



**CENTER FOR TRADE UNION & WORKERS SERVICES
(CTUWS)
ELMODREK FOR TRAINING AND RESEARCHES**

Struggle for Survival

Freedoms of Association Report

2025

BY: CTUWS

Introduction

This Report documents violations of labour rights and freedoms of association during 2025. It is divided into three parts. The first part tackles general conditions which are the background for workers' conditions and the violations that are committed against their rights. This part includes economic conditions in which workers' living conditions deteriorate and workers become unable to meet their basic needs and the needs of their families. It also tackles some important developments in Egyptian society and its limited-income social categories and strata, especially important legislative developments as well as parliamentary elections and all its repercussions.

The second part of the Report covers the New Labour Law no. 14 for 2025 which was issued on the 3rd of May. It went into force on the first of September. It is the most important law that regulates labor relations in Egypt and governs the relation between the two parties of industrial relations (workers and employers) and it is also considered the benchmark that violations are measures against which.

Then, The third part of the report is devoted to the monitoring process and its results, including the monitoring methodology and the quantitative and qualitative analysis of its findings. It is worth noting here that a large number of violations was observed, although the monitoring process could not have covered all violations that took place within the year because of different obstacles, especially lack of official data, limited media coverage amid restrictions on freedom of the media, as well as hardships related to the vast area that should be monitored which extends on all governorates and industrial zones in the country.

It is also worth mentioning that the rising and frequent labour protests during this year are primarily due to economic conditions and declining wages, especially in light of the refusal of many employers to apply the minimum wage. It is also important to highlight the failure of mechanisms of management of collective labour disputes and the refusal of employers (and also managements of companies of the public enterprise sector) to negotiate with representatives of workers that we observed in the Report; and the fact that they use instead methods of intimidation and threat, imposing tough penalties, relocation and dismissal of workers and even arresting them or holding them in provisional detention.

A special part of monitoring work was devoted to violations of occupational health and safety and safe work environment because of this year's rising -and maybe unprecedented- number of accidents and fires in work places as well as road accidents that took place for workers on their way to and from work places. The high number of victims revealed not only violation of occupational health and safety and safe work environment measures, but also lack of protection for irregular workers especially in the agricultural sector and violation of the rights of working women and children in this sector. It also revealed almost complete absence of supervision and inspection, clearly highlighting the urgent need to activate them.

At the end of the Report, main conclusions of its content and findings are written.

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Part One: Background

General Conditions in Egypt

Economic Conditions and Major Events

First: One Third of Egyptians is below Poverty Line

❖ Inflation and Prices

Annual inflation rates in Egypt witnessed severe fluctuations during the past four years (2022-2025) as they reached a record high in 2023 before they started declining in 2025.

In the following, we see the development of annual inflation rates (the general index of consumer prices) according to the data of the Central Agency for Public Mobilization and Statistics (CAPMAS):

- 2022: Annual average inflation was around 13.9%.
- 2023: An unprecedented historic peak: inflation reached 38% in September 2023.
- 2024: Inflation started to gradually decrease after the so-called “financial rescue package” in March. It continued declining to reach lower levels by the end of the year (basic inflation rate recording 23.7% in November compared to 24.4% in October)
- 2025: Inflation continued its considerable decline. In November it was around 12.3% while it was 12.5% in October and 11.7% in September of the same year.

So, accumulated inflation in these four years (2022-2025) may be calculated at 118%.¹

So, we are faced with a grave accumulated impact even with the recent slowing down.

[It has to be taken into consideration that inflation rates continued to accelerate in Egypt since the year 2016, which witnessed a dramatic rise thereof amounting to 19.4% in November of that year as a result of restructuring the Egyptian economy and rising cost of basic services and goods.]

Whereas accumulated inflation is the comprehensive measurement of the deterioration of the value of the currency, reflecting continuous price pressures that affect the living capacity of citizens and showing the effects of economic policies on prices with time, Egyptian citizens (workers) still suffer from rising prices and deteriorating ability to provide basic needs. This rift is not treatable with government palliatives.

Economic expert, Hany Tawfiq,² points out that it is dangerous to radically decrease bank interests while many people live on interests as this will mean that they will have to reduce their consumption leading to rising recession. Declining inflation didn't result from boom and abundance of goods but from declining purchasing power of people leading to recession.

The Central Bank of Egypt had lowered interest rates from their previously record-high levels four times during this year, by a total of 625 basis points (225 in April, 100 in May, 200 in August and 100 in October).

Estimates varied regarding whether to reduce interest rate again or to continue to fix it, which happened in the meeting of the Monetary Policy Committee on the 20th of November. But the

¹ $(1+13.9\%) * (1+38\%) * (1+23.7\%) * (1+12.3) - 1$

$= (1.139 * 1.38 * 1.237 * 1.123) - 1 = 118\%$

² Veto Gate, 18/12/2025

Committee decided in its latest meeting in 2025 (the evening of Thursday the 25th of December) to lower interest rates by 1% so that they become 20% for deposits and 21% for lending. The Central Bank stated that its decision reflects the Committee's assessment of the latest development of inflation and its projections since its last meeting [real interest rate is estimated as nominal rate minus the inflation rate].

The decision of the Central Bank was different from the observations of the IMF according to its latest statement on the last two reviews in the funding programs. The IMF stated that the Egyptian Central Bank should continue cautious administration of the cycle of monetary easing because monthly readings of inflation show that pressures for price disinflation didn't strongly consolidate yet.

A number of economic analysts pointed out that there was a gradual decline of inflation in 2025 but it was accompanied with slow economic activity and the emergence of some recession indicators in some sectors, especially appliances. They explained this by weakening purchasing power in spite of declining interest and attempts to instigate growth.

There were different opinions about whether the economy is in a stage of full recession or slowness that requires measures to support consumption and production. Indicators show that commercial activities are slowing as merchants suffer from weak sales even with the decrease in prices sometimes known as "burning prices", which reflects deterioration in the purchasing power of consumers.

Experts clarify that Egypt goes through a complicated economic phase. While inflation rates decline, the economy faces challenges of slowing activity and rising prices and their impact on the purchasing power of Egyptians.

❖ Poverty Line

In his weekly press conference held on Wednesday, 18 December 2025, Prime Minister Mustapha Madbouli affirmed that the ratio of Egyptians falling below the poverty line in the past two years has increased. He stated that it amounted to 30% because of economic changes, affirming that "the government strives to mitigate the suffering of citizens through two courses: one is raising salaries and the other is reducing prices."³

However, Dr. Aliaa Al-Mahdi, professor of economics, commented on the declared poverty ratio that 30% is very low for the current situation, pointing out that the Family Budget Research in 2021/2022 showed that the ratio amounted to 32% and that was before the big wages of rising prices. She affirmed that sharp increases in prices in the years of 2023, 2024 and 2025 reduced the real incomes of citizens and increased the number of poor people. She pointed out that most estimations now tend to consider that the ratio may amount to 37% or 38% (i.e. one third of the population of Egypt).⁴

CAPMAS declared in 2020 that the ratio of Egyptians below the poverty line amounted approximately to 30% (that was the last time CAPMAS announced this ratio as it refrained -or made to refrain- from declaring it afterwards).

However, if the ratio was 30% five years ago and this period included the year 2023 with the unprecedented inflation rate in the history of Egypt, it -for sure- may not be the same now. It is worth mentioning that the US Dollar in 2020 equaled 15.7 Egyptian pounds while it is at best 47.5 Egyptian pounds in 2025.

³ Ashraq Al-Awsat, 18 December 2025.

⁴ Al-Masry Al-Youm, 17 December 2025

According to the World Bank, the national poverty rate in Egypt increased in 2022 to 32.5%. Heba El-Lithy, Professor of Statistics in Cairo University and CAPMAS advisor, stated that forecasts point out that poverty rates amounted in July 2023 to 35.7%.

In June 2025, the World Bank amended the abject poverty line to be three dollars per person a day (the poorest category in the poorest of countries), while it amended the poverty line for the lower stratum in middle-income countries to be 4.2 US dollars rather than 3.65; and for the higher stratum in middle-income countries to be 8.30 rather than 6.85 as the World Bank used a social poverty line that employs a more relative concept of poverty. The social poverty line is defined as the determined number added to it half the median level of consumption in a certain country. We are faced with a paradox if we adopt the lower poverty line that the World Bank adopted lately, i.e. 3 dollars a day (90 dollars per individual per month), which is equivalent to 4275 Egyptian pounds for individuals. So, the poverty line for a family of four is around 17000 Egyptian pounds (which is two and half times the official minimum wage in Egypt).

Anyway, Dr. Alia Al-Mahdi, states that there is more than one way to measure the poverty line. Some methods consider the person poor if his/her income is less than two to three dollars a day. Others rely on the satisfaction of basic needs like food, drinking, transportation and education. A person who does not have the minimum level of these needs is below the poverty line. A person who barely meets these needs is on the poverty line. It is not just about numbers, but about the ability to live.⁵

❖ **Budget for the Financial Year 2025/2026**

Debts devour the output of workers' work and taxpayers' money

The Egyptian government announced in a statement that it approved the draft budget of the financial year 2025/2026 which included 4.6 trillion pounds expenses (91 billion dollars) while the country continues to reduce costs in consistence with the IMF program while revenues are expected to reach 3.1 trillion pounds, i.e. there is a deficit of around 1.5 trillion pounds (30 billion us dollars).⁶ Thus, costs increased by 18% and revenues by 19% compared to the previous budget of 2024/2025.

Increase in spending partially reflects rising general inflation rate, although it slowed down after reaching the peak in September 2023 (38%) in the aftermath of the “financial rescue package” that was obtained in the context of a program of a loan of eight billion dollars that Egypt signed with the IMF in March 2024.

According to the statement of the government, the new budget aims at achieving a preliminary surplus of 795 billion Egyptian pounds, which is equivalent to 4% of the GDP⁷, which is higher than the initial surplus of 3.5% which was targeted in the budget of 2024/2025. However, what was achieved was 0.5% less than such commitment and the IMF granted the government an exemption thereof in the fourth review.

⁵ Al-Masry Al-Youm, 17 December 2025.

⁶ Egyptian Finance Ministry <http://www.mof.gov.eg>

⁷ The General Budget of the State 2025-2026

<https://mof.gov.eg/ar/posts/stateGeneralBudget/6762f042f9836d0007d4bec6/%D9%85%D9%88%D8%A7%D8%B2%D9%86%D8%A9-%D8%B9%D8%A7%D9%85%D8%A9-2025-2026>

Data from the National Narrative for Economic Development showed that the budget deficit increased to 7.4% of the GDP in the previous financial year which ended in June 2025 from 3.6% in the preceding year (after excluding the outcome of the Ras Al-Hekma deal).⁸

While there are questions raised about how to fund this deficit in view of rising interest rates nationally and internationally, the external debt of Egypt rose to 161.2 billion dollars by the end of June 2025, which is 5.5% compared to the previous year because of increasing withdrawals from debts and decreasing US dollar exchange rate. According to the data of the Central Bank, Egypt paid 139 billion dollars as debt service (installments and interests) during the past five financial years.⁹

Egypt increasingly depends on internal and external borrowing as a primary source for the provision of resources, the matter which clearly affects the make-up of the state budget in which debt and debt commitments and interests swallow around two thirds of spending that the government plans to. Moreover, the primary method that the state relies on to acquire new resources in order to cover the gap between revenues and expenses is getting new loans, which makes this situation likely to continue and even deteriorate in the coming years.¹⁰

Citizens pay the bill of debts

Debt burden continues to pressure the general budget as its ratio increases year after year without substantive improvement in economic indicators or living standards. The ratio of debt interests to total government expenditures increased from 30% in 2015 to 47.4% in the past financial year, amounting to 49.9% in the proposed budget of 2025/2026 of 2.298 billion dollars.

