

An Analytical Study on

Egyptian Asylum Law No. 164 of 2024

and the Impact of the Law on Refugee Communities in Egypt



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Study Objective

General Objective

This study aims to examine the legal and procedural dimensions of the law under review, beginning with an analysis of the international instruments ratified by the Arab Republic of Egypt that are relevant to the legislation, as well as an analysis and assessment of national and international laws pertaining to refugees, including compliance with international protection and human-rights standards.

Significance of the Study, Rationale, and the Knowledge Gap Addressed

The study assesses the potential legal implications for the daily lives of refugees—particularly in relation to their social and economic integration—and seeks to understand the challenges associated with legal rights, access to services, and the protection of data and personal information. It evaluates the advantages and disadvantages inherent in the law, and whether it establishes mechanisms for providing essential and adequate support to families and individuals in vulnerable situations, in accordance with international protection standards and confidentiality requirements.

Importance of the Assessment for Policymakers and Refugee Communities

For this purpose, field research tools—including questionnaires and interviews with refugees—were designed and implemented to evaluate the impact of the new law on refugees in Egypt across multiple dimensions, such as registration, access to services, legal rights, social integration, economic opportunities, and the role of the UNHCR under the new legislation. The study also examines how the law will affect both current refugees and future asylum-seekers once implemented.

The study further aims to provide an assessment of the capacity of Egyptian authorities to enforce the law and to offer recommendations and avenues of support for government entities and international organisations to facilitate the effective implementation of the new law and ensure the protection of vulnerable groups.

Main Research Questions

How does the law affect access to services and rights?

To what extent are the authorities prepared to implement the law?

What are the economic, social, and humanitarian implications?

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Contextual Background

This study emerges in the context of recent legislative transformations in Egypt following the enactment of Asylum Law No. 164 of 2024, which constitutes the first comprehensive national framework regulating the status of refugees and asylum-seekers in the country. While the law carries regulatory potential and opportunities to formalise protection mechanisms, it simultaneously raises significant concerns related to fundamental rights and access to services, particularly given the vulnerability of its target populations and their previous experiences with state institutions.

The study focuses on analysing the implications of the new law from the perspective of the refugees themselves, based on surveys and group discussions, in an effort to gain a deeper understanding of the challenges and opportunities embedded in the new legal framework. The central research questions revolve around how the law affects access to services and rights, the degree to which authorities are prepared to implement it in line with international standards, and the economic, social, and humanitarian consequences that may result from its application.

Purpose of the Study

The study seeks to provide an objective and critical analysis that enriches the broader discussion on the future of protection and integration in Egypt, placing refugees' concerns and questions at the core of the conversation on justice, accountability, and effective implementation of the law.

Study Methodology

Type of Study

This study is based on a descriptive-analytical approach, aiming to describe and analyse the expected impacts of implementing the new asylum law in Egypt. It evaluates the extent to which the law aligns with international standards relating to the protection and rights of refugees. The study also includes an examination of the legal, social, and economic dimensions affecting refugees in Egypt.

Study Population and Sample

Study Population

The population targeted includes refugees and asylum-seekers residing in Egypt. Given the difficulty of obtaining statements from representatives of the United Nations High Commissioner for Refugees (UNHCR) or Egyptian governmental entities, the study ensured that interviews covered a wide and diverse range of refugees in Egypt, guaranteeing representation across:

- Nationalities
- Gender
- Age groups
- Legal status (registered, unregistered, asylum-seekers, community leaders, those who entered regularly or irregularly)
- Length of residence in Egypt
- Reasons for seeking asylum
- Experiences with authorities
- The law's impact on refugee services
- Barriers to local integration
- Aspirations and future prospects

Study Sample

- Survey participants: 20 participants of diverse nationalities (13 Sudanese, 4 Syrians, 4 Yemenis, 3 Uyghur, 2 Palestinians, 2 Eritreans, 1 Ethiopian), including 11 females and 18 males, with one child participating.
- Focus group discussions: 30 participants from varied backgrounds between 24/06/2025 and 27/06/2025.
- In-depth interviews and individual documentation: 20 cases of various nationalities and backgrounds conducted between 15/07/2025 and 15/08/2025.
- Legal and social diversity: The sample included refugees, asylum-seekers, community leaders, registered and unregistered individuals.

Data Collection Tools

- Focus group interviews with refugees: The study relied on structured and regular direct interviews with refugees through group discussions to explore multiple perspectives from different nationalities and back-

- to explore multiple perspectives from different nationalities and backgrounds, collecting rich and detailed accounts of asylum experiences.
- Closed and direct questionnaires: Used to obtain in-depth documentation and realistic insights into the aspirations and concerns of refugee communities, based on an interview guide designed for refugees, asylum-seekers, and community leaders.
- Document analysis: Review of the new asylum law, relevant Egyptian legislation, and international reports.
- Literature review and legal analysis: Based on international instruments ratified by Egypt, the study analysed previous research on the situation of refugees in Egypt. It incorporated legal expertise, research experience, emergency services context, case management, legal documentation, and analysis of recent legislation. The study provides an examination of key legal provisions, comparing them with findings from the study sample and assessing their consistency with binding international references.

Data Analysis Methods

- Quantitative data: Statistical analysis of survey data using specialised software.
- Qualitative data: Content analysis of interviews and discussions, including gap analysis to compare the law with existing practices on the ground.

Study Limitations

- Time frame: Covers the period prior to the law's implementation, and from its issuance up to the preparation of this study.
- Geographical scope: Given the difficulty of accessing refugee communities, the study ensured geographic diversity by selecting areas with high refugee concentrations (e.g., Cairo, 6th of October City, Alexandria, and border areas).
- Topical limitations: Focuses exclusively on the effects of the new law without expanding into the broader history of asylum in Egypt or previous policies.

Constraints and Challenges

- Research in this field faces several inherent challenges, most notably the difficulty of accessing refugees due to security and political sensitivities, movement restrictions in some refugee-dense areas, and limit-

Constraints and Challenges

- limited governmental openness regarding media or academic engagement. These barriers restrict opportunities for direct field interviews or obtaining accurate and up-to-date official data.
- The scarcity of official government data on refugees and state policies poses an additional obstacle. To compensate, it would have been necessary to conduct qualitative interviews with UNHCR representatives and relevant Egyptian officials. However, UNHCR also faced challenges in accessing official data and was unable to provide interviews due to governmental and institutional reservations regarding information-sharing.

Research Ethics

The preparation of this study adhered to protection policies and ethical standards. Confidentiality and privacy principles were strictly observed during data collection involving refugees. Informed consent was obtained from all participants. The study avoided any practices that could expose participants to risks or affect their legal status, ensuring their safety and protection throughout the research process.

