to the Status of Refugees.⁶ On 28 June 1980, Egypt acceded to the Convention through Presidential Decree No. 331 of 1980, issued, and joined the amending Protocol through Presidential Decree No. 333 of 1980, issued on the same date.
- The 1969 Organization of African Unity (OAU) Convention Governing the Specific Aspects of Refugee Problems in Africa.⁷ It is based on the 1951 Refugee Convention and its 1967 Protocol and extends international protection to refugees across the African continent. The Convention broadens the definition of a refugee beyond that of the 1951 Convention to include individuals fleeing natural disasters, external aggression, armed conflict, or occupation. Egypt acceded to the Convention via Presidential Decree⁸ This is a regional legal instrument governing refugee protection in Africa.
- The 1990 International Convention on the Protection of the Rights of All Migrant Workers and Members of Their Families. This Convention is a comprehensive international treaty that focuses on protecting the rights of migrant workers and members of their families. It emphasizes the link between migration and human rights. Egypt acceded to this Convention by Presidential Decree No. 446 of 1991, issued on November 11, 1991, and published in Official Gazette No. 21 on August 5, 1992.
- The International Covenant on Civil and Political Rights. Egypt acceded to the Covenant by Presidential Decree No. 536 of 1981, issued on October 1, 1981, and published in Official Gazette No. 15 on April 15, 1982. (Egypt issued a declaration accompanying its ratification, stating that Egypt's commitment would be consistent with Islamic law.)
- The International Covenant on Economic, Social and Cultural Rights. Egypt acceded to the Covenant by Presidential Decree No. 537 of 1981, issued on October 1, 1981, and published in Official Gazette No. 14 on April 8, 1982. (Egypt issued a declaration accompanying its ratification, stating that Egypt's commitment would be consistent with Islamic law.)

Under Article 151 of the 1971 Constitution, which authorized the President to conclude treaties subject to ratification by the People's Assembly, these conventions were granted the force of law upon

¹ The Universal Declaration of Human Rights, available [here](#)

² The 1951 Refugee Convention, available [here](#)

³ UNHCR: Handbook on Procedures and Criteria for Determining Refugee Status under the 1951 Convention and the 1967 Protocol relating to the Status of Refugees, available [here](#)

⁴ Law No 172 of 1954, on the approval of the agreement concluded between Egypt and the United Nations High Commissioner for Refugees (UNHCR), available [here](#) (AR)

⁵ Presidential Decree No. 331 of 1980, On approving the United Nations Convention relating to the Status of Refugees, available [here](#) (AR)

⁶ Presidential Decree No. 332 of 1980, On the approval of the Protocol amending the 1951 Convention relating to the Status of Refugees, signed in New York in 1967, available [here](#) (AR)

⁷ OAU Convention Governing the Specific Aspects of Refugee Problems in Africa, available [here](#)

⁸ Presidential Decree No. 332 of 1980 on approving the Organization of African Unity Convention governing the various aspects of refugee issues in Africa, available [here](#) (AR)

ratification and publication. This legal incorporation made the 1951 Refugee Convention and its related instruments part of national legislation. Both the 2012 and 2014 Egyptian constitutions reaffirmed this principle, stating that ratified international treaties hold the force of domestic law.

Despite the existence of a legal framework based on Egypt's ratification of international refugee conventions, the asylum system in practice suffers from significant deficiencies. Refugees and asylum seekers continue to face serious challenges in accessing and exercising their right to seek asylum and to enjoy associated rights. These difficulties are compounded by frequent violations of both international obligations and domestic legal standards by the host state, which has undermined the overall system of protection for refugees in Egypt.

Law No. 164 of 2024: The 2024 Asylum Law

On November 16, 2024, Law No. 164 of 2024 was enacted, signed by President Abdel Fattah El-Sisi, and published in the Official Gazette.⁹ Law No. 164 of 2024 represents Egypt's first national legislation to grant refugees the right to apply for citizenship and to formally regulate the legal status of refugees and asylum seekers. It transfers the responsibility for registration and asylum management from UNHCR to the Permanent Committee for Refugee Affairs, which operates under the authority of the Prime Minister.

Under the new law, the Permanent Committee for Refugee Affairs is responsible for receiving and reviewing asylum applications, issuing refugee identity documents, and granting or revoking refugee status. While the law provides access to some basic rights, including education, healthcare, and employment, these are subject to specific conditions and limitations.

Article 2 of the promulgation provisions of Asylum Law No. 164 of 2024 states that the Prime Minister shall issue the executive regulations of the law within six months from the date of its publication in the Official Gazette. The Law relies heavily on the executive regulations to define the mechanisms for applying many of its provisions. These include:

- Procedures for issuing and renewing refugee identity cards, Article 11.
- Procedures for obtaining travel documents and defining eligibility, Article 12.
- Regulation of access to primary and university education, Article 20.
- Specification of access to health care and medical services, Article 21.
- Rules for the right to self-employment and the establishment of businesses, including conditions such as recognition of professional certificates and the issuance of temporary permits, Articles 18 and 19.

However, the law came into force the day after its publication. Since all these core rights and services are linked to the executive regulations, the failure to publish them at the time the law took effect created legal uncertainty. This created a significant legislative issue, as no executive or procedural instructions were issued to implement its provisions during that period. As a result, the absence of executive regulations left refugees in a legal vacuum.

The law was issued within a politically and security-sensitive context, during which the Egyptian government adopted a restrictive approach toward migrants and refugees. Its enactment coincided with growing cooperation between Egypt and the European Union on migration control. While it ends a long period of absence of domestic legislation addressing this issue, the process of adopting the law has been criticised for the lack of participation by civil society and affected communities.¹⁰

Instead of reducing the violations faced by refugees and asylum seekers in Egypt, addressing the legal shortcomings in the existing system, and bridging the protection gaps that refugee communities have endured for many years, several provisions of the law are inconsistent with the Egyptian Constitution and international treaties ratified by Egypt. It fails to uphold the rights of refugees and asylum seekers to international protection and is rooted in a security-based approach that expands the powers of the governmental committee established under the law, without sufficient legal safeguards or accountability mechanisms.

⁹ Law No 164 of 2024, available [here](#) (AR)

¹⁰ The Refugees Platform in Egypt, 'An in-depth analytical study of the draft law on foreign asylum', November 2024, available [here](#).

These issues have raised concerns that the law may have been introduced primarily in response to external political pressure, particularly criticism raised during Egypt's third Universal Periodic Review in 2019¹¹, rather than out of a genuine intent to improve the situation of refugees within the country.

The shortcomings mentioned above cannot be amended or limited by the executive regulations that are still outstanding. Their function is limited to clarifying and implementing procedural and administrative matters. Therefore, fundamental shortcomings in the law itself, such as granting broad unchecked powers or restricting key rights, can only be addressed through formal legislative amendments.

The law grants the Permanent Committee wide discretionary powers to approve or reject asylum applications, without defined criteria and establishing a transparent appeals mechanism, which creates serious risks of refoulement and other rights violations in the absence of adequate procedural safeguards. The law also allows refugee status to be revoked without sufficient safeguards, which opens the door to potential rights violations.¹²

In its current form, the law represents a setback from the legal framework previously established through UNHCR's operations in Egypt. Although not without shortcomings, the UNHCR system had provided a functioning basis for protection and refugee status determination for decades. The law contains no provisions regulating the transitional period between the handover of responsibilities from UNHCR to the new governmental committee. Nor does it specify which entity will be responsible for registering refugees and safeguarding their rights during this transition. While the law stipulates immediate entry into force and mandates the formation of the committee within three months, this deadline has already passed. The Egyptian government has not yet formed the Permanent Committee for Refugee Affairs. This is a clear violation of Article 3 and means there was no functional executive body to manage refugee affairs during this time, which led to evident administrative and legislative confusion.

Although the law clearly states that this committee is the body responsible for receiving and reviewing new asylum applications, at the time of writing the report, executive functions are still effectively carried out by UNHCR, which continues to receive and process applications—thereby exceeding the legal mandate granted to it—in the absence of an institutional Egyptian alternative to date.

At the same time, UNHCR has not officially announced the termination of its operations in Egypt, further contributing to the ambiguity and uncertainty surrounding the future of the asylum system in the country. The implementation of the new legal framework remains on hold pending the formation of the designated committee and the issuance of the executive regulations governing its work.

Given Egypt's transitional asylum system, this report distinguishes between two distinct systems:

"Current Practice": refers to the asylum system administered by the United Nations High Commissioner for Refugees (UNHCR), which remains in effect in many respects at the time of writing.

"2024 Asylum Law": refers to the new system to be established under the 2024 Aliens' Right to Asylum Law, under which Egyptian authorities are expected to assume responsibility for asylum procedures and protection.

These two terms will be used consistently throughout the report to distinguish past and current practices under UNHCR from the legal and institutional framework envisaged under the Egyptian Aliens Asylum Law of December 2024.

Egypt as a country of destination, transit and origin

Egypt as a Destination and Transit Country

Due to many factors, including its geographical location, Egypt has historically become a destination for people moving within the region for various reasons, such as armed conflicts, internal strife, wars,

¹¹ Report of the Office of the United Nations High Commissioner for Human Rights, D.5: Migrants, refugees and asylum seekers, 62.

¹² The Refugees Platform in Egypt, 'An in-depth analytical study of the draft law on foreign asylum', November 2024, available [here](#)

economic conditions, and the effects of climate change. It is both a receiving and transit country, and its political and economic conditions have also made it a country of origin.

Over the past decade, as regional crises intensified, large numbers of refugees have sought safety in Egypt. Data from the International Organization for Migration show that Egypt now hosts more than 9 million migrants and refugees—around 9% of the country's total population.¹³ Among them, 80% are Sudanese, Syrians, Yemenis, and Libyans and 958,179 are registered with UNHCR as refugees and asylum seekers.¹⁴ Thus, the number of people who can be considered as *prima facie* refugees goes well beyond those who are registered with UNHCR. Many face extremely harsh conditions, exacerbated by successive government decisions that further weaken their already fragile legal status.

Sudanese nationals now make up the largest refugee community in Egypt, followed by Syrians. In recent years, Egypt has seen a sharp increase in Syrian refugees fleeing the civil war that has gripped Syria since 2011.¹⁵ According to UNHCR data, the number of registered Syrian refugees in Egypt rose from approximately 12,800 at the end of 2012 to over 147,000 by the end of 2024.¹⁶ With ongoing crises in both Syria and Sudan, Egypt currently hosts the highest number of registered refugees and asylum seekers in its history.

The situation in Sudan underscores the significance of movement across the Egyptian border in search of safety. Since April 2023, Sudan has faced widespread internal conflict and unprecedented human rights violations, leading to what is now considered the world's worst humanitarian crisis.¹⁷ Egypt, due to its geographical and cultural proximity and long-standing patterns of movement with Sudan, became a primary destination. Although Egypt and Sudan are parties to the Four Freedoms Agreement, meant to ensure freedom of movement, the Egyptian authorities soon imposed new visa requirements on Sudanese nationals.¹⁸ This policy shift has forced hundreds of thousands to cross the border irregularly, often under dangerous conditions and in the absence of adequate search and rescue efforts.¹⁹ Those attempting the journey face significant risks, including death, exploitation, detention, violent pushbacks,²⁰ and deportation without access to asylum procedures, all of which have been documented by human rights organizations.

Despite the harsh measures from Egyptian authorities described above, including violations of the Refugee Convention, the number of Sudanese nationals registered with UNHCR in Egypt reached approximately 630,958 by early 2025. According to the Egyptian Ministry of Foreign Affairs, this figure does not reflect the actual number of Sudanese who crossed into or resided in Egypt by the end of 2024, which the ministry estimated at five million.²¹ Sudanese nationals now represent the largest refugee group registered with UNHCR in Egypt. In addition to Sudanese, Egypt hosts tens of thousands of refugees and asylum seekers of other nationalities²², including Syrians (144,557), South Sudanese (approximately 46,000), and Eritreans (39,765), along with individuals from Ethiopia, Yemen, Somalia, and Iraq.

Given its geographic location, Egypt functions not only as a host country but also as a key transit point. Many registered and unregistered refugees face insecure legal status, deteriorating economic conditions, and limited access to protection mechanisms or essential services. These challenges have made Egypt a significant country of transit for those attempting to reach Europe. Since early 2017, Egypt has sought to stop departures from its Mediterranean coast, shifting the migration route to the

¹³ IOM, 'Triangulation of Migrants Stock in Egypt', July 2022, available [here](#)

¹⁴ UNHCR, 'Egypt | Factsheet', available [here](#)

¹⁵ The Refugees Platform in Egypt, 'A case report and legal memorandum on the Egyptian government's decisions regarding the entry and residence of Syrians', March 2025, available [here](#)

¹⁶ UNHCR page, Refugee Context in Egypt, available [here](#)

¹⁷ The Refugees Platform in Egypt, 'More than a year into the war...keep your eyes on Sudan', June 2024, available [here](#) (AR)

¹⁸ The Refugees Platform in Egypt, 'From Sudan to Egypt: Egyptian Decisions Spark High-Risk Irregular Migration Movement', March 2024, available [here](#)

¹⁹ The Universal Periodic Review of Egypt's human rights record before the Human Rights Council, report submitted by the Refugees Platform in Egypt and the Migration and Human Rights Platform, July 2024, available [here](#)

²⁰ Investigation: Inside Egypt's secret system for detaining and deporting thousands of Sudanese refugees, the Refugees Platform in Egypt and The New Humanitarian, April 2024, available [here](#)

²¹ Foreign Minister: Sudanese in Egypt amount to 5 million, local press, July 2004, available [here](#) (AR)

²² Ibid.

land border with Libya, and from there across the sea. This shift has increased the risks for both Egyptian and non-Egyptian refugees and asylum seekers attempting the journey to Europe.

Egypt as a Country of Origin

In addition to Egypt's role as a transit and host country, its role as a country of origin has expanded over the past three years. European policy documents now describe Egypt as a primary actor in relation to the prosperity, security, and stability of the Central Mediterranean region.²³ Although there have been no direct departures from Egypt's northern coast since 2017, interest in Egypt as a country of origin has grown. Despite the government's heavy reliance on militarization and criminalization as core strategies for migration control and border management, often at significant cost to the rights of Egyptians and people on the move, European data shows that crossings via the Mediterranean have continued to rise for the third consecutive year. In 2021, recorded arrivals totaled 67,724, increasing to 105,561 in 2022 and reaching 158,020 in 2023. Egyptian nationals were the second most common nationality recorded in transit after Bangladeshi nationals, although the overall share of migrants from North Africa, including Egyptians, declined by 45.1 percent compared to previous years.²⁴

Since 2020, there has been a significant increase in the number of asylum applications made by Egyptian nationals in EU Member States plus Norway and Switzerland, from just over 6600 applications in 2020 to over 26,000 in 2023. In April 2025, the European Commission proposed to designate Egypt as safe country or origin.²⁵ The proposal is currently assessed by the Council of the EU and the European Parliament as co-legislators.

EU-Egypt Cooperation on Migration

Egypt as an EU Strategic Partner

On March 17, 2024, senior European Union officials, led by the President of the European Commission, met with the President of Egypt to formalise the upgrade of EU–Egypt relations into a strategic partnership.²⁶ The agreement includes a support package totalling €7.4 billion, consisting of €5 billion in financial assistance through short-term loans. Egypt received the first tranche of €1 billion on December 2, 2024. The package also includes €1.8 billion in additional investment support under the European Fund for Sustainable Development Plus,²⁷ along with €600 million in grants through mechanisms such as the Neighbourhood, Development and International Cooperation Instrument,²⁸ of which €200 million is earmarked for migration-related priorities.

On December 11 2024, the Egyptian Ministry of Foreign Affairs published a statement via its official Facebook page announcing the organization of three technical workshops with a European Union delegation focused on migration cooperation.²⁹ According to the statement, the Egyptian side presented its migration policy priorities and submitted proposals for enhanced collaboration. On April 1, 2025, the European Parliament approved the second €4 billion tranche of the financial package. On May 19, 2025, the Council and the European Parliament provisionally agreed on the €4 billion tranche of macro-financial assistance.³⁰

²³ Council of the European Union, 'Overview of the Central-Mediterranean Route', July 2024, available [here](#)

²⁴ Ibid.

²⁵ European Commission Proposal for a Regulation of the European Parliament and of the Council amending Regulation (EU) 2024/1348 as regards the establishment of a list of safe countries of origin at Union level (2025), available [here](#)

²⁶ Joint Declaration on the Strategic and Comprehensive Partnership between The Arab Republic Of Egypt and the European Union, March 2024, available [here](#)

²⁷ European Fund for Sustainable Development Plus, available [here](#)

²⁸ The Neighbourhood, Development and International Cooperation Instrument, available [here](#)

²⁹ Egypt's Ministry of Foreign Affairs and Immigration. Official statement, December 2024, available [here](#)

³⁰ Council of the EU (19 May 2025) Press release 'Egypt: Council and European Parliament secure agreement on macro-financial assistance' available [here](#)

Egypt as a Key Regional Partner in Migration Management and Border Security

While the European Union acknowledges the role Egypt plays in curbing migration in the region, its designation of Egypt as a “strategic partner” reflects not a sudden shift but the culmination of a long-standing and evolving relationship. This partnership is shaped by reports submitted by the Egyptian authorities detailing their efforts in areas such as “migration governance and border control,” as well as cooperation in “combating organized and transnational crime,” particularly in relation to anti-smuggling operations. However, human rights considerations have not been placed at the core of this cooperation. The partnership lacks transparent mechanisms to assess its impact on the rights of Egyptians, migrants, and refugees within Egypt.

Amid ongoing regional geopolitical instability, the EU has increasingly turned to externalised migration control measures as a key policy approach, often referred to as “external solutions” or “border externalisation”. Egypt, due to its strategic position on the regional migration and mobility map, has received extensive financial and political support from the EU and its member states to strengthen law enforcement capacities. This includes cooperation frameworks initiated under the “Khartoum Process” (also known as the EU Horn of Africa Migration Route Initiative),³¹ with Egypt set to host its second edition in April 2025.³²

In June 2022, Egypt signed a support agreement with the European Union to strengthen the Egyptian Coast Guard, including €80 million in funding for maritime surveillance and the purchase of three rescue vessels. With support from the EU through CIVIPOL and the International Organization for Migration (IOM), the agreement aims to curb irregular departures across the Mediterranean.³³ The initiative involves the Egyptian Ministry of Defense and undisclosed security bodies. In October 2024, an Egyptian delegation visited the headquarters of Frontex, the European Border and Coast Guard Agency, in Brussels to discuss enhanced security cooperation in the field of border management and migration.

In November 2024, the Egyptian Ministry of Defense received €20 million through the European Peace Facility,³⁴ a program widely criticized by human rights organizations for its lack of transparency and absence of safeguards for human rights.

