

Foreign labor in Egypt





Introduction

The number of foreign workers holding work permits in Egypt has reached 13,331 from various countries, with Chinese labor at the forefront, followed by Indian and Syrian labor.

The state, through the Ministry of Labor has worked over the past years to regulate foreign labor in Egypt and facilitate the process for investors to obtain work residency. The ministry collaborates with all social partners to exchange expertise that serves the Egyptian labor market.

The employment of foreigners in Egypt is governed by several regulations, the most important of which stipulate that the number of foreign workers in any establishment should not exceed 10% of the total number of insured Egyptian employees. Additionally, the foreign worker's expertise must be relevant to the profession for which they are licensed, with a minimum of three years of experience. There should be no competition between foreign workers and the Egyptian workforce, along with a genuine economic need for the foreign worker's expertise in the establishments.

The regulations also require establishments authorized to employ foreign technicians to assign at least two Egyptians, whose qualifications match those of the foreign technicians, to work as assistants, with the foreign worker obligated to train them. Preference is given to foreigners born and permanently residing in the country.

The necessary ministerial decisions have been issued to regulate foreign labor, tighten oversight, and define categories and required experience durations, as well as training for Egyptian assistants. Additionally, there has been a significant increase in annual revenue from work permit fees for foreigners, rising from 28 million Egyptian pounds in 2014 to 211 million pounds currently, marking an eightfold increase over eight years.

In collaboration between the Ministry of Labor and the General Authority for Investment, work permits have been granted for three years to certain employer categories, including board members, executive directors, and branch managers who were previously denied investor residency under the new investment regulations. Furthermore, it has been agreed that the approvals required for the first year of a foreign worker's permit will be renewed in the third year instead of annually, facilitating quicker permit issuance.

A unified database for foreign labor and foreign investors with investor residency has also been established, aimed at accurately tracking all categories of foreigners and monitoring their actual status within the country.

This report is part of the interest of the Dialogue Forum for Development and Human Rights (FDHRD) in the right to work and in the conditions of Egyptian workers, as well as non-citizens, refugees, and asylum seekers.



Statistics

As of August 2022, Egypt hosted a total of 288,701 registered refugees and asylum seekers, most of whom are from Syria (144,167), Sudan (58,579), South Sudan (23,042), Eritrea (22,325), and Ethiopia (16,147).

However, estimates suggest that the total number of refugees is higher than this, as this figure does not include refugees or asylum seekers who are not registered with the United Nations High Commissioner for Refugees (UNHCR), as well as those who received a negative determination of their asylum status, or rejected asylum seekers. For example, very few Libyan refugees apply to the UNHCR, despite an estimated 350,000 to 820,000 Libyans living in coastal provinces, such as Alexandria and Marsa Matrouh.

Additionally, the number of refugees registered with the UNHCR does not include Palestinians, as Palestinian refugees are excluded from the UNHCR's mandate, and United Nations Relief and Works Agency for Palestine Refugees in the Near East (UNRWA) does not operate in Egypt. The estimated number of Palestinians in Egypt in the early 2000s was around 70,000, and there are no recent studies on the Palestinian refugee community in Egypt, so there are no current estimates.

Refugees in Egypt live under difficult social and economic conditions, resembling the situation of approximately 29.7% of Egyptians living below the national poverty line. Refugees who work for wages tend to take on roles such as domestic workers, nannies, security guards, interpreters, Non-Governmental Organization (NGO) workers, and factory laborers. Those who are self-employed often engage in trade, selling goods from home, car repairs, restaurant work, and sewing, tutoring, and producing handicrafts.

The vast majority of refugees and asylum seekers in Egypt work informally, similar to many Egyptians. The Egyptian labor law does not specifically address refugees and asylum seekers, meaning they are treated like other non-citizens under the law. Egyptian labor laws partially restrict non-citizens' access to the labor market to protect the local workforce.

