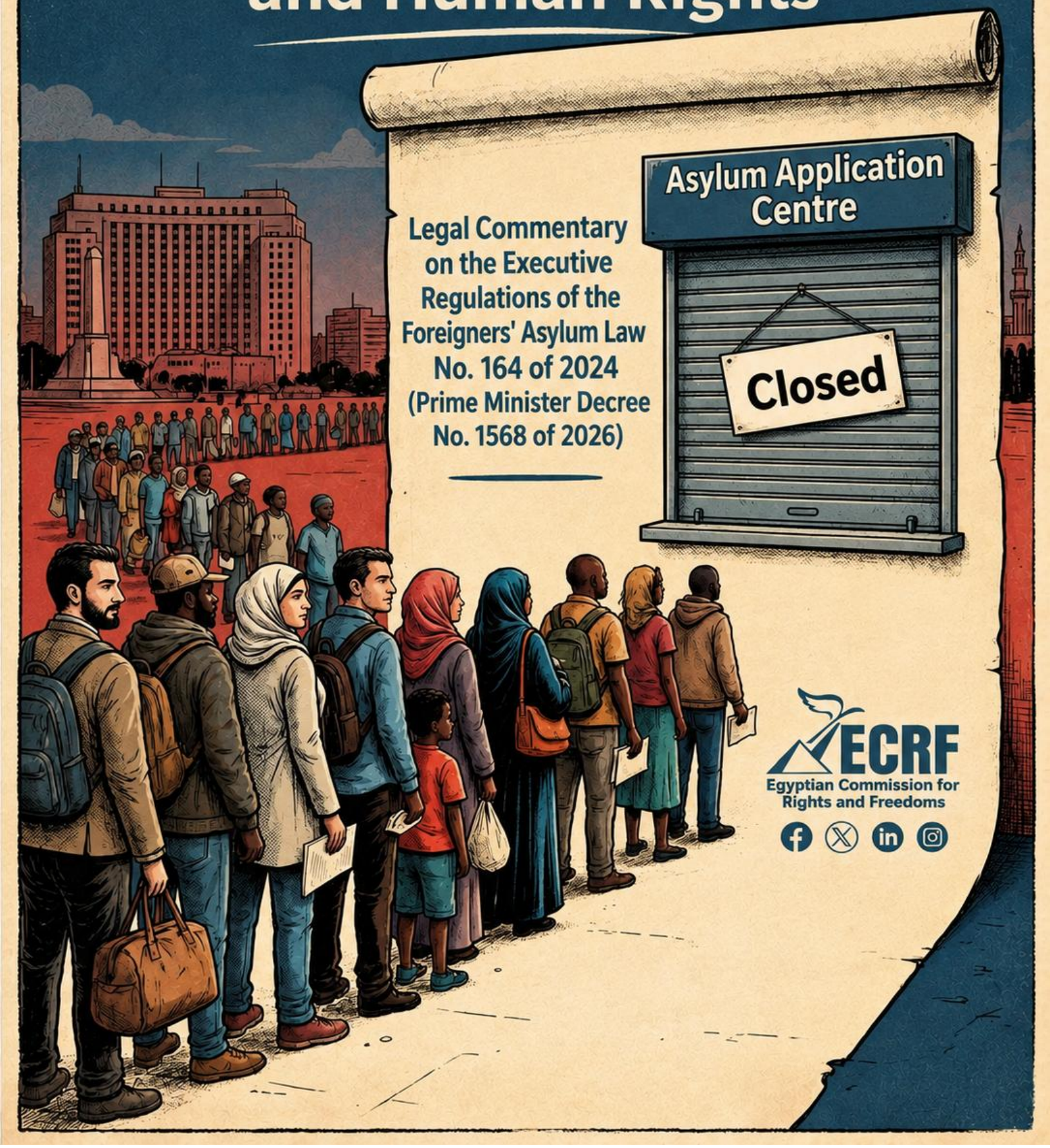
Broad Powers Raise Concerns Over Refugee Protection and Human Rights



Legal Commentary on the Executive Regulations of the Foreigners' Asylum Law No. 164 of 2024 (Prime Minister Decree No. 1568 of 2026)

ECRF
Egyptian Commission for Rights and Freedoms

Broad Powers Raise Concerns Over Refugee Protection and Human Rights

Legal Commentary on the Executive Regulations of the Foreigners' Asylum Law No. 164 of 2024 (Prime Minister Decree No. 1568 of 2026)

Introduction

Two years ago, the law regulating refugee affairs in Egypt, Law No. 164 of 2024, was enacted. The Egyptian Commission for Rights and Freedoms (ECRF) issued a commentary on the law outlining key concerns, along with a legal and social analysis of the legislation, addressing both its merits and limitations in light of the practical realities faced by refugees[1].