In parallel, EU member states have provided support to Egyptian security forces and military entities through both direct and indirect channels. This includes direct cooperation such as the covert Egyptian-French operation “Sirli,” which reportedly resulted in civilian casualties and remains uninvestigated.³⁵ It also includes indirect initiatives like the Italian Police Project (ITEPA), which involves training African police officers at the Egyptian Police Academy in methods to combat irregular migration.³⁶ The first phase of ITEPA began in 2018, with its second phase launched in 2024 and currently ongoing.³⁷

In Cairo, the European Commissioner for Migration announced the launch of negotiations on security cooperation between Europol and the Egyptian police. This announcement has raised concerns among civil society and human rights actors regarding the protection of the rights of Egyptians and people on the move, particularly in relation to data sharing and the use of biometric information.³⁸ To date, Egyptian authorities have shown limited engagement with these negotiations.

The scope and development of these agreements underscore Egypt’s emergence as a key actor in the European Union’s external migration policy.³⁹ Egypt derives financial and political benefit from cooperation in the areas of border security and law enforcement, including through strategic

³¹ Forced Migration Review, ‘The Khartoum Process and human trafficking’, available [here](#)

³² Khartoum Process, ‘Steering Committee Meeting and Senior Officials’ Meeting in Egypt’, April 2024, available [here](#)

³³ State Watch: Coordination Group on Migration, ‘Strengthening the operational capacity of the Egyptian Navy and Border Guards in managing migration flows and provide Search and Rescue at sea,’ October 2024, available [here](#)

³⁴ Council Decision (CFSP) 2024/2843 on an assistance measure under the European Peace Facility to support the Egyptian Armed Forces, November 2024, available [here](#)

³⁵ Disclose, ‘Operation Sirli : France’s complicity in state crimes in Egypt’, available [here](#)

³⁶ Italian Interior Ministry, Project ITEPA: International Training at the Egyptian Police Academy, available [here](#)

³⁷ Egyptian Interior Ministry, updates on ITEPA, April 2024, available [here](#)

³⁸ The Refugees Platform in Egypt, ‘Civil society concerns over Europol-Egypt cooperation agreements in International Advocacy Program, Parliament & the European Union’, January 2025, available [here](#)

³⁹ European Council meeting conclusions, March 2024, available [here](#)

partnerships with EU member states. It is also positioned as a stakeholder in anti-smuggling initiatives,⁴⁰ security sector capacity-building,⁴¹ and so-called “legal migration support”⁴² projects targeting North Africa.⁴³ At the same time, human rights organizations continue to document violations against refugees and migrants within Egypt. Although the EU frames these policies as part of its migration control strategy, human rights organizations raise serious questions about the EU’s commitment to its stated human rights principles, especially given the consistent failure of securitized approaches to effectively reduce irregular migration flows despite significant investment.

The Influence of European Funding on Egypt’s Migration and Asylum Policies

Since 2014, amid growing Egyptian–European cooperation on border control and migration governance, Egyptian authorities have increasingly adopted a militarized and criminalized approach to managing migration flows. Presidential Decree No. 444 of 2014 designated border and adjacent areas as military zones, prohibiting civilian presence without exception.⁴⁴ The decree made no provisions for the protection of asylum seekers or individuals displaced by humanitarian crises, nor did it mandate search and rescue operations or the establishment of reception and asylum registration centers at border entry points.

Law No. 82 of 2016 further entrenched a punitive framework, focusing on criminalization without introducing safeguards for individuals in need of international protection, such as refugees and asylum seekers. Although the law formally exempts smuggled migrants from criminal liability, in practice, both Egyptian and non-Egyptian migrants have faced arbitrary detention, prosecution, and deportation without due process.

European policy documents indicate that, since February 2021, the European Union Agency for Asylum (EUAA) has been implementing a roadmap for Egypt that includes technical support for drafting national asylum legislation.⁴⁵ One EUAA staff member has been stationed in Cairo since then, and the agency’s planning for the next three years suggests the deployment of three staff members to Egypt⁴⁶.

Since 2021, Egypt has accelerated legislative reforms related to migration and border security. Decision No. 420 of 2021 amended the earlier Presidential Decree No. 444 of 2014, expanding the scope of border militarization.⁴⁷ Law No. 22 of 2022 amended⁴⁸ Law No. 82 of 2016 on Combating Migration,⁴⁹ and Cabinet Resolution No. 369 of 2023 established the Fund for the Protection of Victims, Whistleblowers, and Witnesses.⁵⁰ These legal developments have further institutionalized a securitized approach, without addressing long-standing legislative gaps or inconsistencies. As a result, rights violations at borders and within urban areas have escalated, disproportionately affecting migrants, asylum seekers, and refugees.

On June 7, 2023, the Egyptian Cabinet issued Resolution No. 243 of 2023, announcing a proposed law on the status of foreign nationals seeking asylum in Egypt.⁵¹ This move came alongside Cabinet Resolution No. 3326 of 2023, which addressed what the Egyptian authorities described as the “legalization of the presence of foreigners in Egypt.” Under this resolution, individuals without valid residency permits were required to regularize their status within a set period by paying a fee of USD

⁴⁰ State Watch: Coordination Group on Migration, ‘Enhancing international police cooperation against migrant smuggling and trafficking in human beings in North Africa’, October 2024, available [here](#)

⁴¹ State Watch: Coordination Group on Migration, ‘Support to Cross-Border Cooperation and Integrated Border Management in North Africa’, October 2024, available [here](#)

⁴² State Watch: Coordination Group on Migration, ‘EU support to legal migration, mobility and skills partnerships with North of African countries’, October 2024, available [here](#)

⁴³ Council of the European Union, ‘The current situation in Sudan and its impact on the region’, July 2024, available [here](#)

⁴⁴ Presidential Decree No 444 of 2014, available [here](#) (AR)

⁴⁵ Council of the EU, Discussion Paper (6135/22) from 18 February 2022, available [here](#)

⁴⁶ EUAA Single Programming Document 2026-2028 Draft. Endorsed on 28 November 2024.

⁴⁷ Presidential Decree No. 420 of 2021 amending Decree No. 444 of 2014, available [here](#)

⁴⁸ The Refugees Platform in Egypt, Position paper on Parliament’s approval of the amendments to Law No. 82 of 2016, Refugees Platform in Egypt, 18 March 2022, available [here](#)

⁴⁹ Law No. 22 of 2022 amending certain provisions of Law No. 82 of 2016 on Combating Migration and Smuggling of Migrants, available [here](#)

⁵⁰ The Refugees Platform in Egypt, ‘Legal analysis paper on Cabinet Resolution No. 369 of 2023 establishing the Fund for the Protection of Victims, Whistleblowers, and Witnesses’, available [here](#)

⁵¹ The Refugees Platform in Egypt, ‘A Position Paper on Cabinet Decree No. 243 of 2023’, available [here](#)

1,000 to the Ministry of Interior's immigration authorities. Human rights organizations criticized the measure as both unlawful and ineffective.⁵²

On October 22, 2024, the Egyptian Parliament's Defense and National Security Committee unexpectedly announced its approval of the draft asylum law submitted by the government.⁵³ A committee member informed the press that the bill was approved on the same day it was received,⁵⁴ despite formal objections from human rights organizations.⁵⁵ The bill was subsequently introduced to Parliament and passed within days, without meaningful debate or consultation. This occurred despite repeated warnings from civil society and legal experts that the legislation violated Egypt's international legal obligations related to refugee protection.⁵⁶

The Impact of European Funding on the Conditions of People on the Move, Both Egyptian and Non-Egyptian

Resolution No. 444 of 2014 and its amendments embody a legislative flaw that renders individuals present in border areas, whether for migration purposes or any other reason, subject to criminal prosecution under military law.⁵⁷ This development took place after the Khartoum Process agreement⁵⁸ was signed between the European Union and Egypt. Between 2016 and 2021, while European support for the Coast Guard and Border Guard continued, Egypt reported that more than 100,000 individuals of various nationalities were detained by its military forces at border crossings. A European document notes that Egyptian authorities reported detaining more than 27,000 migrants at the Libyan border alone, as they attempted to exit Egypt.⁵⁹ At the same time, funding to support and strengthen the capabilities of the Egyptian Coast Guard and Border Guard did not include any risk assessment of these operations. Detainees have faced detention, military trials, and forced deportation by military border authorities without the opportunity to apply for asylum. UNHCR has not been granted access to these detention facilities or permitted to register asylum applications from individuals seeking international protection.

At the same time, while the European Commission was fast-tracking negotiations from late 2023 through March 2024 to conclude a series of external partnership agreements across the Mediterranean, with Egypt set as the largest, the Egyptian authorities were forcibly returning thousands of Sudanese refugees to Sudan. These returns followed detention in undisclosed locations and the denial of access to asylum procedures after changes to border transit policies.⁶⁰

In 2023, the EU allocated €5 million in funding to support the most vulnerable refugees and asylum seekers in Egypt,⁶¹ followed by an additional €20 million designated for the reception of Sudanese nationals displaced by the conflict.⁶² While the armed conflict in Sudan was devastating the country and triggering what has been described as the world's worst humanitarian crisis, the EU was focused⁶³ on responding to the conflict's implications for irregular migration flows in the region and toward the Mediterranean.⁶⁴

⁵² The Refugees Platform in Egypt, 'Comments on Cabinet Resolution No. 3326 of 2023', available [here](#)

⁵³ Press statement by the Ministry of Parliamentary and Legal Affairs and Political Communication, available [here](#)

⁵⁴ Mada Masr, 'Egypt's 1st bill on asylum-seekers to balance rights against 'stability of Egyptian society', November 2024, available [here](#)

⁵⁵ 22 NGOS in a Joint Statement: Grave risks posed by the passing of proposed Asylum Bill, available [here](#)

⁵⁶ The Refugees platform in Egypt and the Egyptian Initiative for Personal Rights: 'Asylum Law Needs Real Societal Discussion', November 2024, available [here](#)

⁵⁷ Press Release For Egypt's Joint UPR Report: 'Refugees and Asylum Seekers Rights in Egypt: 2019-2024', available [here](#)

⁵⁸ Khartoum Process Agreement, available [here](#)

⁵⁹ State Watch: Coordination Group on Migration, 'Strengthening the operational capacity of the Egyptian Navy and Border Guards in managing migration flows and provide Search and Rescue at sea,' October 2024, available [here](#)

⁶⁰ The Refugees Platform in Egypt, 'From Sudan to Egypt: Egyptian Decisions Spark High-Risk Irregular Migration Movement', March 2024, available [here](#)

⁶¹ European Commission | Egypt (country profile), available [here](#)

⁶² EU External Action: 'Press remarks by High Representative/Vice-President Josep Borrell after meeting with Minister of Foreign Affairs Sameh Shoukry', June 2023, available [here](#)

⁶³ State Watch, 'Ignoring the root causes of disaster: the EU and Sudan', October 2024, available [here](#)

⁶⁴ Council of the European Union, 'The current situation in Sudan and its impact on the region', July 2024, available [here](#)

Simultaneously, additional partnership agreements and funding were directed toward strengthening the capacity of Egyptian border forces.⁶⁵ These same forces have been accused of committing serious human rights violations, including enforced disappearance, torture, arbitrary detention, and the forced return of refugees.⁶⁶ And as the Egyptian authorities exploited the movement of Palestinians into Egypt, denying them residency permits and access to services,⁶⁷ they were receiving €5 million from the EU for the reception of injured and wounded individuals.⁶⁸

Refugees in Egypt face an increasingly precarious situation. On one hand, the borders are tightly sealed. On the other, refugees and asylum seekers experience severe restrictions on their movement and residence. This environment may compel some to pursue alternative irregular migration routes, exposing them to greater risks, rather than leading them toward sustainable, rights-based migration solutions.

⁶⁵ Coordination Group on Migration, Eleventh Meeting Agenda, July 2024, available [here](#)

⁶⁶ Investigation: Inside Egypt's secret system for detaining and deporting thousands of Sudanese refugees, the Refugees Platform in Egypt and The New Humanitarian, April 2024, available [here](#)

⁶⁷ The Refugees Platform in Egypt: "Where Do They Go?" A Year of Siege, Denial of Rights, and Criminalization of Solidarity, November 2024, available [here](#)

⁶⁸ EU External Action: 'Press remarks by High Representative/Vice-President Josep Borrell after meeting with Minister of Foreign Affairs Sameh Shoukry', June 2023, available [here](#)

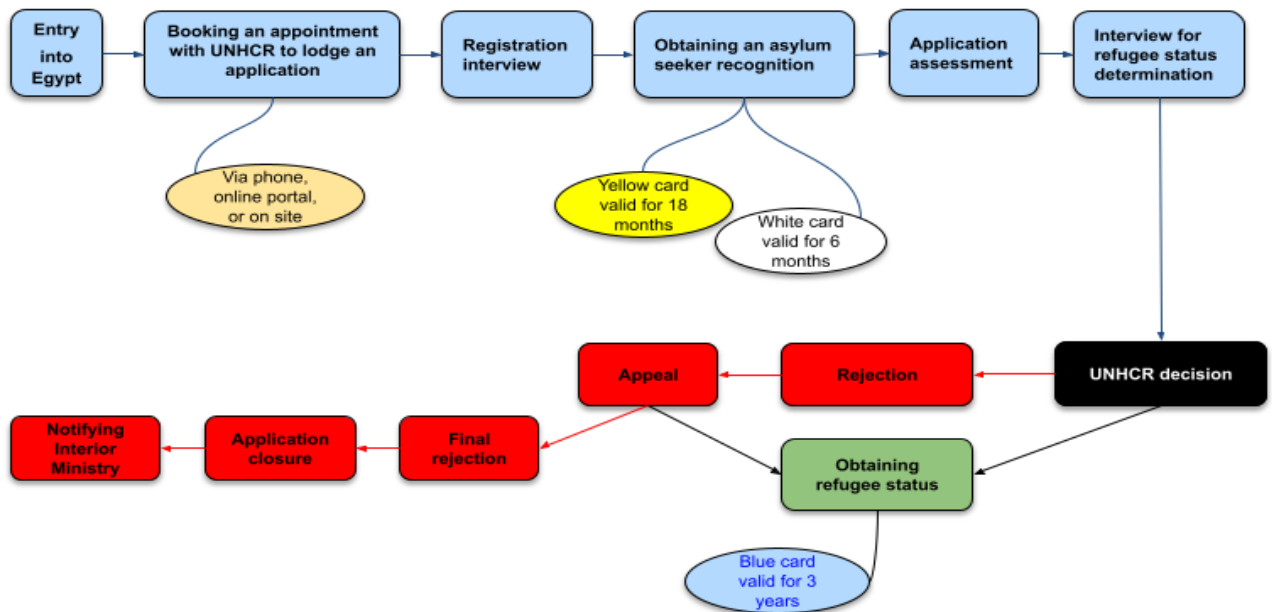
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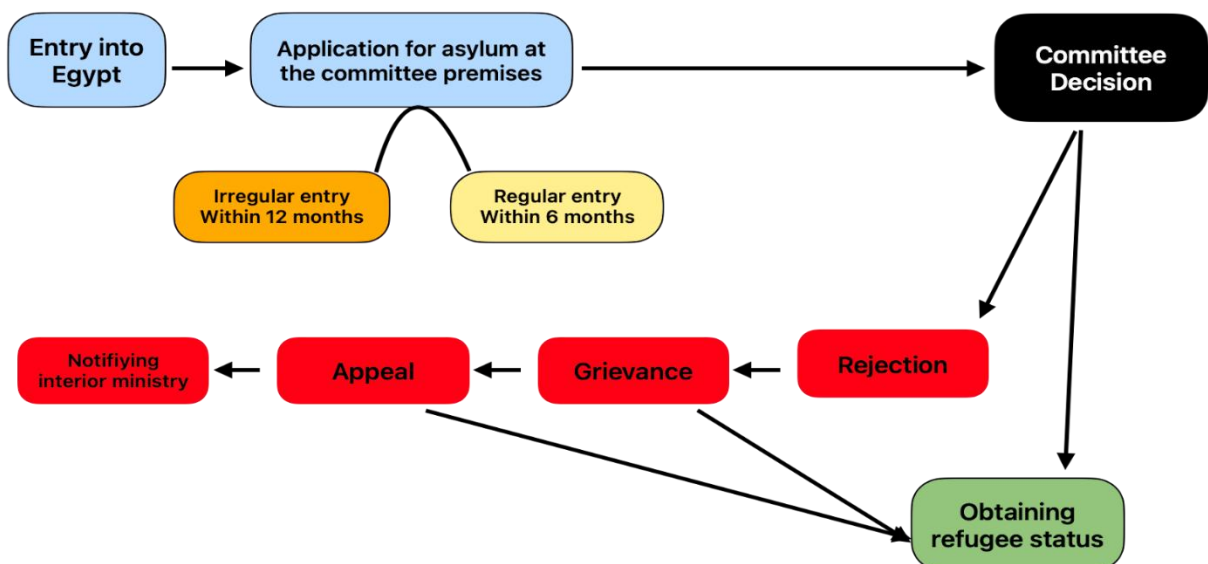
A. General

1. Flow chart

Current practice



2024 Asylum Law



This is an attempt to map out the system under the 2024 asylum law, the process will only be clear once the bylaws are published.

2. Types of procedures

Indicators: Types of Procedures

Which types of procedures exist in your country?

- | | | |
|----------------------------|---|--|
| ❖ Regular procedure: | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No |
| ▪ Prioritised examination: | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No |
| ▪ Fast-track processing: | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No |
| ❖ Dublin procedure: | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No |
| ❖ Admissibility procedure: | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No |
| ❖ Border procedure: | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No |
| ❖ Accelerated procedure: | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No |
| ❖ Other | | |

Are any of the procedures that are foreseen in the law, not being applied in practice? ☐ Yes ☒ No

3. List of authorities that intervene in each stage of the procedure

Current practice:

Stage of the procedure	Competent authority
Application	UNHCR
Refugee status determination	
Appeal	

2024 Asylum Law:

Stage of the procedure	Competent authority (EN)	Competent authority (AR)
Application	Permanent Committee for Refugee Affairs	اللجنة المختصة
Refugee status determination	Permanent Committee for Refugee Affairs	اللجنة المختصة
Grievance	Permanent Committee for Refugee Affairs	اللجنة المختصة
Appeal	Court of Administrative Justice	محكمة القضاء الإداري
Onward Appeal	The Supreme Administrative Court	المحكمة الإدارية العليا

4. Number of staff and nature of the determining authority, UNHCR:

Name in English	Number of staff	Ministry responsible
UNHCR	356 Egyptians, and 35 international employees	-

B. Access to the procedure and registration

1. Access to the territory and push backs

Indicators: Access to the Territory (Current practice)

1. Are there any reports (NGO reports, media, testimonies, etc.) of people refused entry at the border and returned without examination of their protection needs? ☐ Yes ☒ No
2. Is there a border monitoring system in place? ☒ Yes ☐ No
 - ❖ If so, who is responsible for border monitoring? ☒ National authorities ☐ NGOs
 - ❖ If so, how often is border monitoring carried out? ☐ Frequently ☒ Permanently ☐ Never

1.1. Access at the land border

Egypt has broad land borders with several countries, positioning it as a key transit point for migrants and asylum seekers from Sudan, Libya, and the Gaza Strip. These borders are subject to significant security and political challenges, which affect cross-border movement and shape national migration policies.

