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OF EGYPT'S PROTECTION FOR REFUGEES

Systematic and Widespread Violations of the Non-Refoulement Principle and The Right to Asylum

A Joint Report By:
Refugees Platform in Egypt (RPE)
The Egyptian Initiative for Personal Rights (EIPR)

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Introduction

Egypt is witnessing an unprecedented escalation in the violation of the rights of refugees, migrants, and asylum seekers. Mass arrests and refoulement campaigns increased significantly and escalated during 2024 and the first half of 2025, while the new and fundamentally flawed Asylum Law No. 164 of 2024 has been promulgated but is still inoperable pending the publication of executive regulations (by-laws), and in absence of any attempt to reconsider the most serious and flagrant issues in the law or attempt to rectify them in the bylaws by engaging stakeholders and experts.

These violations were not limited to Sudanese people fleeing the conflict but also affected refugees from South Sudan, Ethiopia and Eritrea, making access to protection and residency almost impossible. The crisis was exacerbated by the imposition of strict administrative and financial restrictions to obtain visas, increasing waiting periods for registration and residency to unprecedented lengths, pushing the majority into a state of 'forced undocumentation,' making them vulnerable to arrest and deportation at any moment, even for UNHCR document holders, as well as denying access to basic services and putting them at risk of exploitation without legal protection.

Egypt continues to delegate UNHCR to conduct registration, refugee status determination, and resettlement of refugees and asylum seekers residing in Egypt, while the government develops the by-laws for the heavily criticised[1] law number 164/2024 (the new Asylum Law signed into legislation in December 2024)[2]. The government of Egypt has not engaged UN agencies or civil society in any meaningful process of developing the by-laws for the new national asylum law, despite repeated requests and vague promises on part of the government to take an inclusive approach to the development of the by-laws. In the first three months of 2025, we have witnessed state authorities ramp up targeting of refugees and asylum seekers in a campaign that is unprecedented in both its scale and methods. Authorities have targeted refugee communities through stops and checks on the streets targeting people seemingly on the basis of skin colour, under the guise of checking the legality of immigration papers.

These arrests, which sometimes involved up to 100 people in a single raid, led to numerous cases of detention and subsequent deportation. Many of the forcibly displaced people arrested had legal documents from the United Nations High Commissioner for Refugees (UNHCR), but this did not prevent the authorities from detaining them and deporting a large and growing number of migrants, refugees, and asylum seekers after confiscating their

[1] Refugee Platform in Egypt, In-Depth Analytical Study on the Draft Foreigners' Asylum Law, (14 November 2024), available here;
Refugee Platform in Egypt, Policy Brief on the Draft Foreigners' Asylum Law, (14 November 2024), available here.

[2] Special Rapporteur on the human rights of migrants et al., *Letter from group of Special Rapporteurs sent to the Egyptian Government concerning certain provisions of the recently adopted "Asylum Law"*, (17 December 2024). Available here.

UNHCR documents or simply pretending they did not exist. In some cases, the authorities raided the homes of migrants, refugees, and asylum seekers in neighborhoods known to have large numbers of residents who are refugees or migrants, a practice that is almost entirely new to the Egyptian state's policies toward forcibly displaced people's communities.

While it is difficult to confirm a direct causal link between these increasingly aggressive policies and practices against migrants, refugees, and asylum seekers and the ratification of the asylum law, there is definitely a correlation: the policy turn and unprecedented escalation has very neatly coincided in time with the passage of the law.

With the ratification of the law, including provisions that blatantly violate the 1951 Convention, it is evident that Egyptian authorities are building a structure—so far still confined to paper—that is designed to make access to asylum and protection extremely difficult and, more important, entirely subject to executive discretion and whim.

The scale and nature of targeting of migrants, refugees, and asylum seekers in the first three months of 2025 —in some ways unlike anything that we have seen in the last three decades—indicates that hundreds of thousands of migrants, refugees and asylum seekers are at immediate risk with their status largely disregarded by state authorities.

This joint report by the Refugee Platform in Egypt (RPE) and the Egyptian Initiative for Personal Rights (EIPR) aims to highlight cases documented by local protection agencies and civil society organizations on the ground in Egypt, demonstrating the systematic and deliberate nature of state authorities' targeting of migrants, refugees, and asylum seekers. The report focuses on the worsening crisis facing hundreds of thousands of refugees and asylum seekers in Egypt, as well as new arrivals, by monitoring and documenting patterns of violations in hundreds of cases in which refugees were detained and deported without judicial review or due process guarantees - and in many cases with complete disregard for their legally protected status and asylum seekers or as recognised refugees.

Methodology

This joint report is based on a rigorous human rights methodology that combines field monitoring, documentation of individual cases, and analysis of relevant policies and legislation to analyse emerging patterns of violations, establish a policy direction and propose recommendations.

To establish a general and specific context for this report, the research process relied on:

- Relevant government data available from various government agencies.
- Data and reports from the United Nations High Commissioner for Refugees (UNHCR).
- Data and reports of relevant local and international human rights organizations.
- Reports and investigations of independent local and international media outlets and journalists.
- Relevant governmental laws and executive decrees.

This was compared and checked against first-hand information gathered through:

- Close collaboration with local civil society organizations and protection actors to document and analyze patterns and trends of violations.
- Archives of the Refugee Platform in Egypt and the Egyptian Initiative for Personal Rights regarding relevant cases.
- Testimonies of refugees, asylum seekers, migrants, and their families directly affected by violations.
- Direct interviews with victims and survivors.
- Consultative interviews with lawyers and protection specialists for refugees, migrants, and asylum seekers in Egypt.
- Cases documented by self-organized community groups.

This data was also supplemented by a review of:

- Official deportation documents of refugees, migrants, new arrivals, and asylum seekers during the reporting period.
- Complaints filed by unprotected refugees, migrants, new arrivals, and asylum seekers that they were subjected to unreported violations.

To reach conclusions and propose recommendations, all testimonies and data were subject to cross-verification to ensure accuracy and objectivity, while respecting standards of confidentiality and victim protection. Given the continued targeting of refugees and displaced persons' communities regardless of their legal status, resulting in serious fears of arbitrary arrest and deportation within those communities, we have chosen to withhold any individual data and use anonymised cases without identifying information, figure estimates, and available statistics to describe emerging patterns of violations, while occasionally resorting to some recurring examples to illustrate a particular pattern.