Now, following a period of anticipation, the Executive Regulations for this law have been issued. Upon review of the Executive Regulations, it can be stated that they are more detailed than the law itself and introduce several procedural guarantees that were previously absent or unclear in Law No. 164 of 2024. At the same time, however, the regulations reinforce certain structural shortcomings embedded within the law and grant the administration expansive powers that raise concerns from a refugee protection and human rights perspective.

The Egyptian Commission for Rights and Freedoms (ECRF) analyzed the law and its Executive Regulations through the lens of international refugee law, human rights, and due process guarantees. Any asylum system is typically measured against the following benchmarks:

- United Nations High Commissioner for Refugees (UNHCR) and its Procedural Standards
- Convention Relating to the Status of Refugees
- Protocol Relating to the Status of Refugees
- Principle of Non-Refoulement
- Right to Due Process and Fair Procedures
- Principle of Proportionality
- Principle of the Best Interests of the Child

[1] Egyptian Commission for Rights and Freedoms (ECRF), "Analytical Study on the Egyptian Asylum Law No. 164 of 2024 and Its Impact on Refugee Communities in Egypt," Published: December 18, 2025, Accessed: June 14, 2026, available at the following link.

- Right to Privacy and Data Protection
- Right to an Effective Remedy and Judicial Review

I. General Assessment

Key Axes of Criticism Against the Law

Independence of the Asylum System

The Permanent Committee for Refugee Affairs is not an independent body, as its subordination to the Prime Minister leaves its decisions vulnerable to government policy influence. Moreover, there is an absence of institutional guarantees for independence and a lack of effective, independent oversight over its decisions.

Dominance of the Security Approach

The Ministries of Interior, Foreign Affairs, Justice, and Finance dominate the composition of the Committee, while representatives from social protection, healthcare, civil society, and specialized refugee entities are entirely absent. Moreover, there is a major concern that security considerations will take precedence over international protection.

Lack of Technical Expertise

The law does not mandate the inclusion of refugee and migration experts. Executive tasks can be assigned to seconded personnel who lack specialized expertise, compounded by the absence of a binding requirement for training or qualification.

Curtailment of UNHCR's Role

The powers to register asylum seekers and adjudicate asylum claims are transferred from the UNHCR to the Committee, creating a potential conflict with the Memorandum of Understanding in force since 1954. This curtailment of UNHCR's role raises concerns over the potential loss of international guarantees associated with Refugee Status Determination (RSD) procedures.

Asylum Application Procedures

Processing times for deciding on applications are excessively long. There is clear discrimination between those who enter the country regularly versus irregularly. The legal status of asylum seekers while awaiting a decision remains ambiguous, alongside a lack of clarity regarding their rights during the waiting period.

Risks of Deportation and Expulsion

The Committee is granted authority to request expulsion following the rejection of an application. Interim measures can be taken during application review under the pretext of national security or public order. There is serious concern regarding potential violations of the principle of non-refoulement.

Use of Vague and Overbroad Concepts

The terminology considered most critical and hazardous includes: national security, public order, exceptional circumstances, and counter-terrorism. These terms lack precise legal definitions, allowing for broad or arbitrary application, and can be used to restrict rights or revoke refugee status.

Revocation of Refugee Status

Refugee status can be revoked for actions linked to national security or public order without precise governing criteria. This lack of clear standards heightens concerns that protection will be transformed into a legally precarious and unstable status.

Judicial Appeals & Legal Remedies

Appeals are restricted to the Administrative Judiciary, amidst lengthy litigation procedures and significant barriers for refugees in accessing the judicial system. There is a lack of automatic suspensive effect for deportation orders while an appeal is pending. Specialized judicial circuits dedicated to refugee and asylum cases are entirely absent.

Economic and Social Rights

Although rights such as education, healthcare, employment, freedom of movement, litigation, and freedom of association are explicitly mentioned, they are articulated in purely aspirational and rhetoric language. There are no clear implementation mechanisms, nor are there financial or institutional guarantees to ensure their practical application.