Introduction

Egypt has a long history of hosting refugees. Since the events of the First and Second World Wars and throughout various periods of international and regional conflict—such as the Sudanese civil war in the 1980s, the Iraq war, among others—the country has continued to receive displaced populations. Following the uprisings of 2011, the influx increased significantly with the arrival of refugees from Syria, Yemen, Libya, and several other countries.

Most recently, after the outbreak of armed conflict in Sudan and the flight of tens of thousands of Sudanese nationals to Egypt, the number of registered refugees and asylum-seekers has risen sharply. According to the latest UNHCR statistics (as of 31 August 2025), Egypt hosts 1,035,325 registered refugees and asylum-seekers from 62 different nationalities. Women and children constitute 73.6% of this population. Sudanese nationals represent the largest group, with 772,059 refugees, followed by Syrians (124,968) and other nationalities making up 138,298 individuals.

The Egyptian government, however, refers to much larger figures—estimating 8–9 million “guests” or non-citizen residents. At many points, there is a notable conflation between refugees, migrants, and foreign residents. This reflects the pressure placed on the hosting and asylum system and underscores structural and policy-related challenges.

The Previous Legal Framework and the General Context of the New Asylum Law in Egypt

The new law (or the draft law approved by the Egyptian Parliament in 2024) constitutes the first domestic legislation regulating refugees and asylum-seekers in Egypt. From an official standpoint, the law is viewed as an instrument that, for the first time, provides a clear legal framework governing asylum and refugee affairs within Egypt and links these processes to international conventions—such as the 1951 Geneva Convention Relating to the Status of Refugees—to which Egypt is a State Party.

Conversely, rights groups and refugee-focused organisations consider the law a response to security and quasi-administrative pressures—namely, the management of refugee and migrant flows and the alignment of asylum governance with national policies aimed at limiting irregular entry or irregular stay.

Key Features of the New Law

- Official Title: Law No. 164 of 2024 on the Right to Asylum, issued in November 2024.
- Institutional Structures Created: The establishment of a Permanent Committee for Refugee Affairs, reporting to the Prime Minister, tasked with receiving asylum applications, issuing documentation, and granting or withdrawing refugee status.
- Rights Provided Under the Law: The right to education, healthcare, employment or establishing businesses, and the right to a refugee passport or travel document.
- Eligibility and Procedures: For example, individuals who enter the country irregularly are required to submit their asylum applications within a specific timeframe (e.g., 45 days) after arrival, failing which their applications may not be considered.

Why Is This Law Significant?

- It is the first comprehensive national legislation in Egypt attempting to regulate asylum and refugee affairs after decades in which refugee matters were handled partly through UNHCR and in coordination with the government.
- It emerges amid significant regional changes: crises in Sudan, increased arrivals of refugees and migrants to Egypt, and pressure from the international community as well as Egypt's regional and global partners to manage migration and asylum systems.
- From the government's perspective, this legislative framework assists in documentation, regularising the legal status of refugees, defining rights and obligations, and delineating the responsibilities of the competent authorities.

International Instruments Ratified by the Arab Republic of Egypt Relevant to the Law

These include the international references (conventions, treaties, and protocols) that Egypt has ratified or acceded to and which are relevant to the new law regulating asylum procedures in Egypt. Some of these instruments specifically address refugees, while others concern general human rights standards that apply to refugees and non-refugees alike.

The international instruments that Egypt has ratified in the fields of human rights and asylum constitute a foundational pillar in shaping national

national legislative and regulatory policies relating to refugees. This framework carries particular significance in light of Egypt's international obligations, which require the State to uphold international protection standards and guarantee fundamental rights while taking national sovereignty and domestic legislation into account.

International Conventions and Obligations Specifically Related to Asylum

The 1951 Geneva Convention Relating to the Status of Refugees

Date of accession: 1981

Main content:

The Convention defines who qualifies as a “refugee” and sets out a range of fundamental rights, including:

- The right to non-refoulement: i.e., the prohibition against returning a refugee to a country where they may face persecution.
- The right to lawful residence and legal protection.
- Basic economic and social rights, such as access to education, work, and healthcare, within the limits of domestic law.

Egypt's reservations:

Egypt entered reservations to several provisions granting refugees near-equal treatment to nationals, including:

- Article 12(1): Personal status.
- Article 20: Rationing.
- Article 22(1): Access to public education.
- Articles 23 and 24: Public relief, labour rights, and social security.
- Egypt justified these reservations on the grounds of ensuring consistency between international obligations, domestic legislation, and prevailing economic and social conditions.

The 1967 Protocol Relating to the Status of Refugees

Date of accession: 1981

Content:

The Protocol removed the temporal and geographic limitations contained in the 1951 Convention, thereby broadening and modernising the scope of international protection to apply beyond European refugees displaced after the Second World War.

Reservations:

Egypt has no substantive reservations to the Protocol, reflecting a relative commitment to expanding the scope of international protection.

The 1969 Organization of African Unity (OAU) Convention

Date of ratification: 1980

Content:

The Convention broadens the definition of a refugee to include:

- Any person fleeing their country due to aggression, external occupation, internal disturbances, or events seriously disturbing public order.

It also reinforces African solidarity in hosting refugees and encourages burden-sharing among States.

Significance:

This Convention represents a qualitative addition to the regional framework, as it reflects African specificities related to mass displacement and internal conflicts.

General International Human Rights Conventions Relevant to the Asylum Framework

Although these conventions are not exclusively dedicated to refugees, they constitute a complementary framework that ensures broader protection of refugee rights under general humanitarian principles. Their relevance lies in providing overarching human-rights guarantees that apply to refugees and non-refugees alike, thereby reinforcing the normative basis for protection within the asylum context.

International Covenant on Civil and Political Rights (ICCPR)

Date of ratification: 1982

Content:

The Covenant guarantees fundamental rights such as the right to life, liberty, and security of the person; freedom from torture; and the right to a fair trial. It also provides the legal basis for the application of the principle of non-refoulement, as it prohibits transferring or extraditing any person to a country where they may face persecution or life-threatening risks. It further guarantees fair legal procedures and the right to judicial review.

International Covenant on Economic, Social and Cultural Rights (ICESCR)

Date of ratification: 1982

Content:

The Covenant reinforces rights linked to human dignity, including:

- The right to education
- The right to health
- The right to adequate housing and decent work

These rights are essential for the integration of refugees into the host

society in a manner that preserves their dignity and promotes social stability. They also constitute fundamental components of refugee protection within host countries.

Convention Against Torture (CAT)

Date of ratification: 1986

Content:

The Convention absolutely prohibits torture and cruel, inhuman, or degrading treatment and prohibits returning any person to a State where they may face a risk of torture. This reinforces Egypt's obligations under the principle of non-refoulement.