Background

a. The flawed asylum law and beyond

The Egyptian authorities' concerted implementation of an overly securitized approach to manage asylum must be considered in light of Egypt's recent ratification of an asylum law. The asylum law was promulgated without any meaningful consultation and with zero amendments in response to concerns raised and reforms proposed. The law has been critiqued in a letter by UN special rapporteurs among other bodies[3], and in various commentaries by a number of human rights organizations. Experts and commentators warn that the provisions of the asylum law grant unprecedented discretionary power to the executive authority to deny asylum based on vague concepts of national security, public order, and respect to Egyptian society's values and traditions, as well as the criminalization of irregular entry and the absence of strong language on *non-refoulement*. Egypt's ongoing disregard of the protected status of refugees under the current UNHCR-managed asylum and protection regime—which is still operational—raises fears that under a state-led asylum

[3] Refugee Platform in Egypt, Seven UN Human Rights Rapporteurs Warn of the Dangers of the New Foreigners' Asylum Law and Call on the Egyptian Government to Amend It, (24 December 2024), available here;
Amnesty International, The New Rushed Asylum Law Affront to refugee rights, (3 December 2024), available here;
Refugee Platform in Egypt, Asylum Law Needs Real Societal Discussion (14 November 2024), available here.

system with very limited checks on the government's discretionary powers, violations of refugee rights and the principle of *non-refoulement* will become the norm rather than the exception.

The United Nations High Commissioner for Refugees's position paper on Egypt's Asylum Law No. 164-2024 was released on February 20th, and was published on the UNHCR website in July 2025 with detailed commentary on most of the law's provisions that broadly share the same concerns as human rights organizations. Included in the reservations are concerns that the law does not explicitly incorporate the principle of non-refoulement and that. UNHCR's position paper also rejects the additions made by the legislation to the definition of a refugee included in Article 1(2) of the 1951 Convention and Articles 1 and 2 of the Organization of African Unity Convention, and the additional exceptional clauses in Article 10 of the new asylum law that provide "*too broad a scope and may lead to measures that restrict or diminish the rights of refugees*", amongst other concerns highlighted in the position paper.

Since 14 November 2024, the Egyptian authorities have continued to demonstrate, and actually escalated, their utter disregard for the fundamental principle of *non-refoulement* as they engage in a campaign of detentions of migrants, refugees, and asylum seekers and then subject them to speedy deportations in opaque proceedings devoid of any procedural safeguards. This campaign accelerated in 2025 and led to the *refoulement* of an unprecedented number of migrants, refugees, and asylum seekers that were facilitated by newly adapted immigration proceedings, riddled with violations of basic human rights principles. Given that Egypt hosts several hundred thousand registered refugees from Sudan, and many more unregistered refugees and forcibly displaced people; the Sudanese in Egypt have been the primary target of immigration detention and deportations. Nevertheless, deportations also affected South Sudanese, Ethiopian, Eritrean, and Syrian refugees.

Prior to this date, the compiled statistics and estimates for the previous period, which focused on the first ten months of 2024, already indicated a serious shift in enforcement policies. By the end of October 2024, the Global Detention Project and the Committee for Justice reported that a minimum of 18,000 Sudanese—including UNHCR-registered asylum seekers and refugees—were subjected to *refoulement* from Egypt to Sudan, while according to protection actors in Egypt, the number of refugees deported to Sudan surpassed 20,000 by the end of the year. Without access to detention, the individual identities of many of those thousands remain unknown. In comparison to approximately 3,000 refugees deported to Sudan in 2023[4]; the pace of deportations in 2024 saw a seven-fold increase. It must be emphasised that this number of reported incidents is likely an underestimate, precisely because of the denial of access to detention facilities and border areas. Denial of access also makes it practically impossible to document the details of each incident of *refoulement*[5]. In spite of these barriers, relying on community reports and requests for assistance from family members; local actors were able to individually document the deportation of at least 1,546

[4] StateWatch, European support for Egypt: billions of euros for a dictatorial "partner" in migration control (27 March 2025). Available here.

[5] BBC, Escaping Sudan:'My mother's body was left by smugglers in the desert' (28 February 2024). Available here.

migrants, refugees and asylum seekers in 2024 from Egypt to Sudan and other countries. There has never been a point in time when Egypt engaged in *refoulement* at this scale.

Despite this alarming shift in Egypt's traditional stance towards refugee population, especially Sudanese refugees fleeing the most brutal civil war in their country's modern history - at least in terms of its geographical scope and the severity of the humanitarian crisis – UNHCR , which is uniquely positioned and best equipped to be aware of these daily violations and abuses, has failed to fulfill its expected role in monitoring and responding to these practices and defending the rights of refugees, particularly their fundamental rights to protection and non-refoulement. Instead, UNHCR has publicly praised the Egyptian government as a 'model host for refugees,' ignoring the unprecedented deterioration of the circumstances refugee populations face and the escalation of systematic violations of their rights by the Egyptian authorities; in particular their repeated breaches of the principle of non-refoulement, the cornerstone of international refugee protection and the 1951 Convention. UNHCR's deafening silence was broken only by their commentary on the text of the new law, which, as previously mentioned, was finally sent to the Egyptian government last February and recently published on UNHCR's website in July 2025.

In parallel, the EU continued to expand its partnership with the Egyptian government on migration management, as well as providing extensive macro-financial support to Egypt with no meaningful emphasis on safeguarding the rights of Egyptians or refugees in Egypt.

In order to realise this scale and systemic nature of detentions and deportations, state authorities have constructed a system that renders access to protection and asylum quasi-impossible, pushing refugees and asylum seekers into a state of forced irregularity. To achieve this, Egyptian authorities have simultaneously put in place several new barriers to access to territory, asylum, and regularization.

b, Access to territory and asylum

As of June 2023, Egyptian authorities suspended the visa-free system for Sudanese women, children, and elderly people. From February to May 2024, visa wait times were 4-6 months, with expedited visas costing up to $1,100 USD, leaving hundreds of forcibly displaced Sudanese people stranded, often sleeping in buses or on the ground in border adjacent areas.[6] More recent accounts of corrupt practices detailed that visa issuance became restricted to those able to pay fees exceeding $2,000 USD[7] per person. With visas largely inaccessible, most forcibly displaced people fleeing the ongoing war in Sudan resorted to crossing into Egypt irregularly[8] as it is more affordable and expedient[9]. Local activists indicate that UNHCR

[6] The New Humanitarian, *EXCLUSIVE: Inside Egypt's secret scheme to detain and deport thousands of Sudanese refugees (25 April 2024).* Available here.

[7] UNHCR Egypt, *Sudan Emergency Response Update* (12 June 2024). Available here; Refugees Platform in Egypt, *The Sudanese Under Fire: Armed Conflict, Closed Borders, & Deadly Heat* (17 June 2024). Available here; Radio Dabanga, *Heatwave kills dozens of Sudanese en route to Egypt* (11 June 2024). Available here.

[8] Refugees Platform in Egypt, *From Sudan to Egypt: Egyptian Decisions Spark High-Risk Irregular Migration Movement*, (12 March 2024), available here.