On May 27, 2024, the Central Agency for Public Mobilization and Statistics (CAPMAS) released the annual report on foreign workers in the private and investment sectors in Egypt for 2023. The report indicated that the total number of foreigners with work permits in these sectors reached 17,357, an increase from 13,331 in 2022, representing a growth of 30.2%.

The report highlighted that foreign workers from Asian (non-Arab) countries constituted the largest group among those granted work permits in 2023, totaling 6,275, or 36.2% of the total. This was followed by



European nationals, with 5,975, accounting for 34.4%. Arab countries contributed 3,487 workers, making up 20.1%, while American nationals numbered 779, representing 4.5%. African (non-Arab) nationals totaled 662, or 3.8%, and Oceanic countries had the least representation, with only 71 workers, or 0.4% of the total. The report also noted that the Ministry of Labor was the leading authority in issuing work permits for foreigners in the private and investment sectors in Egypt in 2023, having issued 8,122 permits, which constitutes 46.8% of the total permits granted.

Investment offices ranked second in issuing work permits, with 6,227 permits, accounting for 35.9%. This was followed by company offices, which issued 2,246 permits (12.9%), and petroleum offices, which granted 762 permits (4.4%) of the total permits issued to foreigners for work in the private and investment sectors in 2023.

The report indicated that the category of legislators, senior officials, and managers represented the largest group of foreign workers, totaling 5,413, or 31.2%. They were followed by specialists (those in scientific professions), numbering 4,215, representing 24.3%, and technicians and assistant specialists, with 3,337 workers, accounting for 19.2% of the total number of foreigners granted work permits in these sectors.

In total, there were 3,337 foreigners (19.2%) who received work permits specifically for the private and investment sectors in 2023. The Central Agency for Public Mobilization and Statistics confirmed that the manufacturing industries represented the largest sector for foreign workers, with 4,495, or 25.9%. This was followed by the arts, entertainment, and recreation sector, with 3,397 workers (19.6%), construction and building with 2,288 workers (13.2%), and food service and accommodation, which employed 2,225 (12.8%) of the total number of foreigners granted work permits in the private and investment sectors in 2023.

[Current Legislative and Regulatory Policies](#)

In general, there is no specific legislative framework regulating the access of refugees and asylum seekers to the labor market. Refugees and asylum seekers are treated as non-citizens under the law, and different frameworks govern the access of Egyptians and non-Egyptians to the labor market.

Legal Identity and Registration

The Civil Status Law No. (143) of 1994 grants all Egyptians aged 16 years and older the right to obtain a national identity card issued by the Civil Status Authority under the Ministry of Interior.



The UNHCR is responsible for determining the legal status of refugees under the memorandum of understanding signed between Egypt and the UNHCR in 1954. Through this memorandum, Egypt delegated the process of refugee status determination to the UNHCR, which follows established procedures.

Employment

The memorandum of understanding between the UNHCR and Egypt stipulates that holders of yellow and blue cards can obtain renewable residence permits every six months, although the card is valid for 18 months and can be extended for three consecutive years. However, these residence permits do not grant refugees and asylum seekers the right to work, meaning they must obtain work permits before engaging in formal employment.

The Egyptian Labor Law No. (12) Of 2003 prohibits non-citizens from working without a work permit from the relevant ministry, which is renewable on an annual basis. The law sets conditions for the employment of non-citizen workers and the issuance of work permits, including the law sets maximum limits for non-citizens in institutions, prohibits competition with Egyptian workers, requires proof of appropriate qualifications for job requirements, and evidence of at least three years of experience. The law restricts work in certain sectors, forbidding non-citizens from engaging in import, export, and customs clearance, as well as working as tour guides in the tourism sector.

Book Two of the Egyptian Labor Law No. (12) Of 2003 specifically regulates the employment of non-Egyptians, stating that their employment benefits are subject to the principle of reciprocity. This means that non-citizens in Egypt should receive the same benefits as Egyptians in their home countries. However, the law explicitly excludes certain categories, such as domestic workers, as Article 4 of the law explicitly exempts them from its provisions.