Conflicts with Existing Legislation

A primary example is the conflict between certain statutory guarantees under the law and the residency requirements and fee structures mandated by previous executive decrees.

Financing and Oversight

Concerns over administrative bloat and the expansion of the bureaucratic apparatus. Anxiety regarding the receipt of loans and grants without effective, independent oversight. Skepticism regarding the efficacy and transparency of financial monitoring mechanisms.

II. Assessment of the Executive Regulations

Based on what appeared in the articles of the executive regulations, we can highlight some of the following legal observations according to each article:

Article (2): "Competence Authority of the Committee, Technical Secretariat, and Reporting Database"

The Executive Regulations fail to establish sufficient guarantees to ensure the independence of the Committee, as the text grants it expansive powers. The legislator conferred comprehensive mandates upon the Committee, encompassing establishing adjudication criteria, adopting procedural guidelines, creating branch offices, managing the database, issuing documents, deciding on applications, and adjudicating administrative appeals (grievances). Consequently, the Committee

consolidates the authority to investigate, evaluate, issue decisions, and review administrative appeals, creating a clear problem of "concentration of administrative powers."

Furthermore, there is a complete absence of independent oversight external to the executive branch. The Committee submits its reports exclusively to the Prime Minister, rather than to Parliament or an independent oversight body, with no obligation to publish these reports publicly. International standards favor a structural separation between the primary decision-making body and an independent administrative review body, whereas here, the same entity issues the initial decision and considers appeals against it.

In addition to the exclusion of the United Nations High Commissioner for Refugees (UNHCR), Article 35 of the 1951 Convention Relating to the Status of Refugees[2] obligates Contracting States to cooperate with UNHCR and enable it to exercise its supervisory mandate regarding the application of the Convention's provisions and refugee protection. Therefore, the complete exclusion of UNHCR from status determination procedures, the review of rejection decisions, or the termination and revocation of refugee status raises serious questions regarding the extent of the Egyptian authorities' compliance with the duty of international cooperation enshrined in the Convention, even if this does not result in an immediate legal nullity of the measures taken.

Article (3): "Database and Biometric Data"

[2] Article 35: Cooperation of the National Authorities with the United Nations
The Contracting States undertake to co-operate with the Office of the United Nations High Commissioner for Refugees, or any other agency of the United Nations which may succeed it, in the exercise of its functions, and shall in particular facilitate its duty of supervising the application of the provisions of this Convention.
In order to enable the Office of the High Commissioner, or any other agency of the United Nations which may succeed it, to make reports to the competent organs of the United Nations, the Contracting States undertake to provide them in the appropriate form with information and statistical data requested concerning:
(a) the condition of refugees,
(b) the implementation of this Convention, and
(c) laws, regulations and decrees which are, or may hereafter be, in force relating to refugees.

The regulations set no time limit on data retention, nor do they grant refugees an explicit right to access or rectify their personal data. Furthermore, there is no clear regulation governing data sharing with security agencies. Critically, the legislator failed to include an explicit provision prohibiting the sharing of refugee or asylum seeker data with their country of origin, or with any entities directly or indirectly representing it, representing one of the most hazardous gaps in any asylum system.

The protection of refugees' personal data is directly linked to the principle of non-refoulement enshrined in Article 33 of the 1951 Convention Relating to the Status of Refugees. Sharing information with entities that could lead to revealing an asylum seeker's identity or whereabouts can directly or indirectly expose them to the risk of persecution, or to forced return to a country where they may face severe human rights violations.

Article (4): "Application Submission and Legal Representation"

This article addresses the legal framework governing the representation of refugees and asylum seekers before the competent Committee or relevant administrative and judicial bodies, permitting either the asylum seekers themselves or their legal representative to manage asylum procedures, a element fundamental to ensuring procedural safeguards in the context of refugee protection.

- **Authorization of the Legal Representative:** The Executive Regulations fail to define the criteria for selecting a legal representative, establish a grievance mechanism against legal representatives, or explicitly affirm their independence from governmental authorities. Furthermore, they do not explicitly guarantee the representative's right to access relevant case documents and information. Crucially, the text places the authorization and approval of legal representatives entirely at the sole discretion of the Committee.
- **Separation of Family Applications:** While the legislator granted the Committee the authority to separate family applications "where necessary," it failed to provide a clear legal definition for "necessity" or enumerate the

specific, exclusive cases in which such separation is permissible. This leaves the Committee with broad, unguided discretionary authority. Additionally, the legislator did not oblige the Committee to provide a reasoned justification for decisions to separate family claims.