[9] Refugees Platform in Egypt, *Investigation: Inside Egypt's secret scheme to detain and deport thousands of Sudanese refugees*, (13 May 2024), available here.

registration figures suggest that the 'great majority' of those registering after escaping the conflict in Sudan entered the country irregularly. Having no option but to enter Egypt irregularly, forcibly displaced people escaping Sudan found themselves engaging in terribly dangerous journeys through the desert. Reports emerged throughout 2024 citing that refugees crossing through the desert were targeted with live ammunition, and mistreated and abused by Egyptian authorities; aligning with human rights groups' findings.[10] Smugglers transported refugees in the backs of crowded pickup trucks under extreme conditions, often without food or water.[11] Accidents were common, with survivors recounting deaths due to vehicle rollovers and other accidents.[12] According to reports by the International Organization for Migration (IOM), more than 3,400 deaths and disappearances of migrants were recorded in the Middle East and North Africa region in 2024, most of them in the remote deserts between Sudan, Egypt, and Libya, due to thirst, heatstroke, and lack of water and food, amid the absence of rescue mechanisms. The findings documented by civil society organizations in Egypt during the summer of 2024 confirm these horrific statistics. Between June 7th-9th, 2024, numerous people died due to dehydration and heat stroke while attempting to irregularly cross the border into Egypt as temperatures soared to near 50°C in the south of Egypt during heatwaves. Death counts varied between 40 and 80 individuals, including children, women and entire families; according to the Sudanese Consul in Aswan, the bodies of 51 forcibly displaced people were buried within a few days.[13]

According to data collected by the Refugee Platform in Egypt, between February and August 2024, the platform recorded dozens of traffic accidents involving forcibly displaced people traveling within Egypt, with approximately 165 forcibly displaced people injured and 19 others killed as a result of these accidents. According to dozens of testimonies obtained by the platform, Egyptian authorities do not treat survivors as victims, but rather accuse them and detain them for varying periods of time, including those who are injured. These refugees and asylum seekers are often detained before completing their treatment in hospitals and are charged with smuggling. The Public Prosecutor's Office often subsequently issues decisions to release them. Nonetheless, they are not allowed to apply for asylum but are deported immediately, in violation of their right to seek international protection. During the same period, the Refugee Platform in Egypt documented the disappearance of dozens of Sudanese refugees while attempting to cross irregularly into Egypt via the desert in separate journeys, including women, children, and elderly people. According to statements from the families of the missing, relatives attempted to file official reports at the Central Security Forces Department - Shallal Police Station in the south of Aswan, but the precinct refused to accept them, informing them that search and rescue operations in the desert fall under the jurisdiction of the army alone, without taking any practical action to address the situation.

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[10] Financial Times, *Sudanese fleeing terror in Khartoum make perilous journey to Egypt* (May 2023). Available here; Ayin Network, *Death and detention: the struggle of Sudanese migrants crossing into Egypt* (July 2024). Available here. And Amnesty International, Egypt: *"They Shackled Us Like Dangerous Criminals" – Arbitrary Detention and Forced Return of Sudanese Refugees in Egypt*, (19 June 2024), available here.

[11] Ayin News, *Death and detention: the struggles of Sudanese migrants crossing into Egypt* (July 2024). Available here.

[12] *Id.*

[13] Refugees International, *My People are Stranded: Bearing Witness to the Struggle of Sudanese Refugees in Egypt* (4 September 2024), Available here.

Later, one of the families conducted their own search in the area where the group was likely to have disappeared, and they managed to find an abandoned car and some personal belongings, including the birth certificate of a child who was among the missing. The family was unable to continue the search after border guards refused their request to pass through Shalateen. Despite the presence of a major search and rescue center for the Egyptian armed forces in that area, search and rescue operations in the desert border areas are very rare and are usually limited to maritime or aircraft accidents. In fact, no official search and rescue operations for non-Egyptians or Egyptians in the desert were ever recorded during the recent waves of displacement, despite repeated incidents of mass casualty.

Although Egypt has an obligation, as a signatory to the 1951 Convention, not to criminalise the irregular entry or stay of refugees in Egypt –rendering the administrative detention of refugees for irregular entry illegal– state authorities ramped up the targeting of migrants, refugees, and asylum seekers at the borders with Sudan and along the route from the border to Cairo, the closest place from the border where people can formally apply for asylum. According to protection agencies, arrests related to irregular movement, particularly entry, were the most common reason for arrest in 2024, representing an estimated 70% of all arrests of migrants, refugees, and asylum seekers recorded. Reports detailed how forcibly displaced people get arrested once they cross into Egypt or once they reach the first main towns in Egypt.[14]

Publicly available reports detail the cases of 14 refugees, who had irregularly entered Egypt, arrested between October 2023 and March 2024 when receiving treatment for serious injuries sustained during road accidents on their journeys from Sudan,[15] and about 100 refugees arrested after seeking assistance due to the heatwaves in June and July.[16] Refugees detained from hospitals in Aswan often faced immediate deportation.[17]

An example of this pattern of interceptions at the border was documented by local protection actors in July 2024, when security forces arrested a 95-year-old Sudanese woman, one of seven Sudanese citizens injured in an illegal crossing from Sudan to Egypt, including a child and a girl. They were prosecuted and the prosecutor's office decided to detain them all pending investigation on charges of illegal entry. While the 95 year old woman was being transferred to the prosecution in extremely high temperatures to look into her detention, along with 13 other Sudanese detained on similar charges, the woman lost consciousness and died in the confined space of the police vehicle which has small and high windows that did not allow sufficient airflow. The Public Prosecution ruled that there was no criminal suspicion and authorised the burial of the body after receiving it from the Sudanese embassy. A burial permit was issued in Egypt on July 22nd, 2024.

Those who manage to evade arrest at the border are faced with insurmountable barriers to accessing asylum. Egyptian authorities have consistently denied access to UNHCR at border areas. To seek asylum must travel over 1000 kilometres to reach the closest UNHCR registration centre in Cairo. Through dozens of internal documents reviewed and documented by RPE during 2024 and the first quarter of 2025, security forces set up

[14] Amnesty International, *Egypt: "Handcuffed like dangerous criminals": Arbitrary detention and forced returns of Sudanese refugees in Egypt* (19 June 2024), Available here.

[15] BBC, *Escaping Sudan:'My mother's body was left by smugglers in the desert'* (28 February 2024). Available here.

[16] *Id*.

[17] *Id*.

checkpoints along the road from Aswan to Cairo to search travellers inside train stations or on buses heading to Cairo. All reports, reviewed by teams from both RPE and EIPR in Egypt indicate that there are high-level instructions from various security agencies under the Ministry of Interior to, as official documents state, "arrest and take the necessary legal measures against lawbreakers and African migrants who have crossed or are present in the country without permission.' More than 50% of those cases documented by RPE as being arrested en route to Cairo had appointments to register with UNHCR in Cairo and were on their way there.