Complementary Conventions

- Convention on the Rights of the Child (CRC)
- Convention on the Elimination of All Forms of Discrimination against Women (CEDAW)
- International Convention on the Elimination of All Forms of Racial Discrimination (ICERD)
- Convention on the Rights of Persons with Disabilities (CRPD)

Egypt is party to most of these treaties. They provide essential protection for vulnerable refugee groups and offer additional safeguards for marginalised or at-risk categories (such as children, women, and persons with disabilities) by guaranteeing their educational, health, and social rights and by combating all forms of discrimination against them.

The Egyptian Constitutional Framework

The Egyptian Constitution serves as the foundation for the State's commitment to international treaties relevant to refugee rights.

Article 91

Text of the Article:

"The State shall grant political asylum to any foreigner persecuted for defending the interests of peoples, human rights, peace, or justice. The extradition of political refugees is prohibited. All such matters shall be regulated by law."

The provision establishes that the State grants political asylum to foreigners persecuted due to their advocacy for the rights of peoples, human rights, justice, or peace, and prohibits the extradition of political refugees. It also stipulates that asylum procedures shall be regulated by law.

Article 93

Text of the Article:

“The State is committed to the international human-rights treaties, covenants, and conventions ratified by Egypt, which shall have the force of law upon publication, in accordance with established procedures.”

This provision affirms that human-rights treaties ratified by Egypt acquire the force of law upon publication, thereby becoming part of the national legal system and binding upon the executive, legislative, and judicial authorities.

Summary and Analysis

Egypt’s international obligations constitute an integrated legal framework for regulating and protecting refugee situations within its territory. However, the reservations Egypt expressed to certain provisions of the 1951 Convention reflect its attempt to balance adherence to international standards with its own legal and socio-economic particularities.

The combination of international standards and constitutional principles provides Egypt with a solid legal foundation for shaping a comprehensive national asylum law—one that seeks to balance national security concerns with humanitarian and international commitments.

Given Egypt’s geographic position and regional political role, it remains one of the principal States in the Arab and African asylum systems. Enhancing and modernising its legal framework therefore represents a critical step toward strengthening its international commitments and human-rights profile—provided that implementation adheres to global standards and treaty-based obligations.

The Legal and Institutional Framework – Understanding the Legal and Procedural Dimensions of the New Law

Reservations and Risks Associated with the Law

Human-rights organisations have criticised several provisions of the law on the basis that they may conflict with international standards or introduce implicit reservations or restrictions (such as strict deadlines for lodging asylum applications, conditions that may exclude certain groups, or broadly-worded clauses related to public order or national security). These aspects may undermine Egypt’s international obligations.

Human-rights organisations such as Amnesty International warn that the law contains “weak points” that could restrict the right to asylum or permit the deportation of refugees without adequate safeguards. Concerns also arise regarding broadly drafted grounds—such as “harm to national sovereignty or security” or “violation of Egyptian societal values and traditions”—as justification for refusing or revoking refugee status, which may open the door to arbitrary application.

Absence of Clear Procedural Safeguards

- The law lacks explicit guarantees such as:
- The right to legal representation
- Access to information in a language understood by the applicant

The right to appeal decisions before an independent judicial authority

There is also concern that implementation may become primarily security- and administration-driven (i.e., aimed at controlling flows, enforcing documentation, and tightening entry oversight) rather than adopting a rights-based and progressive approach to refugee protection.

Overview of the Provisions of Law No. 164 of 2024 on the Asylum of Foreigners in Egypt

Article	Content	Analytical Notes
Article (1)	Definitions	Defines “refugee,” “asylum-seeker,” and other terms within the context of the law.
Article (2)	Permanent Committee for Refugee Affairs	The law establishes a Permanent Committee for Refugee Affairs under the Prime Minister, tasked with receiving asylum applications, determining refugee status, and issuing documentation.
Article (11)	Refugee Card / Identity Document	The law stipulates the issuance of identity documents for refugees who meet the required conditions.
Article (12)	Refugee Travel Document	The law provides the possibility of obtaining a “Refugee Travel Document” for eligible individuals.
Articles (18)–(19)	Right to Work and Establish Enterprises	The law addresses the refugee’s right to work and establish private businesses in accordance with conditions to be set by the executive regulations.
Article (20)	Education	Stipulates that refugees may access education (primary, secondary, university) in accordance with the law.
Article (21)	Healthcare and Medical Services	Provides for access to healthcare services within the scope of the law.
Articles (8)–(9)	Suspension or Withdrawal of Refugee Status	Regulate when and how refugee status may be reviewed, withdrawn, or terminated.
Additional Article –	Refers to Article 27, which states that refugees “have the right” to apply for Egyptian nationality under	This indicates that naturalisation is neither automatic nor facilitated for refugees; it is subject to the same conditions as for other foreigners,
Egyptian Nationality	existing legislation (not under which limits any distinct “citizenship a special or facilitated regime).	advantage” for refugees.

Detailed Review of Key Provisions of the Law and Analysis of Selected Articles Relevant to Refugees

A central and transformative change introduced by the law lies in Article 2, which establishes the new mechanism through which refugee affairs will be administered in Egypt—referred to in the law as the “Permanent Committee for Refugee Affairs.”

The article states:

***“A committee shall be established under the name ‘Permanent Committee for Refugee Affairs,’ which shall have legal personality and shall be affiliated with the Prime Minister. Its headquarters shall be located in Cairo Governorate. The Committee shall be the competent authority responsible for refugee affairs, including maintaining statistical information and data on the number of refugees. It shall undertake, in particular, the following tasks:

1. Deciding on asylum applications in accordance with Article (7) of this law.
2. Cooperating with the United Nations High Commissioner for Refugees and other international organisations and entities concerned with refugee affairs, following coordination with the Ministry of Interior.
3. Coordinating with administrative authorities in the State to ensure the provision of all forms of support, care, and services to refugees.”**

Regarding the composition and membership of this Permanent Committee for Refugee Affairs, Article (3) provides:

“The competent committee shall be composed of representatives from the Ministries of Foreign Affairs, Justice, Interior, and Finance. The term of membership shall be four years. The Prime Minister shall issue a decision naming the chairperson and members of the committee, determining its operating procedures and the financial treatment of its chairperson and members. The chairperson shall represent the committee before the courts and in its relations with third parties. The Prime Minister may add representatives of relevant ministries and entities to the committee. The committee may also invite experts and specialists in its field of work to attend its meetings whenever needed.”

Substance of Article 2

- Establishes a Permanent Committee for Refugee Affairs with legal personality under the direct authority of the Prime Minister, headquartered in Cairo.
- Its mandate includes managing refugee affairs, compiling statistical data, and deciding asylum applications.

- It is also tasked with cooperating with UNHCR and coordinating with governmental bodies to provide support and services to refugees.

