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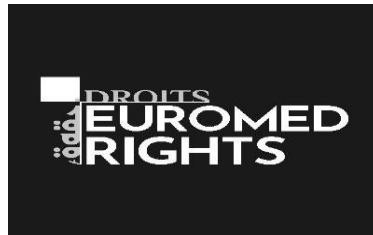
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Joint Letter to GANHRI and the Sub-Committee on Accreditation (SCA): the 2025 Accreditation Review of Egypt’s National Council for Human Rights (NCHR)

Date: 19 January 2026

To:

GANHRI Bureau

Sub-Committee on Accreditation (SCA)

Geneva, Switzerland

Subject: Concerns Regarding the 2025 Accreditation Review of Egypt’s National Council for Human Rights (NCHR)

Dear Members of the GANHRI Sub-Committee on Accreditation,

Dear Members of the GANHRI Bureau,

We, the undersigned human rights organizations, wish to express our deep concern regarding several procedural and substantive shortcomings observed during the 2025 accreditation review of Egypt’s National Council for Human Rights (NCHR). While we recognize the importance of constructive engagement with National Human Rights Institutions (NHRIs), we believe that the outcome of the 2025 review does not adequately reflect the NCHR’s level of compliance with the Paris Principles, nor does it adequately assess the NCHR’s performance in responding to the human rights challenges prevailing in Egypt.

1. Failure to apply a performance-based assessment

The SCA’s decision to maintain the NCHR’s “A status” appears to rely primarily on *proposed legislative amendments* submitted by the institution itself. These amendments remain unpublished, unverified, and unimplemented at the time of the review.

In doing so, the SCA seems to have:

- shifted from assessing actual compliance to relying on promissory commitments;
- departed from its own practice of requiring demonstrated progress, not theoretical reform;
- overlooked clear evidence of the NCHR’s limited performance in addressing serious human-rights violations.

This approach risks creating a precedent that rewards NHRIs for intentions rather than results, undermining the integrity of the accreditation system.

2. Lack of transparency in evaluating the proposed amendments

During the review process:

- The proposed amended law of the NCHR was not made public.
- Civil society was denied the opportunity to review or comment on the draft law.
- The SCA accepted a document not subject to public or parliamentary scrutiny.

This stands in contrast with the SCA's established practice, which emphasizes the importance of broad-based consultation, transparency, and participation in evaluating NHRI frameworks.

Accepting a "confidential legislative proposal" as the basis for maintaining "A status" sets a problematic precedent for future reviews.

3. Overlooking persistent structural deficiencies

Several long-standing structural issues remain unaddressed in both practice and law, including:

- the NCHR's lack of authority to conduct unannounced visits to all places of detention (still pending legislative change);
- the absence of effective mechanisms to investigate complaints or follow up on violations;
- the presence of partisan or politically aligned members undermining independence;
- Minimal transparency in publishing findings and recommendations;
- ongoing constraints on financial autonomy;
- the Council's lack of clear, visible and adequate public positions on torture, enforced disappearance, the death penalty, and violations against human-rights defenders, as illustrated here regarding the death penalty:
 - The NCHR claimed to the SCA that "*it issued a statement calling for a moratorium on a death penalty during the adoption of outcomes of the Universal Periodic Review of Egypt in June 2025*" according to the SCA's Oct. 2025 session report. Yet at the time of writing, it is unclear what statement the NCHR was referring to in this assertion. If such a statement has indeed been issued, is available as an open-source document, and has been shared with the SCA, we would be grateful if it could be made available to us.
 - The NCHR's 2 July 2025 press release ([Arabic](#), [English](#)) welcoming the UPR recommendations to Egypt does not contain such a call; it merely states: "*the Council voiced its support for the review of the application of the death penalty, advocating that its use be confined to the most serious crimes while guaranteeing adherence to fair trial standards.*"
 - The Council did recommend "accelerating the review of offences punishable by death, limiting it to the most serious crimes" and "encourages the adoption of a voluntary moratorium on executions pending the completion of this necessary legal review" in its 18th annual report (1 July 2024-30 June 2025), but this is buried in a very long PDF file (153 pages in the [Arabic version](#)). The public visibility of this position of the NCHR is very low - a Google search conducted in December 2025 in Arabic or in English for the phrase "National Council for Human Rights calls for a moratorium on executions/the death penalty in Egypt" (with or without quotation marks) - yielded no relevant

results; only Google in AI mode manages to find the recommendation quoted above and dates it to December 2025, not June.

- One can only conclude the NCHR's position on this important human rights issue is not sufficiently clear or visible to the Egyptian public, the most important stakeholder involved.