Additionally, the new Labor Law draft, which received preliminary approval from the Egyptian Senate on January 2, 2022, does not include domestic workers. Promises have been made to enact new legislation specifically for domestic labor.

Decision No. (485) of 2010 allows for some non-citizens to be exempt from the principle of competition with the Egyptian workforce. Article 19 of this decision specifies the nationalities and categories of non-citizens exempted from this principle, including non-citizens married to Egyptians, individuals without a



specific nationality living and working in Egypt, individuals born and residing in Egypt for at least fifteen years, political refugees approved by the Political Refugees Affairs Office, and Palestinians holding valid travel documents issued by the Palestinian Authority or other recognized documents.

Decision No. (305) outlines the procedures for issuing work permits for non-citizens and regulates their entry into the labor market. Article 1 states that non-citizens must obtain work permits from the Directorate of Labor and Migration, while Article 4 restricts the number of non-citizens in the workforce to a maximum of 10% of employees in any establishment. Article 5 outlines additional conditions under which work permits may be granted to non-citizens, while Article 14 specifies sectors where non-citizens are not allowed to work, such as import, export, and customs assistance. Although the decision does not explicitly address refugees and asylum seekers, it exempts Sudanese, Palestinians, Lebanese, Greeks, and Italians from work permit fees if they will reside in Egypt for no more than five years.

Decision No. 146 of 2019 mandates that non-citizens obtain work permits from the relevant ministry and its labor directorates or from offices established for this purpose. Under this new decision, the total number of non-citizen workers in any institution, even if it has multiple branches, cannot exceed 10% of the total number of insured Egyptian workers. In contrast, the 2015 decision calculated this percentage based on the overall number of workers, requiring non-citizen workers to meet six conditions.

To obtain a work permit, several requirements must be met, including possessing a professional license. Under the new decision, only those professions that require special licensing, such as doctors and pharmacists, need to have these licenses. Additionally, the decision specifies work permit fees based on different tiers according to the number of years.

Residence permits do not grant refugees the right to work. Like all non-citizens, refugees and asylum seekers must obtain a work permit to be employed officially in Egypt. Several conditions must be fulfilled to employ non-citizens, including a quota that cannot be exceeded in any relevant entity, the prohibition against competing with the local workforce, and imposed fees. Some nationalities are exempt from one or more of these conditions. To apply for a work permit, refugees and asylum seekers need to find an employer willing to sponsor them. The employer must submit an application with the required documents to the Central Administration for Employment, along



with proof of the potential employee's qualifications and at least three years of experience certified by the Ministry of Foreign Affairs or the Egyptian embassy in their home country.

Private Work

Investment Law No. 72 of 2017 regulates the establishment of business activities for non-citizens, including refugees and asylum seekers, even though they are not explicitly mentioned. Any foreigner wishing to start a business must present a valid passport, a copy of their business plan, a power of attorney for a lawyer, a security clearance, and identification documents for the applicant's representative at the Ministry of Investment. Therefore, refugees without passports can do this. Once the application is accepted and the security clearance is obtained, a commercial work license is issued (noting that a commercial license is for private work, while a work permit is for wage labor). A residence permit can be issued for the founder, shareholder, or owner of the business for a duration of at least one year, which can later be renewed based on the project's duration and viability, with a maximum total residence permit duration of five years.

Article 4 of the executive regulations of the Investment Law allows non-Egyptian investors to obtain residency as long as they meet the required conditions, including being founders, shareholders, or partners in a company or owning an establishment and residing in Egypt for no less than one year.

The Commercial Law No. 17 of 1999 grants non-citizens rights equal to those of Egyptians when engaging in trade. Article 11 of this law states that both Egyptians and non-citizens may engage in trade as long as they meet certain conditions, including legal age.

Law No. 159 of 1981 regarding joint-stock companies, limited partnerships, and limited liability companies allows non-citizens to establish joint companies and partnerships by fulfilling certain conditions, including obtaining a security clearance and providing passports and a commercial register.

The law No. 152 of 2020 regarding the development of micro, small, and medium enterprises allows for the initiation of business activities and permits full foreign ownership.