In light of ongoing conflicts in Sudan and the Horn of Africa, the southern border with Sudan has become a critical crossing route. It is also a route used by Syrian nationals, especially since 2014, when Egyptian authorities imposed a visa requirement for their entry. Asylum seekers and migrants from these regions encounter serious obstacles due to intensified security measures and restrictive legal procedures which limit access to protection.

The western border with Libya is considered the most dangerous, with armed groups and smuggling networks actively operating along the frontier. Egypt has been enforcing strict security controls on cross-border movement as a response. With direct migration from the Egyptian coast declining since 2016, desert routes through Libya have become the main pathway contributing to the rise in the number of Egyptian nationals arriving in Europe, primarily Italy.⁶⁹ The eastern border is also under heightened security, particularly at the Rafah crossing, which opens only intermittently, restricting the movement of Palestinians seeking to escape the worsening humanitarian crisis in Gaza.⁷⁰

1.2. Access at the airport

In Egypt, there is no official procedure allowing an asylum seeker to apply for asylum or international protection immediately upon arrival at the airport, unlike in some countries with integrated state asylum mechanisms. Instead, prior to the adoption of the Asylum Law, the asylum system primarily relied on UNHCR, which has been responsible for registering asylum seekers and conducting refugee status determination. If a traveler declares an intention to seek asylum upon arrival, they are often denied entry and returned to their country of origin, particularly if they hold an invalid visa or fail to meet entry requirements. There is no mechanism in place that permits individuals to remain at the airport pending consideration of their claim.

The most common pathway for asylum seekers in Egypt is to enter the country on a tourist visa or by other means, and then approach UNHCR to register their asylum claim. Upon registration, they receive a “yellow card,” which offers temporary protection from deportation but does not confer formal refugee status until a decision is made on their application.

1.3. Access at the maritime borders

As with land and air entry, Egypt's domestic legislation does not provide any mechanism for submitting an asylum application immediately upon arrival in the country. Refugees must submit their asylum claims at the office of UNHCR. Entry by the sea to Egypt for the purpose of seeking asylum remains a rare and difficult option due to the strict security measures enforced by Egyptian authorities to monitor its maritime borders. Egypt's coasts and ports are under intensive surveillance to prevent irregular

⁶⁹ Sky News Arabia: ‘Tensions on all four sides: How does Egypt secure its volatile borders?’, April 2019, available [here](#)

⁷⁰ The Refugees Platform in Egypt: ‘What does opening the Rafah crossing mean?’, December 2023, available [here](#)

migration and human smuggling. When boats or vessels carrying individuals seeking asylum are intercepted, those on board are transferred to temporary detention facilities for security screening. There are no procedures in place that allow them to remain in the country until their asylum claims are examined. Most of the time the authorities proceed with deportation if individuals are unable to prove their identity or the grounds for their asylum request.

This process faces significant challenges, including heightened security restrictions and the absence of clear procedures to facilitate asylum requests for those arriving by sea. Asylum seekers are often subjected to harsh conditions in temporary detention facilities, including a lack of access to basic services. In addition, there are no specific policies or international agreements governing the treatment of refugees arriving by sea, leaving their fate largely dependent on ad hoc security assessments. As a result, maritime entry into Egypt for the purpose of seeking asylum remains a highly risky and uncertain option.

2. Removal and refoulement

2.1. The derogation from the non-refoulement principle

Law No. 89 of 1960 on the Entry and Exit of Foreigners in Egypt, particularly Articles 25, 26, 27, 29, and 31, grants government authorities broad powers to arrest and deport foreign nationals without providing adequate safeguards to protect their rights. This poses a contradiction to Egypt's international obligations, which prohibit the return of individuals to countries where they may be at risk of persecution or serious violations. Furthermore, Decree No. 444 of 2014 provides legal cover for the arrest, detention, and prosecution of refugees and individuals transiting through Egypt for being present in areas classified as military zones, exposing them to further risk of human rights violations.⁷¹

According to various human rights reports, arbitrary stops and arrests of refugees and migrants frequently occur in specific areas, such as certain neighborhoods in Greater Cairo and Alexandria, where security checkpoints target individuals based on racial appearance or nationality. Sudanese, Ethiopians, Eritreans, and Somalis are particularly affected, and are stopped in the streets or on public transportation and asked to show identity documents or residency permits. In many cases, even when refugees present UNHCR-issued refugee cards, they face arbitrary detention or are transferred to police stations for further screening.⁷²

2.2. The Legislative Framework for Forced Return

Before the enactment of Asylum Law No. 164 of 2024, there was no specific domestic legislation regulating the status of refugees in Egypt or explicitly providing them with legal protection against forced return. Refugee protection from deportation remained linked to international agreements signed by Egypt, such as the 1951 UN Refugee Convention and the Convention Against Torture.

Although Article 91 of the Egyptian Constitution provides for the right to political asylum and prohibits the extradition of refugees, this commitment was not clearly reflected in practice. Egyptian legislation before 2024 did not contain any explicit provisions prohibiting forced return or providing adequate safeguards to protect refugees from arbitrary deportation.

Although Article 13 of the Asylum Law prohibits the forced return and expulsion of refugees, earlier pieces of legislation were not consistent with Egypt's international and constitutional obligations in this regard, which led to legal gaps that made refugees vulnerable to deportation without sufficient judicial review. Legal codes allowing forced return including the following:

Law No. 89 of 1960 on Foreign Nationals' Entry and Residency Law grants the Minister of the Interior broad discretionary powers to deport foreigners without providing sufficient judicial safeguards to challenge deportation decisions. This law did not contain any special exceptions for refugees or asylum seekers, exposing them to forced return without effective legal review.⁷³

⁷¹ The Refugee Platform in Egypt, 'Harsher Penalties and (Undocumented) Migration: Legal Crossroads and Everyday Problems', March 2022, available [here](#)

⁷² The Refugee Platform in Egypt, 'What should you know as a migrant during the ongoing security crackdown', January 2025, available [here](#)

⁷³ The Refugees Platform in Egypt, 'Legal analysis paper on Cabinet Resolution No. 369 of 2023 establishing the Fund for the Protection of Victims, Whistleblowers, and Witnesses', available [here](#)

Law No. 82 of 2016 on Combating Migration and Smuggling of Migrants introduced the concept of “safe return,” an ambiguous term that can be used to justify forced return without sufficient legal safeguards. The law did not reference any mechanisms that would allow asylum seekers to challenge deportation decisions, which increases the likelihood of their removal without a legal opportunity to defend their rights.

Law No. 22 of 2022 introduced amendments to the Anti-Illegal Migration Law, but these amendments did not include any provisions prohibiting forced return. On the contrary, they expanded the powers of executive authorities, enabling, for instance, the Ministry of Foreign Affairs to carry out deportations without legal mechanisms for reviewing these decisions.

Article 31 bis of the Foreign Nationals’ Residency Law granted the Director of the Passport, Immigration and Nationality Authority the power to deport foreigners whose residency had expired, without setting clear conditions or legal safeguards to review these decisions. This led to the arrest and subsequent forced return of asylum seekers who were unable to renew their residency due to circumstances beyond their control, such as delays in the processing of their applications or the lack of official documentation.⁷⁴

Asylum Law No. 164 of 2024, Article 13, prohibits the forced return or deportation of refugees to their country of origin or previous country of residence, the law does not provide full and comprehensive protection from forced return, and suffers from several shortcomings,⁷⁵ most notably:

Exclusion of asylum seekers whose claims are still pending: Article 13 limits protection to recognised refugees and does not include asylum seekers whose claims are still under review, exposing them to the risk of deportation before obtaining full legal protection as refugees. It was necessary for the article to stipulate that asylum seekers may not be deported to their country of origin or any country where they may face danger, until the procedures for determining their legal status are completed.

Lack of adequate guarantees prior to deportation: Article 7 states that the Permanent Committee for Refugee Affairs shall issue a decision either granting refugee status or rejecting the application. In the event of rejection, the committee informs the competent authority in the ministry responsible for implementing the deportation.

The article does not require the competent authority to follow clear legal procedures before carrying out the deportation, such as:

- Granting the right to appeal the rejection decision and preventing deportation until all means of appeal have been exhausted.
- Allowing the asylum seeker to travel to another country to submit an asylum application there.
- It did not guarantee protection from forced return or return of the asylum seeker to a country where they may face persecution or danger to their life.

It was necessary for the law to clearly state the prohibition of deporting asylum seekers to the country of their nationality or the country from which they fled due to persecution, to ensure that the law is in line with the principle of non-refoulement set out in the 1951 Refugee Convention.

2.3. Forced Return in practice

Despite the constitutional framework and international obligations upholding the principle of non-refoulement, the practical reality in Egypt reveals the absence of effective legal protection for refugees and asylum seekers. Forced return is eventually carried out through various mechanisms,⁷⁶ including:

Pushbacks from the border to dangerous areas:

After the outbreak of armed conflict in Sudan, the Egyptian authorities closed the border to some asylum seekers and returned them by force to areas of conflict, in direct violation of the principle of non-refoulement under Article 33 of the 1951 Refugee Convention.

Based on deportation orders by the Minister of the Interior:

⁷⁴ Law by Law No. 88 of 2005, available here

⁷⁵ The Refugees platform in Egypt and the Egyptian Initiative for Personal Rights: ‘Joint Policy Brief on the Asylum Bill’, available here

⁷⁶ Investigation: Inside Egypt’s secret system for detaining and deporting thousands of Sudanese refugees, the Refugees Platform in Egypt and The New Humanitarian, April 2024, available here

Under Law No. 89 of 1960 on the Entry and Residency of Foreign Nationals, the Minister of the Interior is granted the power to issue deportation orders for security reasons without judicial oversight, resulting in the enforcement of arbitrary deportation decisions without sufficient legal safeguards.

Based on security decisions:

The Egyptian authorities adopt a controversial mechanism of arbitrarily detaining foreigners and refugees, justified by pretexts such as “security control,” or during their release process followed by accusations in civil or military cases. Detainees are then transferred to the Passport and Immigration Authority or the National Security Sector to make a deportation decision without legal safeguards or judicial review.

The ways in which forced returns are carried out include land return to neighbouring countries (such as Sudan), forcing families to purchase plane tickets to non-bordering countries, or coordination with the embassies of countries of origin, including those experiencing conflict, to implement the deportation. Human rights reports have documented numerous cases of Sudanese, Syrian, Eritrean, and Yemeni asylum seekers being deported without being given the opportunity to appeal or access legal representation, in clear violation of the principle of non-refoulement set out in international agreements.

Forcing refugees to sign “voluntary return” forms:

In some cases, asylum seekers are forced to sign voluntary return forms under pressure, depriving the process of its truly voluntary nature.

3. Registration of the asylum application

Indicators: Registration

- | | |
|--|---|
| 1. Are specific time limits laid down in law for making an application? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| 2. Are specific time limits laid down in law for lodging an application? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| 3. Are registration and lodging distinct stages in the law or in practice? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| 4. Is the authority with which the application is lodged also the authority responsible for its examination? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| 5. Can an application be lodged at embassies, consulates or other external representations? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |

Current Practice:

Asylum applications in Egypt are submitted primarily through UNHCR, as there is no independent government-run system for this purpose. Prior to the issuance of Asylum Law No. 164 of 2024, asylum procedures were carried out through UNHCR according to the following steps:

Booking a registration appointment: The asylum seeker begins by scheduling an appointment with the UNHCR office in Egypt, either by phone or by visiting the UNHCR premises in person.

Submitting the application and receiving documentation: During the registration interview, the applicant is asked to present any available identity documents, such as passports or national ID cards. Upon registration, the applicant and accompanying family members receive an asylum seeker registration card.

UNHCR issuing a reference number.

Visiting the Directorate of Passports, Immigration, and Nationality to obtain a residency permit.

2024 Asylum Law:

Arrival in Egypt and request for protection:

The Egyptian Asylum Law does not regulate the process for submitting an asylum application upon arrival in Egypt, whether through airports, land border crossings, or seaports. However, it stipulates that asylum applications must be submitted directly to the Permanent Committee for Refugee Affairs, either by the applicant or through a legal representative. As a result, asylum applications cannot be submitted at border entry points, meaning that the asylum seeker is responsible for finding a way to enter the country before approaching the committee in person.

Submitting the Application:

Under the law, asylum seekers must submit their application to the Permanent Committee for Refugee Affairs at its main office in Cairo.

Article 31 of the law requires individuals who entered Egypt irregularly to submit their application within a maximum of 45 days from the date of entry. Failure to do so may result in the automatic rejection of their claim. The law does not specify what documents are required for the application, and these are expected to be outlined in the forthcoming executive regulations.

Applications may be submitted by the asylum seeker personally or through a licensed legal representative, provided that all required documentation is complete and in line with the committee's conditions.

Authorities responsible for receiving and processing applications:

- The Permanent Committee for Refugee Affairs is the sole authority responsible for receiving, reviewing, and deciding on asylum claims.
- UNHCR has no authority over asylum procedures under the Egyptian Asylum Law.

Timeframe for processing asylum applications:

The law distinguishes between asylum seekers who entered the country through regular means and those who entered irregularly:

- For those who entered regularly, the law sets a maximum period of six months for processing the asylum claim.
- For those who entered irregularly, the review period may take up to one year. The reason for this distinction is not clarified in the law. It is unclear whether it serves as a punitive measure or is based on another rationale. The law also states that priority should be given to women, children, and persons with disabilities in processing applications.

4. Applications from detention and at the border

At present, the only way to apply for asylum is by going in person to the UNHCR office.

C. Procedures

1. Regular procedure

1.1. General (scope, time limits)

Current practice:

Indicators: Regular Procedure: General

- | | |
|--|----------------------|
| 1. Time limit set in law for the determining authority to make a decision on the asylum application at first instance: | Not specified |
| 2. Are detailed reasons for the rejection at first instance of an asylum application shared with the applicant in writing? | Yes |
| 3. Backlog of pending cases at first instance as of 31 December 2023: | Not available |

2024 Asylum Law:

Indicators: Regular Procedure: General

- | | |
|--|--|
| 1. Time limit set in law for the determining authority to make a decision on the asylum application at first instance: | 6 months for regular entry, 12 months for irregular entry |
| 2. Are detailed reasons for the rejection at first instance of an asylum application shared with the applicant in writing? | Not specified |
| 3. Backlog of pending cases at first instance as of 31 December 2023: | Not available |

UNHCR's office in Egypt was established in 1954 under a legal agreement with the Egyptian government. On 10 February 1954, the Government of Egypt and UNHCR signed a Memorandum of Understanding allowing the agency to begin its operations and open an office in Cairo. The organization was entrusted with overseeing refugee registration and providing protection. This memorandum served as the legal framework for UNHCR's presence in Egypt, which was particularly important since Egypt had signed the 1951 Refugee Convention but did not ratify it until 1981. During that interim period, refugee protection in Egypt relied entirely on the 1954 memorandum, which laid out a bilateral agreement defining UNHCR's role and responsibilities in the country.

According to the memorandum, UNHCR was mandated to act on behalf of the Egyptian government in all matters related to registering asylum seekers, documenting their information, conducting refugee status determination (RSD), and granting refugee status to those who met the criteria. The agency also issued official refugee documentation and coordinated resettlement to third countries or voluntary return in cooperation with the International Organization for Migration. In addition, it provided through its implementing partners a range of support services, including legal, health, education, and financial assistance. Egyptian authorities in return committed to allowing UNHCR unrestricted access to any asylum seeker or refugee detained for irregular entry or stay, and to issuing temporary residence permits for refugees and asylum seekers. The memorandum thus established a formal cooperation framework that clarified the respective roles of UNHCR and the government in managing asylum affairs.

UNHCR's headquarters office in Egypt is located in the city of 6th of October in Greater Cairo, with several administrative and operational branches also present in Cairo. The agency also operates a field office in Alexandria, which is dedicated to serving refugees living in Alexandria and neighboring coastal governorates.

According to multiple sources, the following challenges are faced by asylum seekers in the asylum procedure:

Lengthy waiting periods: The waiting time between different stages of the asylum process can extend for several months or even years, contributing to prolonged uncertainty for applicants.⁷⁷

Security restrictions: Some asylum seekers face security-related limitations that may affect their freedom of movement or result in detention.⁷⁸

Lack of financial support: During the waiting period, asylum seekers receive insufficient financial assistance, making them vulnerable to economic hardship.

Lack of full legal recognition: Until they are officially granted refugee status, asylum seekers may not enjoy the full range of rights and services available to citizens or individuals with legal residency.

After the interview, the asylum seeker is informed of the decision regarding their application. There are two main outcomes:

Recognition of refugee status: If the application is approved, the individual receives a refugee card from UNHCR, which grants them international protection and access to certain basic rights.

Rejection of the application: If the asylum claim is denied following the refugee status determination interview, UNHCR notifies the applicant of a scheduled date to receive the official decision. The notification includes details such as the location, date, and time of the appointment, giving the applicant an opportunity to understand the reasons for the rejection. On the specified date, the individual must present their UNHCR registration card and any identity documents in their possession, such as a passport or other official ID, to the reception staff. They are then issued a formal letter outlining the reasons for the rejection and are required to sign a receipt confirming that they have received the decision.

1.2. Prioritised examination and fast-track processing

In the current practice, there are no regulations to prioritize applications. However, in some cases, UNHCR's partner institution submits requests to expedite the file for certain cases, such as unaccompanied children, people with disabilities and pregnant women.

Under 2024 Asylum Law, people with disabilities, pregnant women, children, the elderly, victims of human trafficking, torture, sexual violence and unaccompanied children have priority in submitting applications. Nevertheless, the law does not specify the nature of this priority or the support provided to these groups.

1.3. Personal interview

Indicators: Regular Procedure: Personal Interview

1. Is a personal interview of the asylum seeker in most cases conducted in practice in the regular procedure? **Yes**
- ❖ If so, are interpreters available in practice, for interviews? **Yes**
2. In the regular procedure: Is the interview conducted by the authority responsible for taking the decision? **Yes**
3. Are interviews conducted through video conferencing? **Sometimes**
4. Can the asylum seeker request the interviewer or the interpreter to be of a specific gender? **No**

Current practice:

There are three main ways to schedule a personal interview with UNHCR.

