



# **“WHATEVER SECURITY SAYS MUST BE DONE”**

INDEPENDENT NGOS’ FREEDOM OF ASSOCIATION  
RESTRICTED IN EGYPT

RESEARCH  
BRIEFING

AMNESTY  
INTERNATIONAL



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**Cover photo:** An illustration depicting how independent associations in Egypt are held on strings by the National Security Agency's grip and administrative interference. © Amnesty International

In March 2024, Egyptian authorities closed Case 173/2011, ending 13 years of unfounded investigations into NGOs and lifting asset freezes and travel bans on human rights defenders. Despite this development, Egypt's restrictive 2019 associations law and continued National Security Agency interference severely limit independent organizations' operations, funding, and registration, undermining freedom of association.

## GLOSSARY

| WORD          | DESCRIPTION   |
|---------------|---|
| AFTE          | Association for Freedom of Thought and Expression   |
| “association” | Any group of individuals or legal entities that come together to pursue a common purpose, whether formal or informal, registered or unregistered. |
| ACWU          | Associations and Civil Work Unit, an administrative authority responsible for registering and overseeing associations.                            |
| CIHRS         | Cairo Institute of Human Rights Studies   |
| ECRF          | Egyptian Commission for Rights and Freedoms   |
| EIPR          | Egyptian Initiative for Personal Rights   |
| ICCPR         | International Covenant on Civil and Political Rights  |
| NSA           | National Security Agency, a specialized police agency operating under the Ministry of Interior and tasked with maintaining national security.     |
| SSSP          | Supreme State Security Protection, a special branch of the public prosecution responsible for prosecuting crimes that relate to state security.   |

# 1. EXECUTIVE SUMMARY

In March 2024, after 13 years of unfounded criminal investigations of the funding and activities of NGOs, the Egyptian authorities announced that there were no grounds to initiate criminal proceedings in Case 173/2011, citing insufficient evidence. As a result, the authorities lifted decade-long asset freezes on at least seven Egyptian associations and 11 of their staff members, as well as travel bans on at least 31 human rights defenders. The announcement of this decision was particularly noteworthy since Egyptian judicial authorities hardly ever announce the closure of an investigation in political cases, and it was a marked development.

Despite the end of this most extreme form of the targeting of NGO work, an overall repressive legislative framework remains in place providing a stranglehold on the work of independent organizations in Egypt.

Although under international human rights law, associations have the freedom to choose which legal framework they register under, in 2023 the Ministry of Social Solidarity ordered all associations to register under Law No. 149 of 2019 on Regulating the Exercise of Civil Work (the 2019 associations law) or face dissolution or penalties.

By that date, and due to the years of ongoing criminal investigations in Case 173, a number of Egyptian independent human rights organizations shut down or opened offices abroad. However, a number of independent associations sought to register under the 2019 law as a political choice to remain and continued to face a range of restrictions on their right to freedom of association.

The Egyptian authorities have imposed a burdensome registration system that enables arbitrary interference in associations' internal affairs. The National Security Agency (NSA) has interfered in the registration process, the composition of associations' boards, and their activities and publications, creating a chilling effect that deters organizations from fully exercising their rights for fear of reprisals. Authorities have rejected foreign funding requests without explanation and, in other cases, granted approvals only after lengthy delays, undermining associations' ability to implement their planned activities and operate independently.

To research this issue, Amnesty International studied the experiences of 12 associations in greater Cairo working in the fields of human rights, media, and social development as illustrative examples. Between March and July 2025, it interviewed 19 individuals, including 16 co-founders and staff members of the associations, as well as a social protection expert and two individuals working for governmental donors that provide financial support to Egyptian associations. In addition, Amnesty International reviewed dozens of official documents issued by administrative authorities responsible for overseeing civil society associations.

## **Restrictive legislation**

The 2019 associations law is incompatible with international human rights law and standards. It grants powers to the Ministry of Social Solidarity to interfere in associations' work, activities and access to funding. It also allows authorities to enter premises without notice and inspect documents, among other restrictive measures. In effect, the law strips associations of their independence and prevents them from monitoring human rights abuses and holding officials accountable. The legislation further undermines associations' ability to cooperate with local, regional or foreign entities, including international NGOs; treats their assets as public funds; and imposes excessive and onerous fines for violating its provisions.

In the 12 cases studied, Amnesty International found that the authorities have imposed undue restrictions on independent associations operating in various fields, including human rights, social development, media and digital rights. These restrictions relate to the associations' ability to register, freely choose their name and select their staff and board members, determine their activities, and access funding.

The 2019 associations law enables the authorities to deny registration to independent human rights organizations on vague grounds. For example, it confines their operations to “societal development” and forbids any civil society activities that the authorities consider to be “political” or in violation of “national unity” or “public order” or “public morals”.

Associations in Egypt have long been unable to register under the country’s consistently restrictive laws governing civil society and have instead opted to register as non-profit companies or law firms under alternative legal frameworks. Following the enactment of the 2019 associations law, all associations were required to register under its provisions to avoid the risk of dissolution or other penalties under the law’s requirements. The Associations and Civil Work Unit (ACWU), which operates under the Ministry of Social Solidarity and serves as the administrative authority responsible for registering and overseeing NGOs and associations in greater Cairo, has imposed a prior authorization stage for registration. This contravenes the notification-based regime stipulated by Egypt’s constitution as well as by international human rights standards. Amnesty International found that the registration process was often unjustifiably lengthy and involved unlawful interference by the ACWU, infringing on the right to freedom of association and deterring individuals from exercising this right.

### **Unlawful interference**

The ACWU offices in greater Cairo repeatedly go beyond the provisions of the 2019 associations law, unlawfully interfering with the internal structures and activities of associations, violating the right to freedom of association. ACWU employees have ordered associations to dismiss staff or board members, without legal basis or justification, thereby violating the human rights of these individuals. ACWU employees have also imposed excessive and intrusive reporting requirements that go beyond the already restrictive ones stipulated in the 2019 associations law, including demanding regular access to the minutes of associations’ meetings, detailed descriptions of planned activities and in certain cases the names of participants in these activities.

The notorious NSA also unlawfully interferes with the registration of associations and their activities in greater Cairo and has harassed and intimidated staff and board members of associations during the registration process. NSA tactics have included intimidating phone calls and unlawful summons that involve coercive questioning without legal grounds or judicial orders. This interference helps explain the long delays in obtaining registration approval from the ACWU as the required notification files have to be first checked by the NSA.

### **Climate of fear**

The pattern of interference and harassment by the NSA along with the ACWU’s unnecessary and invasive reporting requirements on associations has had a chilling impact that not only prevents associations from freely pursuing their legitimate work but also undermines other rights, including the right to freedom of expression.

NSA agents have made phone calls to, or unlawfully summoned, staff members of associations to interfere with their board composition, influence their activities or comment on their publications, and question their receipt of foreign funding. They have instructed through these calls or summons some staff members to regularly report their activities to the NSA. In March 2025, a governorate-level ACWU in greater Cairo issued a directive, which covered nearly 1,400 registered associations and NGOs, that threatened to suspend all activities and dissolve the board of any association that failed to notify the ACWU in advance of any activity or meeting.

In one case, the NSA instructed the ACWU to dismiss two staff members of an association.

### **Starved of funding**

The 2019 associations law requires associations to obtain prior approval from the ACWU before receiving foreign funding, a requirement that is incompatible with international law. The ACWU has either failed to respond to or has rejected foreign funding requests without providing reasons. In other cases, it has severely delayed approving the receipt of funds, leaving associations with little or no time to implement planned activities.

In addition, associations cannot open a bank account without a written request from the ACWU to the bank. In some cases, the process has taken months without explanation from the banks. The lack of access to banking services and delayed funding approvals critically undermine associations' ability to carry out their activities and fulfil their financial obligations.

### **Right to freedom of association**

The right to freedom of association, exercised individually and collectively, enables people to work together to pursue common goals and build a healthy civil society. States must not obstruct associations and have a positive duty to create an enabling environment. The right includes forming NGOs, accessing resources, and enjoying related rights such as privacy and non-discrimination. It is also vital to the rights to freedom of assembly, opinion and expression.

Any state oversight of associations must be narrowly tailored, protect privacy, and not be abused to silence government critics or endanger human rights defenders. Under international human rights law, restrictions on freedom of association must be lawful, clear and non-arbitrary. They are permissible only to protect national security, public order, health, "morals" or others' rights. Any interference must be necessary, proportionate and non-discriminatory, and must not undermine the essence of the right.

### **Conclusion and recommendations**

Amnesty International's research found that the Egyptian authorities are increasingly violating independent associations' right to freedom of association and other human rights. Amnesty International is therefore issuing a series of recommendations to the Egyptian authorities, including to:

- End the NSA's interference, intimidation and coercive practices against associations, their members and service providers, to ensure that associations can operate freely and exercise their rights to freedom of association and expression without fear of reprisals;
- Ensure that associations are registered through a notification system, as guaranteed by the constitution, and that ACWU offices refrain from imposing undue restrictions; and
- Repeal Law No. 149 of 2019 and its executive regulations, and launch an inclusive and meaningful consultation process with all relevant stakeholders to develop new legislation that is fully consistent with international human rights law and Egypt's international obligations.

## 2. METHODOLOGY

This briefing is based on research that Amnesty International conducted between March and August 2025. The organization documented the experiences of 12 Egyptian associations in greater Cairo between 2020 and 2025 in view of Law No. 149 of 2019 and its executive regulations.

Amnesty International interviewed 19 individuals, including 16 co-founders and staff members of the 12 associations. All interviews were conducted in Arabic by voice calls over a secure platform. The organization also interviewed a social protection expert with expertise in the work of associations in Egypt. Additionally, it interviewed, in English, two individuals working for different governmental donors providing financial support to Egyptian associations.

The 12 selected associations are all independent, as they have been operating for years autonomously without external control by the authorities or other actors. All are based in greater Cairo, which includes Cairo as well as parts of Giza and al-Qalyubia governorates. They operate in various fields, including human rights, social development, media and digital rights.

Amnesty International was unable to document the experiences of other associations that might be perceived as less independent. The organization reached out to managers of five such associations based in four governorates, but they were unwilling to share their experiences.