However, this law does not provide specific guidance for refugees regarding procedures and access to business services, and it is unclear whether refugees are included under this law.



Social Security for Foreign Workers

Working Conditions

The Egyptian Labor Law No. 12 of 2003 provides the best description of the working conditions experienced by workers in Egypt, applying the right to fair and favorable working conditions to both Egyptians and non-nationals alike. This includes issues such as working hours, entitlements, annual and sick leave, and the procedures followed in cases of dismissal and termination of service.

The labor law prohibits discrimination in employment based on gender, race, language, religion, origin, or personal beliefs, explicitly excluding domestic workers from its provisions.

The Egyptian Senate gave preliminary approval to the new labor law on January 2022 maintaining the existing provisions regarding working conditions. However, if the new law is adopted, it will extend to new categories of workers, including many categories of informal workers. It would be beneficial to revisit the law once it is passed to understand its potential impact on refugees and asylum seekers working informally in the same categories.

Social Security

The 2014 Egyptian Constitution stipulates social security. For those without social security, social assistance is provided to citizens in cases of physical disability, old age, unemployment, and inability to support themselves and their families. However, there is no mention of non-nationals in this context.

Egypt has several laws addressing social security, including Law No. 179 of 1975 concerning social insurance, Law No. 108 of 1976 concerning social insurance for employers and similar cases, and Law No. 50 of 1978 concerning social insurance for Egyptians working abroad.

In 2019, Egypt issued a new Social Insurance and Pensions Law (Law No. 148 of 2019) that unifies all social security laws. This law includes insurance against old age, disability, death, work-related injuries, temporary disability due to illness or maternity, and unemployment. The law extends to some informal and seasonal workers, such as newspaper vendors, shoe shiners, and some domestic workers like drivers. It also sets subscription rates for each category of workers, reducing the contribution rates from 26% to 12% for employers and from 14% to 9% for workers, calculating pensions based on the average monthly wage.



The officially registered workers are required to pay 9% of the minimum subscription monthly, while the state treasury contributes 12% of the minimum wage monthly. They must obtain a license for registration, but it remains unclear how to license broad sectors of informal workers in various forms, or what the necessity for this licensing is.

There are no provisions specifically addressing refugees and asylum seekers; however, the law applies to all workers covered by it, whether they are Egyptian or non-citizens. The law distinguishes between workers who are employed inside the home, such as maids or nannies, and those who work outside the home, like drivers. Domestic workers who work inside the home are excluded from the law's provisions.

Egypt has entered into several bilateral social security agreements with Sudan, Greece, Cyprus, Tunisia, the Netherlands, and Morocco. The most notable of these agreements is the one with Sudan, as there is a large Sudanese community in Egypt and very few refugees from the other five countries. Rather than benefiting refugees, the goals of these agreements primarily serve Egyptian migrant workers residing in those countries. The agreement with Sudan includes provisions for the transfer of benefits or contributions to the home country, but it applies solely to Sudanese migrant workers intending to return to Sudan and transfer their entitlements, not to Sudanese refugees residing in Egypt.

Regarding social assistance, the Ministry of Social Solidarity is responsible for two cash transfer programs: "Takaful" and "Karama." These programs were established under ministerial decrees 230 of 2015 and 548 of 2015, which outline the beneficiary categories and the implementation methods. **Non-citizens, including refugees and asylum seekers, are not eligible for these programs.**

In 2018, Egypt issued the Comprehensive Health Insurance Law No. 2 of 2018, aimed at expanding comprehensive health coverage and purchasing health services to include all Egyptians by 2023.

The implementation of the law is being carried out in phases, starting with Port Said, Suez, Ismailia, North Sinai, South Sinai, and Alexandria. It will geographically expand until full implementation by the scheduled date, with Greater Cairo being the last area to implement the law.