If we calculated total debt service (i.e. interests and debt installments together), the amount reaches 4.38 trillion pounds out of total uses estimated by 6.76 trillion pounds. This means that debt service consumes around 64.8% of the total budget, while this ratio was 62% in the budget of 2024/2025 and 54% only in the preceding year.

It is probably worth mentioning that the UN report (World Economic Situation and Prospects 2025), when it evaluated the performance of the Egyptian economy, addressed a criticism of the priorities of the Egyptian government in public spending as allocations for public debt service exceeds spending on education and health combined. It also warned that debt interests started to drain more than 70% of the revenues of the state.

In spite of all demands from economists and human rights activists to set a ceiling to public debt that does not exceed a certain percentage from the domestic product contrary to its current high ratio, as well as demands to set priorities for spending borrowed money and to direct revenues to spending on human and economic development, encouraging service and production sectors that contribute to generating income and value added and reviewing spending on projects that don't contribute to generating income, reducing future expenses or meeting basic needs of the majority of the population like development of education, health, provision of housing and decent job opportunities, the government disregards all these demands in order to continue in the vicious circle: new debts to pay debts.

⁸ Masrawy, Saturday 20 December 2025

⁹ Al-Masry Al-Youm, 6 December 2025

¹⁰ Egyptian Initiative for Personal Rights, 27 May 2025

❖ Erosion of the share of the working classes in the national product

Removal of fuel and electricity subsidy and reducing food subsidy

In a statement by the Council of Ministers regarding the budget of the current financial year, it stated that 732.7 billion pounds of spending in the budget will be allocated to subsidy, grants and social security, i.e. 15.2% more.

It pointed out that the budget includes increasing goods and bread subsidies by 20% to 160 billion Egyptian pounds. It also includes 75 billion pounds to support petroleum products, 75 billion for electricity subsidy, and 3.5 billion for subsidizing the installation of natural gas to homes.

Contrarily to these statements, austerity remains a dominant character of the budget. Spending on subsidies of petroleum products is reduced to less than half of last financial year's levels. This means more increases in the prices of fuel after they were raised three times already (once in 2024 and twice in 2025) as part of the government's pledges to the IMF to reduce spending in subsidy. This results in rises in the prices of goods and services that rely on transportation or uses fuel itself.¹¹ Moreover, increases in food subsidy were less than inflation rates which means that real spending on this item deteriorated. At the same time, allocations for the pensions of Takaful and Karama witnessed true increases but they remain less than poverty line estimations.

According to the Minister of Social Solidarity in her statements on the sidelines of her meeting with the delegation of the World Bank (partner in funding), average amount of monetary subsidy to each family amounts to 900 Egyptian pounds (the minimum is 700 egyptian pounds and maximum is 4000 for the family in case it receives support from the programs of Takaful and Karama for more than one category at the same time), pointing out that the budget of the program amounted to 54 billion dollars in the current financial year.

According to the Minister, the number of beneficiary families increased to 4.7 million families in 2025 (75% women and 25% men) while the program focuses in the current stage on fostering mechanisms of transforming beneficiary families from receiving support to engaging in the labour market and production.¹² It is worth mentioning that the Social Security Law no. 12 for 2025 which was issued in April 2025 included conditional and non-conditional financial support programs, applying precise targeting mechanisms, and linking social protection to economic employment in a way that aims at transforming families from reliance on support to production and work.

It is probably worth mentioning that the Prime Minister declared in his weekly press conference on Wednesday, 17 December 2025, the beginning of steps to transform food subsidy into cash subsidy. The majority of Egyptians benefiting from the food subsidy fear that this measure will exclude large sectors of beneficiaries and deprive them of all forms of support, in addition to fears from the deterioration of the value of cash support with the deterioration of the value of the Egyptian pound.

❖ Spending on Health and Education

According to the financial statement of the 2025/2026 budget, the government claims that it allocates around 10.7% of the GDP to sectors of education, health and scientific research combined as follows: 684.7 billion pounds to pre-university education, 358.2 billion to

¹¹ Egyptian Initiative for Personal Rights. Tuesday, 27 May 2025.

¹² Sada El-Balad, Tuesday 23 December 2025; Youm7, 23 December 2025.

university and higher education, in addition to 173 billion to scientific research and 617.9 billion pounds to the sector of health (3.6%). However, these ratios don't express actual spending as they include items that are not directly related to substantive spending on services (like debt interest). These numbers are more of an attempt to make the financial picture look better rather than a true commitment to the spirit of the constitutional provisions which stipulate that a specific minimum is required for spending on health and education rather than gathering several expenses and presenting them as one bloc in order to theoretically pass the constitutional threshold.

In the functional classification of the budget's expenditures, which is the most accurate tool for measuring actual spending, the allocations for the Ministry of Education appear at around 315 billion pounds only, which is 1.8% of the domestic product. The true number of allocations for health appears in the functional classification and amounts to 246 billion pounds only, which is 1.2% of the domestic product. However, the Egyptian Constitution stipulated in articles 18, 19 and 21 that the government is obliged to allocate 3% of the GDP to the health sector, 4% to pre-university education and 2% to university education and scientific research.

The Universal Health Insurance law no. 2 for 2018 was issued in the beginning of 2018. It stipulated that its provisions apply for insurance health services and work injuries, except for services of public health, preventive services, ambulance services, family planning services and health services related to disasters and epidemics and similar services that state agencies are obliged to provide.

The Law stipulated that the family is the unit to which the Law is applied, and that its provisions shall be implemented gradually across the governorates in a way that ensures the financial sustainability of the system and maintains its actuarial balance.

The first stage of the implementation of the Law covered six governorates, while the second stage is supposed to include five governorates (the governorate of Alexandria may be added to them according to statements of government officials).

According to the Law, the head of the family should pay a monthly subscription for himself worth 1% of his income, 3% for his non-working spouse and 1% for each child.

However, workers complain from rising value of subscriptions and from making beneficiaries bear the costs of service and medicine, as well as problems of implementation that often force them to resort to the private medical sector. That is why one of the demands of striking workers in the Sugar Company in Aswan in which the system was applied in its first phase was to withdraw from the universal health insurance system.

On the other hand, Law no. 87 for 2024 to Regulate the Granting of Public Facilities' Concession to Establish, Manage, Operate and Develop Health Facilities was issued and it stipulated that "public facilities concessions may be granted to Egyptian or foreign investors, whether they are natural or legal persons, to establish, manage or operate health establishment; or to manage, operate and develop existing health establishments without being restricted by the provisions of Law no. 129 for 1947 on Public Utilities Concessions and Law no. 61 for 1958 regarding the Granting of concessions related to the investment of natural wealth resources and public utilities and amendment of concession conditions," with the condition that the concession may not be waived to others without the permission of the Council of Ministers and that the concession period is not less than three years and not more than fifteen years.

Granting the concession to manage and operate existing medical establishments results in increasing the burdens of poor people to bear the cost of treatment. It also affects the number of beds available to this category of people in hospitals. The number of hospital beds in Egypt is estimated to be 126,000 hospital beds which is 1.2 beds to one thousand citizens (according

to the statements of the Minister of Health). This rate is lower than international rates which is three beds to one thousand citizens.

In a statement issued by the presidency of the Council of Ministers, the Minister of Health revealed that there is a partnership with the private sector to manage and operate a number of existing health institutions: Mabaret Al-Maadi, Heliopolis Hospital, Al-Agouza Hospital, Sheikh Zayed Aal-Nihian Hospital, and Dar El-Salam Cancer Hospital. Nevertheless, these hospitals -according to the head of the Doctors Syndicate- are successful government hospitals and don't need much development.¹³

❖ Taxes are weighing heavily on workers.

Within the so-called social package launched by the government in March 2025 -which included raising the Takaful and Karama pension and raising the grant for irregular workers-tax exemption limit was raised to 60,000 Egyptian pounds which is equivalent to 5000 Egyptian pounds per month. So, the worker who receives the minimum wage (7000 Egyptian pounds per month) (assuming he receives it) is not exempted from income tax. So, practically workers receive less than the minimum wage although it is the subsistence level.

In addition to income tax, the worker (Egyptian citizen) bears the burden of indirect and unfair taxes, especially the value added tax of 14% rate. The worker -as a final consumer- pays imposed taxes on each point in the supply chain.

The government aims at collecting 2.6 trillion pounds of taxes in 2025/2026, which is 84% of revenues. Increased collection of taxes -according to the government- will be achieved by expanding the tax base and including the informal economy as well as activating electronic tools of collection and updating inspection mechanisms.

Taxes on wages (salaries) and taxes on the consumption of goods and services (value added) represent 45% of the expected tax outcome in the budget, while taxes on company profits represent only 12.5% of this outcome and real estate owners contribute 0.7%.

In 2025, the government took a number of so-called “facilitating” measures, especially Law no. 6 for 2025 which introduced a simplified taxing system for enterprises whose annual work size does not exceed 20 million pounds that exempts these enterprises from capitalist profit taxes, dividend taxes and stamp duties. The Tax Authority launched a comprehensive tax pardon initiative to grant a comprehensive pardon to anyone who registered a commercial or professional activity that was not registered before, provided that this is done before 12 August 2025. Moreover, capitalist profits tax was cancelled and it was replaced with stamp tax on capitalist transactions, and the tax on real estate transactions was re-regulated. Of course, the indirect value added tax was kept in place and it was toughened through the collection system of the electoral bill.

Thus, the government kept taxes on wages -and merely introduced a negligible increase in the tax exemption threshold- as this is the guaranteed source of taxes because they are deducted from the source itself and paid on a monthly basis. Other than that, it sought more exemptions and facilitations for taxes on profits and this has two main purposes (apart from the main purpose which is increasing collected taxes). The two other purposes are:

¹³ CNN Arabic, Wednesday 26 June 2024.

- Attracting the informal economic sector to be registered for taxes. This sector represents a considerable part of the economic structure, and the main objective of the government is to be able to collect taxes from this sector.
- Offering more incentives for investors

Tax policies that the budget of the financial year of 2025/2026 reflect, and measures taken in 2025, reveal a stark bias against workers and poor classes. This is evident in increasing reliance on wage taxes and indirect taxes on one hand and offering incentives for investors on the other hand.

We don't disagree on the importance of supporting production and service sectors that benefit the economy, but we see that this support has to be linked to conditions related to their contribution to creating jobs, increasing production and respecting workers' rights. The objective of the state should not be helping profit-making people increase their profits.

Second: Significant Legislative Developments

❖ Law no. 164 for 2025 [the Old Rent/Rent Control]

One of the most remarkable events of 2025 was the issuance of the new law on rent control which captured huge attention and instigated several forms of protest and opposition.

The Supreme Constitutional Court had issued on 9 November 2024 its ruling in the case no. 24 for the 20th judicial constitutional year declaring the first clause of articles 1 and 2 of law no. 136 for 1981 (on Some Provisions on Leasing and Selling Places and Regulation of the Relation between Landlord and Tenant) Unconstitutional. These provisions were declared unconstitutional because they fixed the annual rent for places built for the purpose of housing since the Law was put into force.

