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EGYPTIAN FRONT  
FOR HUMAN RIGHTS

## **Joint Submission to the UN Committee on Economic, Social and Cultural Rights**

### **Egypt: List of Issues**

**79<sup>th</sup> Session**

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Committee for Justice (CFJ)

Egyptian Front for Human Rights (EFHR)

Sinai Foundation for Human Rights

We write in advance of the 79th Session of the Committee on Economic, Social and Cultural Rights in relation to its preparation and adoption of a List of Issues for Egypt's upcoming review under the International Covenant on Economic, Social and Cultural Rights. This joint submission highlights key areas of concern affecting the enjoyment of economic, social and cultural rights in Egypt, including the right to adequate housing, the right to health in places of detention, the right to education, guarantees for the independence and effectiveness of the National Council for Human Rights, corruption-related financial burdens on prisoners and their families, and the exploitation of women workers within informal agricultural value chains.

### **The Right to Adequate Housing (Article 11)**

1. The Sinai Foundation for Human Rights has estimated in previous [reports](#) that the forced displacement operations carried out by the Egyptian authorities have resulted in the displacement of approximately 150,000 indigenous residents of the Sinai Peninsula, representing nearly one quarter of the population of North Sinai. This includes the entire population of the city of Rafah, which was completely demolished and marked the starting point of demolition and forced eviction campaigns that began in late 2013. Despite the official announcement by the Egyptian authorities of the end of hostilities in 2022, indigenous residents have not been allowed to return to their homes and lands, and large areas remain inaccessible to displaced communities.
2. Human rights reports, particularly those issued by [Human Rights Watch](#) and the [Sinai Foundation for Human Rights](#), have documented widespread forced displacement, systematic home demolitions, and the destruction of agricultural land, which constitutes the primary source of livelihood for local residents. According to these reports, the military destroyed at least 12,350 buildings, most of them residential homes, between late 2013 and July 2020, in multiple phases that included the city of Al-Arish. During the same period, the military cleared, damaged, or restricted access to at least 6,000 hectares (approximately 14,300 feddans) of agricultural land.
3. After 2020, reports indicate that Egyptian military forces demolished hundreds of additional buildings, many of them homes, and cleared thousands more feddans of agricultural land, particularly in the cities of Rafah, Sheikh Zuweid, and Al-Arish, under the pretext of counterterrorism operations. Human Rights Watch has previously described such practices as potentially amounting to war crimes under international humanitarian law, given their scale, systematic nature, and severe impact on the civilian population. These practices appear to be inconsistent with Article 8 of the United Nations Declaration on the Rights of Indigenous Peoples, in particular paragraphs 2(b) and 2(c), which prohibit the dispossession of lands, the forced transfer of populations, and acts aimed at destroying indigenous cultures.
4. In 2014, the Egyptian government announced that it would provide financial compensation ranging between 800 and 1,200 Egyptian pounds per square meter of built structures only, and only to residents of certain areas of the city of Rafah, without recognizing or compensating for

the value of the land. However, compensation was not paid prior to the evictions, and authorities delayed payments for years. To date, thousands of displaced persons remain without compensation. Moreover, compensation amounts failed to take into account the more than 50 percent devaluation of the Egyptian pound in 2016, which significantly eroded the real value of the compensation. Witness testimonies and official data further indicate that the authorities did not conduct property inventories or assessments in several areas of Rafah, Sheikh Zuweid, and Al-Arish prior to the destruction of homes, thereby undermining the possibility of fair future compensation. The authorities also failed to include these residents in any compensation plans addressing the damage to their homes.

5. The Egyptian authorities further refuse to recognize the land ownership rights of local residents in Sinai, whose lands have been inherited over generations. Instead, they have issued a series of ministerial and presidential decrees that treat local residents as unlawful occupants, imposing restrictive and burdensome conditions on land ownership, including the requirement to obtain security approvals from multiple state bodies and complex procedures to prove Egyptian nationality, even for individuals holding.