Due to security concerns, confidentiality concerns and well-documented patterns of reprisals by the Egyptian authorities, Amnesty International has taken measures to protect the identities of the associations and their representatives. The organization only identified the associations by letters selected in no particular order and that do not correspond to their actual names. Amnesty International omitted the names of the two people interviewed who worked for governmental donors. Amnesty International also anonymized the identity of all but two of the interviewees at their request.

The organization reviewed dozens of official documents issued by several offices of the relevant administrative authorities responsible for overseeing civil society associations, including letters, directives, decisions and templates relating to the work and registration of associations.

Amnesty International wrote to the offices of the Minister of Interior, Minister of Social Solidarity, Deputy Assistant Minister of Foreign Affairs for Human Rights and President of the National Council for Human Rights on 10 November 2025, requesting comments on the concerns presented in the briefing. No response had been received by the time of publication.

Amnesty International wishes to acknowledge the valuable assistance it received from co-founders and staff members of Egyptian independent associations who bravely carry on with their work despite all the risks and restrictions.

## 3. BACKGROUND

Since the rise in civil society activity in Egypt in the mid-1980s and early 1990s, successive governments have imposed severe restrictions on the right to freedom of association through repressive legislation that has severely curtailed civil society activities. As a result, many associations were unable to register under legislation organizing civil society work so registered as non-profit companies or law firms under different legal regimes. However, the State Security Investigations Service, under the Ministry of Interior, and later its successor, the National Security Agency (NSA), routinely harassed and interfered in the work of these associations.<sup>1</sup>

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<sup>1</sup> Human Rights Watch, *Egypt: Margins of Repression State Limits on Nongovernmental Organization Activism*, 3 July 2005, <https://www.hrw.org/report/2005/07/03/egypt-margins-repression/state-limits-nongovernmental-organization-activism>

Since 2011, the authorities have intensified the muzzling of independent civil society associations. They have subjected the vast majority of independent Egyptian associations to criminal investigations and frozen their assets solely for the exercise of their human rights. They have also prosecuted many of their staff members and imposed on them arbitrary travel bans, in retaliation for their legitimate work. Indeed, many of them have been subjected to arbitrary detention, enforced disappearance, torture and other ill-treatment, as well as unfair trials merely for peacefully exercising their human rights.

As a result, several civil society associations and their staff members have been forced into exile. The associations that remain in Egypt operate in a hostile environment, facing constant state scrutiny and undue restrictions as the authorities perceive their work as a security threat.

## **A DECADE OF REPRESSION**

Shortly after the 25 January revolution in 2011, judicial authorities began investigating the allegedly illegal receipt of foreign funding by civil society associations, under Case 173/2011, commonly known as the “foreign funding case.” In June 2013, 43 foreign and Egyptian NGO workers were sentenced to between one and five years in prison, and several international NGOs were shut down, including Freedom House and the International Center for Journalists, in connection with the case.<sup>2</sup>

In 2015, after President Abdel Fattah al-Sisi had come to power, investigative judges ramped up pressure on Egyptian human rights groups, using arbitrary travel bans, arrests and asset freezes to stifle freedom of expression, association and assembly, in orchestrated efforts to dismantle the country’s human rights movement and crush the slightest signs of dissent. For years, the authorities subjected most of the leadership of Egypt’s prominent human rights NGOs to travel bans and asset freezes. Among those targeted were Mohamed Zaree, Egypt Programme Director at the Cairo Institute of Human Rights Studies (CIHRS); Aida Seif al-Dawla, Magda Adly and Suzan Fayad from al-Nadeem Centre for the Rehabilitation of Victims of Torture; and Hossam Bahgat, director of the Egyptian Initiative for Personal Rights (EIPR).<sup>3</sup> In addition, between 2016 and 2019, the security forces arbitrarily arrested and detained five staff members of the Egyptian Commission for Rights and Freedoms (ECRF).<sup>4</sup>

Apart from Case 173/2011, three managers of the EIPR remain under a travel ban and assets freeze imposed in 2020 in connection to a criminal investigation.<sup>5</sup> The three were detained for around two weeks in 2020 and investigated over “terrorism”-related charges after EIPR held a human right briefing with 13 Western diplomats in Cairo.

In 2020, Bahey el-Din Hassan, director and co-founder of the CIHRS, in self-exile since 2014, was sentenced in his absence to 15 years in prison in connection to critical social media posts.<sup>6</sup>

Mohamed Baker, founder and director of Adalah Centre for Rights and Freedoms, was imprisoned between 2019 and 2023 following a grossly unfair trial before a state security emergency court on charges of “spreading false news”.<sup>7</sup> On 23 November 2020, the official gazette published the decision

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<sup>2</sup> Amnesty International, “Close Case 173”, 2016, <https://www.amnesty.org/en/latest/campaigns/2016/12/close-case-173/>

<sup>3</sup> Amnesty International, “Egypt: Crackdown on human rights defenders continues amid ongoing ‘foreign funding’ investigation”, 30 July 2012, <https://www.amnesty.org/en/latest/press-release/2021/07/egypt-crackdown-on-human-rights-defenders-continues-amid-ongoing-foreign-funding-investigation/>

<sup>4</sup> Amnesty International, “Egypt: Researcher Forcibly Disappeared: Ibrahim Ezz El-Din” (Index: MDE 12/0785/2019), 26 July 2019, <https://www.amnesty.org/en/documents/mde12/0785/2019/en/>.

<sup>5</sup> Amnesty International and others, “Egypt: Lift punitive measures against EIPR staff”, 4 December 2024, <https://www.amnesty.org/en/documents/mde12/8811/2024/en/>

<sup>6</sup> Amnesty International and others, “Egypt: Joint statement: Veteran human rights defender Bahey el-Din Hassan sentenced to 15-years in prison punished for his critical tweets”, 28 August 2020, <https://www.amnesty.org/en/documents/mde12/2951/2020/en/>

<sup>7</sup> Egypt’s emergency courts are special courts that are only active during a state of emergency. The Emergency Law allows the president to appoint judges to the courts and to designate crimes that are subject to their jurisdiction. See: Amnesty International, “Egypt: Stop trials by emergency courts,” 31 October 2021, <https://www.amnesty.org/en/latest/news/2021/10/egypt-stop-trials-by-emergency-courts/>

of the Cairo Criminal Court to include Mohamed Baker on the “terrorists list” for five years.<sup>8</sup> As a result, he was subjected to a travel ban, his assets were frozen, and he was prohibited from engaging in political or civil society work for five years. Haitham Mohamedein, an Egyptian labour rights lawyer, has also been included in the “terrorists list” since 2014.

On 5 March 2023, a state security emergency court convicted Ezzat Ghoniem and human rights lawyer Hoda Abdelmoneim, co-founders of the human rights group Egyptian Coordination for Rights and Freedoms, and 28 others, on absurd charges stemming from their human rights work or peaceful dissent and sentenced them to prison terms ranging from five years to life, following an unfair trial.<sup>9</sup>

On 20 March 2024, after 13 years of investigations, the authorities announced the closure of Case 173/2011, which had involved asset freezes against at least seven organizations and 11 NGO workers, as well as travel bans against at least 31 human rights defenders and NGO staff. Travel bans against 29 of them have now been lifted, but the travel ban against Hoda Abdelwahab, co-founder of the independent Arab Centre for Independence of Judiciary and Legal Profession, imposed in 2016, remains in place.<sup>10</sup>

## 4. RESTRICTIVE LEGISLATION

The regulation of civil society associations in Egypt began with Law No. 32 of 1964, which placed all NGOs under strict government scrutiny. Nearly four decades later, Law No. 84 of 2002 was introduced, which eased some of the earlier law’s severest limitations but continued to grant the state sweeping powers, including the power to arbitrarily dissolve associations or deny their registration.

Under President Abdel Fattah al-Sisi, Law No. 70 of 2017 imposed harsh restrictions on associations. These included a ban on field research and surveys without government permission, and forcing NGOs to adapt their activities to government plans or face up to five years in prison. The law also gave the authorities wide powers to dissolve NGOs, dismiss their boards and prosecute their staff on vague and broad charges, including “harming national unity” and “disturbing public order”.

In 2019, the President ratified **Law No. 149 of 2019** (the 2019 associations law), which replaced Law No. 70 and severely undermines the ability of civil society to operate independently.<sup>11</sup> Indeed, the law:

- gives the government the right to object to the registration of associations within 60 days of the date of notification if it determines that their proposed activities are criminalized under other laws (laws that unduly restrict the rights to freedom of expression, association and peaceful assembly);
- grants the authorities wide powers to dissolve associations and prosecute their staff on vague and broad charges;
- unduly restricts associations’ ability to determine their purpose and area of work, confining their operations to “societal development” and thereby limiting the role of human rights organizations in documenting human rights abuses and holding the authorities to account.<sup>12</sup> It

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<sup>8</sup> Law No. 8/2015 on Terrorist Entities and Terrorists was amended in February 2020 giving the public prosecutor the power to submit to courts lists of entities and persons to be designated as “terrorists” regardless of whether an alleged “terrorist act” has actually occurred and based only on police investigation or information.

<sup>9</sup> Amnesty International, “Egypt: Drop bogus case against Egyptian human rights group”, 1 March 2023, <https://www.amnesty.org/en/latest/news/2023/03/egypt-drop-bogus-case-against-egyptian-human-rights-group/>

<sup>10</sup> Amnesty International, “Egypt: Lift travel bans imposed on two human rights lawyers”, 9 July 2024, <https://www.amnesty.org/en/latest/news/2024/07/egypt-lift-travel-bans-imposed-on-two-human-rights-lawyers/>.

<sup>11</sup> Joint Communication by the Special Rapporteurs on the rights to freedom of peaceful assembly and of association; on human rights defenders; and on the promotion and protection of human rights and fundamental freedoms while countering terrorism, 8 July 2021, concerning Egypt’s NGO Law 149/2019 and 2021 by-law. OHCHR. Available at:

<https://spcommreports.ohchr.org/TMResultsBase/DownloadPublicCommunicationFile?gld=26522> (accessed August 2025).

<sup>12</sup> Amnesty International, “Egypt: draft new NGO law retains repressive essence of old one”, 16 July 2019, <https://www.amnesty.org/en/documents/mde12/0715/2019/en/>

also forbids any civil society activities that the authorities consider to be “political” or in violation of “national unity,” which are not permissible grounds for restrictions on the right to freedom of association under international law. It also forbids activities deemed contrary to “public order” or “public morals,” falling short of the requirement that such restrictions must be prescribed by law and be necessary and proportionate.