The Court decided that the day after the end of the legislative term of the House of Representatives is the date on which this ruling will be put into force.

This meant that the House of Representatives was obliged to issue a legislation on the value of the rent for houses regulated by the old rent laws (i.e. those leased before the issuance of the Law no. 4 for 1996 which returned the rent relation to the provisions of the Civil Code). With the increasing pressures of investors and business men in the era of Mubarak, it witnessed the emergence of rising voices that demanded the liberation of rent. However, these calls were met with large scale fears from the social repercussions leading the authorities to confine itself to issuing a new law that liberated rent relations after its issuance but kept the situation of previous rent contracts as they are (Law n. 4 for 1996).

Egypt witnessed state interference in the rent relation for the protection of tenants since World War I. In this context, laws developed in two aspects: determination of the rent and imposing controls on the right of landlords to evacuate the tenants. In the 1960s, the state increasingly controlled the rent market and this tendency was supported by a discourse that saw rent control as a tool for social justice and fighting real estate speculation.

The Supreme Constitutional Court decided that it is unconstitutional to make the rental payment fixed and gave the legislator what it considered a sufficient time period to choose from available alternatives whatever is consistent with statistics and studies in order to come up with a legislation to regulate the rent. However, the government didn't prepare necessary statistics and studies and it surprised everyone with a draft law that not only determines the rent but also dismantled all other aspects of the rent control system, especially the aspect that old rent contracts are not limited in time.

This legislation did not only instigate concerns, but actually created a wave of panic combined with anger among tenants. Many experts and politicians expressed their concerns of the grave social repercussions that may result from the loss of shelter for millions of people. So, the government showed some unusual amount of flexibility and ease and it declared that the draft law it submitted may be amended and held hearing sessions in the House of Representatives not only for tenants and landlords' associations but also for representatives of professional syndicates and politicians. The usually "restricted" media was allowed to host representatives of concerned parties and organize conversations with them and among them.

The government withdrew its proposed draft law and submitted another one that included some concessions and limited response to criticisms of the first draft. However, once it submitted the amended draft closed any dialogue about it and the lawyer of the Tenants' Association was arrested in a clear signal that it would not tolerate any more objections.

Many parliament members who belong to the regime-supporting parties or actually the "governmental" parliament members declared that they objected to the draft law submitted by the government under pressure from their constituencies. However, once the general session designated for voting on the draft law was due, discussion was closed and the law was approved by a big majority. So, more than 20 parliament members from the opposition declared their withdrawal from the session and issued a statement protesting the abusive practices that were done in the session and the fact the government refrained from submitting required statistical data and didn't allow the discussion of their proposals to amend the draft or reach a compromise.

On Wednesday 2 July, the House of Representatives approved the law. One month later the President ratified it. So, the law no. 164 for 2025 regarding Some Provisions on Leasing and Selling Places and Regulation of the Relation between Landlord and Tenant was issued and published in the Official Gazette on the 4th of August and it entered into force on the 5th August 2025.

❖ **Criminal Procedure Code**

In August 2024, the government submitted its proposed draft for the Criminal Procedure Code claiming that it aims at alignment with constitutional requirements of the 2014 constitution. Discussions of the draft in the House of Representatives continued for around eight months until it was approved in April 2025.

Throughout these eight months, many human rights defenders, legal experts, civil society institutions, professional syndicates and international human rights organizations, in addition to a number of parliament members, stated their objections to the law demanding the postponement of its discussion and holding hearing sessions that included all concerned parties and stakeholders. However, the House ignored these demands and considered that it was enough that it discussed -as it claimed- the memos submitted by the Lawyers' and Journalists' syndicates and the Judges' Club and responded to them.

"Beyond the detailed legal analyses that aim to highlight the various flaws and inherent risks in the draft law, there is a consensus that its main problem—even if it contained some positive improvement in some of its provisions—is greater than just a legally flawed article or one that lacks appropriate safeguards. The problem lies in the very governing philosophy of the law itself. This philosophy can be summarised as a political and security desire to cement, legalise, and eternalise the existing conditions and practices, including the systematic violations and structural defects that have ravaged Egypt's criminal justice system in recent years and infringed upon the rights of litigants, especially those accused of a criminal offence."¹⁴

¹⁴ The Egyptian Initiative for Personal Rights, Position Paper, 25 September 2025.

United Nations' Human Rights Commission expressed its grave concern regarding articles of the draft law that give public prosecutors broad discretionary powers related to provisional detention, surveillance of communications and travel bans, as well as measures that have adverse effect on the right to effective legal representation and holding public officials accountable for their behavior including law enforcement officials.¹⁵

We may say that the most important objections to the draft law may be summarized in the following:

- Undermining the principle of separation between the power to investigate and the power to indict and giving absolute powers to the Prosecution -without judicial oversight- to take measures that affect the rights of citizens like surveilling communications.
- Undermining the rights of citizens to fair trial (the presumption of innocence) within a reasonable period of time. Although provisional detention was shortened, its maximum time limit is still longer than it is in international human rights law standards. The law does not handle the phenomenon of prolonged provisional detention through what is known as “recycling” and lack of guarantees to make sure it is not used as a punishment. Alternative precautionary measures still restrict freedom in a way that raises concerns about expanding their use as well.
- Throwing the door wide open to shirking the safeguards guaranteed by the law using phrases like “as the case may be” or “may be extended for one or more periods” or linking enjoyment of basic rights of the defendant and his/her defence to “the interests of the investigation”.
- Undermining the right of defendants to fair trial as it gives the Public Prosecution the power to deprive defendants from the right to get the help of lawyers to defend them, including the submission of their defense in plea sessions and gives the Public Prosecution vague powers to deprive defendants and their lawyers from accessing documents of plea if “the interest of the investigation so requires.” It also gives it the power to deprive lawyers of defendants from the right to examine prosecution witnesses, access case files and submit memos during the procedures, which means obstructing the work of defendants' lawyers to prepare their Pleadings.¹⁶
- Articles regulating remote-trials constitute violation of the defendant's right to fair trial as the defendants are not allowed to talk directly to the judge or to see witnesses and evidence presented against them.
- Continuing the exclusive authorization of the Public Prosecution to start investigating the behavior of public employees, which led throughout tens of years to almost complete impunity for crimes of torture and violations in detention.
- Contradicting article 187 of the Constitution which guarantees the principle of public trials through expansion in the scope of prohibition of broadcasting hearings.

On 28 August 2025, the draft law was referred from the House of Representatives to the President in order to be issued. However, there were several demands to the President not to ratify it because of its several defects. The President surprised everyone when he decided to refer it back to the House using his constitutional prerogative for the first time, which was bizarre in view of the political scene in Egypt.

¹⁵ UN Human Rights Commission, Press Release, 13 May 2025.

¹⁶ Human Rights Watch, October 2024.

Returning the draft was accompanied with a request to reconsider articles that:

“Relate to considerations of governance, clarity, and practicality, which require their re-examination to achieve further guarantees for the sanctity of a person's home and the rights of the accused before investigation and trial authorities. This also includes increasing alternatives to pre-trial detention to limit its use, removing any ambiguity in the wording that could lead to multiple interpretations or problems during practical application, and allowing adequate time for the relevant ministries and authorities to implement the new mechanisms and models in the draft law and become familiar with its provisions. This will ensure their application with precision and ease, leading to swift justice within the framework of the constitution and the law”¹⁷

In spite of some optimism created by the unprecedented and unexpected move of the president, the matter was contained by discussing the amendment of merely eight articles of the law in two quick sessions. The House approved the draft amendment submitted by the government and adopted the law on Thursday, 16 October 2025.

Amendments didn't respond to the demands that many parties continued to raise throughout the year and didn't tackle the core problems of the law. Amendments were confined to changing the date of the entry into force of the law to be the first of October 2026, determining the cases that allow public authority officials to enter homes and conditions that allow a prosecutor to interrogate the defendants without the presence of his lawyers, increasing provisional detention alternatives to seven, presenting the documents of any case in which the defendant is provisionally imprisoned to the Public Prosecutor every three months, continuing to work with conventional methods to declare litigants along with new technological methods and obliging the court before which the appeal of a defendant being tried in absentia in a felony is reviewed to postpone the review of the appeal just once in order to allow him/her to attend.

On 12 November 2025, the Criminal Procedure Code no. 147 for 2025 was issued after the ratification of the President.

Third: Parliamentary Elections

2025 witnessed the elections of the two chambers of the parliament amid very low participation rates of Egyptians. The government amended the electoral law before the elections. The block list system (closed absolute list) -which is rejected by opposition political forces- was kept in place. Outcomes of the National Dialogue that the President called for and promised to abide by its outcomes were ignored.

Opposition forces have argued in the sessions of the National Dialogue to adopt the open proportional list and increase the number of seats to allow for more representation, and adopting mechanisms to control electoral spending which became -according to them- a decisive factor in the formation of the parliamentary map.

Supervision on parliamentary elections is entrusted to the National Elections Authority which is supposed -according to the Constitution- to be an independent authority that supervises all procedures of nomination and voting. It comprises ten appointed members: the vice president of the Court of Cassation as president, and the members are the the vice president of the Court of Cassation, two presidents of Courts of Appeal, two vice presidents of the president of the

¹⁷ Statement of the President, Monday 21 September 2025.

State Council, two vice presidents of the president of the State Lawsuits Authority and two vice presidents of the Administrative Prosecution Authority.

Elections of the Senate were conducted on 4 and 5 August 2025 amid clear reluctance on the part of Egyptians to participate. Voter turnout according to official results was 17.1% of the total number of people registered in the voters lists. In fact, most Egyptians see this house as useless and that the only use thereof is to reward some people who were excluded from the membership of the House of Representatives.

The Senate (which was previously known as the Shura Council) was restored to parliamentary life pursuant to the constitutional amendments of 2019. According to the Constitution, it is “mandated to examine and propose any matters deemed to entrench the foundations of democracy; support social peace” in addition to being consulted in “suggestions concerning the amendment of one or more articles of the Constitution” and draft law referred to it pursuant to the provisions of the law.

The Senate comprises 300 members, two thirds of them (200) are elected by secret ballot while the President appoints the remaining third (100 members). The 200 elected members are elected based on a mixed system that equally combines individual seats and a block list (100 for majoritarian individual seats and 100 for the list).

On the fourth of October, the National Elections Authority announced that elections of the House of Representatives and applications for nomination thereto will start on the 8th October for ten days. Voting would be conducted on two stages: the first one was to be on the 10th and 11th of November and the second on the 24th and 25th.

According to the electoral law, the House of Representatives comprises 568 members; half of them (284 members) were to be elected according to a system of closed absolute list (block list) distributed on four lists while the other half is elected in majoritarian individual seats.

It is worth noting that amendments of the electoral law included some amendments in the demarcation of districts. This also was the subject of severe criticism as it included violation of the principle of fair proportional representation of the number of voters.

Because of the electoral system, election results were settled in advance. One block list covers half of the seats and this list was prepared by state apparatuses through the so-called “supportive parties” led by the Homeland Future Party and in alliance with Homeland Protectors Party and the National Front Party. All of these parties directly follow the so-called “sovereign apparatuses.” Moreover, many candidates for individual seats from these parties are also selected. The selection process is characterized -apart from flagrant violations- with all the defects of political corruption and money collection.