Article 3 (Composition of the Committee)

- The Committee consists of representatives from the Ministries of Foreign Affairs, Justice, Interior, and Finance.
- Membership term: four years.
- The Prime Minister appoints the chairperson and members and issues the decision governing the Committee's procedures and remuneration.
- The Prime Minister may add further representatives or invite experts and specialists as needed.

Critical Assessment of the Committee's Establishment, Structure, and Mandate

Below is an evaluative reading of the new central authority responsible for regulating and managing all refugee-related matters in Egypt—the Permanent Committee for Refugee Affairs—focusing on independence, balance of representation, and professional expertise:

First: Lack of Independence

- Cause: The Committee reports directly to the Prime Minister.
- Consequence: The government may influence its decisions, weakening its neutrality in asylum matters, particularly when political or security considerations are involved.
- Alternative proposal: The Committee should be administratively and financially independent, subject only to judicial oversight, and guided by the Constitution and Egypt's international obligations (such as the 1951 Refugee Convention).
- Rationale: Independence is essential because asylum decisions concern fundamental human rights (protection, non-refoulement). Direct executive control risks undermining impartiality and objectivity.

Second: Predominance of Security, Administrative, and Financial Representation

- The Committee is composed solely of representatives of sovereign or financially oriented ministries.
- Absent are ministries or bodies of social and humanitarian relevance (e.g., Ministry of Social Solidarity, Ministry of Health, National Councils for Human Rights, Women, Children, or Persons with Disabilities).
- This shifts the Committee's orientation toward administrative control

- rather than a rights-based or humanitarian perspective.
- The dominance of security and financial actors creates an imbalance, as refugee affairs require a holistic approach encompassing protection, integration, health, education, and psychosocial support.
- The absence of these actors may weaken the Committee's real effectiveness in addressing refugee needs.

Third: Absence of Specialists and Experts

- The law treats consultation with experts as optional (“permissible”), at the discretion of the Prime Minister.

This means that technical expertise in refugee law, international protection standards, psychosocial support, or humanitarian response may or may not be included—leaving a significant gap in the professional grounding of the Committee's decisions.

Human-rights experts criticise this absence and propose that the participation of specialists should be mandatory

In addition to including representatives of civil society and international organisations working in the fields of migration and asylum.

Engaging experts and specialists is a legal and procedural necessity, as they possess technical and field experience essential for handling refugee cases. Leaving such participation to governmental discretion risks rendering the Committee ineffective from a professional standpoint.

Provisions on Asylum Application Procedures

One of the most significant articles regulating asylum application procedures is Article (7), which states:

“The asylum seeker, or his/her legal representative, shall submit an asylum application to the competent Committee.

The Committee shall decide on the application within six months from the date of submission if the asylum seeker entered the country legally; however, in the case of irregular entry, the period shall be one year from the date of submission.

Priority shall be given to applications submitted by persons with disabilities, older persons, pregnant women, unaccompanied children, and victims of trafficking, torture, or sexual violence.

The Committee shall issue a decision granting refugee status or rejecting the application. In the latter case, the Committee shall request the competent Ministry to remove the asylum seeker from the country.

The asylum seeker shall be notified of the Committee's decision. Pending the determination of the asylum application, the Committee may request the adoption of measures deemed necessary pertaining to national security and public order, in accordance with what is stipulated in the Executive Regulations of this law."

Importance of Article (7)

Article (7) is pivotal, as it regulates the submission and adjudication of asylum applications and determines the fate of asylum seekers within Egyptian territory.

- The Committee must decide within six months for lawful entrants and one year for irregular entrants.
- Priority is given to vulnerable groups (persons with disabilities, older persons, pregnant women, unaccompanied children, victims of trafficking/torture/sexual violence).
- The Committee may grant or deny refugee status; if rejected, the Ministry of Interior must remove the applicant from Egypt.
- The Committee may impose security- or public-order-related measures pending the decision.

Despite its importance, the article raises several legal and humanitarian concerns:

First: Undermining the Role of UNHCR

The article raises fundamental questions regarding its overlap with the exclusive mandate of the UNHCR, recognised under the 1954 Agreement between the Egyptian Government and UNHCR (approved by Law No. 172/1954).

Under this agreement, UNHCR is responsible for:

- Registration
- Refugee status determination (RSD)
- Resettlement
- Coordinating protection programmes

Granting a governmental committee full authority to determine refugee status contradicts existing international arrangements, potentially marginalising UNHCR's independent protection role within Egypt.

Second: State Dominance over Asylum Procedures

The law consolidates governmental control over both application submission and adjudication:

- Irregular entrants must submit applications within 45 days, under penalty of imprisonment or fine.
- Two categories:
 1. Legal entry: decision within six months—yet the article does not clarify the protection status during this waiting period.
 2. Irregular entry: decision within one year—an excessive period during which applicants may face risk of detention, deportation, or denial of essential services, despite many entering irregularly due to war or disasters.

Assigning refugee status determination to a fully governmental body raises fears of adopting narrow political or security-based interpretations of “persecution” or “political asylum,” undermining the principles of the 1951 Convention.

Third: Absence of Professional and Humanitarian Expertise

Although vulnerable groups are given priority, the article does not clarify how these groups are identified or which entity has the expertise to assess them.

Since the Committee is composed of representatives from security/administrative ministries, concerns arise regarding:

- The lack of specialised expertise in trafficking cases
- Gender-based violence
- Child protection
- Medical and psychological vulnerabilities

This absence significantly weakens the Committee’s ability to provide fair and humane protection.

Fourth: Granting the Committee Authority to Remove/Deport Applicants

Article (7) authorises the Committee to:

- Reject asylum applications
- Request the Ministry of Interior to remove the individual
- Impose “necessary measures” for national security or public order

These powers are broad and undefined, allowing flexible interpretation of “national security” and “public order,” potentially enabling:

- Administrative detention
- Forced deportation

- Lack of judicial oversight

This conflicts directly with the non-refoulement principle under the 1951 Refugee Convention.

Conclusion on Article (7)

Despite its importance, Article (7) poses several legal and humanitarian challenges:

- Restricting UNHCR's role in violation of binding international agreements
- Concentrating decision-making in government hands without sufficient transparency or independence
- Lack of specialised expertise for vulnerable groups
- Expanding administrative powers that may undermine international protection principles

A revision is necessary to balance national security needs with Egypt's international refugee protection obligations.

Restrictions on Refugee Status, Revocation, Detention, and Forced Removal

Article (8)

The law states that an asylum seeker shall not be granted refugee status if: There are serious reasons to believe they committed a crime against peace, war crime, or crime against humanity.