None of these issues saw meaningful improvement between the 2024 and 2025 reviews. In fact, the SCA itself identified these concerns in previous cycles and considered them grounds for downgrading to "B status" in 2024.

4. Inconsistency with Treaty Bodies' concerns

In March 2023, the Human Rights Committee was concerned "about the lack of safeguards to ensure its full independence and effectiveness and the lack of information provided on the effective implementation of its recommendations, notably with regard to the onward referral of individual complaints submitted to it".

In November 2023, the Committee against Torture was concerned "about the lack of information on any unannounced visits to places of deprivation of liberty by independent mechanisms and on the measures taken to implement the recommendations put forward by monitoring bodies. It also notes with concern that, as the mandate of the Council does not allow it to conduct unannounced visits to places of deprivation of liberty, its visits are allegedly prearranged and do not allow for unhindered access or confidential interviews with detainee."

5. Inconsistency with the SCA's Own 2024 Findings

In October 2024, the SCA explicitly concluded that:

- the NCHR did not meet core requirements of the Paris Principles,
- the legal and institutional framework was insufficient, and
- a downgrade to "B status" was appropriate absent concrete progress.

Between 2024 and 2025, no material or fundamental changes occurred in either law or practice. Despite this, the 2025 review led to an opposite conclusion.

The inconsistency raises serious questions about:

- the criteria used in evaluating compliance;
- the weight given to political considerations over evidence-based assessment;
- the transparency of the review process.

5. Risk of Undermining the Paris Principles and the NHRI System

Maintaining "A status" for an institution whose independence, effectiveness, and public relevance continue to be deeply compromised may:

- weaken international efforts to uphold the Paris Principles;

- send a message that NHRIs can retain top accreditation without demonstrating genuine independence;
- erode trust in the GANHRI accreditation system among civil society and victims;
- give governments a tool to deflect international scrutiny.

This outcome is already being used by the Egyptian authorities to promote an inaccurate narrative of institutional reform.

6. Our Requests to GANHRI and the SCA

In light of the above, we respectfully request that:

- The SCA to initiate a structured follow-up process with clear benchmarks that the NCHR must meet within a specific timeframe.
- GANHRI to publish a justification underlying the 2025 accreditation decision, including the draft law submitted by the NCHR.
- The SCA to reaffirm the principle that accreditation must be evidence-based, grounded in performance and compliance —not unverified commitments and hypothetical reforms.
- A Special Review should be considered in 2026 if legislative reforms are not enacted or if there is no measurable improvement in the NCHR’s independence and effectiveness.
- Civil society be afforded the opportunity to provide input into any follow-up review or special review procedure concerning Egypt.

7. Conclusion

We reiterate our commitment to constructive and principled engagement with GANHRI and the Sub-Committee on Accreditation. Our observations are not intended to call into question the accreditation system as such, but rather to underscore the importance of preserving its rigor, consistency, and credibility in accordance with the Paris Principles.

Accreditation is, by its nature, a formal and technical procedure. Its legitimacy depends on the consistent application of objective criteria, transparency in reasoning, and reliance on demonstrated practice rather than prospective or promised reforms. Where these elements are weakened, the integrity of the process itself is at risk.

While National Human Rights Institutions are not judicial bodies and do not bear responsibility for adjudicating or enforcing accountability, they play a critical role in prevention, monitoring, documentation, and public positioning on serious human rights violations. An NHRI’s independence, visibility, and effectiveness are therefore essential to ensuring that victims, civil society, and state institutions alike can rely on it as a credible national mechanism in line with international standards.

We respectfully submit that maintaining the credibility of the GANHRI accreditation framework requires close alignment between stated standards and accreditation outcomes. We

therefore urge the SCA and GANHRI to address the concerns outlined above through transparent follow-up, clear benchmarks, and evidence-based assessment.

We remain available to provide further information or clarification should this be of assistance in any subsequent review or follow-up process.

Yours sincerely,

Signatories

1. Andalus Institute for Tolerance and Anti-Violence Studies (AITAS)
2. Cairo Institute for Human Rights Studies (CIHRS)
3. Committee for Justice (CFJ)
4. Egyptian Commission for Rights and Freedoms (ECRF)
5. Egyptian Front for Human Rights (EFHR)
6. El Nadeem Centre
7. Egyptian Human Rights Forum (EHRF)
8. EgyptWide for Human Rights
9. EuroMed Rights Network
10. HuMENA for Human Rights and Civic Engagement (HuMena)
11. International Service for Human Rights (ISHR)
12. Law and Democracy Support Foundation (LDSF)
13. Mena Rights Group
14. REDWORD for Human Rights & Freedom of Expression
15. Sinai Foundation for Human Rights