The voting process was highly problematic. Political money and ballot buying were excessively used, which entailed a flagrant violation of the will of voters and constituted inhuman exploitation of the want of the poorest people. Moreover, there were other forms of direct violation including assault on supporters of independent candidates and depriving their delegates from attending the counting process.

However, an unexpected surprise took place. On Monday the 17th of November, the President expressed his observations on the voting process in the first stage demanding the National Elections Authority to conduct full review of the appeals submitted by candidates and “take suitable decisions to reveal the true will of voters in the most fair manner and to make sure all procedures are transparent.”

A few hours after the statement of the President, the “independent” National Elections Authority declared cancelling the results of the elections and reholding them in 19 districts.

Justice Hazem Badawy, President of the National Elections Authority stated in a press conference on Tuesday the 18th of November that the authority observed violations and irregularities in 19 districts in seven governorates, including refraining from handing the vote count report to candidates and their delegates and differences between the number of votes in subsidiary stations and the general station.

Then, the Supreme Administrative Court -which has jurisdiction over processes of nomination and voting- issued its judgement to nullify elections in 29 districts and refer 14 other appeals to the Court of Cassation (which has jurisdiction over members who were already declared winners).

Thus, the electoral scene was disrupted. It was necessary to regulate within a short period of time elections (and second rounds) in 49 districts from the total of 73 districts in the first stage, along with regulating the voting process and second rounds in 13 governorates in the second stage covering 73 districts. It is worth noting that according to the Constitution, elections have to be run within the last 60 days before the end of the current House which formally ends in January 2026.

The statements of the president and the decisions of the National Elections Authority and the ruling of the Supreme Constitutional Court created a state of optimism and encouraged some people to demand cancelling the whole electoral process and opening a social dialogue for the issuance of a fair law for the regulations of elections and canceling the block list system which is not adopted except in very few countries which are not democratic. However, the events of the second stage of elections didn't witness any meaningful difference from the first stage that was contested except in some cosmetic measures and arrest of some persons while they were buying votes without taking any measures against candidates who employ them.

In spite of all these hot events, and of the fact that elections witnessed some positive phenomena in a limited number of districts that their voters defied all forms of violations and vote buying and supported independent candidates, the formation of the new Parliament will not generally be different from the last one except in the change of faces of some member of the government-affiliated parties (without changes in their stances of course). So, the majority of Egyptians -especially working people- still lack anyone to represent them in the Parliament.

Part Two: Labour Law no. 14 for 2025

The advanced section of the Egyptian labour movement went through a long battle with the draft labour law since the first version was sent on 12 February 2017 to the Joint Committee formed from the Labour Force Committee and the offices of the Constitutional and Legislative Committee and the Plan and Budget Committee. The draft law then was attached thereto the remarks of the Legislation Department of the State Council which included considerable observations on the draft. This version included many defects and ignored the treatment of many shortcomings of Labour Law no. 12 for 2003, which were revealed by its implementation in the past years.

The journey of the new law from the Joint Committee to the general session of the House of Representative then to the Senate was long. It included frequent amendments from the government, before it was completely withdrawn and a new amended version thereof was submitted on 12 January 2025.

During this journey, the draft law was being followed by the labour movement from one version to the other and from one amendment to the other until it was finally approved by the House of Representatives on 15 April 2025 and was issued and published in the Official Gazette on 3 May 2025 so that it entered into force on the first of September 2025. Throughout this time, the labour movement managed via successive lobbying campaigns and coordination with people concerned with labour affairs in opposition parties and the few media outlets available and a number of independent and opposition parties' parliament members to improve the conditions of issuing the Labour Law and secure response to some of its demands.

Nevertheless, the new Law was not much different from the previous law and didn't overcome its most important flaws that are related to core labour rights. It didn't respond to essential labour demands and didn't confront significant and evident challenges in the world of work as detailed in the following:

First: Regarding Job Security

➤ Temporary contracts or “fixed term contracts”

One of the big flaws of Labour Law no. 14 for 2025 -and may be the biggest- is that it allows without any restriction fixed-term contracts. Demands of the Federation of Egyptian Industries were met and the tendency of employers to employ workers based on temporary contracts was responded to without any restrictions or conditions. So, article 87 of the new Law stipulated that “Individual labour contract is concluded for unlimited time-periods or for limited periods if the nature of work so requires. The contract may also be renewed by agreement of both parties for other similar periods.”

The labour movement demanded that the law clearly states that a labour contract may not be concluded for fixed term except in the case of doing temporary, occasional or seasonal jobs that are not authentically part of the perennial and constant work of the establishment. Employing a worker based on a temporary contract in a permanent job of the establishment is nothing but a contradiction to reality and escaping the fulfillment of rights. In such cases, employers don't really intend to employ the worker for a limited period. They merely aim to take control of everything that controls workers so that they may fire them and get rid of them under the title of “end of the fixed-term contract” without being obliged to give workers compensation for arbitrary dismissal.

Although article 88 of the law stipulated that the labour contract is considered unlimited in the following cases:

- If it was not written.
- If it didn't mention its period.
- If the contract was concluded for a fixed term and the two parties continued to implement it after this period without a written contract between them;

The Law does not consider that renewing the contract more than once is evidence that the work is unlimited although it is “disguised” in a fixed-term contract, i.e. the employer can and has the right to employ workers based on temporary contracts that are renewed annually forever. How come this is not considered permanent work? The worker remains missing job security and is threatened with ending his/her work (or, according to the law, refraining from renewing the contract) at the end of the year of the “fixed-term” temporary contract. How come these workers will be able to defend their rights? May they submit a complaint to the Labour Bureau or the Social Insurance Bureau? May such a worker get trained and be advanced in his/her work or seek to have his/her skills developed?

➤ **Expiration of the Labour Relation**

The new law was supposed and expected to overcome the flaws of the previous law which were revealed by the experience of 22 years of implementation. However, article 156 of the new law repeated the same problem and stipulated that “if the labour contract is not of limited duration, any of the two parties may end it provided that it notifies the other party in writing before its termination.”

So we will live again with the confusion that this article creates. It allows dismissing a worker under the title of “termination of labour contract” in clear contradiction with article 148 which stipulates that the penalty of dismissal from service is the exclusive prerogative of the Labour Court and specifically determines the only cases that the worker may be dismissed in.

The labour movement repeatedly demanded to cancel this article during the discussions of the draft law as it is related to one of the most essential rights organized by the Labour Law. We are keen to highlight that termination or expiring of the labour relations should not take place except in the following cases:

- Amicable ending of the relation by the consent of both parties
- Ending it by the employer without the consent of the workers which is exactly dismissal from work
- Ending it by the worker which is resignation.
- Death, retirement or incapacity of workers.

So it is not justifiable to include other provisions to regulate ending the labour relation by the employer or the workers apart from provisions that regulate dismissal and resignation. It is also unacceptable to justify this by saying that the article here regulates cases of agreement of both parties. It is needless to say that cases of mutual agreement don't require their regulation with such rules, terms and conditions.

Second: Wages

It is needless to say that wages are the most important aspect in the labour relation or actually its core. An employment contract is in essence a wage for work: specific wage for specific work

according to specific conditions. If the legislation fell short of putting necessary standards and safeguards for the determination of wage. If there are various forms of wage that require different definitions in a confusing way, labour relations become unstable and disputes become daily reality.

The past few years witnessed considerable changes in the mechanisms of calculation of wages. The National Wage Council was activated after being frozen for 16 years. The labour movement demanded during the discussion of the draft law what follows:

- Part One of Book One (Definitions) should include the definition of minimum wage as it is the lowest wage a beginner worker (with no previous qualifications or experience) may receive and it is the minimum level required for satisfying basic needs of workers and their families. It is universal, binding and may not be detracted from.
- Amending article 107 by adding standards for the determination of wage through stipulating its scaling up by calculating the minimum wage added to it the value of the worker's qualification and his/her experience and skills and number of work hours. Even companies and establishments which implement the set minimum wage, refrain from scaling up workers' wages by calculating their experience and years of work.

However, these demands were ignored without discussion.

➤ The Periodic Raise

The government reduced the annual periodic raise which was set to be 7% of the insurance wage in the draft law submitted by it in 2017 to 3% in the latest draft it submitted in January 2025 based upon which the law was officially issued. In fact, this new rate was applied two years ago even contrarily to the law in effect then.

Article three of the promulgation articles of the previous labour law no. 12 for 2003 stated that “workers whose conditions are regulated by the provisions of this Law are entitled to a periodic annual raise that is not -on the date it is due- less than 7% of the basic wage based upon which social insurance subscription is calculated.”

The government justified this reduction by the issuance of Social Insurance and Pensions Law no. 148 for 2019 which stipulated the calculation of social insurance subscriptions based on the comprehensive (basic wage + variable wages) claiming that the average ratio of basic wages to subscription wages of insured workers are around 40% of total subscription wages, and that 7% of basic subscription wages equals around 2.8% of total wages of total subscription wages of insured workers. It relied on the Book of the President of the National Authority for Social Insurance to the Minister of Labour in response to his book regarding the preparation of a study to calculate the equivalent of the 7% of basic wage (which was stipulated in the old Labour Law no. 12 for 2003) in the subscription wage stipulated in the Law on Social Insurance and Pensions no. 148 for 2019.

However, this justification is refutable based on what the very book of the president of the social insurance authorities itself as it stated: **“It is worth noting in this respect that the estimated ratio is the ratio that was calculated based on the subscription wage of insured workers available in the database of the Authority and does not represent the real ratio of the wages of all workers in the private sector.”**

This means that it is hard to calculate the true ratio of basic wages to subscription wages of the insured as variable wages differ a lot from one establishment to the other. Moreover, past experience shows that employers (in the data they provide to the National Authority for Social

Insurance) don't calculate but a very small amount of the variable wage that workers receive in order to minimize the amount of the insurance wage they pay to the Authority. Many employers actually -in the data they submit to the Authority- claim that the worker' wage is the minimum insurance subscription wage stipulated by Social Insurance Law no. 148 for 2019, which is much less than half the minimum wage. This is actually a legislative contradiction that has to be resolved. [The minimum insurance subscription wage in 2025 is 2300 Egyptian pounds and increases to 2700 in the beginning of January 2026] which is also a legal contradiction that has to be resolved.

Third: Employment Agencies

Many Egyptian workers suffer from “subcontracted” employment operations which extended from one sector to the other until it became almost dominant in the sectors of petroleum, utilities, contracting, services and much more in the companies of the private sector. Even some units of the administrative apparatus of the state and public authorities have it as well.

These operations take place in circumvention of the Labour Law which didn't - and shouldn't- allow for the formation of employment agencies which make their own workers work for some other firms (labor contractors). So, these companies used to be legally registered as service companies that undertake the provision of certain services to other companies (security, guarding, maintenance, cleaning, etc). These companies are actually established from within mother companies. So, the matter is only on paper. All workers actually work in the original company but they are made to legally belong to two or three companies (just on paper) in order to circumvent workers' rights and undermine the protection the law gives for workers.

This became a major problem in the job market. So, workers increasingly demand confronting this illegal phenomenon. The past years have witnessed several workers' protests to demand ending these conditions and make workers stable in the companies they actually work in order to protect their rights and end some forms of discrimination among workers who are “on paper” registered as workers in different companies.