- They committed a serious crime prior to entering Egypt.
- They committed acts contrary to UN purposes and principles.
- They are listed as terrorists under Egyptian law No. 8/2015.
- They committed acts harming national security or public order.

Possibility of Misuse in Rejecting or Revoking Status

Under Article (9), refugee status may be revoked at any time if any of the Article (8) grounds apply.

This means a refugee can lose protection at any moment, based solely on the Committee's discretionary assessment.

Article (10)

This article allows the Committee, in times of war, counterterrorism measures, or exceptional circumstances, to request the adoption of measures against refugees for national security or public order reasons.

Use of Vague Language and Risks of Abuse

Articles 8, 9, and 10 contain broad and undefined terms such as:

- “Harming national security”
- “Public order”
- “Acts contrary to UN purposes”

These clauses:

- Grant the government wide discretionary power
- Allow for arbitrary detention or deportation
- Lack judicial oversight
- Undermine international refugee protection standards
- Especially endanger vulnerable groups (unaccompanied children, pregnant women, victims of trafficking, etc.)

Non-refoulement risks are significant.

Appealing Committee Decisions

Article (35)

Provides that decisions may be appealed before the Administrative Court of the Council of State.

However, several obstacles weaken the effectiveness of this remedy:

1. Lengthy judicial procedures may expose refugees to deportation before a ruling is issued.
2. Executive non-compliance with court orders—common in practice—reduces the value of judicial review.
3. Lack of specialised expertise among administrative judges regarding refugee protection and persecution risks.

Thus, while the right to appeal exists in theory, it may not offer real protection in practice.

Provisions on Refugee Rights

Basic Rights of Refugees and Practical Barriers

The law grants several essential rights:

- Documentation: refugee ID (Art. 11), travel document (Art. 12)
- Protection from forcible return: prohibition on surrender or extradition (Art. 13)
- Personal status and property rights: application of the law of nationality of origin (Art. 15), property ownership (Art. 16)
- Access to justice, work, and professions: litigation rights, fee exemptions (Art. 17), right to work and establish businesses (Arts. 18–19)
- Social rights: education (Art. 20), healthcare (Art. 21), freedom of movement (Art. 22), freedom of association (Art. 24)
- Resettlement: right to resettlement in another State (Art. 26)

However, significant obstacles impede implementation:

1. Lack of effective implementation mechanisms

These rights remain largely theoretical without:

- Clear implementation systems
- Resource allocation
- Administrative coordination
- Budgetary support

Weakness in key sectors (education, health, employment) limits the realisation of rights.

2. Overreliance on vague national security concepts

Many rights may be limited or denied based on undefined notions of:

- “National security”
- “Public order”

This allows potential misuse by authorities and contradicts international obligations.

Field and Human Rights Analysis of the Impact of the Egyptian Asylum Law on Refugees

Presentation and Analysis of Field Findings

The field findings derived from questionnaires and individual and group discussions with refugees in Egypt reveal a complex picture of uneven understanding and confidence in the new Egyptian Asylum Law No. 164 of 2024.

The results show that the majority of refugees do not have accurate knowledge of the details of the law. Their primary sources of information are community-level conversations within refugee networks or civil society organisations, which reflects the absence of clear official mechanisms for communication and dissemination of legal information in accessible languages.

1. General Understanding of the Law, Level of Awareness, and Response

The findings indicated that only 9 out of 29 questionnaire participants were aware of the existence of the law, while the rest expressed ignorance of its details. This lack of legal knowledge reinforces a state of confusion and suspicion regarding the State’s intentions and the mechanisms of implementation.

The survey results and discussions highlighted wide variation in refugees' understanding of the new law.

One refugee expressed his fears by saying:

“Why are they transferring registration to the Egyptian state, which treats us badly?”

Regarding registration and legal guarantees, most participants expressed concern about the absence of clear information on registration mechanisms under the new law. Some noted that the law does not clearly define the legal guarantees associated with refugee status, creating a sense of legal insecurity.

Another participant voiced concern about the absence of clear legal safeguards, asking:

“How will the government assess the cases of asylum seekers? And will the already registered cases be reassessed from scratch?”

2. Potential Advantages from the Refugees' Perspective

Despite widespread scepticism, some participants pointed out that the law carries certain theoretical advantages, including the possibility of establishing a unified and clear legal framework to regulate refugee status and enhance coordination with local authorities to manage services more efficiently.

These positive expectations—though limited—are linked to refugees' desire for an officially recognised system that provides them with a sense of stability and recognition.

3. Main Drawbacks and Core Concerns

Lack of Transparency and Participation

- Refugees were not included in the drafting of the law nor consulted in its early stages. The law was passed hastily and without sufficient consultation with UNHCR, civil society organisations, or refugees themselves.
- Refugees, as the primary group affected by the law, appear to have no

meaningful role in designing or implementing regulations, which undermines the legitimacy of the system and heightens fear and mistrust.

- There is significant concern about the transfer of sensitive data from UNHCR files to the Egyptian government, in the absence of transparency regarding refugee data, their files, and how these would be transferred from UNHCR to the State. This increases refugees' apprehension that their information may be exploited or expose them to greater risk.

As one refugee put it:

“Our files contain serious, dangerous secrets and are marked as highly confidential and not to be disclosed. Will they be revealed to the Egyptian government when files are transferred?”

Procedural Challenges

- Ambiguity in the mechanisms for applying for asylum, registration, appeal, and implementation procedures, as the law relies heavily on executive regulations which have not yet been issued.
- Lack of accessible information for refugees regarding their rights, procedures, and the competent authorities—something clearly reflected in their questionnaire responses.
- Unclear coordination between the old system (UNHCR) and the new system (the State), and the absence of a clear transitional plan, which may lead to delays, file conflicts, or loss of data.
- Fear of a reduction in international protection previously provided by UNHCR, and overreliance on State authorities that “may lack expertise in asylum matters.”
- Readiness of the authorities: Most participants agreed that Egyptian authorities need significant capacity-building to understand and implement the law in line with international standards, noting the absence of clear training or awareness programmes on the law for government staff dealing with refugees.

Violations and Field Experiences

Discussions recorded multiple cases of arbitrary detention and stop-and-search without legal justification, including testimonies documenting the arrest of women and minors. Some refugees reported arrest campaigns related to possession of foreign currency and financial extortion in exchange for release. There were also reports of refugees being beaten and insulted inside detention facilities.

One refugee summed up his frustration by asking:

“Why is UNHCR so weak? Why doesn’t it step in to protect us from the brutality of the Egyptian government?”

These testimonies confirm that the reality of protection on the ground remains extremely fragile, and that refugees’ trust in the formal system is limited due to accumulated negative experiences with authorities.