⁷⁷ The Refugee Platform in Egypt, 'Deprived of Access to Services and at Risk: shortcoming of the UNHCR registration system in Egypt', January 2024, available here

⁷⁸ The Refugee Platform in Egypt, 'What should you know as a migrant during the ongoing security crackdown', January 2025, available here

First, applicants can call the UNHCR information line at 0227390400. The line operates Sunday through Wednesday from 8:15 a.m. to 3:00 p.m., and on Thursdays until noon. Callers will be asked to specify the service they need, whether it's a new registration, document renewal (especially for documents expiring within three months), adding a family member, registering a newborn (under the age of two), or replacing lost or damaged documents.

Second, appointments can be booked in person at UNHCR offices. The office in 6th of October City (17 Mecca Street, 7th District) handles cases for non-Syrian nationals, while Syrian nationals are used to be referred to the Zamalek office (5 Michel Lutfallah Street). However, at the beginning of May 2025, the office in Zamalek was shut down and all nationalities should approach El Sheikh Zayed premises.

Third, Sudanese nationals have the option to register online via the dedicated portal titled 'Information for Sudanese Nationals'.⁷⁹

After the request is submitted, UNHCR sends a text message confirming the interview details, including the applicant's case number, date, time, and location. Entry to UNHCR premises is strictly limited to those with a confirmed appointment.

Preparing for the Interview, applicants for international protection are required to bring all relevant documents, such as passports, national IDs or expired UNHCR cards (if being renewed). In case of changes to family composition, such as marriage or childbirth, supporting documentation must also be presented. All family members listed under the file must attend the interview to complete identity verification and biometric enrollment.

During the interview, the applicant's personal data is reviewed and verified. UNHCR staff will take fingerprints, iris scans, and a photo in order to build a secure digital identity. The length of the interview depends on the service: A new registration typically takes 30 to 45 minutes, while renewing documents may take around 15 minutes. Applicants are strongly encouraged to provide truthful and complete information, as omissions or false statements can delay processing or lead to rejection.

After the Interview, applicants receive a document relevant to their case status. If the applicant cannot provide sufficient proof of identity, they are issued a White Certificate valid for six months. Asylum seekers receive a Yellow Card valid for 18 months. Refugees who have been granted status are given a Blue Card, which is valid for three years.

Applicants can update their contact details at any time by calling the information line. The database is updated weekly to reflect any changes.

2024 Asylum Law:

The Asylum Law does not mention any information related to the personal interview and the contact details, this is supposed to be clarified in the bylaws.

1.4. Appeal

Indicators: Regular Procedure: Appeal

1. Does the law provide for an appeal against the first instance decision in the regular procedure? **No**
 - ❖ If yes, is it ☐ **Judicial** ☐ Administrative
 - ❖ If yes, is it suspensive ☐ Yes ☐ **No**
2. Average processing time for the appeal body to make a decision: **Not available**

Current practice:

Under UNHCR standards, asylum seekers have a fundamental right to appeal negative decisions. The United Nations affirms that "every rejected asylum seeker has the right to challenge the decision," and that no one should be deported before being given a fair opportunity to appeal. In Egypt, UNHCR adopts an internal appeals procedure. When an asylum application is denied after the first interview, the applicant is notified and has the right to submit an appeal or request for reconsideration to the UNHCR office within a specified period, typically 30 days from the date of receiving the rejection notice. In order to maintain some degree of impartiality, the appeal is reviewed by staff or a committee who were not

⁷⁹ UNHCR Egypt: Information for Sudanese Nationals, available [here](#)

involved in the original decision. This is considered the final opportunity for review within UNHCR's internal process. If the appeal is also rejected, the asylum file is usually closed.

In order to submit an appeal, the applicant must fill out the designated form, which is available on UNHCR's official website under the "Forms and Publications" section. The appeal should include a detailed explanation of why the applicant believes the rejection was unfair or incorrect, along with updated contact information to allow the office to reach the applicant for further information or to schedule an interview if needed. Appeals can be submitted by email to: arecaapr@unhcr.org, or delivered in person to the Refugee Status Determination (RSD) building at 44A, Second Neighborhood, Eighth District, 6th of October City, on the days designated for individuals who have received a rejection notice.

Once the appeal is submitted, it is then reviewed by a committee composed of protection staff who are independent from those who made the initial decision. Generally, submitting an appeal does not automatically guarantee a new interview. Each appeal is assessed individually, and the committee decides whether a second interview is necessary. If a follow-up interview is deemed required, the applicant is notified via SMS, and the appointment details can also be checked under the "Refugee Status Determination" section of UNHCR's website.

Being an international organization with privileges and immunities, UNHCR is not part of Egypt's administrative or judicial system. Therefore, a rejected asylum seeker, or even a recognized refugee who has had their status withdrawn, cannot file a legal case against UNHCR in Egyptian courts to challenge the decision. This has been criticized by legal experts and human rights advocates as lacking transparency and independent oversight, since the agency acts as both decision-maker and reviewer. In effect, the appellant submits their challenge to the same institution that rejected them, without the oversight of an independent court, which limits the right to a fair and impartial review.

In case the appeal is accepted, the rejection decision is overturned and the applicant is officially granted refugee status, entitling them to UNHCR protection and services. If the appeal is denied, the file is permanently closed, and no further appeal is possible, marking the end of the legal process related to the asylum claim.

2024 Asylum Law:

Article 35 of the Egyptian Asylum Law provides that decisions issued by the Permanent Committee for Refugee Affairs may be challenged before the Administrative Court. This grants refugees the opportunity to seek judicial review of decisions to reject or revoke their asylum claims.

Meanwhile, Article 7 of the same law states that when the committee rejects an asylum application, the competent authority, namely the Ministry of Interior, must be notified to implement the decision immediately. The article raises great concerns by being unclear as to whether the enforcement of such decisions must be suspended until the asylum seeker has exhausted all available legal remedies.⁸⁰

1.5. Legal assistance

Indicators: Regular Procedure: Legal Assistance

1. Do asylum seekers have access to free legal assistance at first instance in practice?
N/A
2. Do asylum seekers have access to free legal assistance on appeal against a negative decision in practice?
N/A

In Egypt, there is no law that provides or requires legal assistance during the application, appeal, or review stages. In some cases, UNHCR partner organizations offer legal support to asylum seekers, whether in organizing their case files or in drafting appeal submissions. Under the Egyptian Asylum Law, there is no available information or binding legal obligation identifying which authority is responsible for providing legal assistance to applicants or those appealing decisions. Despite this, the law requires that appeals be submitted through a lawyer.

⁸⁰ The Refugees platform in Egypt and the Egyptian Initiative for Personal Rights: 'Joint Policy Brief on the Asylum Bill', available [here](#)

2. Dublin

The Dublin III Regulation does not apply in Egypt.

3. Admissibility procedure

In Egypt, there is no separate admissibility procedure. After the application is submitted, UNHCR examines the case on its merits while simultaneously assessing admissibility. This stage is described under the section titled “Regular Procedures: General.”

4. Accelerated procedure

There are no accelerated procedures for registration or asylum applications in Egypt, whether under the current system or 2024 Asylum Law.

With UNHCR, there is no clear legal provision granting priority or urgency to certain applicants. In some cases, UNHCR partner organizations may submit requests to expedite the processing of specific cases, such as unaccompanied children, persons with disabilities or pregnant women. Those categories are explicitly given priority under Law No. 164 of 2024.

D. Guarantees for vulnerable groups

1. Identification

Indicators: Identification

1. Is there a specific identification mechanism in place to systematically identify vulnerable asylum seekers? ☐ Yes ☐ For certain categories ☒ No
2. Does the law provide for an identification mechanism for unaccompanied children? ☐ Yes ☒ No

Vulnerable groups among refugees in Egypt include women, children, persons with disabilities, older people, ethnic and religious minorities, and members of the LGBTQ+ community. Refugee women are at risk of gender-based violence,⁸¹ including physical, sexual, and psychological abuse, as well as sexual exploitation and trafficking. Refugee children, especially those who are unaccompanied, are more vulnerable to exploitation, trafficking, or recruitment by armed groups. They often face barriers to education and suffer from psychological trauma. Persons with disabilities are frequently excluded from basic services and lack access to adequate facilities. Older refugees experience neglect, social isolation, and limited healthcare. Ethnic and religious minorities may face discrimination and persecution. Members of the LGBTQ+ community encounter legal and social discrimination⁸², which exposes them to violence, stigma, and exclusion.

2. Special procedural guarantees

Indicators: Special Procedural Guarantees

1. Are there special procedural arrangements/guarantees for vulnerable people? ☐ Yes ☐ For certain categories ☒ No

Prior to the enactment of the Asylum Law, partner organizations were actively supporting vulnerable refugee groups by recommending expedited registration appointments, expedited asylum case processing, and resettlement for the most vulnerable cases. These efforts aimed to provide urgent protection for individuals at risk of violence, exploitation, or serious violations, such as women survivors of gender-based violence, unaccompanied children, and people with disabilities.

The impact of such initiatives nevertheless remained limited due to the absence of a legal framework at the time, security constraints, and a lack of resources. These groups therefore require additional

⁸¹ Racist assault by police officers on refugee women and children in front of the UNHCR office, [here](#)
Sexual Assault and Murder Case of the Infant “Janet”, [here](#)

⁸² LGBTQ+ Refugees Community in Egypt, [here](#)

legal and community support to ensure their enjoyment of basic rights and reduce their exposure to risks.

Under the new Asylum Law, priority in reviewing asylum applications should be given to vulnerable groups, including pregnant women, children, the elderly and unaccompanied minors, according to article 7. However, the law merely lists them as priority cases without outlining whether there are special procedural safeguards for them.⁸³

E. Subsequent applications (reopening a file)

Indicators: Subsequent Applications

1. Does the law provide for a specific procedure for subsequent applications? ☐ Yes ☒ No
2. Is a removal order suspended during the examination of a first subsequent application? **N/A**
3. Is a removal order suspended during the examination of a second, third, subsequent application? **N/A**

Current practice:

“Reopening a file” refers to submitting a request to reconsider the case of a refugee or asylum seeker whose file was previously closed for any reason (such as rejection of the claim, expiration without renewal, or voluntary closure).

There are cases where UNHCR allows for a file to be reopened if convincing grounds are presented, such as:

Changed circumstances: The emergence of new threats in the country of origin or changes in legal or family status.

New evidence: The emergence of documents or information that were not included previously (such as medical certificates, security reports, etc.).

Correction of errors: In case earlier rejection was based on a mistake in assessment or lack of information.

There is no specific timeframe for requesting a file to be reopened. A new interview may be conducted to examine the reasons provided, and reopening decisions are made according to UNHCR’s criteria.

2024 Asylum Law:

The Asylum Law does not contain any information related to subsequent applications and it is unclear whether this will be regulated by the bylaws.

F. The safe country concepts

The concept of a safe country is neither defined nor referenced in either the 2024 Asylum Law or in current practice.

⁸³ Al-Haq Foundation for Freedom of Opinion, Expression and Human Rights: ‘A Critical Analysis of the Refugee Law Draft in Egypt’, December 5, 2024, available [here](#)

G. Information for asylum seekers and access to NGOs and UNHCR

1. Provision of information on the procedure

Indicators: Information on the Procedure

1. Is sufficient information provided to asylum seekers on the procedures, their rights and obligations in practice? ☐ Yes ☒ No
2. Is tailored information provided to unaccompanied children? ☐ Yes ☒ sometimes ☐ No

In current practice, UNHCR does not provide asylum seekers with information or guidance regarding the procedures required or their rights and obligations in Egypt.

2. Access to NGOs and UNHCR

Indicators: Access to NGOs and UNHCR

1. Do asylum seekers located at the border have effective access to NGOs and UNHCR if they wish so in practice? ☐ Yes ☐ With difficulty ☒ No
2. Do asylum seekers in detention centres have effective access to NGOs and UNHCR if they wish so in practice? ☐ Yes ☒ With difficulty ☐ No
3. Do asylum seekers accommodated in remote locations on the territory (excluding borders) have effective access to NGOs and UNHCR if they wish so in practice? ☒ Yes ☐ With difficulty ☐ No

There is no UNHCR or partner organization presence at Egypt's borders. The only case where a humanitarian organization was allowed near the border was at the onset of the conflict in Sudan in 2023, when the Egyptian Red Crescent was present at the southern border.⁸⁴ That presence was later withdrawn, with services moved to Aswan and Abu Simbel, far from the border. As a result, access to UNHCR and its partners at border areas is effectively impossible.

Access to or communication with UNHCR and its partner organizations inside detention centers is also extremely difficult, as UNHCR is not permitted to enter or visit detention facilities holding refugees or asylum seekers. In rare cases, access is made possible when relatives or acquaintances of detainees intervene and submit multiple requests to UNHCR for visitation.

For refugees or asylum seekers located outside border areas, it is somewhat easier to contact UNHCR through its offices across the country, which provide services to individuals already registered as refugees. Some services are also available through partner organizations operating in different governorates. UNHCR also issues regular service guides detailing available support, either through the agency or its implementing partners.⁸⁵

Gender-based violence emergency hotline

UNHCR partner organizations operate emergency and standard hotlines to report incidents and provide support to survivors of gender-based violence and individuals at risk. These hotlines offer information on reporting procedures, available services, and specialized consultations. UNHCR works closely with other partners to ensure a safe environment for those seeking support.

⁸⁴ Local media: Egypt's Red Crescent Provides services to those affected by the Sudanese crisis', April 2023, available [here](#)

⁸⁵ UNHCR's Guidebook: Services provided to refugees and asylum seekers in Greater Cairo, February 2025, available [here](#)

Emergency services for gender-based violence survivors offered by UNHCR partners

CARE Egypt provides support to survivors of gender-based violence and remains accessible through the following hotlines:

- Cairo helplines: 01028859777 / 01028859666 / 01120486354
- Alexandria helplines: 01276429307 / 01146077273 / 01144470800
- Working hours: Sunday to Thursday, 9:00 AM to 5:00 PM
- After-hours emergency line: 01157016486 (operational outside business hours, weekends, and official holidays)
- Maadi address: Villa 26, Street 262, Algeria Square, Maadi

CARE also manages two women-friendly spaces offering a variety of services such as sexual and reproductive health education, legal awareness sessions, psychosocial support groups, self-defense workshops, gender-based training for children, and child marriage and FGM prevention sessions.⁸⁶ These spaces aim to empower women and girls by improving access to information and providing diverse programming.

- 6th of October: Building 22, First District
- Faisal: 11 El-Sahab Street, off Ahmed Kamel Street, First Faisal, First Floor

Refuge Egypt Foundation provides emergency medical care for survivors of gender-based violence who have experienced rape.⁸⁷ Contact is required before visiting the clinics.

- Zamalek Clinic (All Saints' Cathedral): 5 Michel Lotfallah Street (behind Marriott Hotel)
 - Phone: 01272040710
 - Emergency: 0127204071
 - Hours: Saturday, Monday to Thursday, 8:00 AM – 3:00 PM
- Nasr City Clinic: Market area, 10th District, above the supply office
 - Phone: 01211970028
 - Emergency: 01282112011
 - Hours: Saturday, Tuesday, Wednesday, 9:00 AM – 3:00 PM
- 6th of October Clinic: 48 Central Axis Street, Episcopal Church, 10th District
 - Phone: 01211970037
 - Emergency: 01211970037
 - Hours: Sunday to Thursday, excluding Tuesday, 8:00 AM – 2:00 PM

El-Shehab Foundation:

- Cairo office: 1 Ibn El-Roumi Street, 7th District, Nasr City
 - Phone: 01212682221
- Alexandria office: 485 Mohamed Naguib Street, next to Saeeda Childhood School
 - Phone: 01212954447

Communication and Information Dissemination:

UNHCR regularly publishes updated informational materials in Arabic and English on its website, using posters, announcements, videos, and FAQ sheets. During the COVID-19 pandemic, awareness materials developed in cooperation with the Egyptian Ministry of Health were distributed through field offices and partners. UNHCR also used bulk SMS campaigns to deliver essential information directly to refugees.

⁸⁶ UNHCR partners | Care Egypt, available [here](#)

⁸⁷ UNHCR partners | Refuge Egypt, available [here](#)

UNHCR's NGO partners:

UNHCR cooperates with several non-governmental organizations to deliver a wide range of services to refugees and asylum seekers in Egypt, including:

- Egyptian Foundation for Refugee Rights (EFRR): Provides legal aid to detained refugees, migrants, and victims of crimes.
- Caritas Egypt: Serves as an implementing partner of UNHCR's refugee assistance programs since 1988, covering several governorates along the northern coast.
- Saint Andrew's Refugee Services (StARS): Delivers educational and psychosocial support for refugees in Cairo.
- Save the Children: Works to protect and support refugee children.

H. Differential treatment of specific nationalities in the procedure

Indicators: Treatment of Specific Nationalities

1. Are applications from specific nationalities considered manifestly well-founded? ☒ Yes ☐ No
Palestinians, Sudanese and Eritreans
2. Are applications from specific nationalities considered manifestly unfounded? ☐ Yes ☒ No

While applications from Palestinians, Sudanese and Eritreans are considered in the Egyptian context as well-founded, this does not amount to more immediate access to protection or rights. What it entails is that their asylum application has to be less detailed as the respective country contexts are recognised as situations of war.

1. Palestine

Palestinians in Egypt face persisting challenges related to their legal residency. The process of renewing their permits is complex, and failing to meet the required conditions can result in the permanent loss of legal status. Movement through the Rafah crossing remains restricted due to political and security considerations,⁸⁸ which continues to obstruct thousands of Palestinians, especially patients, students and those with foreign residency. In the labor market, Palestinians are not allowed to work in public sector jobs and encounter security-related barriers in the private sector. Any attempt to start a business requires an Egyptian partner.⁸⁹ In education, Palestinians struggle with high tuition fees and complex admission procedures. Public healthcare services are not provided free of charge, which adds to their financial burden.

Palestinians arriving from Syria face an even more precarious situation as they are not included in the mandate of UNRWA or UNHCR. This leaves them in a legal vacuum with no access to protection or basic services, and at risk of forced return.⁹⁰

After October 7, 2023, following the outbreak of the war in Gaza, scores of Palestinians were evacuated to Egypt through security coordination and were granted a 45-day temporary residence permit upon arrival. However, when this permit expired, the Egyptian authorities did not issue any decision to regularize their legal status. As a result, they lost access to essential services and freedom of movement. The Refugees Platform in Egypt, along with local human rights organizations, documented the authorities' refusal to issue residence permits to these Palestinians, exposing them to violations including exploitation and denial of education and healthcare.⁹¹

This legal exclusion is not a recent development. The Egyptian government has never established a stable legal framework that guarantees the rights of Palestinians. Their status has long depended on shifting regional political dynamics. With no recognition from UNHCR and no access to UNRWA services in Egypt, they remain without legal protection at both the national and international levels. As

⁸⁸ Palestinian News Agency: Egypt to open Rafah border only to return Gazans, August 2021, available [here](#)

⁸⁹ Labor Ministry Resolution No 700 of 2006, available [here](#)

⁹⁰ ARIJ, 'Syrian-Palestinians in Egypt: When children are kept out of the classroom in the name of the law, July 2024, available [here](#)

⁹¹ The Refugee Platform in Egypt: 'Urgent government action is required regarding residency permits for Gaza residents in Egypt', December 2023, available [here](#)

regional crises worsen, Palestinians in Egypt continue to live in legal uncertainty, which requires urgent action to safeguard their basic rights and protect them from further harm.