Although the voices of workers who dare to complain were - and still- clear enough to be heard in the corridors of government agencies and the halls of the House of Representatives, the law didn't confront this problem that is widespread in the job market resulting in tens of labour disputes. Article 94 of the law stipulates that “if an employer outsources from another employer the performance of some of its work or part thereof in a single work zone, the latter has to ensure equality between his workers and the workers of the original employer in all rights. The latter shares all the obligations required by the provisions of this law.”

Of course the provision that workers are equal in their rights is a good thing and it was actually stipulated in the previous labour law no. 12 for 2003. Moreover, it is good that the original employer shares the obligations required by the provisions of the law, which may enable workers to claim their rights from the employer they actually work for. However, fake services, security and guarding companies will continue -according to these provisions- to play the role of human contractors. The government knows this. But it seems complicit and the law ignores the practices of labor contractors although it prohibits employment through them. The labour movement has demanded the amendment of this article by adding two paragraphs.

We demanded the amendment of article 94 of the Law by adding two paragraphs as follows:

- The employer may not outsource workers from another employer in order to perform jobs or work that are considered essential in the activity of his establishments.

- The ratio of the workers of the other employer may not exceed 10% of the total number of workers in the establishment.

As it is not reasonable to have the majority of workers doing main jobs in one company belong formally to another company.

However, this demand was not met or even discussed and the government didn't clarify what its alternative plan was to deal with this challenge.

Moreover, the law kept article 43 in spite of objections to the second paragraph thereof which stipulates that employment firms may receive an amount of money that does not exceed 1% of the wage of the worker being employed for the first year as administrative expenses. However, taking any money from the worker is contradictory to ILO Convention no. 181 on Employment Agencies which stipulates in article seven that "Private employment agencies shall not charge directly or indirectly, in whole or in part, any fees or costs to workers."

The Convention allows competent authorities to make some exceptions but this is only permissible based on the following conditions:

- That this is for the benefit of concerned workers.
- That this is done after consulting trade union organizations.
- That the government submits a report to the ILO to clarify exceptions and their reasons.

What is really astonishing is that the government's response to this demand while the law was being discussed in the general session of the House of Representatives was that it already responded to reducing the amount from 2% (as it was in the first version) to 1%. It was also astonishing that the government's representative justified insistence on this article by saying that Egypt didn't ratify ILO Convention no. 181.

Fourth: Scope of the Law

According to article one of the promulgation articles of the Law, its provisions does not apply to two categories which are:

1. Workers in state apparatuses including units of local administration and public authorities.
2. Workers of domestic services and workers in similar status to them.

This article ignored two demands which are:

- That the Labour Law applies to civil servants in the state in terms of determination of the minimum wage, the National Wage Council, provisions of collective labour relations (social dialogue, collective labour disputes, and strike action), in addition to occupational health and safety and provisions for the employment of foreigners. It is worth noting here that the Legislation Department of the State Council had stated in its remarks (that were disregarded) that the Law should regulate the right to strike for public employees because the Civil Service law no. 81 for 2016 didn't include any provisions to regulate it. Otherwise, there will be a state of legislative void in this respect.

It is also worth noting that the Experts' Committee of the ILO also made observations regarding the absence of regulation for the right to collective bargaining and conclusion of collective labour agreements for workers in the

administrative apparatus of the states as the Civil Service Law no. 81 for 2016 does not tackle this right and the Labour Law does not apply to these workers.

- Implementing the labour law on domestic workers and others in similar status: It is no longer acceptable to exclude domestic workers from the scope of the Labour Law. It is not suitable in our age to refuse to consider the relation between those workers and people they work for as labour relations and to insist that it is a relation of personal subordination or the so-called “direct connection between those workers and their employer.” This can never be consistent with principles of human rights and ILO Conventions, or even with the Egyptian constitution which stipulated that “dignity is a right for every person that may not be infringed upon. The state shall respect, guarantee and protect it” (article 51) and the rights it enshrines of equality, non-discrimination and protection of workers’ rights.

Refraining from the application of labour law on domestic workers is justified by things like “not to invade private lives by allowing labour inspectors to enter homes to check the implementation of the law because homes are the work places.” However, domestic work may be exempted from the application of the provisions of Part One of Book Five (Labour Inspection and Judicial Powers) without depriving those workers from protection regarding wages, work hours, holidays, etc and without depriving them from the right to complain as well.

It is worth noting in this regard that the Egyptian government (the Ministry of Labour) has been making promises for five years now to issue a separate law for domestic workers. Although CTUWS demands the application of labour law on them, it does not see a problem in issuing a special law to regulate their labour relations. CTUWS actually submitted -in cooperation with some parliament members- a draft law for domestic workers that was adopted by more than sixty parliament members and submitted by them to the house of representatives. Those members requested the referral of this draft law to the competent committee in order to be issued but this draft was kept in the drawers for years.

Fifth: Irregular Workers

Providing the minimum level of legal protection for these workers requires the development of legal provisions that respond to the complexities of the realities of labour relations, and building effective governmental and societal supervisory mechanisms. In spite of legal prohibition, the employment of these workers continues through labor contractors. Some companies that subcontract the employment of these workers under the name of security companies or support services companies were even formed specifically to do this. The vast majority of these workers work without labour contracts or any rights.

The law witnessed considerable progress in provisions related to irregular workers as Part Three of Book Two tackled this topic. This part started with article 75 which determined that the objective of its provisions to support and employ irregular workers and informal sector workers at the national level and to help them find decent job opportunities, develop their skills in a way that is suitable for the needs of the job market inside and outside the country, protect them during work and provide the necessary support to them.

However, the means to achieve these objectives are not enough in our view. The dilemma of registration of irregular workers is still difficult to solve because it is not enough to state that the Ministry of Labour is responsible for the process of registration. Registration is an essential

matter in order to support and protect irregular workers. Until now those registered does not exceed two million workers although the number of actual workers in this sector -according to most reserved estimations- amounts to 13 million workers after excluding some categories that are not considered irregular workers. We believe that the law should have stipulated obliging employers to employ irregular workers to keep books in which the names of those workers are registered, the duration of their work, and the hours they work provided that a copy of these books is submitted to the Labour Directorate which should establish an independent office for irregular workers. The law should also oblige government and public agencies that make contracts with contracting companies and other companies to implement their projects to provide the parties they deal with with lists of names of irregular workers, duration of their work and its hours and submitting them as well to the Labour Directorate.

The encouragement and facilitation of the formation of trade union organizations -rather than obstructing them and refusing to register them- remains a decisive factor in the development of the conditions of irregular workers and workers in the informal sector.

Sixth: the Right to Strike

First, we would like to affirm the following:

- The Constitution of Egypt stipulates in article 15 that “striking peacefully is a right which is organized by law.”
- ILO Conventions 87 on Protection of the Right to Organize ratified by Egypt in 1957 and no. 98 on the Right to Organize and Collective Bargaining ratified by Egypt in 1954 stipulate the right of workers to strike and oblige state members in the ILO to refrain from violating this right or take any measures that may detract from it. Both conventions are among fundamental labour standards and actually on the top of this list.
- Moreover, the International Covenant on Economic, Social and Cultural Rights (ICESCR) stipulates in article 8 the right to strike as one of the rights that states pledge to guarantee.
- According to article 93 of the Constitution of Egypt of 2014 “The state is committed to the agreements, covenants, and international conventions of human rights that were ratified by Egypt. They have the force of law after publication in accordance with the specified circumstances.”
- Part One of Book One of the Law (Definitions) defined peaceful strike as “the agreement of all or some workers to stop performing their work inside the workplace in order to demand what they deem will achieve their professional, economic and social interests after amicable settlement has failed, within the measures and procedures determined by law.”

Of course, it is a good thing that the law defines strike action. However, we demanded the omission of the phrase “inside the workplace” (as was stated in the observations of the Legislation Department of the State Council as well) because strike action may be done by refraining from going to work.

- The Law stipulated in article 231 that workers have the right to peacefully strike in order to demand what they deem will achieve their professional, economic and social interests after amicable settlement has been exhausted. The declaration and organization therefore have to be done via the concerned trade union organization or the labour delegate within the measures and procedures determined by law.

We welcomed the addition of economic and social interests to professional interests that workers may see and demand.

- However, we demanded the amendment of the last paragraph of this article so that declaring and organizing strike action is done “via the concerned trade union organization or the labour delegates chosen by workers and this has to be registered in a minutes report that is written in the competent labour bureau, within the measures and procedures determined by law.” The reason behind this suggestion is that workers usually choose more than one worker to represent them in the organization of actions and negotiations.

The definition of the workers’ delegate in article 22/1 of the Law states that “one of the workers of the establishment who the workers agree to delegate pursuant to an official document to represent them before the employer.” However, we were afraid that this meant complicated procedures like doing an official deed of delegation in the official registrar which is known from previous experiences to be difficult and even impossible sometimes. That is why we see that it was enough to express and prove the will of workers by a minutes report written in the relevant labour bureau.

What is important to highlight is the essential objections to the law, especially the restrictions it imposes on the right to strike.

Acknowledging workers’ right to strike is in accordance with the Constitution and to international treaties ratified by Egypt. But it is actually contradicted by the restrictions that the Law imposes on practicing this right as follows:

- Article 234 of the Law stipulates that strike action, the call thereof or the announcement thereof is prohibited in vital establishments that provide essential services to citizens and the stoppage of which entail disruption of national security.

The call for strike or the announcement thereof is prohibited in exceptional circumstances

The prime minister issues a decision to determine vital establishments and essential services they provide.

The decision of the Prime Minister no. 1185 for 2003 was issued in order to implement the provisions of article 194 of Labour Law no. 12 for 2003 which is identical to the current article. It considered that the following is among these establishments: national security and military production establishments, hospitals, medical centers, pharmacies, bakeries, mass transportation means (land, sea and air), goods transportation means, civil defence establishments, establishments of drinking water, electricity, gas, and sewage, communications establishments, ports, lighthouses and airports, in addition to workers in educational establishments. The Prime Minister is supposed to issue a new decision in implementation of the new law, so the current decision will remain in effect until a new decision is issued. We fear that the new decision will be similar to the previous one. So, we have to stress that the report of the Committee of Experts on the application of standards and conventions of the ILO on the case of Egypt had made an observation “on the restriction of the right to strike in service establishments that are not essential in the strict sense of the term”.

The Legislation Department of the State Council stated that the meaning of these establishments have to be defined or criteria thereof have to be determined by the Law rather than merely determining them by a decision of the Prime Minister because this infringes upon the core of the right itself.

Moreover, the phrase “prohibition of the call for strike action in exceptional circumstances” is overly broad and obscure to the extent that determination of these circumstances is difficult. We and many others fear that its interpretation will be expanded and it will be applied in a selective manner.

- Article 232 of the law requires workers to notify the employer and the competent administrative authority at least ten days before the date determined for the strike action via a registered mail with confirmation of receipt, provided that it includes reasons for the strike and its appointments.

The first version of the draft Law submitted by the government stipulated that the notification has to include the date of the end of the strike action. This condition was flawed, as workers don't go on strike just to make a statement but until their demands are met. So, they should not be knowing the date of the end of their strike action in advance.