The average waiting period for registration with UNHCR, since the outbreak of the war in Sudan and the influx of hundreds of thousands of refugees, ranges now between eight and 12 months. During this period of time, any refugee that entered Egypt irregularly is at a constant risk of detention. Once detained, government authorities process these refugees for deportation denying them any access to asylum or protection. Even where UNHCR has offered to register them and assess their claims in detention, Egyptian authorities consistently denied UNHCR such access.

c. Access to Registration Sites and Regularisation

In addition to registration with UNHCR, the government of Egypt requires refugees to obtain a six-months residency permit to regularise their stay in Egypt. In 2024 and into 2025 obtaining residency became practically impossible for both recognised refugees, and asylum seekers – at least not in a timely manner. At the start of 2024, refugees seeking to apply for residency with the Egyptian immigration authorities had to wait 273 days. By March 2025, refugees applying for residency were granted appointments in October 2027 to submit their application for residency. By March 2025, it was estimated that over half of the UNHCR-registered refugees, and asylum seekers did not have valid residency.

Without valid residency, even though this was not caused by any inaction or delay on the refugees' part, but due to a dysfunctional or overloaded system, any refugee or asylum seeker is at risk of detention and deportation.

In 37% of deportations recorded by a local civil society actor in 2024, the deported refugees or asylum seekers had been seemingly arrested for lack of documentation or residency (many have reported having valid documentation that were confiscated by arresting officials before being prosecuted or processed for deportation). Throughout 2024, the most common reason for arrest (in detention cases recorded, irrespective of whether or not they were deported) by the same local actor was lack of residency or documentation (65%).

Although UNHCR announced in April 2025 that Egyptian immigration authorities had extended the validity of asylum-based residency permits to 12 months instead of six, and were increasing their processing capacity from 600 to 1,000 applications per day, these measures will likely only decrease the waiting period for residency permits by less than half in the next two years; which still leaves most refugees with waiting periods that could last as long as one year; a state of forced-irregularity for which they cannot be held responsible.

In the years prior to 2023, UNHCR registration status, even while waiting for residency permits, acted as a form of protection against *refoulement* and refugees arrested due to residency violations were typically released after varying periods in detention. However, this

is evidently no longer the case as demonstrated by recent trends observed by local actors and which mounting evidence suggests may constitute a conscious policy. In 2024, the same local actors individually verified the deportation of over 100 refugees and asylum seekers who registered with UNHCR in 2024; among them 23 UNHCR-registered refugees, 68 UNHCR-registered asylum seekers and 18 people with an appointment to register with UNHCR. In 2023, the same local actors recorded the deportation of only 50 UNHCR-registered refugees and asylum seekers.

The use of immigration detention has been instrumental to implement the Egyptian authorities' expansion of deportations of refugees and asylum seekers. All incidents of *refoulement* recorded by local protection actors in 2024 were preceded by immigration detention of refugees and asylum seekers. Tallies available by protection agencies and cited in multiple reports record the arrest of over 10,000 refugees and asylum seekers in 2024, almost double the figure for 2023[18]. This figure is notably less than half of the 22,000 people recorded by global human rights organizations as deported to Sudan in 2024, all of whom would have been detained prior to their *refoulement,* highlighting the absence of comprehensive or official data on detentions.

I. Mounting targeting of refugees and asylum seekers and covering up refoulement

The expansion in the use of deportations has continued into the first quarter of 2025 and local actors have documented hundreds of cases where the Government of Egypt deliberately violated its obligations under the principle of *non-refoulement,* the 1951 Convention and other International Human Rights Instruments Egypt is party to. Local actors received record numbers of reports of *refoulement* in the first three months of 2025. In none of the cases documented was the decision to deport a refugee or asylum seeker subject to judicial review, nor were the refugees or asylum seekers allowed access to asylum processing. All decisions to deport refugees and asylum seekers documented in the first three months of 2025 were issued by executive security authorities—this is true also for all documented deportations in 2024. According to a recent investigation by Reuters, in the first three months of 2025 alone, Egyptian authorities have already deported 21,000 people from Egypt to Sudan.[19]

As of March 23rd, 2025, local protection actors received verified reports of the *refoulement* of 857 migrants, refugees, and asylum seekers. Between January and March 2025, for example, RPE was able to document 146 arrests just in Aswan Governorate, including 14 children and 19 women, all of whom were ultimately deported. The total figure of 857 refoulement cases reported over a period of three months already amounts to over half of the 1,546 total deportations local protection actors recorded in 2024. Around 46% of those subjected to *refoulement* in 2025, totaling 786 refugees, were forcibly returned to Sudan. Taking into consideration UNHCR's non-return advisory to Sudan, these incidents meet the definition of *refoulement* regardless of the legal status of the deported persons. As an example of the grave risks that any Sudanese refugee or asylum seeker might face if deported to Sudan,

[18] Reuters, Egypt's crackdown drives Sudanese refugees on new route to Libya and beyond (11 June 2025). Available here.
[19] *Id.*

a protection actor in Egypt documented two cases in which two young men from Sudan were handed over after being deported from Egypt to Sudanese army camps, where they were forcibly recruited and sent to the front lines, at a time when international evidence and reports point to the involvement of both parties to the Sudanese conflict in the commission of crimes against humanity.

Against the backdrop of escalating arrests and forced removals of Sudanese refugees, migrants, and asylum seekers in Egypt; this news had a huge impact on Sudanese refugee communities in Egypt, where similar reports from other sources in Sudan began to circulate, alongside media reporting and testimonies from Sudanese activists suggesting that the Sudanese armed forces was targeting refugees recently deported from Egypt who are of conscription age, and transferring them – immediately upon their return – to Sudanese border to recruitment camps. This caused widespread panic within the Sudanese refugee community in Egypt, who began seeing warnings across social media groups for members of the community advising them not to leave their homes except in cases of extreme necessity and after ensuring that they carry the necessary documents. This has exacerbated the ongoing crisis of instability and heightened feelings of insecurity, even among registered or recognised refugees.

Similarly to what occurred in 2024, the increasing reliance on forced deportations in 2025 was accompanied by a parallel expansion in detention of migrants, refugees, and asylum seekers. As of March 23rd, 2025, a local protection actor received reports of 1,128 migrants, refugees, and asylum seekers arrested and detained in Egypt in the first quarter of 2025. January 2025 saw an unprecedented peak in arrests, with 869 arrests reported to the same local actor, the highest ever recorded in a single month by this one protection actor. In 2024, the same protection actor recorded an average of 250 refugees, and asylum seekers arrested per month, with a peak in October 2024 of 342 individuals arrested. This had already represented a significant increase in percentage on previous years.