2. Syria

The past year saw major changes in the Egyptian state's policies toward Syrians residing in the country, reflected clearly in stricter residency and visa procedures and the imposition of new fees on various categories.⁹² In August 2024, the Egyptian authorities canceled the previous exemptions that Syrians had enjoyed from visa and residency fees, and began collecting new fees amounting to 25 USD per application. In September 2024, Syrian students were surprised by a massive increase in student residency fees, which rose by more than 200 percent to 7,000 Egyptian pounds instead of 2,100, without any prior official announcement. This placed many students under additional financial pressure that threatens their ability to continue their education.⁹³

The situation became even more complicated following the issuance of an internal order to deport any Syrian detained by security forces, regardless of their legal status and whether they are recognized refugees or hold valid legal residency. According to human rights reports, Egyptian authorities deported three Syrians who had celebrated the fall of Bashar al-Assad's regime, raising growing concerns about Syrians being targeted based on their political views.⁹⁴ This shift reflects a significant change in the Egyptian state's treatment of Syrians, whose presence in the country has become more restricted and subject to strict security oversight.

In addition to the residency restrictions, on 14 December 2024, the Egyptian authorities issued a decision to cancel the previous exemptions granted to Syrians holding residencies in the United States, Schengen countries, the United Kingdom, and Canada. A prior security clearance became a mandatory condition for all Syrians entering Egypt. The decision was applied immediately and without prior announcement, which led to many Syrians being denied entry, with some being returned from Egyptian airports because they were unaware of the new procedures.⁹⁵

On 29 December 2024, the Egyptian Civil Aviation Authority issued a circular to all airlines and travel agencies requiring them to prevent Syrians from traveling to Egypt from any country, except for those holding temporary residency permits for non-tourism purposes.⁹⁶ The circular also imposed financial penalties on airlines that violated these instructions. This decision disrupted the travel plans of many Syrians, including families who had been living in Egypt and relied on regular travel between Egypt and other countries.

At the same time, the Red Sea Ports Authority announced an Egyptian-Jordanian cooperation to facilitate the return of Syrians to their country through the Nuweiba seaport.⁹⁷ The first group of 40 people departed on the ferry "Ayla" and was transported by a Jordanian company to the Jaber border crossing between Jordan and Syria. While some media outlets indicated that these operations were voluntary, it was not possible to confirm that no forced deportations had taken place. Amid these developments, Egyptian security forces carried out a series of arrests targeting Syrians.⁹⁸ The most notable was the arrest of Syrian activist Laith Faris Al-Zoubi in Hurghada, after he published a video demanding that the Syrian consul in Egypt lower the Syrian regime's flag and raise the flag of the Syrian revolution.⁹⁹

These developments represent a clear trend of restricting the presence of Syrian nationals in Egypt, whether through stricter residency and visa measures or policies that effectively reduce the number of

⁹² Syria TV, 'Disappointment for Syrians: Egypt issues new decision on foreigners' residency', August 2024, available [here](#)

⁹³ The Refugees Platform in Egypt, 'A case report and legal memorandum on the Egyptian government's decisions regarding the entry and residence of Syrians', March 2025, available [here](#)

⁹⁴ EIPR condemns the arrest of Syrians celebrating the fall of Assad, voices concern over the potential deportation, December 2024, available [here](#)

⁹⁵ The Refugees Platform in Egypt, 'A case report and legal memorandum on the Egyptian government's decisions regarding the entry and residence of Syrians', March 2025, available [here](#)

⁹⁶ News report: Egypt [imposes] New requirements for Syrian entry, January 2025, available [here](#)

⁹⁷ The Red Sea Ports Authority: press statement, December 2024, available [here](#)

⁹⁸ EIPR condemns the arrest of Syrians celebrating the fall of Assad, voices concern over the potential deportation, December 2024, available [here](#)

⁹⁹ News report: Syrian Activist Laith Al-Zoubi Arrested in Egypt Over Revolutionary Flag Incident, January 2025, available [here](#)

Syrians in the country. Whilst the reasons behind these actions remain unclear, they have become a serious concern for the thousands of Syrians who have made Egypt their home over the past years.

3. Sudan

Before the outbreak of war in Sudan in 2023, Sudanese nationals were allowed to enter Egypt without having secured a visa, under certain conditions. Entry was permitted for women and children, as well as males under the age of 16 or over the age of 50. However, entry for these individuals was conditional on holding a valid passport with at least six months of validity and presenting a yellow fever vaccination certificate. Upon arrival at the Egyptian border, they would receive an entry stamp after paying the required fees, in accordance with the agreement on freedom of movement, residence, work, and property signed between Egypt and Sudan in April 2004, known as the “Four Freedoms Agreement”.¹⁰⁰

For other categories, particularly males aged between 16 and 50, entry into Egypt required obtaining a prior visa. This visa could be requested from the Egyptian consulate in Wadi Halfa. At the start of the conflict in April 2023, Egyptian authorities continued to apply the Four Freedoms Agreement, which allowed some Sudanese to cross without prior procedures. However, the slow pace of movement during the first two weeks led to overcrowding of displaced people at the border crossings.¹⁰¹

On May 25, Egyptian authorities issued a decision to stop recognizing temporary travel documents issued to Sudanese nationals. These documents had been in use since the start of the armed conflict in Sudan, and Egyptian authorities had previously allowed their holders to cross the border following routine procedures. This was a crucial channel for elderly people, children, and patients who did not hold valid passports to enter Egypt.¹⁰²

The Sudanese authorities had issued emergency travel documents in cases of expired or lost passports for those eligible to enter Egypt without a prior visa—namely women, children under 16, and men over 50—through Sudanese passport offices located near the border. On June 7, 2023, Egypt issued another decision requiring those previously exempt from visa requirements under the Four Freedoms Agreement to obtain a prior visa starting June 10. This escalated the crisis for displaced people and effectively closed the northern border to most of them. Notably, this decision was issued on the same day that the Egyptian Cabinet announced its approval of the draft law on the status of foreign asylum.¹⁰³

In September 2024, Egyptian authorities imposed new restrictions on Sudanese nationals arriving from third countries.¹⁰⁴ These included the requirement to obtain prior “security approval” in addition to a visa. According to a notice from the Passports and Immigration Administration, affiliated with the Egyptian Ministry of Interior, Sudanese passengers arriving in Egypt must obtain both a prior entry visa and a security clearance from Egyptian embassies in the countries from which they are traveling, effective as of September 18, 2024. This decision also revoked previous instructions that allowed Sudanese entry with a visa alone, provided they had proof of residence in Gulf countries or European Union states. However, this decision does not apply to travelers coming directly from Sudan. The most recent decision still in effect allows Sudanese nationals holding prior entry visas issued by the Egyptian embassy in Sudan to enter without needing additional security clearance.¹⁰⁵

¹⁰⁰ Law No 144 of 2004 on the agreement on freedom of movement, residence, work, and ownership between the governments of Egypt and Sudan, available [here](#)

¹⁰¹ The Refugees Platform in Egypt, ‘From Sudan to Egypt: Status report’, April 2023, available [here](#)

¹⁰² The Refugees Platform in Egypt, ‘Congestion and Crossing Crisis at Egyptian-Sudanese Borders’, May 2023, available [here](#)

¹⁰³ The Refugees Platform in Egypt, ‘From Sudan to Egypt: Egyptian Decisions Spark High-Risk Irregular Migration Movement’, March 2024, available [here](#)

¹⁰⁴ News report: ‘New restrictions on the entry of Sudanese nationals into Egypt’, September 2024, available [here](#)

¹⁰⁵ Ibid.

Reception Conditions

There are no reception centers for refugees or asylum seekers in Egypt. Refugees and asylum seekers reside in private accommodations that they rent themselves, either using their own funds or with support from UNHCR or one of its partner organizations.

Detention of Asylum Seekers

A. General

Indicators: General Information on Detention

- | | |
|--|---------------|
| 1. Total number of asylum seekers detained in 2024: | Not available |
| 2. Number of asylum seekers in detention at the end of 2024: | Not available |
| 3. Number of Removal Centres: | Not available |
| 4. Total capacity of Removal Centres: | Not available |

B. Legal framework of detention

1. Grounds for detention

Indicators: Grounds for Detention

- | | |
|--|---|
| 1. In practice, are most asylum seekers detained | |
| ❖ on the territory: | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| ❖ at the border: | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| 2. Are asylum seekers detained during a regular procedure in practice? | Yes |

Detention in Egyptian law is divided into two types:

Judicial detention, applied by court order as a result of a charge punishable by imprisonment or as a precautionary measure known as pretrial detention.

Administrative detention, carried out for immigration-related reasons, and often justified on the grounds of preparing individuals for deportation.

Egyptian law does not include provisions for the detention of migrants or asylum seekers based on seeking asylum. However, asylum seekers, refugees and migrants are detained based on charges related to irregular migration, irregularities related to residence or criminal charges. The detention of refugees and asylum seekers in Egypt remains a legal and humanitarian concern, reflecting a gap between national law and Egypt's international obligations under instruments such as the 1951 Refugee Convention. Although the Egyptian Constitution and national laws guarantee basic rights, including protection from arbitrary detention and the right to seek asylum, actual practice reveals significant shortcomings in upholding these rights. Both internal and published reports have recorded the detention and deportation of more than 22,000 refugees, and prima facie refugees after entering Egyptian territory.¹⁰⁶ The Refugee Platform in Egypt documented the deportation of 1,000 prima facie refugees and refugees registered with UNHCR, mostly Sudanese, following charges of irregular entry, despite having been released by the prosecution. They were all deported to conflict zones.

In a number of cases, prima facie refugees and migrants have been detained without due process, particularly during mass arrests or when attempting to cross Egypt's southern or maritime borders irregularly. The authorities often proceed these detentions without formal charges or presenting individuals to the Public Prosecution, which according to Article 36 of the Egyptian Criminal Procedure Code, authorities are required to bring any arrested person before the prosecution within 24 hours.¹⁰⁷

In cases where courts issue release orders, acquittals, or sentences are served, release may not always be granted, but remains at the discretion of the security authorities, who may issue deportation orders without providing access to appeal mechanisms. This poses a violation of the right to due process and other safeguards guaranteed under Egyptian law and international conventions.¹⁰⁸

¹⁰⁶ The Global Detention Project | Egypt Immigration Detention Profile, available [here](#)

¹⁰⁷ Amnesty International, 'Egypt: Authorities must end campaign of mass arrests and forced returns of Sudanese refugees', June 2024, available [here](#)

¹⁰⁸ The Refugee Platform in Egypt, 'Security agencies continue to recycle victims of immigration cases', April 2022, available [here](#)

The Refugee Platform in Egypt documented a series of wide-scale and systematic arrest campaigns targeting refugees and asylum seekers, most recently in January, when security forces focused on individuals with darker skin tones in high-density refugee/ migrants areas in Greater Cairo.¹⁰⁹ Many were forced to sign “voluntary return” statements and were asked to book tickets to Port Sudan or were returned overland through the Arqin crossing. The RPE also documented the detention of an elderly Sudanese woman at Cairo Airport upon her return from Saudi Arabia, where security authorities informed her that a deportation order had been issued against her.

In the Aswan area, near the southern borders, the authorities arrested dozens of Sudanese nationals, including registered refugees holding valid residence permits and others with pending registration appointments with UNHCR. Detainees were held in the Aswan First Police Station in poor and inhumane conditions, according to testimonies from detainees and verified visual evidence. This included the detention of children, women, and older individuals, some of whom were later forcibly deported via the Arqin border, as confirmed by a deportee.

2. Alternatives to detention

Indicators: Alternatives to Detention

1. Which alternatives to detention have been laid down in the law? Not available

There are no alternatives to administrative detention in Egypt. It is judicial detention that is regulated with alternatives for certain types, such as remand detention and simple imprisonment.

First: Remand detention and its alternatives: Articles 134 and 143 of the Egyptian Code of Criminal Procedure, and Article 43 of Law No. 94 of 2015 on Combating Terrorism, regulate the conditions, restrictions, jurisdiction, and durations related to remand detention. Article 201 of the Egyptian Code of Criminal Procedure regulates alternatives to pretrial detention.

Second: Simple imprisonment and its alternatives: Article 18 of the Egyptian Penal Code allows for replacing simple imprisonment sentences not exceeding six months, in accordance with the rules set out in Articles 479, 520, 521, 522, and 523 of the Code of Criminal Procedure.

3. Duration of detention

Indicators: Duration of Detention

1. What is the maximum detention period set in the law:
 - ❖ Asylum detention Not available
 - ❖ Pre-removal detention Not available
2. In practice, how long on average are asylum seekers detained? Not available

Egypt's legal system demonstrates inconsistencies with international law when it comes to the administrative detention of foreigners. The law does not set a maximum time limit for this type of detention and gives the executive authority the power to detain foreigners indefinitely under the pretext of deportation, without clear standards or any judicial oversight. In the event that a deportation is not possible, such as when a person's country refuses to take them back, this type of detention then becomes a form of prolonged imprisonment that may last for months or even years, in very poor conditions that include overcrowding, lack of medical care, and risk of torture. It also involves legal problems, like not informing people why they are being held or not providing translators.

¹⁰⁹ The Refugees Platform in Egypt, “The Egyptian authorities must implement what they say they are committed to”, January 2025, available [here](#)

C. Detention conditions

1. Place of detention

Indicators: Place of Detention

1. Does the law allow for asylum seekers to be detained in prisons for the purpose of the asylum procedure (i.e. not as a result of criminal charges)? ☐ Yes ☒ No
2. If so, are asylum seekers ever detained in practice in prisons for the purpose of the asylum procedure? ☐ Yes ☒ No

Egypt does not operate dedicated detention centers for refugees. Instead, they are usually held in the same facilities used to detain Egyptian nationals, such as police stations, prisons, and other holding sites. Some military installations, especially in border areas, are also used to detain refugees registered with UNHCR, migrants and prima facie refugees prior to deportation.¹¹⁰

1.1. Police stations

Police stations serve as key detention points for asylum seekers who are arrested and held temporarily, particularly in border governorates such as Aswan, the Red Sea, Marsa Matrouh, and Alexandria. The cells in these facilities are often overcrowded and lack adequate preparation; basic services and proper sanitation are frequently unavailable.

1.2. Unofficial detention facilities

In some cases, refugees, migrants and prima facie refugees are held in camps operated by the Central Security Forces or in military facilities that are not designated for detention, which constitutes a serious violation of their rights. In certain locations, they are confined in improvised spaces, such as storage rooms or a mosque inside security compounds, which worsens their humanitarian situation. This type of detention denies them the rights guaranteed to other detainees held up in legal detention facilities, including necessary healthcare, particularly for older people, pregnant women, and children, which constitutes a clear violation of their rights.

1.3. Temporary detention at border crossings

When migrants, asylum seekers and prima facie refugees are arrested while attempting irregular entry, they are detained at Central Security Forces facilities or military border posts while decisions are made regarding their immediate deportation or referral to the Public Prosecution. They are often held without any clear legal procedures, and some are prevented from accessing lawyers or submitting asylum claims.¹¹¹

2. Conditions in detention facilities

According to the Egyptian Constitution and the Prison Regulations, detainees, including refugees, are entitled to fundamental rights, including:

- ❖ The right to legal representation and access to a lawyer.
- ❖ The right to submit an asylum application in accordance with international agreements.
- ❖ The right to receive basic healthcare while in detention.
- ❖ The right to communicate with their families or legal representatives.

However, in practice, these rights are not effectively upheld in the case of detained refugees and migrants who face the following obstacles:

Denial of the right to seek asylum: In many cases, prima facie refugees and migrants are denied the right to submit an asylum claim while in detention.

¹¹⁰ Investigation: Inside Egypt's secret system for detaining and deporting thousands of Sudanese refugees, the Refugees Platform in Egypt and The New Humanitarian, April 2024, available [here](#)

¹¹¹ The Global Detention Project | Egypt Immigration Detention Profile, available [here](#)

Restricted access to legal counsel: Lawyers and human rights organizations are often not informed of the locations where refugees are being held, making it difficult to provide legal assistance. Lawyers also face bureaucratic and security-related barriers in obtaining permits to visit detainees, resulting in prolonged detention without legal support.

Arbitrary deportation procedures: In some cases, refugees remain in detention despite having been acquitted or having completed their sentence, with their release made contingent on approval from security authorities. Some are forcibly deported in coordination with the embassies of their countries of origin, putting them at risk, particularly those fleeing conflict or political persecution. This constitutes a direct violation of the principle of non-refoulement, which obliges states not to return any person to a country where they may face danger.

3. Access to detention facilities

Indicators: Access to Detention Facilities

1. Is access to detention centres allowed to:

❖ Lawyers:	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> Limited <input type="checkbox"/> No
❖ NGOs:	<input type="checkbox"/> Yes <input type="checkbox"/> Limited <input checked="" type="checkbox"/> No
❖ UNHCR:	<input type="checkbox"/> Yes <input type="checkbox"/> Limited <input checked="" type="checkbox"/> No
❖ Family members:	<input type="checkbox"/> Yes <input type="checkbox"/> Limited <input checked="" type="checkbox"/> No

UNHCR and NGOs face severe difficulties in accessing administrative detention sites in Egypt. The Egyptian authorities impose strict restrictions on visits by these organizations, and in some cases prohibit them altogether, preventing the provision of essential legal and humanitarian support to detainees.

In addition, the authorities detain both registered and unregistered refugees and asylum seekers in unofficial locations that lack even the most basic facilities required to accommodate people or ensure humane conditions of detention.

4. Pre-deportation detention

Under Law No. 89 of 1960 on the Entry and Residence of Foreign Nationals, Articles 25, 26, 27, 29, and 31, government authorities are granted broad powers to arrest and deport foreigners without providing adequate safeguards to protect their rights. This stands in contradiction to international obligations that prohibit the return of individuals to countries where they may face persecution or serious violations. In addition, Decree No. 444 of 2014 provides legal cover for the arrest, detention, and prosecution of refugees and those transiting through Egypt, solely on the basis of their presence in areas designated as military zones, exposing them to further human rights risks.