The ICESCR stipulates in article four thereof that “States Parties to the present Covenant recognize that, in the enjoyment of those rights provided by the State in conformity with the present Covenant, the State may subject such rights only to such limitations as are determined by law only in so far as this may be compatible with the nature of these rights and solely for the purpose of promoting the general welfare in a democratic society.” So, is restricting the right to strike by the requirement of pre-notification of the date of its end something that may be deemed compatible with the nature of this right? Is this an abidance by the International Convention or a flagrant violation of its provisions?

This defective provision was criticized by workers and people concerned with labour affairs, and it was also noted by the Committee of Experts on the Application of Conventions and Recommendations of the ILO. so, the government in its final version (which became a law) evaded these criticisms by stipulating in the law “the dates of the strike action rather than the date of its beginning and its end”.

But we believe that this response is not adequate as the phrase “dates of the strike action” may be interpreted as the beginning and the end.

- The new Labour Law is better when it is compared to Labour Law no. 12 for 2003 as it omitted the prohibition of strike action during all the procedures of mediation and arbitration, but it kept the prohibition of calling for or announcing strike action for the purpose of amending a collective labour agreement during the period of its enforcement (article 233). It ignored the fact that some working conditions may change, making the implementation of some of the items of the agreement impossible or making it necessary to amend some of them, which makes it legitimate for both parties to demand its amendment.

If such change takes place, and workers ask to negotiate with the employer on the amendment of the agreement clarifying that one or some of its items contradict new conditions, but negotiation or agreement on the amendment failed or was halted, workers should have the right to strike to demand the amendment of the agreement.

There are two remarks in this regard:

- Workers don't go on strike just for fun. They do when they have pressing demands that are closely related to their lives and the lives of their families. They -of course- won't resort to it if there is room for negotiation or amicable settlement. However, if workers

don't find anyone to listen or any mechanisms for dialogue, or if they lose confidence in such mechanisms because they were broken for a long time and all means of negotiation are closed before them, strike action becomes irreplaceable.

The only means to reduce the number of strike actions is to activate mechanisms of dialogue and collective bargaining and to foster workplace democracy including the right to freely form trade unions, the right to collective bargaining and protection of workers' representatives.

- Restricting the right to strike using restrictive conditions and excessive prohibitions leads us to continue in the well known endless cycle: if the law is impossible to apply, no one respects it and we find that all strike actions are wildcat Strikes because no one can abide by these conditions. Then, we find selective treatment of these strike actions as some of them are being recognized and their organizers/representatives are negotiated with while other strikes end up with their organizers in jail. In such a situation, the matter is left to power balances and considerations of alignment and even to the nature and tendencies of other parties.

Regarding the Talk that the Law is Balanced

It seems we need to reaffirm the fact that labour relation is not a relation between two parties that are equal in power and that the employment contract is not similar to other civil contracts because of the differences in economic and social positions of its parties. Otherwise, we would not need a labour law and would be satisfied with the provisions of the Civil Code. The contract here may not be the sole law of the parties. The talk that both parties have the right to terminate the contract is astonishing. The first party has the ability to replace the worker with anyone of the long queue of unemployed people aspiring to find a job, while terminating the contract for the second party (the worker) means losing the only source of livelihood for his/her children.

The very need to have a law that regulates labour relations and contracts (the labour law) means exactly that one of the parties to the labour contract is socially weaker that it must be protected not just based on moral considerations and the right of everyone to decent living but also based on concerns for the foundations of the production process, stability of society and means for its development.

So, the rationale behind labour law that made humanity know such laws is to protect the weaker party in the labour relations. That is why the labour law represents the minimum level of rights for workers that may not be reduced but agreements, regulations and contracts may grant workers more rights.

This does not contradict saying that the law should achieve balance between the two parties of the production process in order to provide means of dialogue and cooperation between them and achieve the objectives of stability of work and increasing production as the protection of the socially weaker party exactly targets the achievement of balance between the two parties.

So, is the law balanced?

No, we claim that the law is not balanced. The powers of employers are absolute when it comes to employing workers based on temporary labour contracts that are renewed every year and for ever, the spectre of dismissal always hovers on the heads of workers and makes them reluctant to demand their rights or even use their right to complain. So, this is bias to employers rather than balance. When one of the (unequal) parties can terminate the fixed-term contract merely on the condition of notifying the other party, this is biased to employers rather than balanced.

The annual periodic raise was reduced based on the demand of employers and they were also given the right to ask to be exempted thereof as many of them already do, and restricting workers' right to strike, so this is biased to employers and not balanced.

We would like to affirm here that we are keen to encourage and develop investment opportunities, especially in industrial sector, and that we agree with the demand to mitigate administrative and bureaucratic obstacles, but we refuse to make the cheapness of Egyptian workers and strict working conditions thereof a comparative advantage that is relied on to attract investors. The suffering of Egyptian workers should not be a comparative advantage.

We agree to the provision of investment incentives provided that this is linked to social responsibility of employers where abiding by this responsibility and fulfilling the rights of workers and negotiating with them without any abuses takes priority.

Advantages of the Law

Law no. 14 for 2025 didn't respond to the essential objections to Labour Law no. 12 for 2003 and it actually kept some of its gravest defects. However, some of its provisions represented a considerable progress and included some advantages in comparison to the previous Law as follows:

- The Law witnessed a positive development in Chapter Two of Part One of Book Three which was adopted in response to the demands and observations of the labour movement. It tackled new forms of employment and stipulated that workers therein have all the same rights and duties as workers in conventional forms of work, especially social protection, social security, minimum wage and the way it is calculated, the right to collective bargaining and freedom of association.
- We affirm again the importance of establishing specialized labour courts in Part Two of Book Three of the law, which were established and entered into force since the first of October 2025. Of course, three months are not enough to evaluate their impact on the empowerment of workers to attain their rights.
- Prohibition of harassment, bullying and the practice of all forms of violence constitutes a tangible and considerable progress in the Law. However, it is not sufficient for the following reasons:
 - The Law refers the disciplinary measures (that have to be taken when any of the prohibited acts are committed) to the internal regulations of the establishment. However, the perpetrator of these acts -or actually crimes- may be the employer or one of his delegated deputies and in this case direct legal protection has to be made available.
 - It is well known that victims of harassment, bullying or violence may - or usually- find it difficult to report or complain when such violations take place against them. So, the Law must offer them protection from abuse or reprisal.
- Article 104 of the Law stipulates that establishments governed by its provisions have to abide by the decision of the National Wage Council. It also created a new provision in article 105 stipulating that: "Inspection apparatuses in the competent ministry have to conduct periodic inspections on the establishments governed by the provisions of this law in order to make sure that the decision of the National Wage Council are properly implemented and that employers or their representatives have to keep paper or digital

records of the data of workers and the wages payable to every worker.” So, all establishments are supposed to be obliged to implement the minimum wage decision and activate inspection mechanisms in order to ascertain such implementation. However, in reality these two articles are still far from being applied which will be evident in the violations we monitored and documented later in this Report.

- The demand of the labour movement to prohibit discrimination in training or job vacancies, as well as prohibition of discrimination in the conditions of work, was met.
- One of the greatest problems and forms of abuse that workers face in actual reality is the previously signed resignation along with form no. 6 of social insurance at the time of appointment. The Law no. 12 for 2003 failed to confront this problem. That is why we affirm that it is rather a positive development that the current law confronted this abhorrent phenomenon by article 167 which stipulates that “a worker’s resignation is not considered valid unless it is written and signed by him/her or his/her agent and approved from the competent administrative authority.” This formality (approval by the administrative authority) is the currently possible means to invalidate resignations that are written and signed in advance, and this is of course one of the few advantages of this new Law.
- The new Law did a good thing by omitting item 9 of article 68 of the previous law which considered that strike action conducted in violation of the criteria set out in the law is one of the cases that allow for dismissal from work. That very bad provision was the reason behind the dismissal of tens or maybe hundreds of workers and unionists during the past years.
- The new law paid much attention to guaranteeing the right to wage in cases in which the employer is incapable of paying it. It granted worker’s dues priority to judicial fees and amounts of money due for the Public Treasury (article 8 - General Provisions). Moreover, article 9 included more effective mechanisms for guaranteeing the right of workers to receive their rights in these circumstances.
- In the last version of the draft Law submitted by the government, it included a positive amendment to article 4 thereof by adding the prohibition of Forceful employment of workers to the prohibition of forced labour because force may take several forms. So, this article is consistent with article 12 of the Constitution and with ILO Conventions no. 29 for 1930 and 105 for 1957.

Part Three: Monitoring and Documenting Violations of Labour Rights

Methodology of Monitoring

This Report monitors violations of labour rights and freedoms of association during the period from 1 January 2015 to 31 December 2025.

The monitoring process was based on the following sources:

- Field observation of industrial actions.
- Workers' complaints and requests of assistance submitted by workers to the legal bureau of CTUWS
- Direct meetings with and testimonies of workers
- Statements of trade union organizations and labour leaders
- News and reports published in the media after excluding what was not proven to be true and abiding by criteria for transparency and objectivity.

It has to be noted here that any monitoring process amid the current general conditions may not cover all violations in their different forms. Public media outlets refrain from covering violations. Moreover, many workers don't report violations or make complaints for fear of reprisal from the administration or the employer.

We adopted a qualitative and quantitative analytical methodology for violations, determination of their general tendencies and their geographic and sectoral patterns. Cases were registered pursuant to a unified documentation model that includes a group of main variables like: type of violation - governorate - number of workers affected - responses of workers and the administration - legal situation. Information was checked through the use of different sources in order to minimize probabilities of mistake or repetition. Data was classified according to Egyptian labour standards and international labour standards, and entered into a central database using spreadsheet programs that allow for extracting periodic qualitative and quantitative indicators.

Time indicator observes repetition of violations through months in order to help observe ups and downs and link them to economic and organizational contexts in workplaces. The geographic indicator shows distribution of violations through governorates and industrial zones and it shows the places where violations are repeated whether in big cities or in remote areas in which institutional supervision is weak.

The Report also tackles the sectoral indicator which clarifies the nature and intensity of violations in different economic sectors. This is complemented by the legal indicator which measures each incident to the provisions of the Egyptian Labour Law and international Conventions ratified by Egypt in order to determine the gravity of the violation.