- empowers the authorities to interfere in the composition of associations’ boards;
- allows authorities to enter premises without notice and inspect documents; and
- penalizes NGO staff members found to have conducted acts violating these and other provisions, including activities protected by the rights to freedom of association and expression.

Decree No. 104 of 2021 sets out the executive regulations for the 2019 associations law and includes detailed procedures for the formation, regulation, funding and oversight of civil society associations.

The Associations and Civil Work Unit (ACWU), the administrative authority responsible for registering and overseeing associations under the 2019 associations law, operates under the local administrative branches of the Ministry of Social Solidarity, which has a local administrative branch in every governorate named the directorate of social solidarity.<sup>13</sup> Directorates have lower-level local offices that operate at the district or neighbourhood level.

Other legislative tools can be used to prosecute and imprison members of associations, including legislation that criminalizes the receipt of foreign funding under vague conditions. In 2014, the President amended the Penal Code (Law No. 58 of 1937) to penalize the receipt of foreign funding by individuals, in certain cases with life imprisonment or even the death penalty.<sup>14</sup>

## **PERSISTENT RESTRICTIONS ON FREEDOM OF ASSOCIATION**

Many associations in Egypt have long been unable to register under the country’s consistently restrictive laws governing civil society and have instead opted to register as non-profit companies or law firms under alternative legal frameworks.

In April 2023, Nevine al-Kabaj, Egypt’s then Minister of Social Solidarity, announced that associations that have not registered under Law No. 149 of 2019 on Regulating the Exercise of Civil Work (the 2019 associations law) by 12 April 2023 risk being dissolved, as stipulated by law. As a result, many associations found themselves required to register under the law’s provisions to avoid the risk of dissolution or other penalties. To date, no associations known to have been dissolved due to lack of registration.

Two years after the Ministry of Social Solidarity’s deadline for associations previously registered under alternative legal frameworks to register under the 2019 associations law, independent associations that registered under the law continue to face a range of restrictions on their right to freedom of association, as detailed in the following chapters of this briefing.

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<sup>13</sup> Egypt, Law No 149 of 2019 on Regulating the Exercise of Civil Work, 2019, Article 76.

<sup>14</sup> Egypt, Penal Code, Law 58 of 1937, 1937, <https://manshurat.org/node/14677> (in Arabic), Article 78 (as amended on 21 September 2014).

## 5. COMPULSORY REGISTRATION WITH STIFLING REQUIREMENTS

The 2019 associations law requires all associations to register under its provisions, even if they were previously registered under other legal frameworks, or face dissolution.

Those interviewed by Amnesty International cited different reasons for deciding to register their associations under the 2019 associations law. Some explained that acquiring legal status could provide greater protection for their staff against security harassment and give them more space to operate. Others said they felt compelled to register because of the legal consequences of non-compliance with the 2019 associations law. Others noted that registration was necessary to qualify for certain funding grants.

Some associations chose not to register. Among them is the **Egyptian Commission for Rights and Freedoms** (ECRF), which operates through a network of law firms. Mohamed Lotfy, the group's executive director, told Amnesty International:

**“We thought that if we registered under this restrictive law, we would not be able to work on sensitive issues as we do now. Our ability to speak out would diminish over time, and there would always be a risk of interference from NSA officers in our work. Long delays in securing funding approvals would also be another obstacle. We are already struggling under this government, so it may be better to continue struggling without having our hands tied.”**<sup>15</sup>

He acknowledged some of the consequent challenges:

**“We're not in a very comfortable legal position. For instance, our researchers cannot carry business cards to reassure survivors, as it would be risky for them to be publicly linked to ECRF. Our volunteers also cannot meet in person due to security risks. And we are unable to provide pro bono legal aid under the group's name, as that could put beneficiaries at risk.”**

Under international human rights law and standards, the right to freedom of association comprises the right to form and join associations freely<sup>16</sup> and is protected regardless of whether associations are registered or not. Therefore, associations should never be forced to register or be criminalized for their lack of formal status.<sup>17</sup>

Associations should also be free to determine if they want to formally register and acquire legal personality (an entity or person that has rights, responsibilities and legal standing within a legal system),<sup>18</sup> and states must ensure and facilitate the ability of associations to acquire it should they wish to do so.<sup>19</sup>

When registration is in place, it must be under a notification regime, as opposed to an authorization regime, meaning that the authorities must automatically grant associations legal personality on receipt

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<sup>15</sup> Interview by voice call with Mohamed Lotfy on 11 August 2025.

<sup>16</sup> African Commission on Human and Peoples' Rights, *Monim Elgak, Osman Hummeida & Amir Suliman (represented by International Federation for Human Rights & World Organisation Against Torture) v. Sudan*, Comm. no. 379/09 (2014), para. 118.

<sup>17</sup> See for instance Human Rights Committee, *M.T. v. Uzbekistan*, UN Doc. CCPR/C/114/D/2234/2013, Views of 23 July 2015, paras. 7.7 and 7.8; UN Special Rapporteur on the rights to freedom of peaceful assembly and of association, Report, UN Doc. A/HRC/20/27, 21 May 2012, para. 56; UN Special Rapporteur on the rights to freedom of peaceful assembly and of association, Report, UN Doc. A/HRC/29/25, 28 April 2015, para. 59; UN Special Rapporteur on the rights to freedom of peaceful assembly and of association, Report, UN Doc. A/HRC/53/38/Add.4, 23 June 2023, paras 14-16; African Commission on Human and Peoples' Rights (ACHPR), *Guidelines on Freedom of Association and Assembly in Africa*, 2017, para. 11.

<sup>18</sup> *Guidelines on Freedom of Association and Assembly in Africa*, Provision 12.

<sup>19</sup> UN Special Rapporteur on the rights to freedom of peaceful assembly and of association, Report, UN Doc. A/HRC/20/27, 21 May 2012, para. 57.

of notification.<sup>20</sup> The UN Human Rights Committee has identified and raised concern about de facto authorization regimes under which, despite legislation that appears to be compatible with Article 22 of the International Covenant on Civil and Political Rights (ICCPR), the authorities impose “a process of prior licensing and control.”<sup>21</sup> Moreover, any requirements attached to the registration of associations must comply with the principles that apply to any form of restriction under international human rights law (legality, legitimate aim, necessity and proportionality) and not be misused by the authorities to control and interfere with the activities of civil society organizations<sup>22</sup> or be “unduly restrictive”, “burdensome” or “disproportionate”.<sup>23</sup>

The state’s suspension or dissolution of an association constitutes the most severe form of restriction of the right, and therefore should only apply as a measure of last resort, where there has been a serious violation of a national law, and as a result of a judicial procedure that complies with fair trial standards.<sup>24</sup> In examining the permissibility of the suspension or dissolution of an association, judicial authorities must ensure that the measure is strictly proportionate to the legitimate aim pursued and is applied only when less intrusive measures would be insufficient to achieve such aim.<sup>25</sup>

The state’s obligation to not unduly obstruct the exercise of the right to freedom of association means that associations should be governed by the will of their founders or members, and should be free to determine their own statutes (including their chosen name), structure and activities and make decisions without undue state interference.<sup>26</sup> Any permissible restriction would require state authorities to demonstrate that it is strictly necessary and proportional for the protection of a legitimate aim, such as to protect the rights of others.<sup>27</sup> It is also crucial that adequate legal safeguards are put in place to prevent abuse and that reasoned decisions imposing restrictions on an associations’ name can be appealed.<sup>28</sup>

## 5.1 MANDATORY PRIOR AUTHORIZATION

“Citizens have the right to form non-governmental organizations and institutions on a democratic basis, which shall acquire legal personality upon notification. They shall be allowed to engage in activities freely. Administrative agencies

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<sup>20</sup> African Commission on Human and Peoples’ Rights (ACHPR), Guidelines on Freedom of Association and Assembly in Africa, 2017, para. 13; Human Rights Committee, Concluding observation on the second periodic report of Mauritania, UN Doc. CCPR/C/MRT/CO/2, 23 August 2019, paras 46 and 47; UN Special Rapporteur on the rights to freedom of peaceful assembly and of association, Report, UN Doc. A/HRC/20/27, 21 May 2012, para. 58.

<sup>21</sup> UN Human Rights Committee, Concluding Observations, Lebanon, UN Doc. CCPR/C/79/Add.78, 5 May 1997, paras 27-28.

<sup>22</sup> See for instance, UN Human Rights Committee, Concluding Observations, Turkmenistan, UN Doc. CCPR/C/TKM/CO/3, 12 April 2023, para. 47.

<sup>23</sup> For example, see UN Human Rights Committee, Concluding Observations, Egypt, UN Doc. CCPR/C/EGY/CO/5, 14 April 2023, paras 49-50.

<sup>24</sup> African Commission on Human and Peoples’ Rights (ACHPR), Guidelines on Freedom of Association and Assembly in Africa, 2017, para. 58; UN Human Rights Committee, Concluding Observations, Azerbaijan (2016), para. 40; Ecuador (2016), para. 31; Bangladesh (2017), para. 27; UN Special Rapporteur on the rights to freedom of peaceful assembly and of association, Report, UN Doc. A/HRC/20/27, 21 May 2012, para. 75. See also UN Special Rapporteur on the rights to freedom of peaceful assembly and of association, Report, UN Doc. A/HRC/23/39, 24 April 2013, para. 38.

<sup>25</sup> Human Rights Committee, *Belyatsky v. Belarus*, UN Doc. CCPR/C/90/D/1296/2004, Views of 24 July 2007, para. 7.5; see also Human Rights Committee, *Korneenko v. Belarus*, UN Doc. CCPR/C/88/D/1274/2004, Views of 31 October 2006, paras 7.4-7.7.

<sup>26</sup> UN Special Rapporteur on the rights to freedom of peaceful assembly and of association, Report, UN Doc. A/HRC/20/27, 21 May 2012, para. 64; African Commission on Human and Peoples’ Rights (ACHPR), Guidelines on Freedom of Association and Assembly in Africa, 2017, para. 7; Inter-American Juridical Committee of the Organization of American States, Declaration of Inter-American principles on the creation, operation, financing, and dissolution of nonprofit civil entities, OEA/Ser.Q, CJI/RES. 282 (CII-O/23) rev.3, 15 March 2024, principle 2.