Article (5): "Irregular Entry"

This article raises significant concerns regarding the treatment of asylum seekers who enter the country through irregular channels. The 1951 Convention Relating to the Status of Refugees explicitly guards against depriving individuals of their right to apply for asylum or barring them from status determination procedures solely on the basis of irregular entry,[3] provided they present themselves to the competent authorities without delay and show good cause for their irregular entry or presence.

However, imposing a strict 45-day deadline for irregular entrants to submit their applications is subject to substantial criticism. Many asylum seekers arrive under conditions of severe trauma, detention, or psychological distress, or they may lack language proficiency and awareness of administrative procedures. International standards accommodate delays when reasonable grounds exist and generally do not condition international protection upon such a tight timeframe. Crucially, the text does not sufficiently clarify the legal consequences of exceeding this deadline, creating a risk that missing the timeframe could be used as an adverse factor against the credibility of the application.

Article (6): "Data and Documents"

This is one of the most sensitive articles due to the extensive scope of required information, which includes religion, ethnicity, relatives, complete travel routes, and prior asylum applications. While this sensitive data falls under protected categories of personal data protection, the article fails to specify retention periods or explicitly recognize the rights to data erasure and access.

[3] See Article 31 of the 1951 Convention Relating to the Status of Refugees.

The provision demands exhaustive details regarding relatives and prior movements, alongside mandatory disclosure of religion and ethnicity. Furthermore, requiring declarations, such as affirming non-commission of specific crimes, could be used as a tool against asylum seekers in the event of unintentional errors or minor discrepancies in statements. Similarly, requiring general consent for data processing raises serious questions regarding whether such consent can be considered truly free and informed.

Additionally, the article strictly requires the submission of supporting documents and identity credentials. This poses a major barrier, given that many asylum seekers flee their home countries under urgent and clandestine circumstances without the ability to retain official documentation. Moreover, the legislator failed to clarify the procedural fate of applications submitted with incomplete data or missing documents, offering no explicit safeguards to ensure that claims are not rejected solely due to a lack of documentation resulting from circumstances beyond the applicant's control.

Article (7): "Reception, Registration, and Biometrics"

While this is an procedural and administrative provision, the legislator authorized the collection of biometric data without establishing a mechanism to object to such collection or independent oversight over its utilization. Crucially, the text lacks explicit rules regarding data retention periods, authorized entities permitted access, data sharing protocols, cross-border data transfers, and the right to data rectification, representing a significant legal gap. Furthermore, mandatory medical examinations raise potential privacy concerns unless accompanied by robust safeguards.

Article (9): "Personal Interview"

This article regulates the personal interview, the most critical phase in the asylum procedure. Nevertheless, it contains no explicit provision guaranteeing a lawyer’s right to obtain a copy of the case file or access the evidence presented against the

asylum seeker. Although the text permits audio and visual recording of the interview, it fails to specify who retains these recordings, the retention duration, or the applicant's right to receive a copy. Additionally, the legislator omitted provisions guaranteeing the confidentiality of these recordings, as well as detailed procedural rules for challenging translation and interpretation errors.

In conclusion, Articles 7 and 9 demonstrate a clear surveillance and security-driven orientation (biometric collection, centralized databases, scrutiny of prior travel routes, and expansive disclosure requirements).

Article (13): "Case Assessment"

Regulating the assessment phase of asylum applications, this is one of the most hazardous provisions. The legislator granted the Committee broad authority to gather information from "available sources" without defining the precise nature of these sources, the criteria for relying on them, or mechanisms to verify their impartiality. The text remains ambiguous, raising serious concerns that "available sources" could include security agencies, international databases, embassies, or the government of the country of origin. Uncontrolled communication with authorities of the country of origin could lead to revealing an asylum seeker's identity, constituting one of the most severe potential violations in any asylum system. Furthermore, while the text provides for drafting an evaluation report, it does not refer to the asylum seeker's right to access the report or respond to its findings.