Tables of Monitoring Outcomes

Month	Name of Company or Factory	Governorate	City	Sector	Number of Workers	Type of Violations	Response of Workers	Response of the Administration
January	Oriental Weavers	Sharqeya	10 th of Ramadan	-Private actor -Weaving	20,000	-refraining from the calculation of raises -refraining from the scaling up of wages -arbitrary relocation of 34 workers in contradiction to the Law -threatening and intimidating workers	Strike	Restructuring of Salaries
	T&C	Sharqeya	Al-Obour	-private sector -garments	6,000	-not implementing the minimum wage -not scaling up wages -deprivation from holidays -deprivation from increasing the meal allowance -arresting 11 workers before dismissing them. -threatening the rest of workers with dismissal	Strike	Disregard
	The two drinking water and waste water stations	Alexandria	Alexandria	Public enterprise sector	800	-refraining from the execution of judicial rulings to pay the raises -reducing the meal allowance	vigil	Disregard

	Innova	Fayoum	Fayoum	Private sector	2500	-refraining from the implementation of the minimum wage -lack of occupational promotion - delayed payment of wages - forced holidays and arbitrary dismissal (350 workers)	Strike	Partial response
February	SEDICO	Giza	6 th October	-private sector - pharmaceuticals	2000	-refusal to implement the annual raise - lack of professional promotion - forced holidays - threats with dismissal.	Strike	Gradual implementation of demands
	Al-AMir Factory	Sharqeya	10 th of Ramadan	-private sector - construction materials (ceramics)	3500	- not implementing the minimum wage - not scaling up wages - delayed payment of wages -arresting ten workers	Strike	Pledges to meet the demands
	Samanoud Textiles	Gharbeya	Samanoud	-private sector - garments	500	-not implementing the minimum wage -not paying the raise - suspending a unionist leader from work	Vigil	Disregard
March	Al-Watania for Agriculture	Sharqeya	10 th of Ramadan	National Service Projects Organization of the Armed Forces	1800	-not implementing the minimum wage -arresting 36 workers.	Sit-in	refusal

	Helwan University	Cairo	Helwan	Government sector	300	-turning workers who have temporary contracts to daily workers.	Workers refused implementation	
April	Al-Shorbagi Factory	Cairo	Imbaba	Public Enterprise Sector	500	-canceling the Saturday holiday -wage inequality with workers in similar companies -freezing the trade union organization -investigation with 48 workers -depriving seven workers from incentives for six months -dismissing two workers -arbitrary relocation of one worker	Strike	Agreement on increasing wage by fifty pounds per each working day
	B.Laban Factory	Cairo Alexandria	Several locations	Private sector	unknown	Not paying for extra working hours	Strike	Pledges to pay
	Qasr Al-Ainy Hospital	Cairo	Qasr Al-Ainy	Government sector	Eight	-dismissing doctors -Inhuman working conditions		Disregard
May	Samanoud Ttextiles	Gharbeya	Samanoud	Private Sector	500	Dividing workers into groups and applying the minimum wage on some of them but not the others.	Strike	Pledges to meet the demands
	The Agricultural Bank			Government sector	2000	Arbitrary dismissal	Vigil	Disregard
	Eastern Company	Giza	6 th October	Public sector	24	-Arbitrary dismissal of six workers	Submitting a complaint to the Labour Bureau	Disregard

							-deduction of the raise from the wages of 18 workers		
June	A grape farm	Menofeya	Ashmoun	Private sector	20		<ul style="list-style-type: none"> -lack of all labour standards -employing workers without abiding by the rules of the law <ul style="list-style-type: none"> - not providing safe transportation means for workers -an accident on the way to work -the death of 19 girls and the driver 		Government agencies and individual donations paid compensations. (absence of the role of the employer)
	Seba Company	Portsaid	The Free Zone	Private sector			<ul style="list-style-type: none"> -evading the implementation of the minimum wage -dismissal of a unionist leader because of being accused of organizing a strike action. 	<ul style="list-style-type: none"> -submitting complaints to the Labour Bureau -filing a lawsuit 	Insistence on such abuse
July	Misr El-Mahalla Spinning & Weaving	Gharbeya	El-Mahalla	Public Enterprise sector	A worker		Investigation with a worker because of submitting a complaint against the conditions of the company's hospital		
	United Company of Pharmacists	Cairo	Dar El-Salam	Private sector	4000		<ul style="list-style-type: none"> -not implementing the minimum wage -not scaling up wages -not paying insurance subscriptions -refraining from payment of workers' share in profits 	Vigil	Disregard
August	Institute of Aviation Engineering	Giza	Imbaba	Government sector (Ministry of civil Aviation)	100		Arbitrary dismissal	Vigil	Disregard

	and Technology							
	Adult Education Authority	Governorates in which there are branches for the Authority		Government sector	Tens	Refusal to implement a court ruling to make temporary workers permanent.	Vigil	Disregard
	B.Laban Factory	Several governorates		Private sector	1500	Arbitrary dismissal	Submitting complaints to the Labour Bureau	Disregard
September	Al-Shamadan for Food Industries	Alexandria	Dekheila	Private sector	1000	<ul style="list-style-type: none"> -not implementing the minimum wage and very low wages -mandatory 12 hour day work -forcing workers upon appointment to sign resignation forms without a date and keeping them with the employer -relocating workers who object to remote areas. 	Vigil	Disregard
	Al-Beshbeishy Factory for Textile	Gharbeya	El-Mahalla El-Kobra	<ul style="list-style-type: none"> -private sector -weaving and textile 	<ul style="list-style-type: none"> 53 workers + two civil defence men + a factory owner 	<p>Employing workers without employment contracts, and without the registration of their names. Violation of all their rights</p> <p>Lack of basic requirements for occupation health and safety and security of the work environment leading to a fire and explosion of a boiler.</p> <p>- death of 13 workers, two civil defence men and a factory owner in the same building</p>		

						-Injury of around 40 workers		
United Company of Pharmacists	Cairo	Dar Salam	El-	Private sector	4000	-reducing wages and delayed payment thereof -not paying social insurance subscriptions for two years		
Egyptalum	Qena	Naga Hamadi		Public Enterprise Sector	4000	Deterioration of the annual profit ratio approved	Strike	Partial implementation of demands
Factories of the Egyptian Sugar and Integrated Industries Company	Aswan Luxor Qena	Edfu Kom Ombu Armant Deshna		Public Enterprise sector	6000	-not implementing the minimum wage -not including the raises since 2017 -reducing the meal allowance -reducing the housing allowance -refraining from paying the special bonus that the President promised. -intimidation and threats with National Security -deducting large amounts of money from the salaries of workers for the subscriptions of the universal health insurance system which started to be implemented in the governorate of Aswan	Strike	Pledges to achieve some of the workers' demands
Nile Linen Group	Alexandria	Industrial Zone of Al-Amreya		Private sector	1200	denial of casual leaves and forcing a worker to stay inside the factory leading to the death of an infant.	Total strike action	Negotiation and meeting many of the demands

						<ul style="list-style-type: none"> -evading the implementation of the minimum wage -unlawful financial deductions -not implementing many provisions of the law relating to overtime payment, the right to holiday and unlawful penalties. 		
October	Manafalout accident	Assiut		Irregular workers	Death of 3 children and injury of 6 people	<p>Lack of occupational health and safety measures.</p> <p>Employing workers in violation of the provisions of the Labour Law.</p> <p>Death of 3 children</p> <p>Injury of 6 people.</p>		
November	Canal Mooring & Lights Company	Port Said	Port Said	One of the companies of the Suez Canal Authority	1500	<ul style="list-style-type: none"> -reducing wages by 50% -prohibiting workers from entering the workplace -refusing negotiations -Intimidation and threats 	Sit-in	Insisting on abuses and refusing to respond to demands.
	A factory under establishment	Gharbeya	The new industrial zone of El-Mahalla El-Kobra	-private sector -garments, weaving and dyeing	12	<ul style="list-style-type: none"> -employing workers without contracts or registration of their names and without insurance -lack of basic requirements of occupational health and safety and disregard for all regulations for the security of work environment leading to the fall of a roof on workers - injury of 12 workers 		

	Subsidiary companies to the Holding Company of Water and Waste Water	Giza Sharqeya Menya Beni Suef			-not paying raises since 2016. -avoiding the implementation of the minimum wage -refraining from professional promotion and scaling up of wages -Refusal to regularize temporary workers -low level of medical services		
	The Company of Water and Waste Water	Gharbeya	El-Mahalla El-Kobra		Arbitrary relocation of three workers before arresting and detaining them		
	The Company of Water and Waste Water in Cairo	Cairo	Cairo		-refusing negotiations -threatening workers		
	Egyptian Sugar and Integrated Industries Company Edfu Kom Ombu	Aswan		Public Enterprise sector six	Arbitrary relocation of six workers		
	Al-Ahly Sports Club	Cairo		-private sector -sports club 3000	Not implementing the minimum wage		Denial and refusal to respond
	ArabPolvara Spinning & Weaving Co.	Alexandria		Private sector	-stopping the system of health insurance for workers		

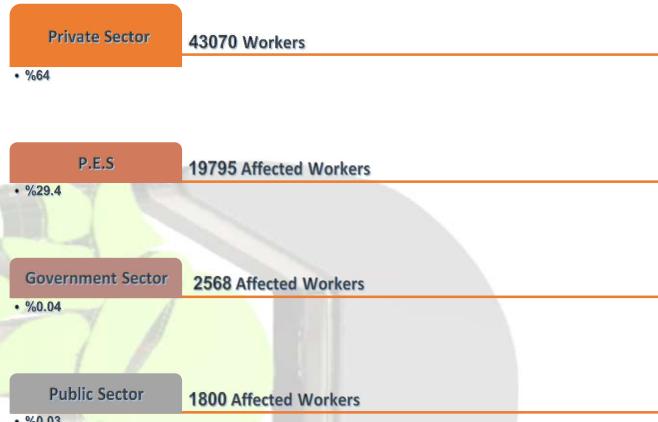
						- not implementing the minimum wage		
Mffco Helwan	Cairo		Private Sector			Refraining from the implementation of the minimum wage		
The Water Company in Cairo	Cairo		Public Enterprise sector	5000		<ul style="list-style-type: none"> -not paying raises -not taking occupational scaling up into consideration -refusing to pay profit shares -refusal to regularize temporary workers -low level of medical services 		
Power stations	Aswan Assiut		Public Enterprise sector	3000 workers		<ul style="list-style-type: none"> -not paying raises -not scaling up wages -refusal to pay incentives 		
The Modern Company for Natural Gas (ModernGas)	Qena Suhag Sharqeya Cairo			2500		<ul style="list-style-type: none"> -subcontracted employment -temporary work without any legal protection -the company that workers were outsourced from (the labour contractor) deduct large percentage from wages -intimidation and threats of workers -security forces raids on the homes of 25 workers in Qena, Suhag, and imprisoning them in provisional detention 		Refusing to negotiate and resorting to intimidation and oppression

	Al-Bawaba News	Cairo		-Private Sector -Press	75	-not implementing the minimum wage -threatening to lock out and lay off journalists working in the newspaper	-A continuous sit-in in the premises of the newspaper -filing complaints to the Journalists' Syndicate and the Ministry of Labour	Refusing to negotiate to resolve the dispute -Threatening to lock out and lay off workers -Submitting seven reports against seven journalists and two members of the board of the Journalists' Syndicate
December	Oriental Weavers	Sharqeya	10 th of Ramadan		28	giving an open vacation to workers raises concerns regarding tendency to arbitrary dismissal	-filing a report in the Labour Bureau to prove the action the company took -submitting a complaint to the Ministry of Labour	
	Electricity Company - the Red Sea Sector	Red Sea	Hurghada		Two workers	-refraining from the implementation of the minimum wage -employment through subcontracting -dismissal from work	Submitting complaints	Arbitrary dismissal

Analysing Outcomes of Monitoring

Total number of affected workers: 67233 workers

Number of cases of “known values”: 45 cases¹⁸



➤ **Distribution of workers according to economic sector:**

- Private sector: 23 cases of violation - 43070 affected workers - 64%
- Public enterprise sector: 28 cases of violation - 19795 affected workers - 29.4%
- Government sector: 6 cases of violation - 2568 affected workers - 0.04%
- Public sector: one case of violation - 1800 affected workers - 0.03%

Notes:

- ✓ The private sector represents a great majority of affected workers and includes more than three quarters of the total number.
- ✓ There are violations in different sectors that the total number thereof was not ascertained.