When documenting deportations in 2025, local actors identified a number of new trends that raise concerns about the disregard for principles of international protection and the erosion of the protected status of refugees and asylum seekers in Egypt. The following represent the most concerning trends observed through the documentation of incidents of immigration detention and *refoulement.*

a. Asylum-based residency and the targeting of refugees and migrant communities

As of the end of March 2025, the waiting period for applying for asylum-based residency exceeded 30 months, with the next available appointment in October 2027. Despite these unrealistic waiting periods being beyond the control of refugees and asylum seekers, those who are arrested due to residency violations are increasingly subjected to *refoulement* regardless of their registration status with UNHCR and regardless of any UNHCR documentation they present to authorities or that UNHCR provides on their behalf to authorities.

Among the documented number of deportees in 2025 that one local actor was able to confirm, 75% were detained for lack of documentation or residence permits. This is a significant increase compared to 2024, when 37% of refugees, and asylum seekers whose deportations

were reported to the same local actor had been arrested on grounds of lack of documentation or residency. These figures indicate a continuing upward trend in deportations following residence violations since the local actor first received reports of this nature in late 2023. The majority of those arrested and deported for residency violations were apprehended while engaged in mundane day-to-day activities, and the motives for their arrests do not appear to be related to any unusual behavior that might have attracted the attention of law enforcement authorities; some were even taken from their own homes. More recently, local actors have received community reports of more than 750 migrants, refugees, and asylum seekers being detained during random ID checks and arrests on the streets in the first three months of 2025.

- The majority of arrests reported to local actors and agencies took place on the streets, during police identity checks and round-ups in neighborhoods with high concentrations of asylum seekers, refugees, and migrants. The neighborhoods with the highest number of street arrests were Ard El-Lewa, 6th of October City, and Faisal.

- Between January 1st, to March 23rd, 2025, local protection actors received three reports of large-scale round-ups in which more than 50 individuals were arrested at the same time. In one incident in January 2025, around 100 people were arrested in a street round-up in Faisal, a neighborhood frequently targeted by police for searches and arrests. At least 21 children were arrested in street round-ups in the same context between January 1st and March 23rd, 2025.

- Local actors also received several reports in January of mass arrests in Cairo, each involving 30 or more refugees, following street celebrations after the Sudanese army captured Wad Madani from the Rapid Support Forces.

- Most of those arrested in the above cases had valid UNHCR documentation (42%) or proof of an upcoming appointment to register with the UNHCR (12%) at the time of their arrest, but this did not protect them from arrest, administrative detention and, in many cases, subsequent deportation.

- Reports from the local community indicate that security forces targeted asylum seeker, refugee, and migrant neighborhoods not only in the streets but also inside their homes, a practice that is entirely novel to the policing of refugee communities in Egypt.

- Towards the end of 2024, RPE and EIPR reviewed photographic evidence showing security forces, including police officers in plain clothes, raiding the homes of refugees and migrants of various African nationalities and arresting them. The police entered their homes without arrest warrants or court orders, with complete disregard for procedure and in violation of the constitutional protection of the right to privacy.

- In the first three months of 2025, local actors documented reports of 66 migrants, refugees, and asylum seekers arrested from their homes after security personnel appeared at their doors to check their residency permits. In the whole of 2024, local actors documented 56 similar arrests from homes.

- In one incident, police officers entered a residential building and arrested approximately 25 refugees, and asylum seekers for lack of residency documents.

The increasingly systematised approach to targeting migrants, refugees, and asylum seekers on the street, in their neighbourhoods, and even homes is not only observed through analysing reports of these arrests from the community, but is also supported by official documents – which are occasionally obtainable by family members or lawyers, but are not always easy to obtain (the absence of paper trails is a systemic issue in some parts of the Egyptian criminal justice system). This indicates the development and ongoing implementation of policy aimed at increasing the detention and deportation of those groups.

- Throughout 2024 and the first few months of 2025, RPE reviewed and documented various police reports (first instance or arrest reports) from different regions, including Aswan, Cairo, and Alexandria, which provide official evidence that the campaigns to arrest and detain migrants, refugees, and asylum seekers are not random, improvised, or confined to a specific region; but are carried out in the context of implementing a government policy that is beginning to take shape.

- In cases handled by police departments in various governorates, police reports and statements begin with the following preamble: 'In accordance with the directives of Major General (Provincial Security Director) and Major General (Director of Criminal Investigation in specific jurisdiction), to work to limit the entry of ~~illegal~~ immigrants into the country, check their residence permits, and set up fixed and mobile checkpoints…'

- Meanwhile, in cases where the General Administration for Combating ~~illegal~~ Immigration and Human Trafficking, which is affiliated with the Public Funds and Organized Crime Division of the Ministry of Interior, brings charges against Sudanese refugees after their arrest, the arrest reports employ the following language 'Based on the directives and instructions of the Assistant Minister for the Sector and under the direct supervision of the Director of the Administration, in cooperation with the Public Security and National Security Sector (NSS) and the Criminal Investigation Branch of the Directorate (...) After our covert investigations revealed the presence of African migrants in this place, and for fear of losing evidence and suspect flight, we detained a number of…'.

The documented information and patterns outlined above regarding the locations and conditions of arrest and direct reference to "migrants" generally, and specifically migrants that appear to be African, in addition to official police documents, present clear evidence that the security authorities perceive every refugee or migrant of a certain appearance unlawful regardless of their legal status or behavior, even if they are inside their own home. This aggressive approach has robbed migrants, refugees, and asylum seekers in Egypt of any sense of security, as local communities came to realize that at any moment they could be detained and deported without having committed any crime, in violation of their legally guaranteed right to protection from arbitrary detention and *refoulement*.

b. Refoulement of children and family separation

- Between January 1st, and March 23rd, 2025 local actors received reports of the deportation of at least 54 children, in comparison to documenting 29 children deported in all of 2024.

- In 25 of the refoulement cases documented by local actors in the first quarter of 2025, deportation resulted in the separation of children from their families. Seven cases

involved the deportation of children alone without their parents, and four cases involved the deportation of one or both parents, leaving the children alone in Egypt.

- Local protection agencies recorded the detention of 64 children, including 9 children under the age of 10 and 56 children between the ages of 11 and 17, between January 1st and March 23rd, 2025.