*Sinai Foundation recommends that the Committee ask the Egyptian government:*

- What immediate measures has the State party taken to halt all ongoing arbitrary home demolitions and forced evictions in North Sinai?
- What steps has the State party taken to ensure that all families forcibly evicted from their homes, land, and farms receive prompt, fair, and full compensation, including compensation for the loss of livelihoods and sources of income?
- How does the State party ensure access to effective remedies, including independent judicial review, for individuals and communities affected by decisions related to forced evictions, demolitions, and compensation?
- What timeline has the State party established to allow the return of displaced and forcibly evicted people to their homes and lands after the security reasons invoked by the authorities to justify these exceptional measures no longer apply?

### **The Right of Everyone to the Enjoyment of the Highest Attainable Standard of Physical and Mental Health (Article 12)**

6. Article 18 of the Egyptian Constitution provides that “every citizen has the right to health and to integrated health care in accordance with quality standards. The State shall ensure the preservation of public health facilities that provide services to the people, support them, work to raise their efficiency, and ensure their fair geographical distribution.” This constitutional guarantee reflects Egypt’s obligation under Article 12 of the International Covenant on Economic, Social and Cultural Rights to respect, protect, and fulfill the right of everyone to the highest attainable standard of physical and mental health.

7. Despite these obligations, challenges are most acute and severe in the context of places of detention. In addition to Article 18, Articles 55 and 56 of the Egyptian Constitution explicitly prohibit the deprivation of health care for persons deprived of liberty and impose a legal duty on prosecutorial and judicial authorities to oversee prisons and detention facilities. The denial of medical care to prisoners is therefore criminalized under domestic law.
8. According to documentation by the Committee for Justice (CFJ), detention conditions in Egyptian prisons are harsh and degrading, characterized by severe overcrowding, poor ventilation, lack of exposure to sunlight, unsanitary conditions, restrictions on access to clean water, and the denial of regular outdoor exercise. These conditions have a direct and detrimental impact on prisoners' physical and mental health, often exacerbating pre-existing medical conditions and contributing to the emergence of new illnesses. Medical neglect in detention is further compounded by the routine refusal of prison authorities to transfer prisoners requiring urgent or specialized care to external hospitals. Requests submitted by prisoners, their families, or legal representatives are frequently ignored or arbitrarily rejected, particularly in cases involving political prisoners or prisoners of conscience. In many instances, prison medical staff limit treatment to basic painkillers, regardless of the seriousness of the medical condition, leading to the deterioration of health conditions and the development of chronic diseases.
9. In its [November 2023 concluding observations](#), the Committee against Torture acknowledged steps taken by Egypt to improve detention conditions, including the closure of substandard facilities and the construction of new detention centers. However, the Committee expressed serious concern over persistent overcrowding and poor detention conditions in places of deprivation of liberty, including the Badr Rehabilitation and Correctional Centre known as Badr Prison, citing insalubrity and inadequate hygiene, lack of ventilation, poor quality and insufficient quantity of food and water, and limited access to recreational and educational activities. CAT further raised concerns regarding limited access to quality health care, including mental health care, shortages of trained and qualified prison and medical staff, violence by prison personnel, and that political prisoners are frequently subjected to particularly harsh conditions, including prolonged solitary confinement. Despite these clear and detailed recommendations, Egypt has failed to implement the Committee's recommendations, and the deficiencies identified continue to persist across multiple places of detention, which was confirmed by the Committee against Torture in its [May 2025 follow-up](#) to the concluding observations.
10. Between January 2014 and December 2025, CFJ has documented over [1,418 cases of medical neglect](#). CFJ further documented more than [1,045 deaths in custody](#) in Egyptian places of detention for the same period. During 2025, at least [51 deaths](#) in custody occurred as a result of the deliberate denial of medical care. Recent cases documented in facilities such as Badr Prison 3 "Badr Rehabilitation and Correctional Centre", including [the death of Professor Atta Youssef](#), and Minya Prison, including [the death of Hamdy Mohamed](#) due to medical neglect, illustrate recurring and consistent patterns of violations, including delayed medical intervention, denial of

hospital transfers, absence of independent medical assessments, and failure to provide life-saving treatment.