<sup>27</sup> For example, the Council of Europe Joint Guidelines on Freedom of Association state, “[t]he law should refrain from restricting the use of names of associations, unless they impinge on the rights of others or are clearly misleading, such as when the name gives the impression of being an official body or of enjoying a special status under the law, or leads to the association being confused with another association.” (OSCE/ODIHR-Venice Commission, Joint Guidelines on Freedom of Association, CDL-AD(2014)046, 17 December 2024, para. 159). The Guidelines on Freedom of Association and Assembly in Africa (para. 15) state that associations must be free to choose their names “unless they are misleading, for instance due to resembling the names of other associations, or where they violate the prohibition of hate speech as defined by regional and international human rights law.”

<sup>28</sup> See for instance, Guidelines on Freedom of Association and Assembly in Africa, fundamental principle vii; UN Special Rapporteur on the rights to freedom of peaceful assembly and of association, Report, UN Doc. A/HRC/20/27, 21 May 2012, para. 84 (e).

shall not interfere in the affairs of such organizations, dissolve them, their board of directors, or their board of trustees except by a judicial ruling.” Egypt’s constitution, article 75.

The ACWU in greater Cairo has imposed a prior authorization regime for registration. This contravenes the notification-based regime stipulated by Egypt’s constitution, as well as international human rights standards. The registration process is often unjustifiably lengthy and involves unlawful interference by the ACWU in determining associations’ names and activities, infringing on the right to freedom of association and deterring individuals from exercising this right.

The 2019 associations law provides for 10 different legal structures for non-profit groups, mostly distinct by the number of co-founders or geographic scope, with some structures that allow for forming collations of different groups. The most common ones are “associations” and “civic foundations,” both which have similar requirements for registration. The law formally provides that forming either civic foundations or associations is done through a notification submitted to the ACWU.<sup>29</sup> In theory, legal personality is acquired once the required information and documents are submitted.<sup>30</sup> However, the law authorizes the ACWU to “cease” the registration within 60 days through a written reasoned decision if it has found that the association has purposes that violate the constitution or law, or the required information was incomplete. This effectively makes the registration of associations governed by a de facto authorization regime.<sup>31</sup>

Under the 2019 associations law, if the 60 days pass without comments from the ACWU, the association is considered registered.<sup>32</sup> In practice, however, associations are only considered registered after they receive an “enrolment decision” document from the ACWU, a process that well exceeded the 60-day limit in the cases of all 12 associations that registered between 2020 and 2024 and shared their experiences with Amnesty International. If the ACWU “ceases” the registration of an association, the co-founders may appeal before the court of administrative justice within 60 days of being notified.<sup>33</sup>

Instead of creating an enabling environment, the law requires associations to present overly detailed information. This exceeds the basic information necessary for associations to acquire legal personality and makes the process inherently burdensome.<sup>34</sup> The law also includes discriminatory provisions based on nationality. For example, 75% of the boards and total membership of associations must be Egyptian nationals.<sup>35</sup> Such a requirement violates the rights to equality and non-discrimination.<sup>36</sup>

The law and its executive regulations require the following documents to establish an association or civic foundation:

- signed copies of the group’s by-laws;
- copies of internal regulations on financial and administrative matters;
- criminal record certificates and declarations of “no terrorist listing” for each founder;
- a list of the elected president and board members;
- proof of headquarters occupancy;
- evidence of registration fee payment;

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<sup>29</sup> In this briefing, Amnesty International is referring to all civil society organizations as “associations” regardless of their legal status.

<sup>30</sup> Law No 149 of 2019 on Regulating the Exercise of Civil Work, Article 2.

<sup>31</sup> Law No 149 of 2019 on Regulating the Exercise of Civil Work, Article 9.

<sup>32</sup> Law No 149 of 2019 on Regulating the Exercise of Civil Work, Article 9.

<sup>33</sup> Law No 149 of 2019 on Regulating the Exercise of Civil Work, Article 9.

<sup>34</sup> See for instance, African Commission on Human and Peoples’ Rights (ACHPR), Guidelines on Freedom of Association and Assembly in Africa, 2017, para. 14.

<sup>35</sup> Law No 149 of 2019 on Regulating the Exercise of Civil Work, Article 5.

<sup>36</sup> UN Human Rights Council, Resolution 15/21, 6 October 2010, preamble; African Commission on Human and Peoples’ Rights (ACHPR), Guidelines on Freedom of Association and Assembly in Africa, 2017, para. 9; UN Special Rapporteur on the rights to freedom of peaceful assembly and of association, Report, UN Doc. A/HRC/20/27, 21 May 2012, para. 54. The UN Human Rights Committee has also expressed concern regarding discriminatory restrictions to the right to freedom of association, in law and in practice, in several Concluding Observations. In relation to disproportionate and discriminatory restrictions targeting foreigners, see: Qatar (2022), para. 32; Dominican Republic (2012), para. 25; Monaco (2015), para. 13; Senegal (1997), para. 16; Estonia (1995), para. 22; Russian Federation (2022), para. 34; Ethiopia (2011), para. 25.

- rules for volunteering, if applicable;
- designation of a representative to handle registration;
- the group’s website and email, if available;
- written approval from any entity the association wishes to affiliate with or be named after; and
- any additional documents specified by the law’s executive regulations.<sup>37</sup>

In addition, the name of the group seeking registration as an “association” must be “inspired by the purpose of the association”.<sup>38</sup>

All those interviewed by Amnesty International opted to register their newly established or already existing associations as “civic foundations” apart from one, which opted for “association” status.

According to 10 individuals interviewed, the ACWU always refused to accept the notification file, even when all the required documentation complied with the law. Different ACWU offices subjected the documentation submitted to substantive review, particularly by making changes to associations’ names and activities. Such unnecessary and disproportionate reviews by the ACWU, which are not authorized by the law or its executive regulations, violate the right to freedom of association.

Of the 12 associations studied, nine eventually registered after a process that lasted between five and 15 months. The three others were denied registration.

For example, in July 2022, co-founders of **association A**, a group that planned to work in the media, submitted the notification file along with the required documents to an ACWU office. In August 2023, well beyond the 60-day window allowed, the ACWU sent them a letter stating: “It was not approved to register the mentioned association.”<sup>39</sup> The letter did not provide any reasons, let alone cite either of the two legal grounds that permit a rejection (lack of documentation or incomplete information).

In 2023, co-founders of **association C**, a human rights group that works on a broad range of civil, political, economic, social and cultural rights, submitted the notification file to an ACWU office. The staff there refused to receive it and asked them to change the association’s name, even though the name did not breach requirements of the 2019 associations law.<sup>40</sup> They instructed the co-founders to seek approval for the name from the Minister of Social Solidarity. In October 2023, the co-founders sent a letter to the minister asking for her approval, but have yet to receive a response.<sup>41</sup>

In a third case, co-founders of **association G**, a group that provides social and economic services to refugees and asylum seekers, who were all refugees registered with the United Nations High Commissioner for Refugees (UNHCR), faced legal and extra-legal challenges for registering a community-based refugee association in 2024. One of the co-founders told Amnesty International that an ACWU employee told him that he could not register because of the requirement that Egyptian nationals comprise at least 75% of the board and total membership of the group. The employee also said that all co-founders who are refugees must have a one-year residence permit, a condition that has no basis in the 2019 associations law or its executive regulations, and was anyway impossible as at that time Egypt was only issuing six-month permits for refugees.<sup>42</sup>

For five of the associations studied, the ACWU had compelled them to change their names or activities to register between 2021 and 2023, including the three cases described below.

In 2021, ACWU staff told co-founders of **association H**, a group that works on human rights in the digital space, that the group would have to change its name before they would accept the file. One of the co-founders told Amnesty International that the ACWU rejected 26 alternative names without

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<sup>37</sup> Law No 149 of 2019 on Regulating the Exercise of Civil Work, Article 8; Prime Minister’s Decree No. 104 of 2021 Issuing the Executive Regulations of the Law Regulating the Exercise of Civil Work No. 149 of 2019, Article 99.

<sup>38</sup> Law No 149 of 2019 on Regulating the Exercise of Civil Work, Article 7.

<sup>39</sup> Letter on file with Amnesty International.

<sup>40</sup> Law No 149 of 2019 on Regulating the Exercise of Civil Work, Article 60.

<sup>41</sup> Interview by voice call with a co-founder of association C on 28 March 2025.

<sup>42</sup> The Egyptian government extended the validity of asylum-based residence permits from six months to one year in 2025.

providing the reason.<sup>43</sup> Eventually, the ACWU's employees chose a name. It then took the co-founders 15 months to obtain registration, severely delaying the co-founders' ability to exercise their right to freedom of association and to provide the planned services to the community. In 2022, co-founders of **association B**, a group that works on social and economic rights from a feminist perspective, attempted to submit their notification file over a four-month period before the ACWU accepted it, despite presenting all required documents from the start. Initially, ACWU employees asked them to remove all the activities proposed and provided them with a "guidance list" from which to choose activities. Such a requirement has no basis in the law or its executive regulations. The two-page list cited 18 "areas of work", under which between one and 10 "activities" were listed.<sup>44</sup> The co-founders eventually had no option but to choose from these activities.<sup>45</sup> One of them told Amnesty International:

**"To get things done, you have to manoeuvre and comply with ACWU's requirements."**<sup>46</sup>

In 2024, co-founders of **association E**, a group that plans to work on human rights and democracy, and the only one researched that opted to register as an association, faced similar challenges. They submitted their notification file to the central ACWU's office in the Ministry of Social Solidarity, as they decided to register as a central association.<sup>47</sup> One of the co-founders told Amnesty International that ACWU employees rejected the name, even though the name was compatible with the unduly restrictive conditions on naming associations. Eventually, they changed the name, but ACWU employees then requested further changes to some of the activities listed. The co-founder told Amnesty International:

**"I spent weeks of back and forth with the ACWU to reach a list of acceptable activities. They kept rejecting the activities we proposed. The rejections were only verbal."**<sup>48</sup>

The co-founder added that they eventually obtained approval after around six months.

## 5.2 INTERFERENCE WITH ASSOCIATIONS' LEADERSHIP AND ACTIVITIES

The ACWU in greater Cairo has unlawfully interfered with the internal structures and activities of registered associations, violating the right to freedom of association. Without legal basis or justification, ACWU employees have ordered associations to dismiss staff or board members of registered associations or associations still undergoing the registration process, thereby violating the human rights of those individuals, including their rights to freedom of expression and association.