- Similar to the general pattern observed and described above, children were deported alone or left without their primary caregivers, due to arrests based on lack of residence permits, even if the individuals were registered with UNHCR or had pending appointments. Some were arrested at home, others in public spaces such as parks or on their way to and from school. In certain cases, deportations took place despite ongoing legal appeals, and even affected children who had lived in Egypt for most of their lives. These trends reflect a growing pattern of arbitrary enforcement that blatantly contravenes the law, often causing family separation and disregarding safeguards and minimum legal obligations to protect children, dependents, and minors.

c. Refoulement covered up as 'voluntary return'

In addition to the general increase in the number of deportations and targeting methods described above, documented incidents of deportation of refugees and asylum seekers in 2025 revealed a new and particularly alarming practice that accentuates the authorities' entire disregard of the protected status of these groups deserving of international protection—a disregard that seems to stem from official policy rather than ignorance or lack of knowledge of the protection obligations incumbent upon the Egyptian state.

In almost each of the cases of registered refugees and asylum seekers who were deported in 2025, local protection actors confirmed that police officers frequently confiscate the UNHCR documents of detained refugees and asylum seekers upon arrest, leaving them with no way to prove their registration status while detained. Additionally, through the documentation of deportation process for a number of cases, a recurring pattern emerged of authorities coercing refugees and asylum seekers, particularly those registered with UNHCR, to sign voluntary return documents. These cases demonstrate the deliberate nature of authorities' engagement in textbook *refoulement* of refugees and their attempts to establish a detention and deportation processing system of refugees that intends to cover up *refoulement* either as voluntary return (by forcing them to sign such documents) or the removal of irregular migrants (by confiscating documents that prove their legal status).

- Local protection and legal aid agencies documented a growing pattern of practices used by Egyptian authorities to obscure or bypass legal safeguards against the forcible return of refugees and asylum seekers. Some of these accounts were relayed to local civil society by family members seeking aid or legal assistance throughout detention and deportation proceedings. Detailed accounts have been documented but below are some of the common patterns established which included: the systematic confiscation or destruction of UNHCR documentation at the time of arrest; the falsification of arrest records to suggest individuals were found near borders without papers; and the use of physical and psychological coercion to extract signatures or fingerprints on documents falsely indicating consent to deportation. Individuals have reported being threatened, beaten, or

misled into signing such documents, often while in administrative detention or during forced appearances before consulates or appearances before prosecutors. In some cases, deportations proceeded despite ongoing legal proceedings, valid UNHCR registration, or imminent resettlement plans to safe third countries.

- Additionally, there were reports of mistreatment and punitive treatment faced by refugees, and asylum seekers who refuse to sign voluntary return documents or who assert their protected status. Individuals who insist on this refusal are often subjected to physical violence, including beatings that result in serious injury, as well as psychological abuse such as isolation or denial of food, visitation, or medical care. In some cases, authorities incited other detained people to attack them or subjected them to degrading conditions, such as forcing them to sleep in unsanitary areas. Many agreed to 'voluntary return' after weeks or months of detention under these conditions, to end their dire detention situation by any means, even if it means returning to the country they fled, often suffering from untreated illnesses or injuries.

- In January 2025, a Sudanese refugee who was registered with UNHCR and had come to Egypt with his family as a young child was deported. His family had been resettled in a safe third country, while he was awaiting the completion of his own resettlement procedures. Police officers stopped him on the street, searched him, and found US dollars in his pocket that his family had sent him via Western Union. After he was brought before the public prosecutor, a decision was issued to release him. Despite the prosecutor's decision, he remained in administrative detention and was subjected to *refoulement* a month later. He reported that when he initially refused to sign a document consenting to his deportation, a police officer beat him while he was handcuffed. The police officer then informed him that if he did not sign the document, he would be taken to a room inside the General Administration of Passports, Immigration, and Nationality and beaten until he signed. Because he had heard stories from other detained people at the police station about others being subjected to severe physical violence in this room, he complied and signed the document out of fear.

- A Sudanese asylum seeker who was forcibly returned in December 2024 described how authorities refused to acknowledge his UNHCR registration documents. Police officers confiscated his UNHCR card when he was arrested at a checkpoint in the north of Egypt. During a routine appearance before the public prosecutor following his arrest, the prosecutor informed the asylum seeker that the prosecutor's office had not received any of his documents from the arresting police station where he was detained and would have to treat his case as if he were undocumented, meaning that he would likely be deported. The asylum seeker reported that he tried to remind police officers that he had a UNHCR card, but they replied that they did not care about the card and that he would be returned to Sudan. At the Sudanese land border where he was taken, police officers ordered him to sign a document consenting to his deportation to Sudan. He initially refused but ultimately signed the document after the police officer told him that he would spend the rest of his life in detention if he did not sign.

- A Sudanese asylum seeker who was deported in January 2025 after being arrested from a street in Cairo seemingly for not having a residency card reported that police officers confiscated her documents when they stopped her. She was transferred to a deportation center in the Red Sea governorate prior to her deportation; and she reported that police

officers falsely recorded in her file that she was arrested near the Sudanese border without documents. She also reported seeing police officers tear up UNHCR cards belonging to refugees and asylum seekers who were deported with her. When she was taken to the Sudanese consulate to obtain a travel document, she tried to explain that she was registered with the UNHCR, but since she had no way of proving her registration, travel documents were issued in her name and she was ultimately deported.

In cases where individuals cannot be deported by land, as well in the case of citizens of countries other than Sudan, testimonies indicate that authorities pressure families to pay for travel tickets, prolonging detention until the cost is covered. Evidence also points to institutional efforts to conceal forced returns. Official government documents obtained by protection agencies indicate that authorities explicitly instruct staff to confiscate UNHCR cards from registered refugees and ensure they sign documents confirming their 'willingness' to leave, despite clear indications of coercion. These practices not only confirm the systematic nature of forced returns, but also confirm the state's clear intent and active attempts to conceal violations of its non-refoulement obligations.

This apparent intent to cover up incidents of forced returns is consistent with the Egyptian government's emerging approach to responding to or discussing any concerns about its targeting of refugee communities. In December 2024, during Egypt's session at the UN Committee on Migrant Workers and during Egypt's Universal Periodic Review, government officials categorically denied any reports that Egypt was carrying out border arrests or *refoulement* of any kind, claiming instead that refugees and asylum seekers benefited from full integration into Egyptian society. Nonetheless, the facts we have outlined above tell a different story.

d. Refoulement and deportations to other countries

Local protection agencies also documented cases in which security authorities deported refugees to other countries (that are not their countries of origin) in the global south where they could not access protection, did not have legal residence, or faced the risk of persecution. This was particularly the case for refugees from South Sudan who refused to sign documents agreeing to return to South Sudan, despite some of them being tortured and having their documents confiscated and destroyed, which then led to the South Sudanese embassy refusing to issue emergency travel documents to facilitate their deportation. While other embassies readily respond to requests for emergency travel documents regardless of the consent of the individual concerned; South Sudan's embassy in Egypt in particular have a historical sensitivity to the plight of refugees that were displaced in the context of the war against North Sudan and a different relationship with their citizens residing in Egypt and neighboring countries.