11. Despite the scale and persistence of these violations, prosecutorial and judicial authorities have consistently failed to conduct prompt, independent, and effective investigations into allegations of medical neglect or deaths in custody. Documentation over the past decade indicates that many of these violations are not the result of isolated misconduct by prison administrations or corrupt prosecutors and judges but rather within a broader systematic system of control exercised by officers of the National Security Agency, whose approval is required for decisions affecting political prisoners and prisoners of conscience.
12. National Security Officers are exercising de facto authority over access to detention facilities, including approval or denial of prison visits, solitary confinement orders, the entry of food and basic supplies, access to medical treatment, and transfers to hospitals, and are implicated in practices such as enforced disappearance and torture. In this context, prison officials, police personnel, prosecutors, and judges lack effective decision making power and act upon instructions issued by National Security authorities in these cases. In several prisons known to hold large numbers of political prisoners, including Badr Prison, Wadi El-Natrun, and Borg El-Arab, and others, National Security offices have offices inside the prison facilities to oversee matters related to these prisoners. This practice has no clear legal basis in Egyptian prison regulations or domestic law and contributes directly to the systematic denial of health care, arbitrary restrictions, and the absence of accountability for violations affecting prisoners' physical and mental health.
13. Complaints submitted by families and lawyers rarely result in accountability or remedial measures, contributing to a climate of impunity and the normalization of health-related violations in detention settings. This systemic failure undermines both domestic constitutional guarantees and Egypt's obligations under Article 12 of the Covenant.

*Committee for Justice recommends that the Committee ask the Egyptian government:*

- What measures the State party has taken to ensure that persons deprived of liberty, including political prisoners and prisoners of conscience, have timely access to adequate and specialized medical care in line with article 12 of the Covenant.
- Whether independent medical examinations and access to external hospitals are guaranteed in practice for prisoners whose health conditions require urgent or specialized treatment.
- What steps the State party has taken to prevent and address medical neglect in places of detention, including through effective monitoring by prosecutorial and judicial authorities.
- What data are available on investigations, prosecutions, and other accountability measures in cases of medical neglect and deaths in custody, including information on remedies and reparations provided to victims' families.
- Whether decisions affecting access to medical care, hospital transfers, visits, and conditions of detention for political detainees and prisoners of conscience are subject to approval by

the National Security Agency, and how such practices are reconciled with judicial oversight and the State party's obligations under article 12 of the Covenant.

### **The Right of Everyone to Education (Article 13)**

14. The Sinai Foundation Published in 2024 a [detailed report](#) exposed widespread abuses of children's right to education by the Egyptian military and allied non-state armed groups (NSAGs) in North Sinai from 2013 until 2023. Using field visits, ground footage, satellite imagery, official sources, and first-hand accounts, we provided rigorous evidence that:
15. At least 60 state-run schools had been demolished or attacked by the Egyptian military. Most were elementary schools. Ground footage and satellite images taken before and after the attack conclusively verified local testimony claiming that the Egyptian military had destroyed the institutions, often overnight. Most of these attacks were launched from the air. Little progress had since been made to rebuild demolished schools;
16. At least 39 schools had been commandeered as bases by the Egyptian military. Satellite images showed the establishment of military fortifications around these sites and the erection of military equipment on the premises. Such equipment included large communications antennae, military vehicles, and miscellaneous military equipment on the top of school buildings. Yet the war has ended, there are many schools still serving as military outposts. Further evidence can be found on this [interactive map](#), showing the exact coordinates of schools, ground footage and a timeline of the violations;
17. Children were being used to participate directly in hostilities. We provided several examples of social media footage showing the use of adolescent children by NSAGs allied to the Egyptian military and intelligence services. We provided evidence also of the combat deaths of some of these recruited children. Based on our [published report](#), in late September 2023, the [US government listed](#) its Egyptian counterpart for the first time in the annual human trafficking report issued;
18. The Egyptian military had announced that children could enlist from age 15, in violation of OPAC.