Main Challenges Identified by Refugees

Based on the experiences of refugee communities in Egypt with government agencies and the police, current field concerns can be summarised as follows:

- Arbitrary detention
- Unjustified stops and checks
- Forced deportation
- Arrest of women and minors
- Cases of arrest over possession of foreign currency (especially US dollars)
- Racist insults
- Fabricated charges

Detention

Detention is often preceded by arbitrary stop-and-search not based on any judicial order, coupled with denial of all legal rights during arrest and detention. Cases were documented of women and minors being detained, and of arrest campaigns targeting individuals merely because they possessed foreign currency.

Inside police stations, some refugees reported being pressured to pay money or hand over gold jewellery in exchange for release. Several witnesses confirmed repeated instances of physical assault against detained refugees.

Refugees also reported verbal and racist abuse by members of the public and, at times, by police officers, and that victims were often prevented from filing complaints at police stations and threatened with deportation. Refugees with dark skin reported being subjected to fabricated charges, most commonly “illegal currency dealing” (outside the banking system), while women were sometimes falsely accused of prostitution.

Forced Deportation

Forced deportation constitutes a serious violation that may endanger the life of the refugee and their family. Violations often begin with withholding information from refugees from the moment of arrest until deportation, and with concealing or confiscating their refugee cards.

As a result, police reports are filed treating them as “irregular migrants,” not refugees, leading to in absentia court rulings ordering deportation and imposing fines.

Decisions have been issued to deport large numbers of women and forcibly separate them from their children, as well as deport unaccompanied minors.

Among the measures taken by security authorities during detention is referring refugees to their embassies to complete deportation procedures—exposing them to serious risks of retaliation, persecution, imprisonment, or even death. Families are sometimes pressured to purchase travel tickets for their detained relatives from their own funds under threat.

Lack of Institutional Preparedness

Most participants agreed that Egyptian authorities need stronger institutional capacities to understand and implement the law in accordance with international standards. They pointed to the absence of training and awareness programmes on the law for relevant government officials, which increases the likelihood of misapplication and rights violations.

Legal Access and Protection: Registration, Detention, Deportation, Trials
Analysis of field outputs shows that refugees’ priorities and needs can be ranked as follows:

Top-priority needs:

Safety and protection

- Housing
- Psychological support
- Legal awareness

Feeling Safe and Protection from Harassment, Arbitrary Detention, and Deportation

Personal security and protection from harassment, arbitrary stops, and deportation represent the greatest concerns. One refugee said:

“Given that I’m in a country that adopts a forced-deportation policy, what happens if there is security coordination between my country and Egypt? Will I be protected or handed over?”

This quote reflects a deep lack of trust in safeguards against refoulement, a fundamental principle of international refugee law.

Legal Effect and Protection from Detention and Deportation

Under Law 164/2024, responsibility for registration and status determination shifts from UNHCR to the Permanent Committee for Refugee Affairs under the Prime Minister.

Although this move appears to institutionalise a national framework, it opens the door to serious legal risks:

- The law imposes a short deadline (45 days) for submitting an asylum application, exposing those who miss it to the risk of deportation or prosecution.
- There are concerns that protection responsibilities will move from UNHCR—seen as an internationally specialised and neutral body—to State authorities that may lack equivalent experience or guarantees.

Most participants therefore oppose the full transfer of competences to the State, fearing the loss of the humanitarian nature of protection. UNHCR is perceived as a neutral actor, while the State is seen primarily as a security actor.

This shift raises fears of increased arbitrary detention and refoulement. Human rights organisations have warned that the law “delegates broad powers to the State that may contribute to violations.”

As a result, the new legal reality places refugees in a situation of reduced legal protection guarantees, both in terms of access to registration and protection from refoulement.

Meeting Basic Needs – Economic and Livelihood Impact

Next in priority after safety are:

- Housing
- Food
- Education
- Healthcare

Refugees link the absence of these services to the weak effectiveness of legal protection, noting that protection is not limited to non-deportation but also includes dignified living conditions.

Economic and Livelihood Impact

Refugees expressed cautious optimism about the possibility of lawful work, but stressed that economic opportunities remain limited and that bureaucratic restrictions make them vulnerable to questioning or detention for even minor administrative infractions.

Groups emphasised that the absence of dedicated training and skills programmes for refugees prevents them from achieving the “sustainable livelihoods” the law ostensibly aims to promote.

Although the law recognises the right of recognised refugees to work or establish businesses under certain conditions, content analysis shows that:

- These rights are conditional and lack implementation details.
- Practical application is unclear and subject to multiple restrictions.

Refugees reported:

- Limited awareness of registration procedures or requirements.
- Lack of clarity on “where and how” to access services or legal support.

This deepens feelings of legal and social insecurity.

There is also concern that transferring registration from UNHCR— which issues registration cards and often provides legal accompaniment— to a governmental body may reduce access to legal aid, translation, and support services.

Refugees feel that investing in work or small projects is risky in a context where:

- They may be asked for documents they do not have.
- They might be detained over a minor administrative issue or a political situation they have no control over.
-

If the State does not proactively introduce training and vocational programmes targeted at refugees, the goal of achieving truly sustainable livelihoods will remain out of reach.

Access to Legal Information

The single most frequently cited need in all groups was access to legal information in clear, understandable languages. Refugees feel that the lack of official explanations of the law in everyday language leaves them vulnerable to exploitation and in constant fear of unintentionally breaking the law.

Integration and Recognition of Qualifications

A recurring priority is integration into the host society through recognition of professional qualifications and academic certificates. Many refugees expressed a desire to contribute economically but find themselves trapped by bureaucracy and discrimination.

They called for effective policies to:

- Recognise qualifications and prior experience
- Provide clear prospects for education, work, and resettlement

Social and Community Integration: Relations with the Host Society, Discrimination, Hate Speech

Hate Speech and Discrimination

Discrimination and racism remain among the most pressing challenges facing refugees. The law does not provide clear mechanisms to combat hate speech or discrimination in the host community.

Several African nationalities reported experiencing ongoing harassment in public spaces, with negative repercussions on psychological and social security.

Survey results highlighted that “discrimination and stigma” remain major challenges, particularly for African refugees.

Psychological and Social Support

Several groups stressed the need for psychological support in light of:

- Harsh experiences of detention, threats, and deportation
- Exposure to hate speech and discrimination, especially among Black refugees

One participant said:

“Black refugees are accused of fabricated charges, most commonly currency dealing or prostitution.”

These statements reflect an environment of social stigma and structural discrimination, making psychosocial support a fundamental need on par with legal protection.

The law may provide a formal legal framework, but it does not appear to offer clear mechanisms to:

- Combat hate speech
- Promote social integration (e.g., qualification recognition, community participation, platforms for expression, etc.)

The practical reality of the host society—based on participants' input—indicates a fear that the relationship with the State will become more security-oriented than protection- or integration-oriented, especially if the State alone manages registration and services.