Current laws and regulations remain in effect until then, and the law applies to Egyptians and non-citizens residing in Egypt with permanent or temporary residency permits for work, tourism, or education. The executive regulations of the



law stipulate that authorities will establish a program covering non-citizens in several categories, including permanent residents, those residing in Egypt for work, and individuals entering Egypt for business, tourism, education, or as refugees.

Law No. 23 of 2012, concerning health insurance for the breadwinning woman, applies to non-breadwinning women and their families, including provisions related to medical services and rehabilitation services in the event of illness or accident.

The law does not explicitly limit benefits to citizens, allowing refugees and asylum seekers to benefit from this insurance if they are self-supporting women. Similarly, Law No. 99 of 1992 includes provisions for health insurance for students from kindergarten to secondary school, and it does not exclude non-Egyptians. This may apply to refugees and asylum seekers if they are enrolled in schools.

Ministerial Decision No. 601 of 2012 stipulates collaboration between the Ministry of Health and the UNHCR to provide preventive and therapeutic healthcare to refugees in public health facilities. Additionally, a memorandum of understanding signed in 2016 between Egypt and the UNHCR focuses on access to primary care and medical referrals, including emergency services for refugees and asylum seekers. This includes improving access to mental health services in Abbassia and Helwan in Cairo, as well as in Al-Montazah in Alexandria.

Ministerial Decision No. 239 of 1997 allows private hospitals to set prices for Egyptians and non-Egyptians as determined by each hospital's board of directors, unless there are other decisions allowing specific categories of non-Egyptians to receive medical treatment at the same prices as Egyptians.

[Gaps in Legislation and Policies](#)

Egyptian national legislation rarely refers to refugees and asylum seekers in general, except for Article (19) of the 2014 Constitution, which states that Egypt will ensure political asylum for non-citizens who have been persecuted for defending human rights, peace, and justice, and prohibits the extradition of refugees. However, this provision has primarily been used to grant asylum to ousted political leaders and allies, rather than addressing the needs of ordinary refugees.



Moreover, Egypt lacks specific national legislation or procedures for asylum and fully delegates the responsibility for refugees and asylum seekers to the United Nations High Commissioner for Refugees (UNHCR) under a memorandum of understanding. Consequently, many rights granted to refugees under international and regional laws are stronger than those provided by local laws, such as the right to seek asylum, protection from forcible return, and other related rights.

In general, refugees and asylum seekers in Egypt are treated under the law in the same manner as other non-citizens. In some cases, decrees may grant preferential treatment to certain nationalities, but this is often applied on a case-by-case basis, which can lead to confusion regarding the intended provisions of the law.

Furthermore, refugee and asylum seeker communities advocate for a national asylum law that would establish a local process for determining refugee status, procedures for obtaining residence and work permits, and rights related to work, education, health, and housing, among other issues. This would also facilitate pathways for social integration. Despite the announcement of an asylum law, its content has not yet been revealed.

Many of the obstacles faced by refugees stem from the lack of the documents typically required of non-citizens in Egypt, the most important of which is a valid passport. Refugees often cannot meet this requirement due to fleeing their home countries and the resulting legal status, as well as the risks associated with interacting with their home country embassies.

These barriers could be alleviated through the formulation of policies that allow UNHCR cards to serve as official forms of identification, replacing passports in both the public and private sectors.

Policies regarding access to the labor market are limited as they only apply to formal employment, while the majority of refugees work in the informal economy. Therefore, the current labor law should encompass all workers in both the formal and informal sectors. Regarding private work, the legal framework requires a valid passport to obtain a business license and security approval for any non-citizen wishing to start a business. Refugees who do not possess passports are unable to apply for these licenses and approvals, making it difficult for them to establish a business due to the lack of recognition of their specific status compared to other non-citizens under the law.



Since the labor law explicitly excludes domestic workers, they cannot enjoy legal protections or fair working conditions. Informal workers often lack written contracts, preventing them from accessing many of their labor rights and appropriate working conditions. The new labor bill has received preliminary approval from the Egyptian Senate and is likely to include certain categories of informal labor. A bill addressing domestic workers was also introduced to the Egyptian parliament in 2021, presenting an opportunity for current and new laws to ensure that contracts exist for all workers, thus fostering a mutual understanding of fair and favorable working conditions.