*Sinai Foundation recommends that the Committee ask the Egyptian government:*

- What measures has the State party taken to immediately cease the use of schools and their surroundings for military purposes? Does the State party intend to accede to the Safe Schools Declaration?
- Has the State party conducted an independent and thorough investigation into the military use and destruction of educational institutions, as well as the recruitment and use of

children, by all parties to the armed conflict in North Sinai. What were the findings of such investigations, and what accountability measures have been taken?

- Does the State party have a comprehensive plan to reintegrate all children in North Sinai into education, including through the accelerated repair and reconstruction of destroyed schools during the armed conflict?
- What steps has the State party taken to cease inviting children below the age of 16 to join the armed forces and to prevent their recruitment?
- Is the State party considering raising the minimum age for voluntary recruitment into the armed forces to 18 years, in line with international standards?
- What justifications does the State party provide for the continued restrictions on access to North Sinai for independent journalists, human rights observers, and humanitarian relief organizations?; When does the State party intend to lift these restrictions in order to ensure transparency, independent monitoring, and the delivery of humanitarian assistance?

#### **Guarantees that the National Council for Human Rights Complies with the Paris Principles**

19. In its concluding observations on Egypt's previous review in 2013, the Committee expressed concern about uncertainties surrounding safeguards ensuring the National Council for Human Rights' (NCHR) full compliance with the Paris Principles, particularly with regard to the selection, appointment and removal of members, access to places of detention and confinement, and its mandate to promote and protect human rights. More than a decade later, these concerns remain largely unaddressed.
20. Recent civil society assessments submitted in the context of the NCHR's accreditation and re-accreditation before the Global Alliance of National Human Rights Institutions indicate persistent structural deficiencies affecting the Council's independence and effectiveness. The NCHR continues to operate within a legal and institutional framework that allows significant executive influence over its composition and functioning, including through appointment procedures that lack transparency and meaningful pluralistic participation, and the absence of robust safeguards governing the removal of members. These shortcomings undermine the Council's perceived and actual independence, contrary to the requirements of the Paris Principles.
21. In practice, the NCHR's effectiveness in monitoring and addressing economic, social and cultural rights violations remains limited. The Council has demonstrated a pattern of selective engagement, failing to address emblematic or systemic violations, including those related to detention conditions, health, social protection, and the treatment of political prisoners. Complaints submitted by victims or their families often do not result in visible follow-up, public findings, or recommendations, and the Council's public reporting largely reflects official

narratives rather than independent assessments of compliance with international human rights obligations.

22. Serious concerns also persist regarding the NCHR's mandate and ability to access places of detention. Although the Council reports conducting visits, these are typically pre-arranged with the authorities, do not allow for unannounced inspections, and do not ensure confidential interviews with prisoners. This practice falls short of the Paris Principles and undermines the Council's role as an effective national monitoring mechanism, particularly in light of widespread allegations of torture, medical neglect, and inhuman conditions of detention documented by civil society and UN mechanisms. The absence of independent follow-up after such visits further weakens the NCHR's protective function.

*Committee for Justice recommends that the Committee ask the Egyptian government:*

- Whether the legal and institutional framework governing the National Council for Human Rights has been amended to ensure full compliance with the Paris Principles, in particular with regard to the transparent and pluralistic selection, appointment, and removal of its members.
- What measures have been taken to guarantee independence, pluralism, and effectiveness of the National Council for Human Rights in monitoring and addressing violations of economic, social and cultural rights.
- Whether the National Council for Human Rights has unrestricted authority to conduct unannounced visits to all places of detention and confinement, including the ability to carry out confidential interviews and follow-up on findings.
- What steps have been taken to ensure that the National Council for Human Rights is provided with adequate human, technical, and financial resources to enable it to effectively discharge its mandate in line with the Paris Principles and the Committee's General Comment No. 10 (1998).