Human rights reports indicate that arbitrary stops and arrests of refugees and migrants are recurring in certain areas, such as parts of Greater Cairo and Alexandria, where security checkpoints are commonly deployed. These operations often target individuals based on their racial features or nationality. Sudanese, Ethiopian, Eritrean, and Somali nationals in particular are frequently stopped in the streets and on public transportation and asked to present identification or residency permits. In many cases, even when refugees show UNHCR-issued asylum documents, they are subjected to arbitrary detention or transferred to police stations for further screening.

D. Procedural safeguards

1. Judicial review of the detention order

Indicators: Judicial Review of Detention

1. Is there an automatic review of the lawfulness of detention?

❖ Asylum detention	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
❖ Pre-removal detention	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
- If yes, at what interval is the detention order reviewed? -

2. Legal assistance for review of detention

Indicators: Legal Assistance for Review of Detention

1. Does the law provide for access to free legal assistance for the review of detention?
☐ Yes ☒ No
2. Do asylum seekers have effective access to free legal assistance in practice?
☐ Yes ☒ No

E. Differential treatment of specific groups in detention

There is no discrimination based on nationality in detention, nor are there preferential decisions issued for specific nationalities.

Content of International Protection

Until the end of 2024, international protection in Egypt was based on the definitions contained in ratified international agreements, particularly the 1954 protocol signed with UNHCR, without the existence of domestic legislation regulating the granting of refugee status. At the same time, Palestinian refugees, who are not covered by the 1951 Refugee Convention under Article 1(d), were granted residence in Egypt and issued travel documents until 1976 through an exceptional mechanism set out in Ministerial Decrees No. 180 and 181 of 1964. The first provided for the exemption of certain groups, including Palestinian refugees, from residence fees; the second allowed Palestinian refugees to be issued travel documents on the condition that they were granted refugee status. This practice reflected the existence of two forms of international protection, one covering persons covered under the 1951 Convention and another for Palestinians in Egypt.

The issuance of Law No. 164 of 2024, which has not yet been effectively implemented, entrenched a serious legislative gap by limiting international protection to a single model tied to recognition by a government committee, without establishing alternative mechanisms such as subsidiary or temporary protections. This deepens the legal vacuum and jeopardises the rights of individuals unable to prove their refugee status under the narrow definitions in the conventions, in violation of the principles of justice and inclusivity in international protection.

The definition of an asylum seeker under the 2024 Asylum Law is limited to "a foreign national who submitted an application to the committee", thereby excluding *prima facie* asylum seekers from international protection and access to services. More critically, the law explicitly fails to provide temporary protection to asylum seekers. This wording has led to the exclusion of individuals from protection in many cases and results in the total denial of protection for persons who meet the definition of a refugee under Article 1, if they have not submitted an application to the designated committee.

The definition of a refugee in the law aligns with that set out in Article 1 of the 1951 Refugee Convention. The definition positively expands to include stateless persons among those eligible for protection. It is also consistent with the definition contained in the African Charter on Human and Peoples' Rights, and incorporates the broader definition found in the Convention of the Organization of African Unity, which includes in its second paragraph causes of displacement such as "external aggression, occupation, and events seriously disturbing public order".¹¹²

However, the definition of a refugee or person eligible for asylum in the law adds the term "serious" in the clause that outlines the reasons for being outside one's country of nationality or habitual residence: "anyone who is outside the country of their nationality or habitual residence due to a reasonable cause based on a well-founded and serious fear of persecution."

A. Status and residence

1. Residence permit

Current system:

Indicators: Residence Permit

- | | |
|--|----------|
| 2. What is the duration of residence permits granted to beneficiaries of protection? | |
| ❖ Refugee status | 6 months |
| ❖ Asylum seeker status | 6 months |

Holding a residence permit is a fundamental legal requirement for all foreign nationals residing in Egypt, including refugees and asylum seekers, in accordance with Egyptian law. Law No. 89 of 1960 on the Entry and Residence of Foreign Nationals in Egypt. Article 16 of the law states:

"Every foreign national must obtain a residence permit, and must leave the territory of the United Arab

¹¹² Presidential Decree No. 332 of 1980 on approving the Organization of African Unity Convention governing the various aspects of refugee issues in Africa, available [here](#) (AR)

Republic¹¹³ at the end of the permitted period of residence unless they have obtained an extension from the Ministry of Interior before its expiry.”

The law also imposes financial penalties for non-compliance with this requirement. According to the amendments introduced under Law No. 77 of 2016, a fine of 1,000 Egyptian pounds is imposed on anyone who violates Article 16 during the first three months of failing to renew their residence permit. This fine increases by 50% for every additional three-month period of delay. In some cases, penalties may extend to deportation, particularly when delays persist without submitting an official renewal request.

Although many refugees in Egypt hold asylum seeker or refugee cards issued by UNHCR, some Egyptian police officers do not recognise these cards as valid residence documents and require refugees to present an Egyptian residence permit during security checks or official procedures. Therefore, all refugees and asylum seekers are advised to apply for a residence permit as soon as they register with UNHCR and to renew it regularly to avoid legal complications during their stay in Egypt.

Notably, even after completing registration, refugees continue to face considerable obstacles in obtaining a residence permit from the Egyptian Ministry of Interior. While the permit itself is valid for no more than six months, the process to obtain it can take between five and six months, pushing refugees to begin renewal procedures months in advance to avoid potential legal consequences.

In addition to lengthy waiting periods, the limited number of UNHCR offices in Egypt — restricted to two branches in Zamalek and Sixth of October City, each assigned to specific nationalities — further complicates the situation. By the beginning of May 2025, UNHCR had closed its office in Zamalek and kept only the one of Sheikh Zayed in Cairo to serve all nationalities. Regardless of where they reside in Egypt, refugees must travel to the designated office to complete procedures, incurring high financial costs and increased legal risks, particularly for those without identity documents.

These conditions have a disproportionate impact on the most vulnerable groups, such as unaccompanied minors, survivors of violence, and newborns, who may face arrest or detention due to the lack of residence permits or registration documents. The complexity of the process also results in refugees being denied access to essential services such as healthcare, education, and social assistance, whether from government entities or local and international organizations, all of which require valid official documentation.¹¹⁴ This situation creates a precarious legal environment for individuals who assist undocumented refugees, as they may face criminal charges under Article 8 of the Anti-Smuggling of Migrants Law No. 82 of 2016, which criminalises harbouring or providing services to irregular migrants with knowledge of their legal status. This heightens the isolation of refugees and limits their ability to access any form of support, which is an approach that is also reflected in 2024 Asylum Law.

Foreign nationals are permitted to reside in Egypt, but they must obtain a residence permit issued by the relevant government authority, specifically the General Directorate of Passports, Immigration, and Nationality under the Ministry of Interior. The requirements and procedures for obtaining a residence permit vary depending on the type of residency requested. Below are the procedures for obtaining a residence permit for refugees in Egypt and the challenges they face:

The process of obtaining a residence permit for refugees in Egypt begins with securing a reference number from UNHCR. Once this number is obtained, the applicant must go to the General Directorate of Passports, Immigration, and Nationality, located at 12 El-Sikka El-Beida Street in El-Waily, Cairo, next to the Police Academy in Abbasiya. At the directorate, the required documents are submitted to the Communications Office. These include a copy of the UNHCR-issued asylum card and the reference number. After submission, an appointment is set to complete the remaining steps of the application.

On the scheduled day, the refugee must appear at the residency office in Abbasiya with the original asylum card and the passports of all registered family members. If a passport is missing, a police report documenting the loss must be submitted. The applicant must also present the UNHCR reference number and a personal photo for each adult. After the application is received, fingerprints are taken, and another appointment is set to collect the residence card, which is valid for six months. Once issued,

¹¹³ In February 1958, Egypt and Syria signed a unity agreement between the two countries, under the name of the United Arab Republic. The unity ended in October 1961.

¹¹⁴ Egyptian Commission for Rights and Freedoms: ‘UNHCR Policies in Egypt in Light of Global Crises’, available [here](#)

it is advisable to keep a copy of the permit in a safe place, as it will be required for future renewal.

If the residence permit is lost, the individual must file a loss report at the relevant police station, then go to the Passports and Immigration Directorate in Abbasiya to request a replacement. If the permit was already expired at the time of loss, no replacement will be issued; instead, a new application must be submitted for a fresh permit.

Renewal follows the same steps as the initial application, starting with obtaining a new reference number from UNHCR or its partners, and then proceeding to the directorate to complete the process.

In the case of a lost passport, a police report must be filed at the station in the place of residence or where the loss occurred. This report may be required when renewing the residence permit.

In general, many refugees in Egypt report that the dates they are given to receive their residence permits are scheduled years in advance, some as far as the end of 2027.¹¹⁵ In the meantime, they face restrictions on their movement due to fear of being stopped by security forces. Egyptian police officers often do not recognise the UNHCR-issued asylum card unless it is accompanied by a valid residence permit. They also do not accept the receipt that indicates the date for collecting the permit, which makes holding a residence permit crucial as the only official proof of legal status in the country.

2024 Asylum Law:

Under the 2024 Asylum Law, the residency procedures should be specified in the bylaws.

2. Civil registration

The birth certificate is the primary document that establishes a person's identity, as it includes the name, date of birth, parentage, and place of birth. It is essential for accessing education, healthcare, and nationality.

According to the International Covenant on Civil and Political Rights (Article 24) and the 1951 Refugee Convention (Article 25), states are obligated to issue identity documents to refugees when they are unable to obtain them from their national authorities.

2.1. Civil registration of child-birth

Refugees follow the same birth registration procedures as Egyptian citizens. Article 19 of the Civil Status Law requires that births be registered within 15 days of delivery. The father, or a paternal family member, can carry out the registration at a health office. If this legal period is missed, the individual must go to the Civil Registry and submit the necessary documents.

According to various sources, challenges refugees face in obtaining birth certificates:

Requirement to present valid official documents: Such as travel documents, refugee cards, or residence permits. Some refugees may not have these due to fleeing their countries or because their original authorities refuse to renew them.

Marriage documentation: A birth certificate can only be issued if the marriage is officially registered. This is often difficult for some refugees, and can result in the child's parentage not being legally recognised.

Expiry or non-renewal of the refugee card: This can affect a refugee's ability to deal with official authorities and obtain civil documents.

Administrative complexity and difficulty in communication: Interacting with Egyptian government offices can be exhausting and complicated, especially in the absence of effective support systems to help refugees complete the process.

¹¹⁵ News report, 'Testimonies of refugees in Egypt about the horrors of residence and deportation', July 2024, available [here](#)

2.2 Civil registration of death

Refugees follow the same procedures as Egyptian nationals. Article 35 of the Civil Status Law stipulates that deaths must be reported within 24 hours through one of the following:

- Health offices
- Medical authorities accredited by the Ministry of Health
- The village mayor or the local sheikh in rural areas

Challenges refugees face in obtaining death certificates include:

- The deceased may not have identity documents, making it difficult to register the death officially.
- Movement and administrative procedures are often complicated, particularly in areas where refugees have limited access to legal assistance.
- The process requires official documentation that some refugees may be unable to provide.

3. Refugee Card

Current practice:

Before the law came into effect, UNHCR's office in Egypt issued different types of cards to asylum seekers and refugees:

White Card: Issued to asylum seekers who do not hold any original photo ID, as proof of registration, but it does not grant residency.

Yellow Card: Issued to those with valid identity documents; it offers legal protection and a temporary six-month residence permit.

Blue Card: Issued to individuals officially recognised as refugees; it is valid for three years.

2024 Asylum Law:

Article 11 of the law states that the Permanent Committee for Refugee Affairs is responsible for issuing an official document confirming refugee status. The article refers to the executive regulations for determining the document's validity, required content, and procedures for issuance and renewal.

4. Naturalisation

Indicators: Naturalisation

- | | |
|--|---------------|
| 1. What is the waiting period for obtaining citizenship? | 10 years |
| 2. Number of citizenship grants to beneficiaries in 2024 | Not available |

Access to Egyptian Nationality for Refugees

In Egypt, refugees are not granted Egyptian nationality regardless of the length of their stay in the country. To acquire Egyptian citizenship, they must follow the provisions of the Egyptian Nationality Law.

Law No. 26 of 1975 on Egyptian Nationality allows foreign nationals to apply for citizenship under specific conditions.

Acquisition of Egyptian Nationality by Birth

Children of refugees or migrants automatically acquire Egyptian nationality if born to an Egyptian father or mother. The law also permits individuals born in Egypt to foreign parents to apply for naturalisation under certain conditions, including that one parent be of Egyptian origin, provided they reside legally in Egypt and pay a fee of USD 10,000 transferred from abroad. Additionally, individuals born in Egypt to

foreign parents, in case one of the parents was also born in Egypt, may apply for naturalisation within one year of reaching adulthood, provided they pay the same fee.

Acquisition of Egyptian Nationality by Marriage:

This right is granted to a foreign wife married to an Egyptian citizen, provided two years have passed since the marriage and the couple has continuously resided in Egypt during that period. The applicant must submit a formal request to the Passport, Immigration, and Nationality Authority, and the basis of residency must be marriage-based. This creates a significant obstacle, as the authorities do not allow refugees to hold a residency status other than that of refugee, even if they meet the conditions. To change their residency status, they are required to close their asylum file.

Acquisition of Egyptian Nationality by Naturalisation:

The law allows foreign nationals who have resided in Egypt for a long period to apply for citizenship, provided they have maintained legal and continuous residence in the country for at least ten consecutive years, have reached adulthood, possess a stable source of income sufficient to support themselves and their family, and meet additional conditions: good conduct, no criminal record or security cases, proficiency in Arabic, and a medical certificate confirming the absence of communicable diseases.

Acquisition of Egyptian Nationality by Special Decree:

The Minister of Interior is granted by the law the authority to award nationality by special decree in exceptional cases, based on a substantiated request, subject to assessment by the competent authorities and in consideration of security concerns and the public interest.

Acquisition of Egyptian Nationality by Investment:

Amendments to the Egyptian Nationality Law introduced a path to citizenship through investment, available via one of the following options:

- Non-refundable deposit: A minimum of USD 250,000 must be deposited as direct revenue to the state treasury, non-refundable. New provisions allow the amount to be paid in instalments over one year.
- Refundable deposit: Depositing USD 500,000 via bank transfer or from within Egypt, provided the source of funds is verified at a customs entry point. The deposit must remain for three years and is refundable in local currency at the official exchange rate, without interest.
- Purchase of state-owned or public entity property: The property must be worth at least USD 300,000 and registered in the investor's name. It is no longer required that the amount be transferred from abroad; payment from within Egypt is now allowed if the amount had previously entered the country and is documented.
- Establishing an investment project: The minimum required is USD 300,000 invested in a project approved by the General Authority for Investment and Free Zones, with the condition that it creates jobs for Egyptian nationals.

2024 Asylum Law:

Article 27 of Asylum Law No. 164 of 2024 affirms the refugee's right to enjoy Egyptian nationality in accordance with the applicable laws, meaning that access to citizenship is neither automatic nor exceptional for refugees but remains subject to the general provisions of Law No. 26 of 1975.

Challenges Refugees Face in Accessing Egyptian Nationality

Lack of clarity on how residence duration is calculated: The Asylum Law does not specify whether a refugee's residence period counts toward the years required for naturalisation, leaving the matter to the discretion of the competent authorities.

Administrative and legal difficulties: Most refugees in Egypt are granted temporary, not permanent, residence permits, which may legally disqualify them from applying for citizenship after ten years.

No special facilitation for refugees: The law does not include exceptional or flexible procedures to ease the naturalisation process for refugees, meaning they are subject to the same conditions as other foreign nationals.

5. Cessation and review of protection status

Indicators: Cessation

1. Is a personal interview of the beneficiary in most cases conducted in practice in the cessation procedure ☐ Yes ☒ No
2. Does the law provide for an appeal against the first instance decision in the cessation procedure? ☐ Yes ☒ No

This is a process carried out by the state or by UNHCR to assess whether the reasons for protection still apply. Its purpose is to determine whether the refugee continues to require international protection.

Available information does not reveal UNHCR's policies on cessation and protection status review in Egypt, nor the timeframes within which such reviews are conducted.

As for Law No. 164, no timeframes or mechanisms were regulated for reviewing protection status. However, the law includes provisions that allow for the review or termination of protection granted to refugees under certain defined circumstances, in accordance with Articles 8 and 9 of the law.

6. Cancellation of protection status

Indicators: Cancellation

1. Is a personal interview of the beneficiary in most cases conducted in practice in the cancellation procedure? ☒ Yes ☐ No
2. Does the law provide for an appeal against the cancellation decision? ☒ Yes ☐ No

Current practice:

The 1951 Refugee Convention and its 1967 Protocol set out the conditions under which refugee status may end or be withdrawn in Article 1, paragraph (C) of the Convention. While the Convention does not use the term “withdrawal” explicitly, it defines the situations in which international protection ceases to apply or no longer applies to an individual who was previously recognised as a refugee.

Cessation of Status:

This refers to a change in legal status resulting from a change in objective circumstances—such as an improvement in the situation in the country of origin, or a change in the refugee's legal or humanitarian situation. Article 1(C) outlines the grounds for cessation of refugee status, including:

- Voluntary return to the country of origin
- Reacquisition of a previously lost nationality, or acquisition of a new nationality and enjoyment of its protection
- Disappearance of the circumstances that led to flight (e.g., the end of war or fall of a persecutory regime)

Exclusion or Revocation

This refers to a change in legal status resulting from serious misconduct by the refugee. Article 1(F) of the Convention limits protection in cases where the individual:

- Committed a crime against peace, a war crime, or a crime against humanity

- Committed a serious non-political crime outside the country of refuge before being accepted as a refugee
- Engaged in acts contrary to the purposes and principles of the United Nations

UNHCR may also withdraw international protection if it is found that status was granted based on misleading or falsified information or through the concealment of material facts.

2024 Asylum Law:

The grounds outlined in the 1951 Convention are largely reflected in Egyptian Law No. 164, though the law uses the terms “termination of asylum” and “revocation of asylum.”

Termination of Asylum:

The law aligns with the cessation grounds established by the 1951 Convention but adds one additional condition: the departure from the country for six consecutive months without an excuse accepted by the Permanent Committee on Refugee Affairs.