ACWU employees have also imposed excessive and intrusive reporting requirements that go beyond the already restrictive ones stipulated in the 2019 associations law, including demanding regular access to the minutes of associations' meetings, detailed descriptions of planned activities and, sometimes, the names of participants in these activities. These practices effectively place associations under surveillance and infringe on the right to privacy of the association and its members.<sup>49</sup>

Amnesty International documented ACWU's dismissal of four board members of three associations between 2020 and 2024. At the time of dismissal, two associations were officially registered, while one was waiting for the ACWU's approval.

In January 2024, the ACWU sent an official letter to **association D**, a women's rights group, registered in August 2022, informing it that three of its board members were dismissed. The letter said, "all

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<sup>43</sup> Interview by voice call with a co-founder of association H on 12 March 2025.

<sup>44</sup> Guidance list on file with Amnesty International.

<sup>45</sup> Interview by voice call with a co-founder of association B (name withheld) on 26 March 2025.

<sup>46</sup> Interview by voice call with a co-founder of association B on 26 March 2025.

<sup>47</sup> Article 1 of the law defines the central association as: "an association that is registered in accordance with the provisions of this law shall be issued a decision by the competent minister or their delegate, which includes in its bylaws the operation at the national level and the establishment of one or more branches in one or more governorates. The executive regulations of this law shall define the criteria for attaining central status."

<sup>48</sup> Interview by voice call with a co-founder of NGO E (name withheld) on 19 March 2025.

<sup>49</sup> African Commission on Human and Peoples' Rights (ACHPR), Guidelines on Freedom of Association and Assembly in Africa, 2017, para. 35; UN Special Rapporteur on the rights to freedom of peaceful assembly and of association, Report, UN Doc. A/HRC/20/27, 21 May 2012, para. 65.

members of the board of trustees were approved except for... [three names redacted]”. The letter asked the association to “inform it [of] members that would be appointed in replacement of the aforementioned names... as the current board of trustees is illegal.”<sup>50</sup> The ACWU did not provide the legal grounds or the reasons for dismissals.

The three dismissals without legal justification or due process constituted a breach of the authorities’ human rights obligations. International and regional human rights standards state that associations are free to determine their management structures without undue state interference.<sup>51</sup>

That same month, one of association D’s co-founders, who was among those dismissed, told Amnesty International that she visited an ACWU office to inquire further about the dismissal:

**“I went to the local ACWU office where employees instructed me to lodge an appeal at the security department in the Ministry of Social Solidarity. I went with the dismissed board members to the ministry to submit the appeal, where security personnel denied us entry and refused to receive the documents, claiming, without even reviewing them, that they were incomplete. After we insisted, the security personnel checked the documents and told us that they lacked a ‘certificate’ from the public prosecution indicating that I had no due convictions.”<sup>52</sup>**

The same co-founder told Amnesty International that she cannot obtain this “certificate” as it can only be issued through a judicial order. She added that she submitted in March 2024 an appeal to the ACWU by letter, the only accessible avenue. A week later, the local ACWU office wrote back, saying that “the ACWU is not mandated to accept or reject the appeal.”<sup>53</sup>

A co-founder of **association J**, a women’s rights group, told Amnesty International that in 2021, six months after submitting its notification file, the local ACWU office informed her by letter that she must dismiss a board member, without providing reasons. She said that the association had to comply to receive approval for registration.<sup>54</sup>

The ACWU in greater Cairo also routinely demands unnecessary and invasive reporting from associations concerning their operations and activities prior to and following their implementation, in a manner that constitutes a systematic and intrusive monitoring of associations. This creates a chilling effect, where staff members in associations refrain from fully exercising their human rights and feel compelled to avoid certain activities for fear of repercussions.

Co-founders of **associations F and B** told Amnesty International that upon receiving registration approvals in March and November 2022, respectively, the ACWU required them to submit copies of all board meeting minutes and any relevant attachments, which has no basis in the law or its executive regulations and constitutes an excessively burdensome, unnecessary and disproportionate requirement under international and regional human rights standards.<sup>55</sup> The co-founders said ACWU employees stamped all these minutes on receiving them to prove receipt. One added:

**“We ended up preparing a meeting minutes for everything related to the association. Payments, receipts, resignations, new appointments, changes in the board, everything... The ACWU wants to know everything about associations because they perceive you as a suspect until otherwise is proven.”<sup>56</sup>**

The same co-founders along with co-founders of **association E** (registered in early 2025), as well as **association K**, a group that works on media freedoms (registered in 2021), said they had been

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<sup>50</sup> Letter on file with Amnesty International.

<sup>51</sup> African Commission on Human and Peoples’ Rights (ACHPR), Guidelines on Freedom of Association and Assembly in Africa, 2017, para. 36; UN Special Rapporteur on the rights to freedom of peaceful assembly and of association, Report, UN Doc. A/HRC/20/27, 21 May 2012, para. 65.

<sup>52</sup> Interview by voice call with a co-founder of association D on 17 March 2025.

<sup>53</sup> Letter on file with Amnesty International.

<sup>54</sup> Interview by voice call with a co-founder of association J on 3 July 2025.

<sup>55</sup> African Commission on Human and Peoples’ Rights (ACHPR), Guidelines on Freedom of Association and Assembly in Africa, 2017, para. 33; UN Special Rapporteur on the rights to freedom of peaceful assembly and of association, Report, UN Doc. A/HRC/20/27, 21 May 2012, para. 65; UN Special Rapporteur on the rights to freedom of peaceful assembly and of association, Report, UN Doc. A/HRC/26/29, 14 April 2014, para. 58.

<sup>56</sup> Interview by voice call with a co-founder of association B on 26 March 2025.

subjected to similar practices. All were verbally instructed by ACWU employees to submit reports of any activity before it happened, including the nature of the activity, its date, location, participants' names and copies of their IDs. **Association D** was additionally instructed to provide the birth certificates of minor participants. A co-founder of association E said:

**“Reporting activities before implementation is the practice since early 2000s, you have to report any activity prior to implementation.”<sup>57</sup>**

A co-founder of association D told Amnesty International that these reporting obligations imply that activities are subject to approval or rejection. This was explicitly mentioned in the “enrolment decision” of association D issued by the ACWU, dated August 2022, which states, “No activity should be implemented without the approval of the competent entities.”<sup>58</sup> An identical provision was mentioned in the enrolment decision for the **Association for Freedom of Thought and Expression (AFTE)**, a human rights group, which was provided to the association by the ACWU when its registration was approved.<sup>59</sup>

In March 2025, a governorate-level ACWU in greater Cairo issued a directive to all its offices in the governorate stating that organizing any “activity or meeting” without “prior notification” to the ACWU would subject associations to article 45(5) of the 2019 associations law, which permits the “suspension [of] the association activity and dissolution of its board.”<sup>60</sup> The directive required the notification to include “the type of the activities or meetings and their agenda.” The directive affects 1,392 associations and NGOs registered in the governorate, according to the Ministry of Social Solidarity.<sup>61</sup>

Article 45 grants the Minister of Social Solidarity the authority to temporarily suspend associations and close their offices for up to a year under specific circumstances. Point 5 of the article, cited by the directive, states that violating any of the following articles of the law may warrant such action by the minister:

- **Article 10**, which regulates the online publication of association information and the opening of bank accounts;
- **Article 13**, which governs the organization of time-limited campaigns by individuals or legal entities;
- **Article 14**, which pertains to associations operating in border areas;
- **Article 15**, which lists prohibited activities for associations, including point (H): “carrying out any activity that requires prior authorization from a government entity without first obtaining that authorization”;
- **Articles 20 and 21**, which address the establishment of association branches within Egypt or abroad;
- **Article 22**, which regulates the hosting of elderly people, children or patients in shelters;
- **Article 23**, which includes additional provisions related to association bank accounts; and
- **Article 28**, which deals with association transparency requirements.

As shown above, the only provision that concerned reporting activities prior to implementation is found in article 15(H). Violating this provision would constitute one of the circumstances listed in article

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<sup>57</sup> Interview by voice call with a co-founder of association E on 19 March 2025.

<sup>58</sup> Decision on file with Amnesty International.

<sup>59</sup> Decision on file with Amnesty International.

<sup>60</sup> Directive on file with Amnesty International.

<sup>61</sup> Ministry of Social Solidarity, “Civil Organizations”, <https://www.moss.gov.eg/Sites/MOSA/ar-eg/Pages/NGOs.aspx> (accessed on 20 July 2025).

45(5), which was cited by the ACWU's directive, and would allow the minister of social solidarity to temporarily suspend associations and close their offices for up to a year.

Upon reviewing the 2019 associations law, Amnesty International found that only two types of activities explicitly require prior authorization:

1. **Article 14**, which says associations intending to operate in border areas must obtain prior authorization from the ACWU.
2. **Article 19**, which says that associations planning to engage in activities in partnership with foreign organizations must first obtain authorization from the ACWU.

Neither apply to the directive issued by the governorate-level ACWU.

Thus, nearly 1,400 associations are currently required to report all their activities prior to implementation without legal basis, or else risk suspension for up to a year. The directive exemplifies how the ACWU is imposing unlawful restrictions on associations' freedom to operate.

Another example of ACWU interference in the internal rules of associations was its objection to an amendment introduced by the board of **association F** to its internal regulations. In late 2024, as unlawfully required by the ACWU, association F sent minutes of a board meeting that documented the board's agreement to make a single amendment to the internal financial regulations of the group. In January 2025, the ACWU requested that the amendment be reversed. The amendment concerned a price quotation, a matter entirely internal and not governed by the 2019 associations law nor its executive regulations.<sup>62</sup>

Under international human rights standards, oversight over associations should be limited to essential and minimal internal governance and structures in accordance with the law to ensure that oversight does not infringe on the right to freedom of association.<sup>63</sup>

The effective exercise of the right to freedom of association also requires states to refrain from imposing reporting requirements that are overly burdensome or that interfere with the internal management or activities of associations.<sup>64</sup> The Special Rapporteur on the rights to freedom of peaceful assembly and of association has reiterated that "[r]equiring civil society organizations to publicly disclose financial information constitutes a severe restriction to freedom of association"<sup>65</sup> and that states must ensure that obligations to publicly disclose the sources of funding are "narrowly tailored to specific, enumerated purposes and sufficient procedural safeguards should be in place to protect the privacy and safety of civil society organizations, donors, and beneficiaries."<sup>66</sup> Moreover, international human rights mechanisms have warned against controls and reporting requirements being used as a pretext to silence critics or hamper the work of human rights defenders.<sup>67</sup>

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<sup>62</sup> Interview by voice call with a co-founder of association F (name withheld) on 13 March 2025.