Article (14): "Adjudication of Applications"

The statutory processing timeframes of 6 months (or up to 1 year) appear reasonable in theory; however, the law provides no legal remedy or consequence if the Committee exceeds these deadlines. Consequently, cases may practically languish for years without clear legal recourse. Moreover, a one-year timeframe for irregular entrants may be considered relatively prolonged absent justification.

Finally, while the article mandates formal notification of the decision, it fails to explicitly require delivering a written copy of the decision and its legal reasoning to the applicant.

Article (15): "Precautionary Measures"

This is one of the most alarming provisions, as it directly impacts the liberty and rights of asylum seekers while their applications are under review. It permits imposing requirements such as periodic reporting, repeated medical examinations, and mandatory notification. The primary legal flaw is the complete absence of clear definitions for the standards of "danger" or "necessity," combined with a lack of automatic judicial review or an absolute maximum timeframe. Furthermore, the legislator failed to precisely define "national security and public order considerations," granting wide latitude to executive authorities.

Article (16): "Deeming the Application Withdrawn"

An application may be deemed abandoned if the applicant fails to attend an interview or cannot be reached. The practical concern is that refugees frequently change residences, lose access to mobile phones, and live under highly precarious conditions. Consequently, individuals risk forfeiting international protection due to purely administrative or logistical factors.

Article (17): "Rejection of Applications"

Regulating the grounds for denying asylum, this is a critical provision as it empowers the Committee to reject claims without international protection. Key concerns include:

1- Effective Protection in a Third Country: The concept remains completely undefined. Does "effective protection" imply temporary residency, a valid visa, or permanent protection? The article offers no clarity.
2- Inconsistencies in Testimony: This is an overly broad criterion. Given that trauma significantly affects memory and minor discrepancies are common in

asylum testimony, a rigid application of this standard risks leading to the wrongful rejection of genuine claims.

3- Internal Flight Alternative (IFA): While this is one of the most complex legal concepts, the regulations fail to establish criteria assessing the accessibility, safety, or availability of basic living conditions and services in the proposed alternative region, elements that constitute essential international benchmarks.

Article (18): "Deportation Following Rejection"

The text fails to explicitly reiterate the fundamental principle of non-refoulement. It should have explicitly prohibited the execution of deportation orders where doing so would expose the individual to a risk of persecution, torture, or threats to life. Moreover, the legislator failed to explicitly provide for the suspension of deportation orders upon the initiation of legal proceedings; while the law recognizes administrative grievances, it omits any explicit reference to the suspensive effect of filing an annulment action before the Administrative Court.

Article (19): "Administrative Appeals (Grievances)"

The 15-day deadline for submitting an administrative appeal is relatively short, particularly considering language barriers, translation needs, limited access to legal counsel, and economic constraints, whereas many legal systems afford significantly longer timeframes. Furthermore, the legislator tasked the same Committee that issued the original decision with adjudicating the appeal; establishing an independent appeals committee would have been essential to ensure impartiality.

Article (20): "Judicial Review"

The provision does not grant automatic suspensive effect to deportation orders while a judicial appeal is pending, representing a critical procedural gap under international human rights standards.

Article (22): "Healthcare for Refugees"

This article raises a practical question regarding operational capacity: Do the existing funding mechanisms and health infrastructure possess the capacity to execute these provisions? The article lacks a clear, designated financing mechanism to guarantee real implementation.

Article (23): "Services for Asylum Seekers"

The article uses phraseology such as "coordinating to facilitate support," failing to establish an enforceable, directly claimable right. Consequently, actual service delivery may vary significantly on a case-by-case basis. Moreover, the article fails to define the core "basic humanitarian and social services," leaving wide administrative discretion. It does not specify the standard of healthcare to be provided, nor does it establish a grievance mechanism in the event an asylum seeker is denied access to these essential services.

Article (24): "Obligations of Asylum Seekers"

The article imposes an obligation to report any personal changes, including prior notification before leaving the country. However, the article fails to clarify the legal consequences of non-compliance or address emergency situations. Furthermore, requiring immediate disclosure of any pending criminal proceedings raises concerns regarding the presumption of innocence if interpreted expansively.

Regarding the third paragraph, the legislator omitted a legal definition for "cases of necessity" and failed to provide a grievance mechanism to appeal administrative decisions placing individuals in care facilities or safe houses.

Under paragraph four, the strict 7-day notification timeframe contains no exceptions or accommodations for particularly vulnerable groups, such as persons

with disabilities or unaccompanied minors, for whom such a deadline may prove excessively burdensome.