Revocation of Asylum:

The Asylum Law of 2024 regulates the ending of refugee status under the term ‘revocation of asylum,’ referring to the removal of legal status as a result of the refugee’s own conduct or breach of specific obligations. The law sets out three main grounds:

1. Obtaining status through fraud or concealment of information
If it is proven that refugee status was granted based on forged documents or the concealment of material information, the competent committee may revoke status. This is considered a fundamental breach of the conditions for granting protection.
2. Acts covered by Article 8
Article 8 includes crimes affecting national security or public order, such as affiliation with terrorist organizations, human trafficking, or falsifying official documents. Committing any of these acts leads to automatic revocation of refugee status, regardless of humanitarian considerations.
3. Violation of obligations under Articles 28, 29, and 30
These provisions require the refugee to follow specific procedures. Article 28 is about violation of any laws, regulations, or Egyptian society’s values and traditions. Article 29 prohibits acts contrary to purposes and objects of UN, African Union, League of Arab States and other organization, or acts that may harm national security and public order, or hostile acts against any foreign state. Article 30 prohibits political activities completely, not just ones that harm the state. Failure to comply with any of these obligations constitutes sufficient grounds for revocation of status.

B. Family reunification

1. Criteria and conditions

Egypt does not have a national legal framework regulating the right to family reunification for refugees on its territory. The 2024 Asylum Law does not include any clear procedures or guarantee this right in accordance with international standards.

In practice, Egyptian authorities do not implement any formal system through which refugees can apply to bring their family members. There are no announced or permanent pathways for this, whether through the Ministry of Interior or through UNHCR.

Although no official family reunification system exists in Egypt, limited opportunities have been available in certain cases. These have usually taken place in coordination with UNHCR or with third countries that receive refugees. UNHCR has facilitated family reunification procedures either through resettlement programmes, or by coordinating with the authorities in the destination country upon the

request of a family member residing outside Egypt. The role of the Egyptian authorities so far has been limited to facilitating the departure of refugees or granting travel approval, without assuming a position in accepting or rejecting reunification requests. Moving forward, this role is assigned to the Permanent Committee for Refugee Affairs in Egypt once it is established, according to 2024 Asylum Law.

C. Movement and mobility

1. Freedom of movement

The right to movement and mobility is one of the fundamental rights guaranteed by the Egyptian Constitution and international conventions. It is closely tied to human dignity and to individuals' ability to exercise other rights. In Egypt, the Constitution regulates the status of refugees and migrants in relation to freedom of movement. Article 62 of the Egyptian Constitution affirms that freedom of movement is guaranteed for all.

At the international level, the treaties to which Egypt is party oblige the state to uphold the right of refugees and migrants to move freely. The 1951 Refugee Convention, in Article 26, affirms that refugees lawfully staying in the host country must be allowed to choose their place of residence and move freely within its territory under the same conditions as other foreign nationals. Likewise, Article 12 of the International Covenant on Civil and Political Rights states that every person lawfully present in a state's territory has the right to freedom of movement. That is an obligation Egypt must uphold in its policies towards refugees and migrants. The International Convention on the Protection of the Rights of All Migrant Workers and Members of Their Families, adopted by the United Nations in 1990, also guarantees migrant workers the right to move freely within the territory of the host state.

Current Practice:

Egypt does not apply a camp policy in hosting refugees; they are allowed to reside in urban areas. Most live in major cities such as Cairo, Giza, Alexandria, and Damietta. Yet, despite all these legal commitments, legal and administrative obstacles persist, limiting the freedom of movement of refugees and migrants in Egypt. Complex residency procedures and administrative discrimination against certain nationalities, such as Syrians and Palestinians, hinder their movement due to fear of deportation, forced return or detention.

2024 Asylum Law:

The asylum law speaks to freedom of movement in Article 22, which states that "in accordance with relevant laws and regulations, the refugee shall enjoy freedom of movement and the right to choose their place of residence within the country, with the obligation to notify the competent committee of their permanent address and any change thereto".¹¹⁶ While the text reflects a formal commitment to the principle of freedom of movement, as provided in the 1951 Refugee Convention, which requires granting refugees freedom of movement on par with other lawful residents, it explicitly excludes the cases governed by Article 10.

Article 10 introduces a significant exception to this right, allowing the competent committee, in times of war, in the context of counterterrorism measures, or during serious or exceptional circumstances, to request temporary measures and necessary procedures in relation to asylum seekers for reasons linked to national security or public order. The article refers to the executive regulations for determining the specifics of such procedures, creating broad potential for practical restrictions.

In addition, Article 22's reference to 'relevant laws and regulations' opens the door to regulatory constraints that may in practice limit this right. These restrictions may take the form of requiring prior notification or approval for travel between governorates, or linking access to services and data updates to a fixed place of residence. This can result in informal limitations on movement, especially in border areas. Therefore, despite the protective appearance of the provision, it does not effectively guarantee the exercise of the right to freedom of movement without restrictions.

¹¹⁶ Law No 164 of 2024, available [here](#)

2. Travel documents

In the current system, no travel documents are issued for refugees except for resettlement cases where IOM is in charge of issuing a one time travel document.

According to the 2024 Asylum Law, the refugee has the right to obtain a travel document issued by the competent ministry (the Ministry of Interior). The article also grants the Permanent Committee for Refugee Affairs the authority to prevent certain refugees from obtaining travel documents in specific cases, to be defined by the executive regulations.¹¹⁷

3. Resettlement

Resettlement is one of the durable solutions available to refugees in cases of heightened vulnerability. It involves transferring the refugee from the first country of asylum to a third country that provides permanent protection and better living conditions. Before the adoption of Asylum Law No. 164 of 2024, the UNHCR-handled resettlement procedures, in coordination with the governments of receiving countries.¹¹⁸

Resettlement is not an automatic right. It is a selective process based on the criteria set by UNHCR, and it aims to target specific groups exposed to serious risks in the country of asylum, such as survivors of violence or persecution, or individuals with particular needs.

To apply for resettlement, the refugee must be registered with UNHCR and hold either an asylum seeker certificate or a refugee card issued by UNHCR in Egypt. The agency reviews the files of those registered to identify individuals eligible for referral to resettlement programmes. If selected, the refugee is contacted to undergo detailed interviews that include a legal assessment and an evaluation of protection needs. If accepted into the programme, UNHCR coordinates with the receiving country to complete medical examinations and security interviews, followed by arrangements for departure.

Current Practice:

Before adopting the asylum law, Egypt's approach to resettlement was based on its international obligations, including the 1951 Refugee Convention and the 1954 Memorandum of Understanding signed with UNHCR. But these frameworks did not guarantee refugees' access to social protection or social security, which meant that for many vulnerable individuals, resettlement remained one of the few available options for a safer and more stable future. Moreover, resettlement states apply their own criteria for accepting resettled refugees, which render the process long and complex, with limited opportunities due to the global shortfall in available resettlement places.

2024 Asylum Law:

Under the new law, the Permanent Committee for Refugee Affairs is the competent authority to coordinate refugee transfers to another country, in cooperation with the relevant international agencies, as defined by the executive regulations. According to Article 26, resettlement is not an automatic right, but rather a procedure subject to legal and administrative criteria set by the competent committee in consultation with international organizations, particularly UNHCR.

Article 33 further states that resettlement is one of the grounds for termination of refugee status. A refugee is considered to have exited the scope of protection granted in Egypt once transferred to a third country that grants them permanent residence or nationality.

Under these provisions, the implementation of resettlement remains subject to procedures to be defined by the executive regulations. Therefore, practical details, such as selection criteria, the role of international organizations, and coordination mechanisms between Egyptian authorities and receiving states, will depend on forthcoming executive decisions. This reflects a legislative approach that allows Egyptian authorities to retain control over the management of asylum and resettlement in line with state policy and what is described as national security requirements.

¹¹⁷ Ibid.

¹¹⁸ UNHCR page | What is resettlement?, available [here](#)

D. Housing

Current Practice:

There are no camps or designated accommodations for hosting refugees or asylum seekers in Egypt. Refugees and migrants live in urban communities alongside Egyptian citizens, which makes them reliant on the private sector to secure housing. However, many of them face major challenges related to the high cost of rent, especially in areas where refugee communities are concentrated. One report indicated that some landlords exploit the housing needs of refugees by raising rents unjustifiably, particularly in the absence of a legal framework that protects their housing rights, which increases their economic hardship.¹¹⁹

As the primary partner of the Egyptian government in providing support to refugees and asylum seekers, UNHCR offers limited financial assistance to the most vulnerable families to help them cover the costs of housing and living. However, this assistance remains insufficient to meet the increasing needs, especially in light of rising costs of living and rent.

Among the challenges faced by refugees is the difficulty to obtain residence permits, which further increases the fragility of their legal status and affects their ability to access basic services. Reports have noted that some Sudanese refugees in Egypt suffer from harsh humanitarian conditions, including high housing costs and soaring living expenses, prompting some families to consider returning to their home country despite ongoing risks.¹²⁰

As for groups most at risk, there are no designated housing facilities or state-funded housing programmes for these categories. These groups rely on support from non-governmental organizations and community initiatives to secure temporary shelter or financial aid to help with housing costs. In November 2020, the Ministry of Social Solidarity inaugurated the first shelter in Egypt for victims of human trafficking, in cooperation with the National Coordinating Committee for Combating and Preventing Migration and Trafficking in Persons.¹²¹ The shelter aims to provide social, health, and psychological care to victims and works to support their integration into society.

In summary, refugees and migrants in Egypt face significant challenges in securing adequate housing due to high rental costs and the absence of direct government support. They rely heavily on support from international and local organizations to meet their housing and living needs.

2024 Asylum Law:

The Egyptian Asylum Law outlines refugees' housing and residence rights, while allowing restrictions in cases the state deems necessary for national security or public order.

Article 22 states that the refugee enjoys freedom of movement and the right to choose their place of residence, but is required to notify the Permanent Committee for Refugee Affairs of their permanent address and to report any change, in accordance with the provisions of the law and the executive regulations. However, this freedom is not absolute. Article 10 of the Law imposes restrictions that may be applied to refugees in exceptional cases such as times of war, counter-terrorism efforts, or in the event of serious circumstances that affect national security, in which case, the competent committee may take measures and procedures it deems necessary to control refugee movement or regulate their residence.

In the context of housing or shelter provision, Article 37 imposes strict penalties on any person who accommodates or employs an asylum seeker without notifying the relevant police station. The penalty is no less than six months of imprisonment or a fine ranging between 50,000 and 100,000 Egyptian pounds. This reflects a surveillance-oriented approach to housing and adds an additional barrier to securing stable accommodation. Instead of housing being a normal contractual matter between landlord and tenant, it becomes subject to security and administrative requirements that may lead landlords to refuse to rent to refugees.

¹¹⁹ The Independent Arabia, 'Egypt's housing rents soar, with refugees most impacted', October 2024, available [here](#)

¹²⁰ Sudan Justice Hub, 'Sudanese refugees in Egypt face harsh conditions', April 2024, available [here](#)

¹²¹ Ministry of Social Solidarity | Launching Egypt's first shelter in Egypt for victims of human trafficking, available [here](#)

E. Employment and education

1. Access to the labour market

Current Practice:

Before the adoption of Asylum Law No. 164 of 2024, the employment of refugees and migrants in Egypt was regulated by the Labour Law No. 12 of 2003 and Ministerial Decree No. 146 of 2019, published on 16 July 2019. The decree requires all foreign nationals seeking employment in private sector establishments, public sector entities, public business sector companies, public authorities, local administration units, and the state's administrative apparatus to obtain a work permit from the Ministry of Manpower, taking into account the principle of reciprocity when granting licences.

This permit is issued by authorised offices, such as the foreign workers' licensing office affiliated with the relevant local manpower directorate, the licensing office at the General Petroleum Authority, or the licensing office at the General Authority for Investment and Free Zones.

Egyptian law requires any foreign national wishing to work in the country to hold a residence permit for work purposes and to have experience relevant to the job for which the permit is issued, with a minimum of three years of experience in the relevant field. The law also imposes restrictions on the proportion of foreign workers: their number in any establishment, regardless of how many branches it has, must not exceed 10% of the total number of insured Egyptian workers employed there.

Categories exempt from work permits:

Although the law requires payment of fees to obtain a work permit, it exempts certain categories, including nationals of Greece, Palestine, and Sudan working in the private sector only, as well as foreign nationals who are exempt under specific or implicit provisions in international agreements to which the Arab Republic of Egypt is a party. It also exempts certain groups from the requirement to obtain a work permit, among them: foreign nationals exempt under international agreements to which Egypt is a party, including refugees.

Despite these exemptions, the law obliges employers or individuals who hire foreign nationals exempt from work permits to notify the relevant manpower directorate within seven days of the start of employment, and also when the employment ends.

According to reports by human rights organizations, the vast majority of refugees work in the informal sector due to the absence of clear policies that allow them to access formal employment.

Reports also confirm that refugees face legal barriers, including the non-recognition of academic and professional qualifications held by many of them, which limits their ability to access jobs matching their skills. Subsequently, most of them are pushed into exploitative work conditions, with low pay and no legal protection.

One human rights initiative documented testimonies from Sudanese refugees in Egypt who reported being kidnapped by individuals wearing official security uniforms and forced to work in unknown locations before being abandoned in desert areas. According to these testimonies, at least fifteen individuals were subjected to human trafficking through forced labour under threats and physical abuse.¹²²

Forced labour is recognised as a form of human trafficking and refers to any work or service imposed on a person under threat of punishment, without their voluntary consent. Refugees' accounts describe repeated violations by individuals in uniform, including abduction, physical assault, and forced unpaid labour. Article 12 of the Egyptian Constitution states: "No citizen may be forced to work, except by law, and for a public service, for a limited period, and for fair compensation, without prejudice to fundamental rights."

Although refugees come to Egypt seeking safety, many face various forms of violence and both institutional and societal discrimination, in the absence of effective legal protection. Media reports,

¹²² The Refugee Platform in Egypt, 'Security forces detained Sudanese refugees and forced them to work under torture, later abandoning them in the desert', February 2022, available [here](#)

human rights organizations, and UNHCR staff have all documented cases of abuse and mistreatment of refugees and migrants, particularly women and children, who are exposed to harassment, sexual violence, and gender-based violence.

On the other hand, the Egyptian government has affirmed its commitment to protecting the rights of refugees and migrants. On 15 November 2021, following a meeting between the Egyptian Minister of Foreign Affairs and the European Commissioner for Home Affairs, the spokesperson for the Ministry of Foreign Affairs stated that the state follows “a human rights-based approach to dealing with migrants and refugees, one that allows for their integration into Egyptian society and works to eliminate all forms of discrimination against them.” The European Commissioner described Egypt as “a reliable partner on migration issues”.

Human rights reports,¹²³ including the U.S. Department of State’s 2021 Trafficking in Persons Report on Egypt, documented that refugees and migrants, particularly men, are subjected to exploitative conditions that amount to forced labour.¹²⁴ Many work long hours without pay and face physical and sexual abuse, particularly in domestic work, which is not covered by Egypt’s labour laws. Refugee women and girls, especially those from Sub-Saharan Africa and the Middle East, are also subject to sexual exploitation and trafficking.

Others have reported difficulty accessing UNHCR to report violations, as the agency’s premises are surrounded by tight security measures that prevent them from presenting their cases.

Restricted occupations for foreign nationals in Egypt:

According to Ministerial Decree No. 146 of 2019, foreign nationals are prohibited from working in certain occupations in Egypt. These include tour guiding, import and export, and customs clearance.

Employment of foreign women:

According to Ministerial Decree No. 43 of 2021, it is prohibited to employ women in underground work such as mining and quarrying and in all activities related to the extraction of minerals and stones, except for administrative positions, health services, or training during study.

It is also prohibited to employ women during pregnancy and breastfeeding in work that may pose a risk to their health or the health of the child or fetus.¹²⁵ A female worker, whether foreign or Egyptian, who has completed ten months of work, is entitled to ninety days of fully paid maternity leave, including forty-five days following childbirth.¹²⁶

The law does not grant female workers maternity leave more than twice during their employment and may not be dismissed or work for another employer during this leave.¹²⁷

A breastfeeding worker has the right to two daily nursing breaks, each not less than thirty minutes, which may be combined into a single break, during the two years following childbirth. If employed in a workplace with fifty or more workers, she is entitled to childcare leave of up to two years.

Any employer with one hundred or more female workers in one location must establish or contract with a licensed childcare facility.

A working woman, whether foreign or Egyptian, may terminate her employment contract, fixed or indefinite, due to marriage or pregnancy, without losing her legal rights, provided she notifies the employer in writing within three months of the date of marriage, confirmation of pregnancy, or childbirth.

Challenges facing migrant women workers:

Migrant women workers in Egypt face legal and social challenges that shape their working conditions and daily lives. Despite laws regulating foreign employment, the absence of a comprehensive legal framework to protect migrant women exposes many of them to exploitation.

¹²³ Ibid.

¹²⁴ U.S. Department of State | 2021 Trafficking in Persons Report: Egypt, available [here](#)

¹²⁵ Article 90 of the Egyptian Labor Law No. 12 of 2003.

¹²⁶ Article 91 of the Egyptian Labor Law No. 12 of 2003.

¹²⁷ Articles 90 and 91 of the Egyptian Labor Law No. 12 of 2003.

Those who work in the informal sector, such as domestic work and agriculture, face the harshest conditions: long working hours, low wages, no social protection, and no health insurance. Many are also exposed to harassment and gender-based violence, with limited legal recourse.

Egyptian labour law does not differentiate between Egyptian and migrant workers in basic rights such as minimum wage and leave. However, strict work permit requirements and limited access to litigation put migrant women at a disadvantage. Many work without formal contracts, leaving them unable to claim their rights.

International conventions ratified by Egypt, including ILO Convention No. 189 on decent work for domestic workers, provide a protective framework. National legislation still requires alignment with these standards.

Employment of foreign children:

Articles 98 and 99 of Labour Law No. 12 of 2003 prohibit employment of children before completing basic education or reaching age fourteen, whichever is higher. Children aged twelve and above may receive training.

Article 101 limits child labour to six hours per day and requires a total of at least one hour of rest. Children may not work overtime or during weekly rest days or public holidays.

Children are also prohibited from working between 7pm and 7am.¹²⁸

Labour dispute resolution and litigation procedures:

In case of a dispute, either the worker or the employer may submit a complaint to the Dispute Resolution Committee within ten days. The committee includes a representative of the relevant administrative authority, the labour union, and the employers' organization.

If no resolution is reached within twenty-one days, either party may request the administrative authority to refer the dispute to the competent labour court. The worker may also directly approach the court within forty-five days after the reconciliation period. If this deadline passes without action, the right to litigate is lost.

If a worker is dismissed, suspended, or penalised, they must file a complaint at the labour office, which will set a date for a session attended by a representative of the employer to attempt reconciliation.

If no resolution is reached within twenty-one days, the worker may request that the dispute be referred to court within forty-five days. The labour office will send the court the case file, which includes all documents and a summary report of the committee's opinion.

If no amicable resolution is possible, the worker may file a formal incident report at the police station, then initiate proceedings in the labour court with jurisdiction over the workplace.