In theory, social security or insurance covers all Egyptian and non-citizen workers, and refugees can access social security if they are formally employed or working informally in covered sectors. However, they face barriers in the registration process due to the lack of required documents.

In 2018, the Comprehensive Health Insurance Law was passed, which includes informal workers as well as non-citizens living and working in Egypt.

According to a 2019 assessment study on the vulnerabilities of refugees in Egypt, 50% of refugees aged 15 and older joined the labor force (both employed and unemployed), with significant disparities across different groups. Approximately 60% of non-Arabic-speaking refugees participated in the labor force, while this percentage dropped to 42% among Syrian refugees. Among Syrian refugees, wage-earning jobs predominated, whereas other refugee groups tended to have temporary jobs paid by the hour or based on productivity. The unemployment rate was 45% among non-Arabic-speaking refugees, compared to 13% among Syrian refugees, which marked a decrease from the previous year.

Regarding wage employment, it is evident that refugees are largely unable to access the formal labor market due to their inability to obtain work permits. Opportunities for formal employment are scarce, and very few work permits are granted to non-citizens, effectively excluding refugees from formal employment. The main barrier for refugees is securing a formal job offer. Since the law does not distinguish between non-citizens and refugees, the required documentation does not align with the situation of refugees in Egypt. Additionally, there is another



barrier related to the high costs of work permits, even though employers are responsible for covering these costs.

Some refugees benefit from short-term volunteer contracts that do not guarantee any benefits and rely on negotiations between the employer and the refugee for acceptable terms. These contracts typically last for six months to a year and are not linked to any employment benefits, including vacation days. However, they can be associated with social insurance if both workers and employers choose to make voluntary contributions for protection against various risks, such as income loss due to shocks to livelihoods or work-related injuries. These contracts should not be considered formal contracts; they primarily serve to grant workers access to social insurance. While it is unclear how widespread these contracts are among refugees, many have been offered through local and international NGOs.

Private Employment

Private work is more common among Syrian refugees than among African refugees, as Syrians share similar social norms, language, and religion with the Egyptian community and have better access to capital compared to refugees from African nationalities. Syrian women, in particular, have been able to start their own businesses without needing a partnership, especially for small, informal projects. They also participate significantly in certain economic activities from home, such as cooking and supplying meals, alongside handmade crafts.

There is no accurate documentation of the number of businesses established by refugees in Egypt. However, according to a 2019 article by the American Chamber of Commerce, it is estimated that there are over 3,300 registered Syrian companies and more than 30,000 Syrian investors operating in Egypt since 2011. According to Al-Mal newspaper, 818 Syrian companies were established in the first nine months of 2018, with investments exceeding 1.2 billion Egyptian pounds (66 million USD), representing a quarter of the companies established by non-Egyptians that year.

All refugees generally prefer self-employment over wage work in companies or institutions to maintain financial control and avoid potential exploitation by employers. Self-employment opportunities also provide some non-monetary benefits that refugee entrepreneurs prefer. Driven by necessity and in response to barriers in wage work, refugees seek opportunities for self-employment, even if they are low-paying.



Refugees have limited access to sporadic job opportunities within the private sector. Many rely on recruitment agencies and brokers to find jobs in the informal economy, especially those with African nationalities seeking domestic work and physically demanding jobs.

Rights at Work

Although Egyptian law stipulates certain provisions regarding labor rights, these do not apply to formally employed workers, whether Egyptians, refugees, or asylum seekers. Working informally leads to a lack of legal protection regarding working conditions, social security, and labor rights. Consequently, refugees and asylum seekers often find themselves in the informal economy, where they face long working hours and low wages, which is particularly concerning in the case of domestic work, as they are excluded from the current labor law.

Refugees and asylum seekers in informal employment often find themselves in an unstable situation where employers may refuse to pay their wages, significantly reduce their salaries, or change the nature and pace of their work.