Article (25): "Place of Residence and Legal Notifications"

This article regulates designated places of residence, notification procedures, and their legal effects, representing a highly hazardous procedural rule. Under these provisions, sending a notification to the registered address is legally sufficient to establish constructive notice, even if the notice is never actually received. Consequently, asylum seekers risk forfeiting interview appointments, administrative appeal windows, or judicial review rights due to housing instability or communication barriers.

Furthermore, the article grants full legal authority to electronic notifications without detailing standard proof-of-delivery mechanisms, particularly for critical decisions, posing severe risks for asylum seekers facing technical hurdles or language barriers.

Article (26): "Precautionary Measures During War, Counter-Terrorism Operations, or Exceptional Circumstances"

The legislator granted the Committee broad authority to impose exceptional administrative measures of a security nature during times of war, counter-terrorism operations, or state of emergency/exceptional circumstances.

Paragraph two severely restricts freedom of movement, effectively amounting to house arrest or forced confinement if prolonged.

Paragraph five risks indefinitely prolonging asylum procedures for the duration of the exceptional circumstance.

While the measures are initially set for a three-month period, the Committee is authorized to renew them for additional terms without a statutory maximum limit on renewals.

Article (28): "Asylum Seeker Card"

The card itself does not confer substantive statutory rights; rather, it functions merely as proof of registration, which may create severe practical hurdles in daily administrative and socio-economic transactions.

Additionally, the legislator failed to outline a grievance process in cases where card renewal is rejected or issuance is withheld, nor did the article clarify the legal status and protections during administrative delays in card renewal.

Article (29): "Refugee Identity Document"

The article fails to delineate the substantive rights conferred by the document in detail, nor does it explicitly clarify the extent to which other parties are legally obligated to recognize it.

Article (30): "Renewal of the Refugee Document"

The text indicates that the recognition of refugee status is not a permanent right, but rather subject to periodic review. Re-evaluating the grounds for asylum on a periodic basis risks creating a state of perpetual legal instability, particularly if political assessments of conditions in the country of origin fluctuate.

Furthermore, the legislator failed to regulate the refugee's legal status while their renewal application is under consideration: does the expired document remain legally valid and produce its legal effects until a final decision is rendered by the Committee?

Article (31): "Travel Document"

This provision permits the denial of a travel document on grounds of national security and public order, amidst a complete absence of objective criteria, a lack of requirement to provide detailed legal reasoning, and the absence of a specialized review mechanism. Additionally, the article sets no statutory timeframe for adjudicating travel document applications, creating a risk of prolonged administrative delays.

Article (32): "Loss or Damage of Documents"

This article regulates the procedures to be followed in cases of lost or damaged asylum seeker registration cards. However, the mandatory 3-day notification deadline may prove excessively tight for vulnerable categories, such as the sick, children, and victims of human trafficking.

Moreover, the provision fails to clarify the legal consequences of missing the deadline, whether exceptions apply, or whether fee waivers exist for obtaining replacement documents.

Article (34): "Resettlement"

This article does not establish an enforceable right to resettlement for refugees, treating it instead as a matter of administrative discretion, which aligns with general international practice, but leaves decisions entirely to the discretion of executive authorities and receiving states.

Furthermore, the legislator failed to outline clear criteria for prioritizing refugees for resettlement, nor did it establish procedural mechanisms to challenge or appeal exclusion from resettlement consideration.

Article (35): "Cessation and Termination of Refugee Status"

This is one of the most sensitive provisions, raising major legal concerns across three main areas:

1- Departure from Egypt for 6 Months: The legislator granted the Committee broad discretionary authority to define what constitutes an "acceptable excuse." Complex circumstances, such as medical treatment, study, pending resettlement, or family emergencies, may necessitate a temporary absence; yet, assessing the validity of these reasons remains entirely at the Committee's discretion.
2- Cessation of Grounds for Asylum: This is an overly broad criterion that requires an exceptionally rigorous assessment of the political and security conditions in the country of origin.

3- Acquisition of Another Nationality: While the article assumes that the individual now enjoys the protection of another state, practical scenarios are often far more complex.

Crucially, the article omits any requirement to hold a formal personal interview or allow the refugee to present a legal defense prior to the issuance of a decision by the Committee.