In such cases, the Egyptian authorities resorted to another tactic and managed to persuade the North Sudanese consular authorities to issue travel documents for them and forcibly return them to war-torn Sudan, a country to which they did not even belong in the first place. These cases are pertinent because they demonstrate that the Egyptian authorities are able to exert some pressure on the Sudanese consulate to issue emergency travel documents even to people who are not their own citizens.

This pattern is illustrated in a number of similar documented cases in which Egyptian security forces deported refugees and asylum seekers from South Sudan to Sudan because

they did not have documents legalizing their status before the authorities and faced serious risks of persecution, arbitrary detention, or violence. Although the individuals clearly stated that they were South Sudanese citizens and presented their registration papers with UNHCR, authorities forcibly returned them to (north) Sudan after confiscating or destroying their documents and forcing them to place their fingerprints on the deportation documents. These practices not only violate the principle of non-refoulement, but also expose individuals to renewed harm in countries where they have no theoretical legal or physical protection, effectively exacerbating their vulnerability and ending their refugee status.

Such incidents show the unrelenting intent of authorities in Egypt to enforce the *refoulement* of refugees outside of Egypt. Regardless whether this *refoulement* results in the refugees' return to their country of nationality or a third country where they could also face the risk of persecution, the priority for Egyptian authorities remains to force a growing number of refugees out of Egypt and make Egypt an increasingly inhospitable place for refugees.

II. Feared repercussions of a state-operated asylum system

In a joint study published in November 2024 on the asylum law, RPE and EIPR explained that the new law grants unprecedented discretionary powers to the executive authorities with little to no due process guarantees. Current practices by Egyptian authorities, as evidenced by the cases documented above, as well as official and visual evidence reviewed, point to a new direction and an active policy of expanding mass detention and deportation of refugees and asylum seekers that completely disregards the basic principles of international refugee law and the Egyptian constitution.

Egypt is also detaining and deporting refugees and asylum seekers in record numbers. The juxtaposition of these policies and security practices with the new legal regime being created in the shadows and without much consultation with experienced partners—such as UNHCR—should be enough cause for alarm. Yet there has been very little pushback against the Egyptian government's concerted efforts to make Egypt an unsafe place for refugees and asylum seekers. The lack of safety or access to protection is increasingly pushing refugees in Egypt to make the dangerous journey into Libya. According to Libyan officials in a recently published Reuters report, between the start of the conflict in Sudan and January 2025; 20,000 to 25,000 Sudanese crossed from Egypt to Libya, confirming that many of them held refugee status in Egypt, but struggled to settle there[20]. According to the report, Libya has become an increasingly utilised route of irregular migration for new arrivals as well long-term refugees and migrants residing in Egypt who are also facing increasing threats, denial of services and a newly hostile environment.

In light of the above evidence of increasingly hostile government policies and practices, the following are areas of particular concern under a national asylum system that relies on the problematic provisions of the newly adopted asylum law:

[20] Id.

In the absence of any legal provisions in the asylum law regulating the transition from the UNHCR-administered asylum system to the newly established asylum system, more than one million currently recognized refugees and registered asylum seekers, as well those awaiting registration with UNHCR, will be at risk of losing access to legal protection. Given the complete disregard shown by the authorities for the protection of refugees, and asylum seekers registered with the UNHCR under the current system, which has been established and operational over many decades; it is reasonable to expect that the authorities will exploit any transitional vacuum or "teething problems" to diminish the already limited access to protection that UNHCR-registered refugees and asylum seekers had under the UNHCR-administered asylum system, which is currently being phased out.

The expansion of criteria for exclusion and revocation of refugee status under the new asylum law – far beyond the scope of criteria specified in the 1951 Convention – on the basis of vague considerations relating to national security, public order, or respect for the values and traditions of Egyptian society, could allow Egyptian authorities to deny almost any refugee or asylum seeker access to refugee status, while failing to guarantee their right to non-refoulement.

When considered with evidence of authorities engaging in deliberate and systemic *refoulement* through procedures that lack any semblance of due process designed to cover up authorities' violation of refugee rights, it is reasonable to consider the risk that government authorities will use exclusion and revocation grounds provided in the asylum law in an arbitrary and excessive manner. The expanded exclusion and revocation provisions will allow authorities to add an appearance of legitimacy to the *refoulement* of refugees and asylum seekers by labelling refugees and asylum seekers a concern to national security or public order. Egyptian judicial authorities already use a wide range of vaguely defined crimes classified in the law as crimes against state security, as well as vague crimes of disturbing public order or spreading false news, to investigate and prosecute dissidents or perceived dissenters.[21].In September 2024, four Sudanese journalists were arrested in Cairo, apparently in connection with their work with a Sudanese media platform. Although all of them are registered refugees with official protection in Egypt, they were transferred to Aswan for deportation proceedings according to media reports.[22]

It is likely that grounds for revocation related to respect for Egyptian society's values and traditions will be used to label refugees and asylum seekers as undeserving of status and protection for a wide array of acts, including the clothes they wear, or expressing their sexual orientation and/or gender identity, or any other behavior in public places.

Local protection actors also documented a number of cases in which Egyptian authorities expedited the deportation of refugees on account of mere suspicion of belonging to the LGBT community, and other cases in which they prosecuted them on charges such as habitual debauchery or other related charges and then deported them regardless of the outcome of the prosecution. Even in cases where defendants were referred to trial on such charges and then acquitted by the court, many of them were not released but were subsequently transferred to the National Security Agency and issued with deportation orders signed by the

[21] Migration and Human Rights Platform and the Refugees Platform in Egypt, Access to Asylum and Legal Framework for Refugees in Egypt 2019 – 2024 Joint submission to EGYPTUPR: 48th Session (July 2024). Available here.

[22] Mada Masr, Detention of four Sudanese refugees for one month, their fate remains unknown, (30 October 2024). Available here.

immigration authorities. As in many other cases, UNHCR documents were often confiscated, and security agencies coerced individuals into signing 'voluntary' return documents.

In this context, it is worth mentioning that in recent years, the Egyptian criminal justice system has significantly ramped up prosecution of nationals based on violations or perceived violations of public decency and morality provisions in the Penal Code. The criminal justice system has also launched a fresh spate of prosecutions based on the crime of"assaulting Egyptian family values" introduced in the new cybercrime law (Law No. 175/2018).[23]

In many cases, these prosecutions led to prison sentences, mostly for artists and online content creators, the majority of whom were women and girls. Charges under the violation of Egyptian family values article have been shown to target two other groups in particular, gay and bisexual men and trans women, and religious minorities. The vague language of the article allowed its use separately or jointly with legal charges from other national laws, namely "habitual debauchery" and "contempt of religions" (blasphemy). A study of prosecution patterns based on 'violating the sanctity of the Egyptian family' from 2020 to the present demonstrated that these charges not only opened a new door for moral policing in Egypt, but were also a means of increasing the length of the final sentence.