### **Financial Burdens on Prisoners and Their Families Resulting from Corruption (Article 2(1))**

23. Following up on [the committee's concluding observations in 2013](#), point (7) concerning the corruption and the inadequate implementation of measures to combat it by the state, which violated art. 2, para. 1 of the Covenant. In Egypt, Prisons, Police Stations, and other detention facilities maintain dangerous policies and practices that are not limited to physical abuse but have resulted in abusing families financially to halt those violations. We believe that those victims are in serious need of international intervention to ensure accountability and justice and to end those practices against detainees. According to the documentation with the families of prisoners, EFHR found that it is inevitable to pay bribes in places of detention to obtain the minimum basic rights and that the relationship between financial corruption and violations in detention places is direct, as those in charge of prison administrations benefit from violating the rights of prisoners because

they receive bribes continuously to reduce those violations, and therefore they are constantly intransigent in the rights of detainees stipulated in the law, including the provision of health care.

24. The types and quantities of food provided to detainees vary in different places of detention. In police stations, they do not provide detainees with any food at all, or they provide only bread and cheese, and sections that provide some types of cooked food in very small quantities and of poor quality that is not sufficient for the detainees' needs. As for prisons, they provide only breakfast and lunch daily for detainees, and in all cases, the amount of food provided to detainees is less than what is stipulated in the law. Therefore, many prisoners are forced not to eat prison food due to its poor quality and rely entirely on receiving food from the families during the visit or buying food from the prison cafeteria, whose prices are more than double outside the prison. It's worth mentioning that the prison administration forbids receiving any product - available in the prison cafeteria - from the prisoners' families to force them to buy from the cafeteria at high prices.

25. The prisoners' Families have to pay bribes during visits to detention places. According to the prisoners' families, the value of the bribes paid at one time is not less than 150 EGP. Also, the prison staff seize some of the prisoners' belongings during visits, and the detainees and their families are forced to be silent to avoid intransigence. In this regard, families who are unable to pay bribes are subjected to ill-treatment.

26. Banning visits also results in the theft of money deposited to detainees from their families. For example, some prison administrations do not inform detainees of the true amount of the money deposited by their families. The visit prohibition also allows some prison officials to financially abuse the detainees' families in exchange for promises that they will inform them of news of their detained relatives.

*Egyptian Front for Human Rights recommends that the Committee ask the Egyptian government:*

- What measures has the State taken to investigate and prosecute allegations of systemic bribery and financial extortion by prison and detention facility officials?
- How does the government ensure that detainees receive their legally guaranteed rights—such as adequate food, healthcare, and humane treatment—without families being forced to pay bribes?
- What oversight mechanisms are in place to monitor prison cafeterias and prevent monopolistic practices and inflated pricing that financially burden prisoners' families?
- How does the State ensure transparency and accountability in the handling of money deposited by families for detainees, particularly during periods when visits are banned?

### **Victims of Informal Agricultural Value Chains: Unsafe Working Conditions, Exploitation, and State Failure to Protect (Articles 6, 7, 11)**