Challenges in labour dispute resolution:

Workers face the following issues:

1. Need for continuous follow-up with the labour office to avoid neglect of the complaint.
2. Delays in litigation, as courts take time to schedule hearings, and initial sessions may be postponed for notification.
3. Difficulty proving entitlements without written contracts or payroll records, requiring labour inspectors to file violation reports.

¹²⁸ Article 101 of the Egyptian Labor Law No. 12 of 2003.

2024 Asylum Law:

Asylum Law No. 164 of 2024 obliges employers to notify the police when hiring a refugee, which makes it harder for refugees to find stable jobs. The risk of fines starting at fifty thousand Egyptian pounds and at least six months in prison makes many employers reluctant to offer them work.

Article 18 affirms that refugees have the right to work and practise self-employment, but only if they hold a recognised qualification and obtain a temporary permit from the authorities. For many, especially those who fled without documents or whose certificates are not recognised, this is a major hurdle, as the process to get the permit is complex and often costly.

Article 19 gives refugees the right to work independently or start a business, but this too is limited by the need for security clearances and various administrative approvals. All these requirements make it difficult for many refugees to benefit from this right or achieve professional stability.¹²⁹

2. Access to education

Current practice:

Although Egypt is a signatory to the 1951 Refugee Convention,¹³⁰ it has officially reserved Article 22 on education, which obliges states to grant refugees the same access to education as nationals. Egypt's reservation states: "The Arab Republic of Egypt reserves the right not to apply Article 22 regarding education in a manner that conflicts with the laws and regulations in force in the Arab Republic of Egypt."

Despite this legal reservation, actual practice shows cooperation between the Egyptian government and UNHCR and international organizations, through which access to basic education is made available to refugees. Refugees are allowed to enrol in public schools, and some do so due to the use of Arabic (the language of instruction in Egypt). This access is subject to the condition of "availability of vacant places" and the possession of a valid residence permit, which limits access for many.

Barriers facing non- Arabic speaking groups:¹³¹

Refugees from non-Arab countries (such as Eritreans, Ethiopians, South Sudanese, and other non-Arabic-speaking groups) face fundamental difficulties due to:

Language barriers: Education in Egypt is only in Arabic, without available support classes or educational programmes in other languages.

Bureaucratic procedures:¹³² Complications in recognising certificates or obtaining residence permits. Registration Procedures: To register a child in school in Egypt, parents must go to the education administration to which the desired school is affiliated, bringing the required documents, including a valid residence permit and an accredited school certificate from the child's previous school before arriving in Egypt. If these documents are not available, the child must take a placement test organized by the Ministry of Education to determine the appropriate grade. The responsibility for registration lies with the parents, not with UNHCR.

Placement tests are a means to evaluate the student's academic level and are necessary for students who received education outside Egypt and wish to enrol in Egyptian public schools. These tests are conducted free of charge at the student affairs section of the relevant education administration, after presenting a valid residence permit. Once the test is passed, the student receives a recognition letter stating their academic year, facilitating their school registration.

Regarding certificate recognition, any educational certificate held by the child must not be older than two years and must be submitted to the educational authorities, who will evaluate and determine its equivalency to Egyptian certificates. In cases where refugees and asylum seekers face difficulties

¹²⁹ The Refugees platform in Egypt and the Egyptian Initiative for Personal Rights: 'Joint Policy Brief on the Asylum Bill', available [here](#)

¹³⁰ The 1951 Refugee Convention, available [here](#)

¹³¹ Analysis of refugees needs on the Egyptian education system, [here](#)

¹³² Human Rights Watch: 'Egypt: Education Restricted for Refugees Convolved Residency Requirements, Costs, Discrimination Impede Access to Schools', available [here](#)

registering their children due to a lack of residence permits, they may follow alternative procedures. This begins by obtaining a stamped letter from the school confirming that there is a place for the student, having it stamped by the educational department, and then taking it to the Passports and Immigration Authority in Abbasiya to obtain a number indicating the expected date of residence permit issuance. After that, a copy of the UNHCR registration card and the school letter are submitted to the Ministry of Education to obtain an exemption until the residence permit is issued.

Children with no previous education may enrol in the first grade of primary school up to the age of nine, in either public or private schools. If the child is over nine years old, they must complete a literacy course before enrolling in school. After passing the course, the student is registered in the first preparatory year through the home education system ("manazil") and continues their education through this system unless their age allows for regular school attendance, in which case they may enrol in a public school depending on availability.

To register students through the home education system, parents must go to the student affairs department at the relevant education administration and submit the required documents, including the last educational certificate obtained by the student or proof of having passed a certain level, in addition to the UNHCR registration card and two personal photographs. The student is then referred to the school closest to their residence, registered for distance learning, and takes mid-year and final exams at the school.

Al-Azhar education in Egypt is one of the available educational tracks for students of various nationalities, including refugees and migrants. It is supervised by Al-Azhar according to Law No. 103 of 1961 on the reorganization of Al-Azhar and its institutions. Al-Azhar education consists of three stages: primary (six years), preparatory (three years), and secondary (three years), after which students may enrol in Al-Azhar University. Al-Azhar Institutes Sector allows the admission of non-Egyptian students according to decisions issued by the Supreme Council of Al-Azhar. Some refugees, such as Syrians and Palestinians, receive special admission privileges.

UNHCR provides financial assistance to asylum seekers and refugees registered in public, private and community schools in Egypt. Eligibility criteria for these education grants are set annually and announced in June of each year. UNHCR also supports children with special needs by assessing their needs and providing appropriate support, which may include helping to find a suitable school or providing additional education grants.

University education:

University education in Egypt for refugees and migrants is governed by a set of laws and ministerial decisions that define the conditions for admission and the legal treatment of non-Egyptian students. Law No. 49 of 1972 on university organization, particularly Articles 3 and 89, regulates the admission of non-Egyptian students to Egyptian universities. Refugees and migrants are subject to the same rules applied to international students, which are set by the General Department for International Students at the Ministry of Higher Education. The ministry also determines exceptions to university fees based on nationality and type of high school diploma, with these exceptions renewed annually.

Refugees and migrants also have the opportunity to enrol at Al-Azhar University, which includes many faculties in religious and scientific disciplines, in accordance with Law No. 103 of 1961 on the organization of Al-Azhar and the regulations of the International Students Department at Al-Azhar University. International students are admitted based on decisions by the Supreme Council of Al-Azhar. Refugees from countries with educational agreements with Egypt, such as Syria and Palestine, benefit from reduced tuition fees according to decisions issued by Al-Azhar. Some students also benefit from scholarships provided by Al-Azhar in cooperation with the Egyptian Ministry of Foreign Affairs, in line with Egypt's obligations under the 1951 Refugee Convention, which guarantees access to higher education for refugees on equal footing with other international students.

In July 2023, following the Cabinet's approval of the draft Foreign Refugees Asylum Law on 7 June, the Central Administration for International Students in Egypt issued a decision raising the university registration fees for international students to 2,000 USD. For the first time since their arrival in Egypt, Syrians were not exempted.¹³³

¹³³ Syria TV: 'Egypt raises tuition fees for foreign students, Syrian refugees are not excepted', September 2023, available [here](#)

In September of the same year, the Ministry of Education issued a decision setting tuition fees for international students in public schools, and again Syrians were not exempted, contrary to previous practice.¹³⁴

In July 2024, the Egyptian government also cancelled the exemption of Syrian children residing in Egypt from residency fees and required them to pay retroactive settlement fees for previous years, without any official announcement or circular from the Passports and Immigration Department.¹³⁵ Previously, the government had exempted Syrian children under 16 from residence fees and late penalties. Residence was only required when registering for school. The government began charging Syrians a late fine of 5,000 EGP per year for each child not previously registered, applied retroactively. Parents were surprised to find themselves required to pay up to 30,000 EGP for a child's first residence permit in order to enrol them in school.¹³⁶

In August 2024, registration in public schools became limited to holders of UNHCR refugee cards, provided the card carried a valid residence permit for both the student and their parents. However, 90% of Syrians in Egypt do not hold refugee cards. UNHCR has only registered 150,000 Syrians according to its reports, while Egyptian government estimates speak of 1.5 million Syrians living in Egypt. Regardless of the exact figures, the sudden decision just weeks before the start of the school year disrupted thousands of Syrian families, forcing them to resort to private education and its high costs.¹³⁷

Alternatives to public schools:

Migrants in Egypt created an alternative path for their children's education known as community schools, which offer an alternative model created by refugee and migrant communities in response to the difficulties they face enrolling in official Egyptian schools. Community schools rely on individual efforts and, in some cases, limited support from humanitarian relief organizations. They provide migrant children with the opportunity to continue their education based on curricula from their home countries. With the growing number of Sudanese, Syrian, and Yemeni refugees in Egypt, these schools have expanded to meet the needs of thousands of students who have fled to Egypt.

Despite their key role in providing education, these schools suffer from legal instability. For years, they operated without formal licences, relying on informal understandings with local district authorities and embassies. However, the Egyptian government has launched large-scale security campaigns to shut down schools that do not meet legal requirements,¹³⁸ resulting in the closure of more than 300 Sudanese schools.¹³⁹ This move came as part of a broader effort to regularise these schools and require them to obtain the necessary licences from the Ministries of Education and Foreign Affairs, in addition to commercial and tax registration—compliance that most schools had previously avoided.

Students in these schools face several challenges, including the absence of formal educational oversight, frequent interruptions in schooling due to administrative instability, and high tuition fees paid by families or covered by humanitarian organizations for officially registered refugees. Because some of these schools operate outside formal structures, students may struggle to continue their education or have their certificates recognised, particularly in light of the Sudanese embassy's requirements for final examinations.

The Egyptian government has allowed community schools to operate for decades with minimal interference, but recent actions reflect a shift toward tighter regulation, raising concerns that this may deprive thousands of children of their right to education, especially given the lack of suitable alternatives in the Egyptian educational system.

The Egyptian government allowed community schools to operate for years with minimal oversight. Recent actions, however, point to a shift toward tighter regulatory control. Many fear this could cut off

¹³⁴ Ibid.

¹³⁵ Syria TV: 'New shock for Syrians: Egypt cancels the exemption of children from residency fees', July 2024, available [here](#)

¹³⁶ Syria TV: 'Previously exempted: Egypt burdens Syrians with more fines', July 2024, available [here](#)

¹³⁷ Syria TV: 'Difficulty in enrolling in schools: New procedures in Egypt raise concerns among Syrians', August 2024, available [here](#)

¹³⁸ Alhurra: 'Sudanese community schools in Egypt close, raising concerns for refugee children's future', October 2024, available [here](#)

¹³⁹ Sudanese Teachers Committee: 'Estimates indicate 300 Sudanese schools in Egypt', July 2024, available [here](#)

access to education for thousands of children, particularly in the absence of viable alternatives in the public system.

The timing of the mass closures and the lack of a clear path to regularization have raised concerns among refugees. The closed schools did not receive specific guidance on how to meet the requirements, and some teachers have been arrested, further complicating the situation. Furthermore, the association of these measures with a broader wave of restrictions on migrants and refugees in Egypt has heightened concerns about the future of these schools, especially given the lack of clear educational alternatives for affected children.

Following the outbreak of the Syrian revolution and the arrival of Syrian refugees in Egypt, a large number of Syrian educational centres were established. Many Syrian students enrolled in these centres to continue their education after facing obstacles in public schools. In 2020, the Giza Governorate closed seven such centres, followed by the closure of most Syrian schools.¹⁴⁰

In October 2024, Egyptian authorities abruptly closed all Yemeni schools serving the Yemeni community.¹⁴¹ The decision affected 15 schools in various locations and left over 6,000 students without access to education, prompting serious concern among parents and teachers. Authorities cited the lack of official licences, the same reason given for the recent closure of several Sudanese community schools. The closures were also linked to the schools' use of the Yemeni rather than the Egyptian curriculum, which Yemeni students rely on to complete their education in line with their national system and to facilitate access to Yemeni or international universities that recognise those qualifications.

The implications of these closures also affected legal residency, given that many Yemeni students depend on student residency permits, which require enrolment in officially recognised schools. Shutting down these schools exposes thousands to the risk of losing their legal status, facing possible deportation or being forced to seek costly and uncertain alternatives.

2024 Asylum Law:

Article 20 of the law affirms the right of refugee children to access basic education. As for university education, refugees are treated as foreign nationals, in the sense that they are subject to the same admission requirements and tuition fees applied to international students.

F. Social welfare

Refugees and migrants in Egypt generally face significant challenges in accessing social welfare and social security services, as the Egyptian legal system does not grant them the same entitlements as Egyptian citizens in this area.

Egyptian laws regulating the social security system include no reference to refugees and migrants. Social protection is primarily limited to citizens and those employed in the formal sector. Some forms of support are provided to refugees through UNHCR and its international and local partners, who offer limited financial assistance to the most vulnerable families. However, this support is insufficient to ensure a dignified standard of living for all refugees, leaving many in precarious situations, particularly amid economic crises and rising living costs.

2024 Asylum Law:

The law does not include explicit provisions guaranteeing refugees access to social security services. It is expected that the executive regulations and ministerial decisions will clarify the extent to which refugees may benefit from such services.

G. Health care

Current Practice:

Refugees and asylum seekers in Egypt receive basic and specialised health services through cooperation between UNHCR, the Ministry of Health and Population, and partner organizations. These

¹⁴⁰ News report: 'Syrian educational centers closed in Egypt', available [here](#)

¹⁴¹ New report: 'Egypt shutdown all Yemeni schools in the country', available [here](#)

services include primary healthcare (such as checkups, chronic disease management, and preventive care), psychosocial support, and public health awareness campaigns. Emergency life-saving care is available free of charge in public hospitals, and the 123 hotline can be used in critical situations.

Services provided by UNHCR and its partners are free, while public hospitals may charge fees for advanced procedures or extended hospitalisation. Refugees are advised to carry their documentation, such as the Yellow Card, when visiting health centres and to consult UNHCR for guidance.

Despite these provisions, refugees and migrants continue to face major obstacles in accessing healthcare, particularly outside of urban centres like Cairo and Alexandria. Facilities equipped to serve them are limited and concentrated in a few areas, while rural and remote regions lack adequate coverage. Humanitarian organizations remain the primary providers, but their services are constrained by funding shortages, which affects quality and increases waiting times. Without access to health insurance, many refugees remain unprotected against medical risks. Private healthcare is unaffordable for most, especially those needing urgent surgery or specialised treatment, forcing many to rely on limited free services or forgo care altogether. Such challenges point to the need for stronger coordination between the government and international partners to expand healthcare access and improve coverage.

2024 Asylum Law:

Article 21 of the asylum law provides for the right of refugees to access healthcare. The scope and implementation of this right will be defined by the law's executive regulations and future ministerial decisions.

H. Access to justice and the right to litigation

Refugees in Egypt, in principle, have the right to access the judiciary, just like any other individual within the Arab Republic of Egypt. Article 79 of the Egyptian Constitution stipulates that "litigation is a right guaranteed to all." In addition to being a party to the 1951 Convention Relating to the Status of Refugees, Egypt is obligated to guarantee refugees' right to access the courts. Article 16 of the Convention stipulates that any refugee has the right to free access to the courts of the host country, equality with nationals in judicial proceedings, legal assistance, and exemption from court fees.

Accordingly, refugees have the right to file lawsuits before Egyptian courts, and in some cases, fees may be waived if necessary. In theory, refugees and asylum seekers can resort to the Public Prosecution Office or the courts, either as plaintiffs (filing complaints or civil suits) or as defendants to ensure their rights. For example, if a refugee is the victim of a crime, they have the right to file a police report or a complaint with the Public Prosecution Office like any other person. If a civil dispute arises (such as a rental contract or commercial dispute), they can file a lawsuit before the competent civil court. There is nothing preventing non-Egyptians, including refugees, from litigating.

Challenges in accessing justice:

Despite the legal recognition of refugees' right to litigate and access the courts, refugees face numerous obstacles and challenges that may hinder their easy access to justice, such as:

Bureaucratic complications and identity document requirements:

Lack of official documents is one of the biggest obstacles facing refugees when dealing with judicial or security authorities. Many refugees arrive in Egypt without passports or with expired documents, and some lose their documents while fleeing. Others face lengthy waits to obtain a UNHCR registration card (yellow card for asylum seekers or blue card for recognized refugees). During this period, their legal status is suspended. All services in Egypt, including police and judicial services, require valid identification documents and a valid residency permit. Therefore, a refugee who lacks a passport or a valid refugee card faces difficulty even entering a police station to file a complaint. This reality creates a fear among many of approaching police stations for fear of being treated as an 'immigrant' rather than recognized as a refugee with rights.

Lack of legal representation and legal aid:

Refugees often lack the financial resources to hire lawyers or even knowledge of the legal procedures to follow. Furthermore, government-funded legal aid services for refugees are scarce. Most rely on civil society organizations for advice or legal representation.

Fear and lack of trust in law enforcement authorities:

As a result of accumulated negative experiences, a number of refugees feel that resorting to the police may not bring them justice and may even expose them to additional problems, especially if there is a problem with their residency permit. There are also fears of discrimination or ill-treatment.

Language barriers:

Language is a major barrier for many refugees in Egypt. While some refugee communities speak Arabic (such as Syrians and Sudanese), others of different nationalities (such as non-Arab Africans and Asians) face difficulty communicating with police or court staff. The lack of interpreters during filing complaints or hearings can lead to misunderstandings or a reluctance for refugees to follow the proceedings.

Temporary Protection

Egypt hosts large numbers of refugees and asylum seekers, while it does not operate a formal legislative framework for 'temporary protection.' Instead, it relies on ad hoc administrative arrangements that lack legal safeguards.

Temporary protection in practice

Following the outbreak of the Syrian revolution in March 2011, the Egyptian authorities adopted an exceptional policy toward Syrian nationals, granting them renewable tourist residence permits without formally recognizing them as refugees under the 1951 Refugee Convention. Similar arrangements were extended to Libyan nationals (with free renewable six-month residencies), and other nationalities such as Palestinians, Yemenis, and Sudanese, under varying conditions subject to political context. These policies were framed as based on 'humanitarian considerations' and regional diplomatic interests.

Such measures helped reduce the immediate burden on UNHCR and the national asylum system. Nevertheless, individuals under these arrangements remained excluded from formal international protection frameworks and lacked guarantees of access to basic rights such as lawful employment, formal education, or protection from forced return.

Asylum Law No. 164 of 2024 bears no reference to temporary protection as a faster and more practical mechanism, especially in situations when ordinary asylum systems may be overwhelmed, as a result, say, of wars or disasters. Nor does the law reference asylum seekers or define their rights, obligations, or interim protections. This resulted in a legal gap between the moment a person seeks asylum and the point at which refugee status is granted, where individuals become excluded from legal protection for a period of six months to one year. This legal uncertainty continues to undermine the humanitarian situation of affected groups.