General Conclusion

If we were to rank the articles of the Executive Regulations that raise the most significant human rights concerns, they would be ordered as follows:

1- Article 17 (Rejection of Applications)
2- Article 18 (Deportation and Removal)
3- Article 26 (Exceptional Measures During War, Counter-Terrorism, or Emergencies)
4- Article 15 (Precautionary and Interim Measures)
5- Article 13 (Information Gathering and Case Verification)
6- Article 25 (Legal Notification)
7- Article 35 (Cessation and Termination of Refugee Status)
8- Article 19 (Short Timeframe for Administrative Appeals)
9- Article 31 (Travel Documents)
10- Articles 3, 6, and 7 (Biometric Data, Personal Data Protection)

From the perspective of international refugee law, the conformity of practical application with international standards will ultimately depend, not on provisions governing welfare or basic registration, but primarily on four core issues:

- The extent to which the principle of non-refoulement is respected in practice.
- The degree of independence in the refugee status determination.
- The degree to which security considerations and exceptional measures are strictly constrained.

- The effectiveness of administrative grievances and judicial review as genuine legal remedies for correcting administrative errors.

III. Does the Egyptian Government Possess the Necessary Capacity to Implement the Executive Regulations?

Does the government possess the practical capacity, political will, impartiality, and transparency to assess humanitarian claims fairly and safeguard rights from a security-driven perspective? This question moves beyond the legal text to evaluate the state's institutional capacity and operational practices. Consequently, a distinction must be drawn between conclusions inferred directly from the law and its regulations, and empirical evidence that can only be gathered from practical implementation over the coming years.

First: Does the Egyptian Government Possess the Institutional Capacity to Implement the Law?

Factors Raising Doubts Regarding Executive Capacity

Scale and Diversity: The refugee and asylum-seeker population in Egypt is exceptionally large and composed of diverse nationalities. Establishing an entirely new national system requires: personnel rigorously trained in international refugee law, professional interpreters covering dozens of languages, psychological and social work specialists, advanced, secure database infrastructure, specialized units dedicated to children and vulnerable groups.

The Executive Regulations set relatively ambitious statutory deadlines (e.g., adjudicating applications within 6 months to 1 year). Adhering to these timeframes may prove difficult if application volumes surge. From a strictly institutional

standpoint, implementation is feasible, but it requires substantial investments in human resources, capacity building, and administrative infrastructure.

Second: Does the Government Possess the Will and Impartiality to Apply the Law Through a Human Rights Lens?

This question enters the realm of institutional and political analysis, where a definitive binary answer is not possible. However, the Regulations themselves reveal two parallel, competing orientations:

The Human Rights Orientation: Reflected in statutory provisions for free legal aid, protection for unaccompanied minors, healthcare access, interpretation services, adherence to the best interests of the child, prioritization of vulnerable categories, and the rights to administrative appeal and judicial review. These guarantees are typically not incorporated into legislation solely designed for security control.

The Security-Driven Orientation: Reflected in the centralized role of the Ministry of Interior, collection of biometric data, expansive precautionary measures, restrictions on freedom of movement, powers to postpone adjudication, and the direct linkage between certain administrative decisions and deportation procedures.

This duality indicates that the state approaches the asylum portfolio through a dual lens: balancing humanitarian protection with national security and border control.

Third: Is There a Risk that Security Considerations Will Override Rights?

This represents the primary challenge embedded in the Regulations, not because the articles explicitly mandate arbitrary action, but because numerous provisions confer broad, unguided discretionary authority upon the executive branch. In comparative legal systems, as administrative discretion expands, the necessity for the following procedural guarantees increases: transparency and periodic publication of official statistics, robust judicial oversight, guaranteed access to legal assistance, independent administrative review of decisions.

Fourth: Can Impartiality and Transparency Be Predicted at This Stage?

Definitive conclusions cannot be drawn prior to observing practical implementation. However, the true indicators will be if the Committee publishes the number of applications submitted, acceptance and rejection rates, legal grounds for rejection, average processing times, and the number of accepted administrative appeals—which would serve as an indicator of transparency.

Furthermore, if it is observed in practice that personal interviews are conducted professionally, lawyers are granted access to case files, children and vulnerable groups receive designated protections, and the Administrative Court exercises effective review over executive decisions, this would serve as an indicator of impartiality.

Conversely, if security considerations become the dominant factor in approvals and rejections, criticisms will swiftly emerge from human rights organizations, judicial courts, and refugee communities alike.