A thorough examination of these cases reveals a pattern of class discrimination in their application, as the Public Prosecution imposes the aforementioned Egyptian family values only on less affluent social groups.[24] The proliferation of such legal language, which criminalizes behavior based on highly culturally subjective concepts of ' family values' or 'social values', is likely to have a greater negative impact on refugee communities that are already vulnerable and for whom legal protection is rapidly eroding.

The provisions of the law criminalizing refugees who enter Egypt irregularly raise further concern that they may be used to deny refugees access to asylum. As indicated above, Egyptian authorities have established a non-entrée regime leaving the majority of refugees no other recourse but to enter Egypt irregularly. The 1951 convention explicitly instructs signatory states not to deny asylum seekers access to protection on the basis of irregular entry. Egyptian authorities have taken advantage of these newly established barriers and engaged in mass detentions at the border and en route from southern Egypt to Cairo where refugees can apply for asylum. Regardless of the needs of those detained after irregular entry into Egypt, authorities have entirely denied them access to any asylum processes.

In light of the authorities' years-long consistent approach to deny those apprehended following irregular entry any access to asylum, provisions in the new law requiring refugees who enter Egypt unlawfully to turn themselves in to government authorities raise significant concerns. It is reasonable to anticipate that under a national asylum system refugees who turn themselves in following irregular entry would be subject to instant detention and deportation without access to asylum processing similar to current state practice.

Such concerns are particularly pressing as the Government of Egypt has disregarded virtually all comments, critiques and concerns raised about the provisions of the asylum law. The Government of Egypt has not engaged in any consultations regarding the by-laws, and has

[23] StateWatch, European support for Egypt: billions of euros for a dictatorial "partner" in migration control (27 March 2025). Available here.

[24] EIPR, Crackdown on Content Creators: the mix of security repression, class discrimination, and "moral panic" is the real threat here (4 August 2025). Available here.

made no indication or commitment to consider or integrate comments from civil society or UN experts. The process of the development of the by-laws (executive regulations) is shrouded with secrecy replicating the process that led to the adoption of the highly controversial asylum law.

The Government's continued monopoly of the process to develop the national asylum system is a clear warning sign that the by-laws are unlikely to address concerns raised by UN experts and civil society, but may instead exacerbate those problems and empower state authorities to use the discretionary powers granted to them under the asylum law to their fullest extent.

III. Conclusion

Over the past few years, Egypt's role in hosting hundreds of thousands, and possibly millions, of refugees cannot be denied. Egypt has historically been host to hundreds of thousands of refugees from neighbouring countries, and this responsibility has increased significantly since 2023 due to the devastating war in Sudan. However, Egyptian authorities have recently sought to establish a non-entrée regime restricting access to Egyptian territory, leaving refugees with no viable option but to resort to migrant smuggling into Egypt. The Egyptian authorities have also taken unprecedented measures to emphasise border militarization, creating a system that makes it virtually impossible for regularisation and forcing people into irregularity. Authorities have also engaged in a systematic and indiscriminate campaign of arrests and detention of refugees and migrants. Taken together, these practices represent an all-out assault on international refugee protection and a reversal of Egypt's historical position as a country relatively open to refugees arriving from war-torn countries, especially neighboring countries with historical ties to Egypt. More importantly, they constitute a violation of a set of international legal instruments to which Egypt was committed to for decades (and is still a signatory).

This assault on international refugee protection has left hundreds of thousands, if not millions, at the theoretical risk of *refoulement* to countries where they face imminent persecution – the majority of recorded deportations being to an active conflict zone recognized as the world's worst humanitarian crisis.

For those who manage to escape detention and deportation, access to rights is almost impossible when people cannot regularise their status in the country and formally apply for protection or residency. Despite the severity and scale of these violations and the risks to which refugees are exposed, Egypt continues to be revered by international partners and even rewarded with political and financial support as an exemplary host for refugees.

Although not yet implemented, the provisions of the asylum law signal that its implementation will grant wider discretionary powers to Egyptian authorities to continue and further its violations of basic principles of international refugee law, particularly refoulement – the prohibition of which is the cornerstone of international refugee protection – but now in accordance with national law. These practices and recent legislative developments stand in contrast with Egypt's official narrative at the international stage, claiming unrestricted access to territory and asylum, and treatment of refugees on equal footing as citizens in all rights and service provisions.

IV. Recommendations

With thousands of refugees forcibly deported to areas where they face persecution or where their lives are at risk, the urgency to reform laws and policies that undermine the protection system and to press for an end to these violations cannot be overstated. Of utmost necessity is for the Egyptian government to reverse its recently adopted security-centred response to the ongoing conflict in Sudan, and to ensure maximum protection for Sudanese refugees and respect towards its obligations under international law.

Based on the above, the Refugee Platform in Egypt (RPE) and the Egyptian Initiative for Personal Rights (EIPR) call on the Egyptian government to adopt the following recommendations:

- Immediately halt all planned deportations to Sudan, whether individual or collective, in line with UNHCR's recently published International Protection Considerations for Sudan.
- Release all refugees, asylum seekers, migrants, and new arrivals facing administrative detention, including children and women. Desist from targeting refugees, asylum seekers and migrants with deportation without appropriate legal proceedings that comply with international standards.
- The Egyptian government must ensure that anyone detained for migration-related reasons while entering the country has access to legal assistance and representation, and comply with due process including compliance observance of court rulings in favour of refugees and migrants, and legal protection procedures carried out by the UNHCR in Egypt (authorised by the Egyptian government).
- The Egyptian government must also stop criminalizing irregular refugees and comply with Law No. 82 of 2016, which stipulates that refugees who are smuggled should not be held criminally responsible and should be treated as victims.
- Allow refugees fleeing persecution to enter Egyptian territory without restrictions, including refugees fleeing the conflict in Sudan, and allow them unrestricted access to asylum procedures so that their asylum claims can be fully and objectively examined.
- Ensure access to fair and independent asylum procedures for any refugee or asylum seeker arriving in Egypt, whether regularly or irregularly, including refugees who may be detained.
- Postpone the implementation of the current national asylum law and amend its provisions and articles to ensure full compliance with the 1951 Refugee Convention.
- Engage in constructive consultations with civil society, UN agencies, and refugee communities to incorporate their perspectives into the development of the legal framework for asylum, including the drafting of bylaws (executive regulations) currently underway.
- Ensure international protection for refugees that are already recognized by or registered with UNHCR and respect extant legal obligations during any transitional period.