<sup>63</sup> Guidelines on Freedom of Association and Assembly in Africa, Provision 33(a); UN Special Rapporteur on the Rights to Freedom of Peaceful Assembly and of Association, *Report of the Special Rapporteur on the rights to freedom of peaceful assembly and of association, Maina Kiai* (previously cited), UN Doc. A/HRC/23/39, para. 38.

<sup>64</sup> African Commission on Human and Peoples' Rights (ACHPR), Guidelines on Freedom of Association and Assembly in Africa, 2017, paras 47, 48 and 49.

<sup>65</sup> UN Special Rapporteur on the rights to freedom of peaceful assembly and of association, Report: Access to resources, UN Doc. A/HRC/50/23, 10 May 2022, para. 23; UN Special Rapporteur on the rights to freedom of peaceful assembly and of association, Report: General principles and guidelines on ensuring the right of civil society organizations to have access to resources, UN Doc. A/HRC/53/38/Add.4, 23 June 2023, para. 53.

<sup>66</sup> UN Special Rapporteur on the rights to freedom of peaceful assembly and of association, Report: General principles and guidelines on ensuring the right of civil society organizations to have access to resources, UN Doc. A/HRC/53/38/Add.4, 23 June 2023, para. 53.

<sup>67</sup> African Commission on Human and Peoples' Rights (ACHPR), Guidelines on Freedom of Association and Assembly in Africa, 2017, paras 48.e, 49; Human Rights Council, Resolution 22/6 Protecting human rights defenders, UN Doc. A/HRC/RES/22/6\*, 12 April 2013, paras 9(a) and (b).

## 6. UNLAWFUL INTERFERENCE BY SECURITY AGENCY

The NSA scrutinizes and interferes in the registration of associations and their activities in greater Cairo, even though it is not authorized to do so under the 2019 associations law. NSA agents have harassed and intimidated staff and board members of the associations studied, including by using intimidating phone calls and unlawful summons without legal grounds or judicial orders. This interference helps explain the long delays in obtaining approval to become registered, as the ACWU has to send notification files submitted by the associations to the NSA first for a security check.

The NSA also interferes with the activities of greater Cairo-based associations both inside and outside the region. NSA agents have intimidated staff members of associations engaged in certain activities or receiving foreign funding that the NSA objected to or about which it wanted to gather information. NSA agents instructed some of the concerned associations' staff members to regularly report their activities to the NSA. These patterns of interference have a chilling effect on associations that prevents them from freely pursuing their legitimate work and undermines other rights.

Interference by the NSA has taken a significant toll on the mental well-being of staff members due to the notorious reputation of the NSA. The agency has long been used by the government to suppress dissent and civil society, and has subjected those who defend human rights or are seen as critical of the authorities to arbitrary arrest, enforced disappearance, and torture or other ill-treatment.<sup>68</sup>

Amnesty International has long documented how the NSA works in tandem with the Supreme State Security Prosecution (SSSP), a special branch of the public prosecution responsible for prosecuting crimes that relate to "state security" and "terrorism", to prosecute human rights defenders, journalists, opposition political figures and social media users for "terrorism"-related charges solely for peacefully exercising their human rights.<sup>69</sup> Indeed, three co-founders interviewed by Amnesty International were criminally prosecuted by the SSSP between 2019 and 2025 for the peaceful exercise of their human rights, based solely on NSA investigations.

Amnesty International documented five cases between 2020 and 2025 of associations whose staff or board members were contacted or summoned by NSA agents in connection to their associations' registration or activities.

In one egregious case, the NSA instructed the ACWU to order the dismissal of two staff members of a registered association. In November 2023, it complied, sending a letter to **association F**, registered in March 2022, notifying it that two of its members were dismissed. The letter cited "security instructions" as the reason, without specifying which security agency had issued them.<sup>70</sup> The letter did not clarify the reasons for these security instructions, which have no legal basis in the 2019 associations law or its executive regulations.

A few days after receiving the letter, a co-founder of the association went to the ACWU office to inquire about it. She told Amnesty International:

**"I went to the governorate-level ACWU office to understand the reasons for the dismissal. The director of the office told me that the dismissal was ordered by the NSA without providing any further information. He said whatever security says must be done."**<sup>71</sup>

She added that the ACWU director told her that the ACWU would not deal with the association until the two members had been dismissed, but never provided this in writing.

The co-founder decided not to dismiss the staff members and in December 2023, she filed an appeal before the court of administrative justice contesting the ACWU's refusal to engage with association F

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<sup>68</sup> Amnesty International, *Egypt: Permanent State of Exception: Abuses by the Supreme State Security Prosecution* (Index: MDE 12/1399/2019), 27 November 2019, <https://www.amnesty.org/en/documents/mde12/1399/2019/en/>

<sup>69</sup> Amnesty International, *Egypt: Permanent State of Exception: Abuses by the Supreme State Security Prosecution* (previously cited).

<sup>70</sup> Letter on file with Amnesty International.

<sup>71</sup> Interview by voice call with a co-founder of association F (name withheld) on 13 March 2025.

on the grounds that she had declined to dismiss the two staff members. Later that month, the court rejected the appeal. In its ruling, the court accepted the ACWU's argument that it had not issued any formal decision to cease dealing with association F. The ruling added that since the plaintiff failed to present evidence to the contrary, her claim was deemed to be "an unsubstantiated statement with no supporting evidence."<sup>72</sup>

The co-founder told Amnesty International that in the end she was forced to dismiss the two members so that the ACWU would deal with the association.

Between 2021 and 2022, NSA agents contacted several co-founders and board members of **association H**, suggesting that the ACWU had shared the group's notification file, which has the contact details of those members, with the NSA. While the association was waiting for registration, NSA agents called all board members and put pressure on them to quit the board. One of the co-founders told Amnesty International:

**"The NSA agents contacted all five members of the board of trustees and asked them if they were actually part of the association's board of trustees. Agents questioned the members about their reasons for joining the association and if they were sure that they wanted to be part of this association as its co-founders are troublemakers and do not do real work or have any role."**<sup>73</sup>

The co-founder added that NSA agents called him with similar questions and innuendos, and concluded that, "it was indirect intimidation with blaming other unknown entities."

Even after registration, NSA agents continued to harass staff members of association H after it published two reports. The same co-founder told Amnesty International:

**"A few days later, an NSA agent called one of our staff members and asked him aggressively if we were thinking that NSA is not watching us. The agent instructed him to send him any reports over WhatsApp prior to publication. In March 2024, the same agent called the same staff member again asking him about another publication and reiterated that we must share all publications with NSA prior to publication."**

The NSA called the same co-founder following his participation in two public events, organized by other entities:

**"I gave a training in Cairo in 2021 as a staff member of our association. An NSA agent contacted me over the phone after the training and asked why I appeared under the name of the association and that this is prohibited. In 2023, another agent called me after I participated as a speaker in a webinar in Cairo. He ordered me not to speak or appear in public under the name of the association. Since then, we decided at the association not to speak to media or participate in certain public events that may be perceived as sensitive or critical by NSA."**

The co-founder explained the impact of such calls:

**"These calls pose significant psychological pressure... There is no chance to expand our activities due to the security harassment."**

In relation to a separate incident in 2020, a staff member at **association L** told Amnesty International:

**"The agent called my colleague and told him that we must send to NSA the names and national IDs of all participants at an event we were organizing. My colleague told the agent that we cannot do so. Hours ahead of the event, the hotel we booked for the event informed us that the NSA ordered them to cancel the booking. In the end, we had to organize the event in our office. A few days after the event, the landlord of our office told us that an NSA agent called him asking him to terminate the lease and evict the association out of the office, but the landlord refused."**<sup>74</sup>

The same staff member added that NSA agents regularly contact at least two staff members of the association demanding information about the association's activities and travel abroad. She said:

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<sup>72</sup> Court ruling on file with Amnesty International.

<sup>73</sup> Interview by voice call with a co-founder of association H (name withheld) on 12 March 2025.

<sup>74</sup> Interview by voice call with a staff member at association L (name withheld) on 11 March 2025.

**“To avoid harassment, we had to agree that we would share with the same NSA agent who is always contacting us a brief summary of any activity we plan to implement at least a week in advance.”**

In 2022, the NSA ordered a hotel to cancel another booking for association L. This time, the event was taking place outside greater Cairo. Another staff member at the association said:

**“The hotel accepted initially the booking, but later told us that NSA instructed the management to cancel it without providing any reasons.”<sup>75</sup>**

NSA interference with the work of association L expanded to the association’s funding. The same staff member told Amnesty International:

**“In 2021, an NSA agent called me and questioned me about a certain foreign-funded project. He asked me about the purpose of this project, the donor and the country where the donor is based.”**

The staff member explained how these communications aim to restrict the association’s activities and how it is difficult to deal with them:

**“If you are a prominent member of an association, NSA will likely contact you. If they sensed that you are worried or not confident enough, they will increase the pressure to extract more information from you and impose more restrictions on your association. But not everyone would be able to set boundaries with NSA agents. Only associations with certain level of popularity or international presence could do so.”**

Between 2022 and 2024, NSA agents twice summoned a co-founder of association J, without specifying the reasons. The summons appeared to aim to establish a line of communication with the co-founder to gather information, as she explained to Amnesty International:

**“During the two summons at the NSA facility, an agent questioned me about my personal life and my family. I was surprised that the whole questioning was about me personally and not the association’s work. Following the interrogation, agents continued to call me afterwards, requesting information about the association’s trainings and activities. During a call, an agent instructed me to amend a post on the association’s Facebook page. He said that the agency did not like that post. I think they wanted to tell us that they are watching everything.”<sup>76</sup>**

In another case, NSA agents interfered with the selection of the board members of association F. In early 2025, a staff member received a phone call from an individual who identified himself as an NSA agent. The man asked the staff member to report the following day to an NSA facility in greater Cairo, because he was a candidate for the association’s board. A co-founder of the association told Amnesty International:

**“When my colleague went to the NSA facility, an agent questioned him for around four hours about the association, its activities, membership and funding. Before going to the interrogation, my colleague felt unsafe and quit the association. He even took his resignation letter with him to the NSA to prove that he is no longer part of the association. Later, two other staff members also quit the association after they learned about the interrogation.”<sup>77</sup>**

The NSA harassment and interference stifle the associations’ ability to operate and exercise its human rights, and also intimidates other actors who would potentially interact with the targeted associations. For instance, the co-founders of five of the associations studied told Amnesty International that hotels never accept their event booking requests before getting NSA approval.