27. On June 27, 2025, a devastating accident on a regional road in Monufia Governorate claimed the lives of 18 young women working as seasonal grape harvesters. This accident exposes a troubling gap between official rhetoric and the harsh reality faced by women agricultural workers in Egypt, revealing that export profits consistently overshadow genuine concerns for worker welfare and safety.
28. Women and children form a substantial portion of Egypt's agricultural workforce, particularly in seasonal roles requiring delicate crop handling. Official statistics show that women from the informal sector represented 32.4% of agricultural workers in 2022, with the sector absorbing 25% of women's capacity in the informal economy. Despite their crucial role, Egypt's National Strategy for the Empowerment of Women 2030 fails to provide adequate protection for these workers. Instead, the strategy focuses primarily on privileged groups, emphasizing women's economic empowerment in the formal sector, entrepreneurship, and public institutions, while merely calling for "the development of laws and procedures" to protect informal sector workers without concrete implementation mechanisms. The Monufia incident revealed that women remain confined to the most basic roles: harvesting, collecting, cutting, and occasionally sorting and packing. This contradicts the National Strategy's proclaimed goal of integrating women into more complex processes like agro-industrial production.
29. The working conditions exposed by the tragedy are appalling. The victims earned 120 Egyptian pounds daily (approximately 3 USD)—a rate unchanged since 2018 despite rampant inflation and repeated currency devaluations. For harvesting and collecting tasks, wages often drop to 70-80 EGP per day (around 1.5-2 USD). These meager wages are not paid daily but accumulated and distributed weekly or bi-monthly, with occasional holiday bonuses of around 500 EGP (10 USD). Workers lack formal contracts, protective equipment against pesticides, and any meaningful legal protections.
30. The new Labor Law, which took effect in September 2025, continues this pattern of neglect. It delegates the regulation of working conditions to ministries and administrative bodies without stipulating legal guarantees or requiring employers to provide formal contracts. The existing Labor Law of 2003 is similarly ineffective—the Monufia victims included girls below the legal working age of 15, working 10-12 hours daily despite legal limits of six hours for minors under 18, without permits or proper oversight. These practices raise serious concerns under Article 7 of the Covenant, regarding the right to just and favourable conditions of work, and under Article 6, in relation to the State party's obligation to take steps to ensure access to decent and protected employment.

### Transportation Dangers and Compensation Failures

31. With no legal requirements for safe transportation, factory and export station owners fail to provide transport for workers. Instead, "labor contractors" arrange vehicles—often unfit for highway travel and dangerously overcrowded. In the Monufia accident, 20 people were crammed into a microbus designed for 12 passengers. These substandard vehicles are chosen to cut costs,

which are then deducted from workers' wages, despite journeys often spanning long distances between Upper and Lower Egypt governorates.

32. The aftermath of the tragedy raises further concerns about compensation credibility. While the Ministries of Social Solidarity and Labor announced compensation for victims' families, reports suggest either non-disbursement or coercive practices where local authorities pressured families to "donate" up to half the compensation back to the state for village school construction. A heavy security response has restricted communication between victims' families and media, suppressing public discussion about the poverty and working conditions that forced these young women into such dangerous employment. These circumstances raise serious concerns under Article 11 of the Covenant, as the absence of safe transportation, effective compensation, and accountability mechanisms exposes workers and their families to unsafe living conditions, heightened poverty, and preventable loss of life.

#### Failed Infrastructure Governance

33. The concept of sustainable value chains requires governance to coordinate all stages and ensure equitable benefit distribution. The Monufia incident exposed the complete absence of such governance. While the state expands industrial zones throughout the Delta, infrastructure like the regional road where the accident occurred has been transferred from public authority oversight to private ownership—specifically the National Roads Company. This company built the road and collects revenue without fulfilling maintenance responsibilities or reporting to public authorities. The road has gone without maintenance for six years despite repeated accidents and complaints.

34. This reality contradicts centralized governance principles requiring coordination among all contributors and fair distribution of added value. The Minister of Transport justified the road's deterioration by citing "overloading" from heavy commercial transport permitted on roads shared with individual vehicles. The official approach prioritizes keeping roads open for freight and commercial traffic serving exports and industrial facilities, while relegating safety interventions to technical changes like concrete conversion. This directly contradicts sustainability and user protection goals, continuing to expose rural women and children—primary road users—to recurrent danger, which is a serious violation of Article 11 of the Covenant, and amounts to a structural violation of Article 11, especially where the State prioritizes industrial freight over civilian safety

*Egyptian Front for Human Rights recommends that the Committee ask the Egyptian government:*

- How does the government reconcile the National Strategy for the Empowerment of Women 2030 with the continued exclusion of women agricultural workers from legal protections and decent working conditions?
- What concrete legislative or administrative measures exist to protect women working in the informal agricultural sector, particularly seasonal workers?
- What mechanisms does the State have to ensure equal pay, safe working conditions, and protection from exploitation for women agricultural workers?

- How does the new Labor Law of 2025 address gaps that allowed these violations to persist under the previous law?
- Why has the regional road in Monufia remained without maintenance for years despite repeated accidents and complaints?