Thus, it is crucial that the law's implementation be accompanied by community-based policies aimed at reducing discrimination and promoting integration; otherwise, integration will remain burdened by social stigma and fear of arrest or deportation.

Many refugees, particularly from African countries, reported repeated experiences of racial discrimination and hate speech. Participants stressed the importance of including specific mechanisms in the law to combat these phenomena. The most frequently cited forms of discrimination were:

- Discrimination and hatred based on skin colour
- Followed by discrimination based on language and nationality

Impact of the Law on the Most Vulnerable Groups

Most vulnerable groups: women, children, older persons, persons with disabilities, and the LGBTQ+ community.

These particularly vulnerable groups are not clearly mentioned in the law. Experts fear that the absence of detailed provisions addressing them will lead to further marginalisation. Implementing the law without a specialised protection plan may increase their vulnerability and expose them to additional violations.

Textual analysis showed that “vulnerable groups” are not explicitly mentioned in protective and support provisions (such as women, children, and persons with disabilities). This represents a deficiency in the legal and implementation framework, as specialised protection requires:

- Clear, targeted articles
- Tailored interventions (e.g., protection from sexual and gender-based violence, child protection, safeguards against deporting unaccompanied minors)

If responsibility is shifted entirely to governmental authorities without specialised mechanisms, the risk of marginalisation increases.

Therefore, effective implementation of the law must include a detailed plan for at-risk groups, with the participation of specialised organisations to ensure they are not left in a “protection vacuum.”

Trust, Participation, and Institutional Confidence

Overall, the picture reflects:

- Weak trust in authorities and protection bodies
- A sense of instability within refugee communities
- Fear stemming from lack of information, weak legal protection, and concerns over data-sharing

These testimonies show that institutional trust is extremely limited and that the new law, instead of generating a sense of security, has triggered a new wave of anxiety among refugees.

- Refugees repeatedly stressed that they are not merely asking for “a law,” but for:
- Effective implementation
- Genuine participation in decision-making and execution

Key Questions of Concern for Refugees

- “We are afraid that the confidential data of families registered with UNHCR—data that includes highly sensitive information marked as restricted—will be transferred to the Egyptian authorities. Will these files be disclosed when cases are moved from UNHCR to the State?”
- “How will the government assess asylum seekers’ cases? Will existing cases be reassessed? Are there protection policies for refugees within

the new system? Is there any international oversight to guarantee a minimum level of humane treatment and basic rights?”

- “How will resettlement work? What mechanisms will be used to prioritise the most vulnerable cases?”
- “Given that I live in a country that practices forced deportation in breach of international standards, what happens if there is security coordination between the two States? Will I be protected or handed over? Based on how the Egyptian government treats us now, why should we accept transferring our registration to the same State that already mistreats us?”

These questions, voiced by refugees participating in the survey and discussions, crystallise the core anxieties surrounding the new law: fears over data privacy, protection, fairness in procedures, and the future of resettlement and safety.

Analysis of Institutional and Legislative Challenges and Comparison with International Standards Institutional Readiness of the State

The findings indicate that the State has not yet completed building sufficient institutional capacity to implement the law in a manner consistent with its international obligations. Staff have not received adequate training, and the transitional phase from UNHCR to the governmental committee lacks a clear plan to ensure data security and continuity of services. As one refugee asked:

“How will the files be handed over? And is there any international supervision to ensure a minimum level of humane treatment?”

Assessing the Institutional Readiness of the Egyptian Government to Implement Law No. 164

- Analyses show that the Egyptian government has not sufficiently involved civil society or refugees themselves in drafting the law or its executive regulations. The relevant governmental entities also do not appear to have completed the necessary capacity-building to implement registration and processing procedures in line with international standards (e.g. staff training, complaint mechanisms, specialised asylum services). One outcome repeatedly stated was: “Most participants

agreed that the Egyptian authorities need to build greater capacity.”

- The transitional phase (from UNHCR to the State) is a major challenge: How will files be transferred? How will data security be ensured? What mechanisms will be used to involve UNHCR and organisations in this transition? Will UNHCR continue to act as a monitoring or supporting body? A transfer of responsibilities of this scale and sensitivity requires a clear timeline for the transitional period.
- From the field: “Questions were raised about how the transitional phase, file handover, and the registration process from UNHCR to the proposed governmental committee will be managed.”

Role of UNHCR and Partner Organisations: Working Modalities under the New Law and During the Transitional Phase

The shift in the roles of UNHCR and human-rights organisations constitutes a serious challenge. There is widespread fear that the system will move from a “humanitarian protection” model to a “security management” model, thereby weakening the overall protection framework. Most refugees stressed the importance of UNHCR continuing as an oversight body and guarantor of international standards.

Ambiguity of Roles

It remains unclear what the exact role of UNHCR will be once the law enters into force:

- Will it become purely a monitoring body?
- Will it be excluded altogether?

Similarly, the Permanent Committee for Refugee Affairs may not yet be adequately equipped in terms of transparency or understanding of refugee rights, leaving it vulnerable to politicisation and misinformed decision-making.

There is also uncertainty as to whether community-based organisations will continue to operate with the same freedom or be subjected to stricter controls, potentially obstructing support services. Partner organisations, which often provide legal, psychological, and social services, may find themselves excluded from operational frameworks or subjected to tighter oversight, thereby weakening the overall protection network.

Under current practice, UNHCR has been responsible for:

- Registration
- Refugee status determination (RSD)
- Resettlement

Under the new law, these functions are transferred to the State. This shift may result in loss of expertise and a deterioration of protection guarantees. Several participants expressed concern that the shrinking role of UNHCR after implementation of the law could leave a protection gap. They emphasised the importance of UNHCR continuing as an oversight body and guarantor of international standards.

There is also ambiguity around the re-evaluation of already registered cases, how transitional files will be treated, and whether there will be effective legal protection. There is therefore a clear need for robust coordination mechanisms between the State, UNHCR, and civil society to ensure continuity of effective protection and to avoid a “protection vacuum” during the transition.

Transfer of registration and services from UNHCR to the State: “Why are they transferring registration to the Egyptian state, which treats us badly?”

Legal, Legislative, and Implementation Risks Associated with the Law

- Risks include violations such as:
- Violation of the non-refoulement principle through potential security coordination and deportation:
- “Given that I live in a country that practices forced deportation... what if there is security coordination between the two States?”
- Detention, stop-and-search, or deportation without safeguards, in the absence of independent complaint and accountability mechanisms.
- Violation of data confidentiality or use of data for security purposes, including misuse of family or highly sensitive information:
- “We are afraid that the confidential data of families registered with UNHCR will be transferred... Will it be disclosed to the government when files are handed over?”
- The law does not provide for temporary protection in situations of large-scale influx, which represents a failure to meet a core standard of refugee protection under the spirit of the 1951 Convention.