One staff member of an international donor that provides funding to associations in Egypt said that grantee associations told them that the NSA needs to approve any events organized by these associations in hotels or public spaces. The staff member said that in some instances, even after securing approvals, NSA have sent undercover agents to attend the events, in particular workshops and trainings. She added that in certain instances, their beneficiaries had to obtain NSA approval for some audiovisual materials before their publication.

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<sup>75</sup> Interview by voice call with a staff member at association L (name withheld) on 18 July 2025.

<sup>76</sup> Interview by voice call with a co-founder at association J (name withheld) on 3 July 2025.

<sup>77</sup> Interview by voice call with a staff member at association F (name withheld) on 13 March 2025.

The NSA's interference also affects collaboration between associations and public institutions as members of these institutions are afraid to deal with associations without a greenlight from the NSA. A staff member at **association K** described their experience:

**“In 2023, we signed a protocol with a public institution [name redacted] to provide training sessions for its members. In the end, the sessions did not take place as a member in the legal affairs office in the public institution asked us to get approval from the NSA before carrying out the training. We experienced similar situations with public universities. We would sign a training protocol and later these protocols get annulled without any explanation, but it is implicitly known that the NSA did not approve these trainings.”<sup>78</sup>**

Under international law, state authorities should respect the rights of associations and their founders and members to carry legitimate work without threats, harassment, intimidation and any form of violence or reprisals. States also have a duty to protect associations and their members from any infringement of their human rights, including freedom of association, carried out by third parties, both state authorities and non-state actors.<sup>79</sup>

## 7. RESTRICTIONS ON FUNDING

Under the 2019 associations law, associations are required to obtain approval from the authorities before receiving foreign funding, a requirement that is incompatible with international law. Indeed, the law gives the ACWU sweeping powers to effectively deny foreign funding for associations. Article 27 allows the ACWU to submit an “objection” to funding received or agreed upon by donors within 60 days of the date of notification submitted by associations, thereby subjecting foreign funding to an approval requirement. If the ACWU does not respond in 60 days, then the funding is considered approved. Neither the law nor the executive regulations specify any grounds that may constitute the basis of objections to foreign funding other than violating the provisions of counterterrorism and money laundering laws.

Associations that fail to comply with this rule risk dissolution or suspension. According to the 2019 associations law, the court of administrative justice shall order at the request of the ACWU or “whoever is concerned”, the dissolution of an association that has acquired foreign funding without obtaining the necessary permission. The law also authorizes the Minister of Social Solidarity to suspend associations for up to a year if it violated article 27.

Under international law, the right to freedom of association protects the right to seek, secure and use resources, including financial resources, from domestic, foreign and international sources, without prior authorization.<sup>80</sup> States often justify constraints on access to resources (particularly to funding from external sources) as necessary to protect state sovereignty, combat money laundering and the financing of terrorism, or ensure that associations are transparent and accountable in relation to their operations and resources.<sup>81</sup> However, for those objectives to constitute permissible restrictions, states must identify and justify which of the legitimate aims accepted under international human rights law

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<sup>78</sup> Interview by voice call with a staff member at association K (name withheld) on 11 March 2025.

<sup>79</sup> African Commission on Human and Peoples' Rights (ACHPR), Guidelines on Freedom of Association and Assembly in Africa, 2017, paras 29 and 30; UN Special Rapporteur on the rights to freedom of peaceful assembly and of association, Report, UN Doc. A/HRC/20/27, 21 May 2012, paras 63 and 84 (c). The Human Rights Committee has expressed concern about threats, attacks, harassment and intimidation against journalists, human rights defenders and activists exercising their right to freedom of association in numerous Concluding Observations: Egypt (2023), para. 49; Peru (2023), para. 14; Honduras (2017), para. 40-42; Uzbekistan (2010), para. 22; Djibouti (2013), para. 12; Angola (2013), para. 22; Tunisia (2008), para. 20; Algeria (2007), para. 25; Sudan (2007), para. 29; Syria (2005), para. 12; Thailand (2005), para. 19; Guatemala (1996), para. 30.

<sup>80</sup> Human Rights Council, Resolution 22/6 Protecting human rights defenders, UN Doc. A/HRC/RES/22/6\*, 12 April 2013, para. 9(b); Declaration on the Right and Responsibility of Individuals, Groups and Organs of Society to Promote and Protect Universally Recognized Human Rights and Fundamental Freedoms, Adopted by General Assembly Resolution A/RES/53/144, 9 December 1998, Article 13; African Commission on Human and Peoples' Rights (ACHPR), Guidelines on Freedom of Association and Assembly in Africa, 2017, para. 38; UN Special Rapporteur on the rights to freedom of peaceful assembly and of association, Report, 24 April 2013, UN Doc. A/HRC/23/39, paras 8 and 20.

<sup>81</sup> UN Special Rapporteur on the rights to freedom of peaceful assembly and of association, Report, 24 April 2013, UN Doc. A/HRC/23/39, paras 22 and 27.

would apply. International human rights standards stress that restrictions must not be applied in an arbitrary manner and that the scope of the legitimate aims shall be narrowly interpreted.<sup>82</sup>

## 7.1 PRIOR AUTHORIZATION REQUIREMENT

Of the nine associations examined in this briefing that registered, only two tried to obtain funding approval. Four opted not to, each for different reasons.

A co-founder of **association D** said they could not pursue any foreign funding due to the restrictive process outlined in the law, as the association had become effectively non-operational after the ACWU dismissed three members of its board.<sup>83</sup> Co-founders of **associations H and J** said that they chose not to submit funding requests, one saying they feared a repeat of the security harassment they experienced during the registration process,<sup>84</sup> and the other saying their work would be severely impeded if they had to wait for prolonged, uncertain approval periods.<sup>85</sup>

**Association K** has not attempted to obtain foreign funding approval after their ability to work was severely impacted by the NSA's interference.<sup>86</sup> One of its co-founders said:

**"We are unable to secure funding because there is no space to work in the first place."<sup>87</sup>**

Between 2021 and 2025, Amnesty International documented the cases of two associations whose funding requests were either rejected by the ACWU without explanation or only approved after significant delays, hindering their work. **Association L** had submitted multiple approval requests since 2021, but the ACWU never approved them within the 60-day time frame. The process often took between six months and a year, and in some cases the ACWU never responded.

Despite the law stating that a lack of an "objection" by the ACWU within 60 days constitutes an approval, association L was still unable to access the funding because banks require a written approval from the ACWU to release the funds.

A staff member at association L explained the impact of the delays:

**"In 2024, we submitted approvals for two foreign-funded grants but received no response from the ACWU. The two international donors that provided the fundings terminated the contracts with the association after waiting for the ACWU's approval for a year."<sup>88</sup>**

On another occasion, the ACWU approved association L's request for a foreign-funded grant almost a year after it submitted the request, which also had a negative impact. The same staff member said:

**"In March 2023, we submitted a funding approval request from another international donor for a project that [was] scheduled to run between August 2023 and February 2024. The ACWU granted its approval in February 2024, two weeks before the project's end date. The donor informed us that they would not provide further fundings due to the approval delays that had derailed the project implementation timeline."**

In instances when the ACWU explicitly rejected association L's funding requests, the authority did not provide any reasons. The same staff member of the association said:

**"We submitted four other funding requests between 2024 and 2025. The ACWU office explicitly rejected these requests, issuing written rejection letters eight to 10 months following the submissions. All the rejection letters had**

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<sup>82</sup> Siracusa Principles on the Limitation and Derogation Provisions in the International Covenant on Civil and Political Rights, UN Doc. E/CN.4/1985/4, 1985, principles 1-14.

<sup>83</sup> Interview by voice call with a staff member at association D (name withheld) on 17 March 2025.

<sup>84</sup> See security harassment of association H in Chapter 6.

<sup>85</sup> Interview by voice call with a co-founder of association J (name withheld) on 3 July 2025.

<sup>86</sup> See security harassment of association K in Chapter 6.

<sup>87</sup> Interview by voice call with a co-founder of association K (name withheld) on 11 March 2025.

<sup>88</sup> Interview by voice call with a staff member at association L (name withheld) on 13 March 2025.

**the same format, reading [we [the ACWU] are informing you that the grant was not approved], without providing any reasons.”<sup>89</sup>**

Another staff member at association L told Amnesty International that they appealed against the four rejections to the ACWU, requesting clarification on the reasons, but never received a response.

To seek foreign funding approval, the ACWU requires associations to submit a project summary, a contract between the association and the donor, and a project budget, according to four staff members at three associations. It also asks associations to fill in an application form for each funding approval request.

Amnesty International reviewed the application form that association L received from an ACWU office, which was nearly identical to a form received by another association from a different ACWU office. The form received by association L was titled “Request for civil society organizations and institutions to obtain grants”.<sup>90</sup> It contained 24 sections many of which asked for excessively detailed information on the activities and funding. Sections in the form included “implementation mechanisms,” “target audience,” “mechanisms for reaching the target audience,” and “[t]he association's previous experience in this field.” The other form reviewed was the same except for the title, which was “Application form for receiving funds from natural or legal persons, whether Egyptian or foreign, from outside the country, or from foreign natural or legal persons within the country.”<sup>91</sup>

The two international donors who spoke with Amnesty International said that the funding approval process under the 2019 associations law took between four and six months and between two months and a year, respectively. One of them said that delays were primarily caused by the NSA review:

**“Associations that work on non-human rights issues or perceived as less critical of the government also need a security clearance by NSA or other security agencies for the funding we provide. They also face the same lengthy and complex approval process due to the backlog at the NSA.”<sup>92</sup>**

Association F was the second association that sought to obtain approval for funding. In 2024, the ACWU asked it to submit an approval request for funding the association was receiving from a domestic entity, even though the law does not require this. It did so in February 2024 and the ACWU office approved it in June the same year, four months after the scheduled start date of the project. A staff member explained the impact:

**“All members and even members of the board had to work extra hours every day under extreme pressure in order to get the deliverables of the project done before the end of the project after we lost four months of the implementation period waiting for an approval.”<sup>93</sup>**

The negative impact of the restrictions was compounded by security interference in the association’s operations and the dismissal of staff members. The same staff member added:

**“Due to these restrictions and the difficult environment to operate since the beginning of registration, we considered shutting down the association more than once.”**

The UN Human Rights Committee and the UN Special Rapporteur on the rights to freedom of peaceful assembly and of association have stressed the importance of safeguarding the capacity of NGOs to engage in fundraising activities, and have clarified that funding restrictions that impede the

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<sup>89</sup> Interview by voice call with a staff member at association L (name withheld) on 12 March 2025.