Since labor law does not protect or address the rights of domestic workers, this particular group, mostly consisting of African women, faces significant violations regarding working conditions. Refugee and migrant domestic workers are at risk of employers withholding their wages and confiscating their legal documents, as well as facing the dangers of human trafficking and deprivation of food and medical care.

Summary Table of Legislation Regarding Foreign Workers Who Are Not Citizens and Refugee



Item	Legislation or Policy or Regulatory Framework	ARTICLES	LEGAL GAPS	NOTES
Access to the Labor Market	<p>Legal Identity and Registration</p> <ul style="list-style-type: none"> • Law No. 143 of 1994: Civil Status Law • Memorandum of Understanding (MOU) 1954: Between Egypt and the UNHCR • Law No. 89 of 1960 • Law No. 173 of 2018 • Law No. 8180 of 1996 	<p>Holders of yellow and blue cards are allowed to obtain renewable residency permits every six months. The yellow and blue cards serve as identity documents.</p>	<p>Inconsistency regarding the duration of residency permits for refugees.</p>	<p>Residency permits that are renewable every six months take a long time to process and do not include the right to work. There are other types of residency, such as education permits, which can be renewed annually.</p>



	<p style="text-align: center;">Employment</p> <ul style="list-style-type: none"> • Memorandum of Understanding (1954) between Egypt and the UNHCR • Labor Law No. 12 of 2003 • Decision No. 485 of 2010 • Decision No. 305 of 2015 • Decision No. 146 of 2019 • Casablanca Protocol • The Four Freedoms Agreement 	<p style="text-align: center;">Prohibition of Employment without Work Permit</p> <ul style="list-style-type: none"> • All non-citizens, including refugees and asylum seekers, are prohibited from working without a work permit. <ul style="list-style-type: none"> • Some nationalities are exempt from restrictions on entering the labor market; however, it remains necessary They must obtain a work permit 	<p>Refugees would benefit from a law that specifically addresses their right to work and removes all barriers that equate them with other non-citizens. Additionally, implementing a policy to recognize blue and yellow cards as official forms of identification would facilitate access to the labor market.</p>	<p>Due to the scarcity of formal jobs and the high costs and difficulties associated with work permits, refugees and asylum seekers primarily work in the informal economy.</p>
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	<p>Private Work</p> <ul style="list-style-type: none"> • Law 159 of 1981 • Law 17 of 1999 • Law 72 of 2017 • Law 152 of 2020 	<p>Foreigners are allowed to establish a business in Egypt according to specific laws and regulations.</p>	<p>The registration cards issued by the UNHCR should be recognized as identity documents for refugees seeking to obtain work permits and security approvals.</p>	<p>Due to the scarcity of formal job opportunities and the high costs and difficulties associated with work permits, refugees and asylum seekers primarily work in the informal economy.</p>
	<p>Employment Services Labor Law No. 12 of 2003</p>	<p>Refugees are entitled to access employment services.</p>	<p>Laws should regulate employment services to mitigate the risks of fraud.</p>	<p>Social networks play a crucial role for job seekers. Relying on private employment services can expose refugees to fraud.</p>
<p>The Right to Work</p>	<p>Working Conditions</p> <ul style="list-style-type: none"> • Labor Law No. 12 of 2003 • Child Law No. 12 of 1996 	<p>All workers have the right to enjoy fair and favorable working conditions, regardless of nationality</p>	<p>There are no legal gaps regarding working conditions.</p>	<p>Refugees work in the informal economy without contracts and under unstable working conditions</p>