Administrative Concerns

1. Lack of refugee participation in drafting or implementation, which undermines the legitimacy of the process and intensifies fear.
2. Weak transparency in the distribution of services.
3. Fears that community-based organisations and initiatives working with refugees may face closure or increased restrictions.
4. Lack of transparency in data transfer between UNHCR and the State.
5. Transferring a large number of responsibilities to a governmental committee may lead to “securitisation” or politicisation of asylum rather than ensuring protection, as several human-rights reports warn.

These concerns indicate that most refugees do not perceive the new law as accompanied by sufficient guarantees to reassure them; rather, they view it as an additional source of anxiety.

Potential Changes in Protection Models

- Instead of a model in which UNHCR is the main operational actor for registration and services, the future model is expected to be State-led. Human-rights analyses warn this may shift the logic of the system from protection to administrative/security management.
- The new model may reduce or eliminate temporary protection or expedited procedures for asylum seekers, as the law does not provide for a clear temporary protection regime.
- It is therefore crucial to design a clearly defined transitional phase with temporary measures to ensure that refugees are not left in a legal or practical vacuum.

Degree of Compliance with International Obligations

Although Egypt is party to the 1951 Refugee Convention, the 1967 Protocol, and the 1969 OAU Refugee Convention, the analysis reveals a gap between international obligations and national implementation.

- The 45-day time limit for lodging asylum applications conflicts with Article 31 of the 1951 Convention, which prohibits penalising refugees for irregular entry, provided they present themselves without delay.
- The absence of a clear right to appeal before an independent body and the lack of explicit protection for vulnerable groups represent breaches of core principles of international protection.

Human-rights reports note that Law No. 164/2024:

- Lacks sufficient safeguards to guarantee non-refoulement for all asylum seekers, not only recognised refugees.
- Introduces a strict time limit (45 days) and criminalises irregular entry, contrary to Article 31 of the Refugee Convention.
- Fails to clearly provide complaint mechanisms, legal representation, or explicit protection for vulnerable or temporarily protected groups, which may conflict with international human-rights and refugee law standards.

Accordingly, one may say there is formal alignment with some obligations (e.g. recognition of refugee status, conditional right to education), but a substantive gap remains between international norms and the likely implementation of the law, especially in terms of safeguards and procedures.

Implementation Notes and Challenges – General Negative Points Requiring Monitoring

- The full text of the law, accompanied by explanations of each article, is not easily accessible to the public. Therefore, much of the analysis relies on secondary sources that have examined the law.
- The executive regulations (secondary rules detailing how the law will be implemented) have not yet been fully published or made clear to the public, delaying effective implementation.
- There is a discrepancy between what the law states on paper and what happens in practice, as many reports indicate that some refugees lack clarity regarding their documentation and protection status.
- Cooperation with civil society and human-rights organisations is essential to ensure transparent implementation; however, there are criticisms that this has not occurred adequately.
- The law does not answer critical questions about the roles of national and international institutions such as UNHCR and local/international NGOs.
- There is no mechanism for temporary or emergency protection, unlike in some systems that address mass influxes.
- Without the executive regulations, it does not appear that the law ensures all procedural safeguards, such as the right to a lawyer, access to information in the refugee's own language, or appeal before an independent body.
- Exclusions are broad: individuals who engaged in “political or party activity” or who supposedly “acted against State security or public order” may be stripped of protection.

- Strict time limits apply to asylum applications, especially for those who entered “irregularly,” with the law referring to a 45-day window to submit an application.

Expected Positives

The existence of a national legal framework regulating refugee matters in Egypt for the first time is a significant step in principle. It grants the State and its institutions an official role in protection, which could:

- Lead to better organisation and coordination of services
- Improve coordination with local authorities
- Enhance the efficiency of service delivery if implemented appropriately

The law may also open opportunities for stronger economic and social integration of refugees, provided clear policies are designed for:

- Economic empowerment
- Recognition of qualifications
- Language support and services

Summary, Conclusions, and Recommendations

Overall Conclusion: General Legal and Political Analysis

The new Egyptian Asylum Law represents an important legislative step in form, as it incorporates asylum into the national legal framework for the first time. However, field implementation and human-rights concerns reveal that the law focuses more on administrative control than on humanitarian protection.

The study’s findings show that refugees live in a state of fear and confusion due to:

- Lack of transparency
- Lack of participation
- Insufficient safeguards against detention and deportation
- In principle: The law seeks to formally regulate asylum within a national framework for the first time—an ostensibly positive legal development.
- In substance: The provisions tend to favour centralised governmental control rather than the independence and transparency required by international asylum standards.
- Institutional balance: The absence of humanitarian and community representation risks producing dry administrative decisions that fail to take into account the human-rights dimension of asylum.
- International commitments: The current configuration appears to partially conflict with Egypt’s obligations under the 1951 Convention and 1967 Protocol, which call for fair and impartial procedures for asylum seekers.

Key Conclusions

- Weak awareness of the law constitutes a fundamental obstacle to its fair implementation.
- The absence of refugee and community participation in drafting the law leaves them feeling marginalised.
- The shift from UNHCR to a governmental committee threatens to erode protection standards.
- Social discrimination and hate speech increase refugees' vulnerability, especially those with dark skin.
- Vulnerable groups are not adequately protected, in contravention of international standards.

Recommendations

- Enhance transparency and participation by involving refugees and civil society organisations in the implementation and monitoring of the law, and by drafting and enforcing clear executive regulations with their participation and that of UNHCR.
- Improve access to legal information for refugees in understandable languages, and ensure that registration procedures and rights are clearly communicated.
- Align the law with international standards by revising provisions on time limits, appeals, and detention in line with the 1951 Convention.
- Build institutional capacities of governmental bodies (the Permanent Committee and relevant ministries) in international protection standards, humane asylum procedures, registration, complaints, and data management.
- Establish a clear transitional mechanism for the handover of files from UNHCR to the State, with strong data confidentiality safeguards and a jointly agreed roadmap.
- Guarantee effective mechanisms to combat discrimination, hate speech, and abuses by authorities, including training, human-rights monitoring, accessible complaint mechanisms, and legal accountability for racist practices.
- Ensure data protection through strict protocols safeguarding the confidentiality of refugee files.
- Develop targeted programmes for vulnerable groups (women, children, older persons, LGBTQ+ persons), including dedicated legal, psychological, and social support and measures to ensure their integration.
- Maintain UNHCR's oversight role as an independent, neutral monitor of protection standards.
- Institute independent, periodic monitoring and evaluation of the law's implementation and impact, with transparency in data and procedures and involvement of governmental and non-governmental actors.

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