<sup>90</sup> Application form on file with Amnesty International.

<sup>91</sup> Application form on file with Amnesty International.

<sup>92</sup> Interview over Teams with a staff member at an international donor (name withheld) on 26 May 2025.

<sup>93</sup> Interview by voice call with a staff member at association F (name withheld) on 13 March 2025.

ability of associations to pursue their statutory activities constitute an interference with Article 22 of the ICCPR.<sup>94</sup>

## 7.2 BARRIERS TO OPENING A BANK ACCOUNT

Under the 2019 associations law, associations can only open a bank account through a written request from the ACWU to the bank, even if they are registered and possess legal personality.<sup>95</sup> Without a bank account, associations cannot pay salaries, rent and other expenses.

Under the executive regulations of the 2019 associations law, associations can receive donations through a special bank account other than the association's main account,<sup>96</sup> and must obtain authorization from the relevant ACWU office prior to using these donations.<sup>97</sup>

According to staff members of associations interviewed by Amnesty International, the ACWU must issue a formal letter to the bank, either during the registration process or after its completion. Even after registration is completed, the account remains blocked until the ACWU issues a second letter requesting the bank to activate the account. In four cases documented by Amnesty International, the process of opening or activating the bank accounts took between three and 15 months, seriously delaying the associations' operations.

Co-founders of **association H** approached four banks, three of which immediately said that they do not open accounts for associations. One of the co-founders described what happened:

**“One of the three banks... told me that opening an account for an association needs an approval from the headquarters, which will also require a security clearance different from the clearance of the association's registration. With the fourth bank that finally opened the account, I submitted all the documents required by the bank and kept checking every week if they opened the account. For five months, the bank's employees would tell me that the request is being processed or its awaiting approval from the main branch. After five months, I went to check as usual, and the employees told me the account was opened.”**<sup>98</sup>

Co-founders of associations interviewed by Amnesty International had different explanations. A co-founder of **association J** said that the delays might be related to the longstanding crackdown on civil society:

**“Banks' management have general worries about dealing with associations. There could be a lot of troubles as there is a history of freezing bank accounts of associations and no one wants to get in trouble.”**<sup>99</sup>

A co-founder of **association C** agreed:

**“Banks do not want troubles. They do not want to deal with associations because this entails complicated procedures such as referring the matter to the legal affairs and compliance departments in the bank.”**<sup>100</sup>

AFTE had to wait 11 months before it was able to open an active bank account. Throughout this period, the association had no access to any financial resources. According to AFTE's executive manager Mohamed Abdel Salam, their experience reflects a lack of knowledge of the law by banks:

**“In April 2023, during the registration process, we opened an account at a private bank using a letter from the ACWU addressed to the bank. After the registration was approved, in June 2024, we wanted to activate the account by submitting the required documents as per the bank's internal regulations... However, the bank refused to activate the**

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<sup>94</sup> Human Rights Committee, *Viktor Korneenko et al v. Belarus*, Communication no. 1274/2004, U.N. Doc. CCPR/C/88/D/1274/2004, 10 November 2006, para. 7.2; UN Special Rapporteur on the rights to freedom of peaceful assembly and of association, Report, 24 April 2013, UN Doc. A/HRC/23/39, para. 16.

<sup>95</sup> Law No 149 of 2019 on Regulating the Exercise of Civil Work, Article 10.

<sup>96</sup> Implementing Regulations of Law No 149 of 2019 on Regulating the Exercise of Civil Work, Article 54.

<sup>97</sup> Law No 149 of 2019 on Regulating the Exercise of Civil Work, Articles 25 and 26.

<sup>98</sup> Interview by voice call with a co-founder of association H (name withheld) on 12 March 2025.

<sup>99</sup> Interview by voice call with a co-founder of association J (name withheld) on 3 July 2025.

<sup>100</sup> Interview by voice call with a co-founder of association C (name withheld) on 13 March 2025.

**account, instead [it] asked for authorization to collect donations, even though we were not trying to open a bank account for collecting donations.”<sup>101</sup>**

The bank never activated AFTE’s account, so the group had to restart the process with a different bank, which also asked for the same permission. Mohamed Abdel Salam added:

**“In December 2024, we submitted the required documentation to open a new account in another bank. In February 2025, the bank provided us with a list of inquiries to which the association responded in a memo. But again, in March, the bank asked us to provide an authorization from the ACWU to collect donations.”**

In April 2025, AFTE presented a written endorsement from the ACWU, confirming that authorization is not required for the association’s main account. In May, the bank finally opened the account for the group.

The Special Rapporteur on the rights to freedom of peaceful assembly and of association has stated that “[t]he obligation to protect requires that positive measures be taken to prevent actions by non-state actors, including businesses, that could unduly interfere with the rights to freedom of peaceful assembly and of association.”<sup>102</sup> Blocking or complicating access to financial resources – such as by imposing burdensome or discriminatory bank requirements – can constitute an undue restriction on the right to freedom of association, from which the state should protect associations in compliance with its obligation to protect the right to freedom of association.

## **8. CONCLUSION AND RECOMMENDATIONS**

Independent Egyptian civil society associations are operating in an increasingly restrictive environment that deters or prohibits individuals from exercising their right to freedom of association and other rights. Law No. 149 of 2019 mandates all associations to register under threat of dissolution, undermines their ability to determine their purpose and confines the permitted scope of their operations to “societal development,” severely limiting the role of human rights organizations in documenting human rights abuses and holding the authorities to account. Once registered, associations are under near-total control of the ACWU, the administrative authority responsible for registering and overseeing associations, as well as unlawful interference by the notorious NSA.

In greater Cairo, the ACWU has imposed an authorization system for registration that breaches Egypt’s constitution and international human rights standards. The process is not only lengthy and burdensome, but also entails unjustified interference in internal associations’ decisions, such as the association’s name and the planning and implementation of its objectives and activities. The ACWU has also forced the dismissal of staff and board members of associations without legal basis, and subjected associations to intrusive and excessively arduous reporting requirements, effectively placing them under constant surveillance.

Meanwhile, the NSA treats associations as security threats. It exerts undue influence over the registration and operation of associations, including by reviewing and often delaying registration or foreign funding approvals. NSA agents have intimidated staff and board members of associations, and fostered a climate of fear that not only suppresses the right to freedom of association and the right to privacy but also has a chilling effect on the exercise of these and other rights. The psychological toll on associations’ staff members is considerable.

Egyptian independent associations also face considerable barriers to accessing financial resources. They cannot open bank accounts without a written request to the bank from the ACWU and, in some cases, the process of opening an account is delayed for months without justification. This lack of

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<sup>101</sup> Interview by voice call with Mohamed Abdel Salam on 16 July 2025.

<sup>102</sup> UN Special Rapporteur on the rights to freedom of peaceful assembly and of association, Report, UN Doc. A/HRC/41/41, 17 May 2019, para. 14.

access to banking services and delayed funding approvals critically undermines associations' ability to carry out their activities and fulfil their financial obligations.

In light of these findings, Amnesty International makes the following recommendations to the Egyptian authorities and the international community.

### **TO THE MINISTRY OF INTERIOR**

- End the NSA's harassment and intimidation of members of associations, including through coercive questioning, solely for the exercise of their human rights, so that associations can carry out their legitimate work without fear of repercussions.
- End the NSA's interference in the activities of associations, including by pressuring them to refrain from certain initiatives or publications that deter associations and their staff from exercising their rights to freedom of association and expression.
- End the NSA's practice of intimidating service providers that work with associations.
- Ensure that the NSA does not instruct ACWU offices to compel associations to dismiss board members.

### **TO THE MINISTRY OF SOCIAL SOLIDARITY**

- Instruct ACWU offices nationwide to register associations through a notification system, as mandated by the constitution, rather than an authorization system, and ensure that ACWU offices do not compel associations to alter any of their information, including their names, activities and/or internal administrative or financial regulations, during registration.
- Ensure that ACWU offices do not impose undue restrictions on associations, including unnecessary detailed reporting requirements or by compelling associations to dismiss board members.
- Ensure that ACWU offices do not obstruct associations' access to domestic or foreign funding and that any restrictions are limited to the same general laws applicable to individuals and for-profit enterprises on issues such as money laundering, fraud, corruption, trafficking and related offences.

### **TO THE COUNCIL OF MINISTERS**

- Amend the executive regulations of Law No. 149 of 2019 to ensure that they are in line with international human rights law and standards, particularly with respect to registration requirements, the ability of foreign nationals to form associations, and access to foreign funding.
- Invite visits by relevant UN human rights mechanisms, including the UN Special Rapporteur on the Rights to Freedom of Peaceful Assembly and of Association.

### **TO THE PARLIAMENT**

- Repeal Law No. 149 of 2019, which is incompatible with international human rights law and standards.
- Launch an inclusive and meaningful dialogue and consultation process with all relevant stakeholders, including independent associations, to introduce a new law on associations that is in line with Egypt's international obligations.

## **TO INTERNATIONAL DONORS**

- Ensure that Egyptian associations, whether registered or not, forced into exile or still operating inside the country, have unimpeded access to funding opportunities in accordance with international standards.

## **TO THE INTERNATIONAL COMMUNITY**

- Urge Egypt to repeal Law No. 149 of 2019 and its executive regulations and replace both with legislation that respects, protects and fulfils the exercise of the right to freedom of association in line with international human rights law and standards.
- Press the Egyptian authorities to abide by its obligations to respect, protect and fulfil the right to freedom of association, including by ending interference in the work of associations, lifting burdensome regulatory requirements and stopping security harassment and intimidation.
- Press the Egyptian authorities to take these steps both bilaterally and multilaterally through relevant international forums such as the UN Human Rights Council and regional mechanisms such as the African Commission on Human and Peoples' Rights and the League of Arab States

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