	<p align="center">Social security</p> <ul style="list-style-type: none"> ☐ Constitution of 2014 ☐ Law No. 2 of 2018 <p align="center">"Comprehensive Health Insurance Law"</p> <ul style="list-style-type: none"> ☐ Law No. 23 of 2012 ☐ Ministerial Decision No. 601 of 2012 ☐ Ministerial Decision No. 239 of 1997 ☐ Law No. 148 of 2019 regarding Social Insurance ☐ Two ministerial decisions, No. 230 of 2015 and No. 458 of 2015 	<p>Workers in the formal sector and certain categories of workers in the informal sector are entitled to social security under the new law, which also applies to non-citizens. The new health insurance law includes non-citizens as well.</p>	<p>There is no legal gap regarding social security</p>	<p>Refugees cannot access social security and health insurance unless they are not working in sectors covered by the law, and the majority of refugees do not receive social security.</p>
	<p>Occupational Health and Safety</p> <ul style="list-style-type: none"> ☐ Labor Law No. 12 of 2003 ☐ Ministerial Decision No. 126 of 2003 ☐ Ministerial Decision No. 134 of 2003 ☐ Ministerial Decision No. 932 of 1996 	<p>Workers officially employed in certain sectors enjoy legal protection against occupational and health risks.</p>	<p>The law does not cover those who work informally.</p>	<p>Occupational health and safety guarantees are out of reach for refugees who primarily work informally.</p>



	<p>Trade Union Freedom</p> <ul style="list-style-type: none"> • Labor Law No. 12 of 2003 • Trade Unions Law No. 213 of 2017 • Law No. 142 of 2019 	<p>Non-citizens are legally permitted to join trade unions in specified sectors according to the law.</p>	<p>There is no legal gap.</p>	<p>The freedom to form associations is limited for both Egyptian citizens and non-citizens alike.</p>
	<p>Access to Justice and Grievance Mechanisms</p> <ul style="list-style-type: none"> • Constitution of 2014 • Labor Law No. 12 of 2003 	<p>All workers are entitled to access legal mediation in labor disputes, and both Egyptians and non-citizens have the right to seek recourse through the judiciary</p>	<p>There is no legal gap concerning access to justice and grievance mechanisms.</p>	<p>Grievance mechanisms apply only to formal workers, as refugees in informal jobs are reluctant to resort to the court system and prefer to seek community mediation.</p>

Conclusion

Due to the lack of differentiation in legislation between refugees, asylum seekers, and other non-citizens, significant challenges arise concerning refugees' rights to access work and their rights while employed, which are subject to restrictions. The legal frameworks that apply to non-citizens also apply to refugees, thereby automatically limiting their integration into the labor market. Work permits are issued under highly restrictive criteria, making the process burdensome for both potential employers and refugees.

On the other hand, refugees can participate in the informal economy similar to Egyptians, despite the absence of clear legal guidelines that recognize refugees and their rights. This situation



exposes them to exploitative and discriminatory working conditions, along with a lack of protection

Many of the challenges faced by refugees in the labor market reflect the requirements for documentation, including identity documents such as passports or academic certificates, which most refugees lack due to the nature of their escape from their home countries. Additionally, renewing these documents at their embassies incurs high fees, along with the anxiety of potential risks associated with engaging with their embassies.

Recommendations

1. **Legislative Framework:** Establish legislation that recognizes refugees on broader bases reflecting international standards, alongside a legislative agenda that acknowledges and protects the rights of refugees in Egypt, including their rights in the labor market.
2. **Decentralization of Residency Procedures:** Initiate dialogue with relevant government institutions to decentralize residency permit procedures, expanding access beyond Cairo to facilitate movement for refugees by offering services in their respective governorates.
3. **Promotion of Vocational Training Services:** Promote the vocational training services provided by the Ministry of Manpower among refugees to enhance their integration into the Egyptian labor market.
4. **Alternative Qualification Recognition Policies:** Develop policies that provide alternative means of recognizing qualifications and skills, as refugees in Egypt may not possess formally recognized academic or professional certificates.
5. **Expansion of Social Protection Programs:** Extend social protection programs to include the informal sector, thereby creating opportunities for refugees and asylum seekers in Egypt.
6. **Legislation for Domestic Work:** Fill the legislative gap by enacting a law to regulate domestic work in line with international commitments, including provisions that govern the relationship between employers and domestic workers to ensure contractual balance and protect the rights of domestic workers.