➤ **Distribution of affected workers per governorate**

	Governorate	Number of Cases of Violation	Number of Workers Affected
1	Sharqeya	4	31300
2	Cairo	6	9627
3	Alexandria	8	4200
4	Several governorates	3	3600
5	Qena	3	3150
6	Aswan	5	3100
7	Canal cities	1	2861
8	Giza	4	2624
9	Fayoum	1	2500
10	Gharbeya	4	1504

¹⁸ Values are according to the number of affected workers.

11	Suez	2	1050
12	Port Said	3	801
13	Luxor	1	800
14	Suhag	1	50
15	Red Sea	1	1
16	Qalyoubeya	1	NA
17	Beheira	1	NA

There are registered cases but not in a specific governorate. In these cases, workers made a strike action or a sit-in in several governorates. For example: the Agricultural Bank (2000 workers), B.Laban, Adult Education Authority, etc

- ✓ A big gathering in Sharqeya (one large case of 20,000 workers in one private establishment)
- ✓ Alexandria has a high rate of violations against workers (8) followed by Cairo (6 violations) then Aswan (5)

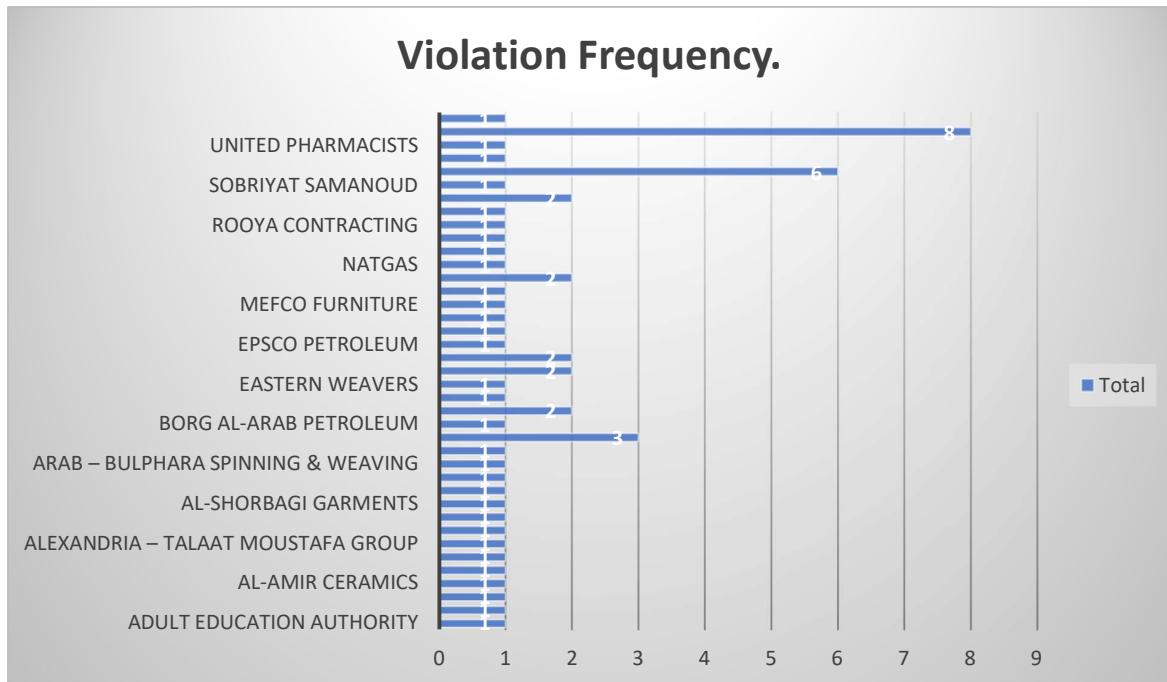
➤ **Rate of repetition of violations inside the establishments in different sectors:**

Geographic and sectoral concentration shows scattering of violations although they are concentrated in vital sectors (water, sugar, medical services, garments, and food)

Establishments with the highest rates of violations:

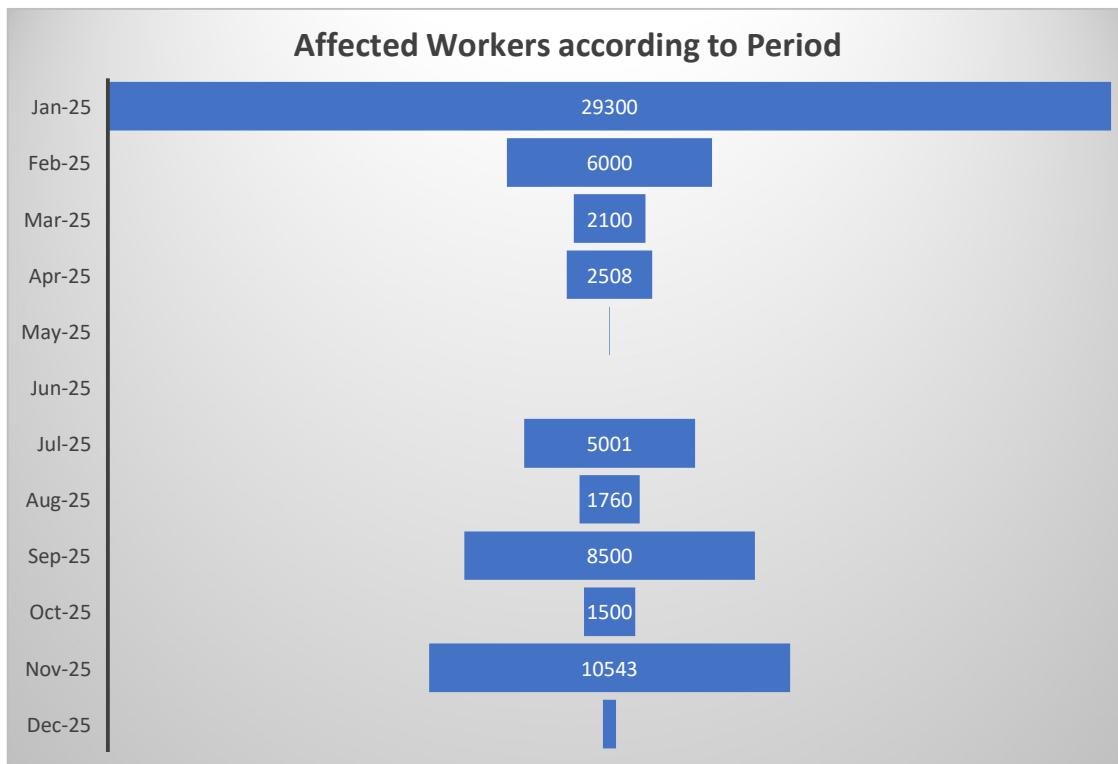
- The Company of Water and Waste Water (public enterprise sector) (8 cases)
- Sugar company factories (public enterprise sector) (6 cases)
- B.Laban Confectionery (private sector) (3 cases): repetition - in the sector of food/retail;

Such increasing repetition of violations in the Company of Water and Waste Water and the Sugar Company factories refers to the existence of a structural imbalance in the management of labour relations inside these essential establishments within the public enterprise sector.



➤ Time frame (total number of affected workers per month)

	Month	Total Number of Affected Workers per Month
1	January 2025	29300
2	February 2025	6000
3	March 2025	2100
4	April 2025	2508
5	May 2025	24
6	June 2025	1
7	July 2025	5001
8	August 2025	1760
9	September 2025	8500
10	October 2025	1500
11	November 2025	10543
12	December 2025	396



The Peak of the First Quarter (January - February):

- January was the highest with 29,300 affected workers. This number may refer to workers' being affected by budget settlements done at the end of the year, calculation of the annual raise, and may be because of non-commitment to the minimum wage decision of 2024
- "Relative quiet" in May-June: sharp and sudden decrease (24 cases only then just one). This may be due to workers' waiting for the implementation of the minimum wage.
- Back to the rise in September (8500) and November (10,543). This may be due to workers' being affected by decreasing wages, non-implementation of the decided minimum wage and not scaling up wages.

➤ Violations of wages and financial benefits

This includes not implementing the minimum wage, delayed payment of wages, refraining from payment of financial dues, and deprivation from allowances and incentives.

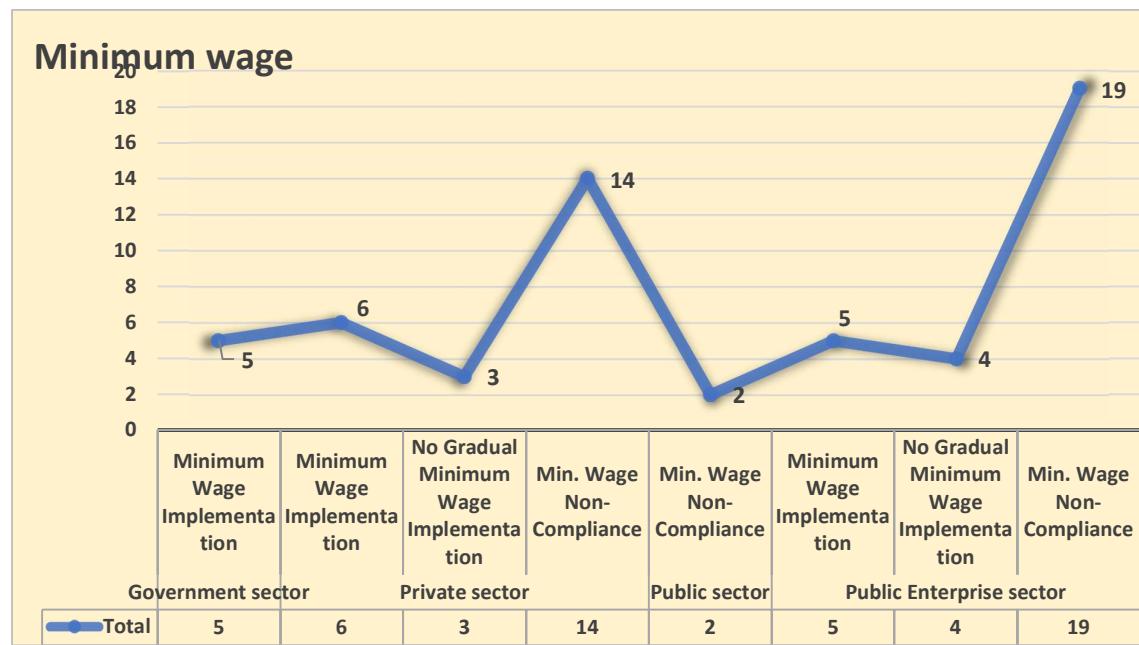
Field indicators show severe challenges that face the enforcement of the decision of the National Wage Council, as cases of violation may be observed in the following:

First: Cases of Non-Compliance with Minimum Wage

There were 35 cases of refraining from the implementation of the minimum wage distributed as follows:

The Public Enterprise Sector: the highest with 19 cases of non-implementation

The Private Sector: 15 cases



Second: the crisis of scaling-up wages: In addition to cases of non-implementation, there is also the problem of non-scaling up of wages in four establishments of the public enterprise sector and three in the private sector

The year witnesses a series of labour protests and sit-ins resulting from disorder in the wages system and these violations may be detailed according to the sector and percentage as follows:

- Delayed Payment of Wages: Two cases of delayed payment of salaries were recorded in the private sector and one case only in the public enterprise sector
- Reducing incentives and profit shares (gap among sectors): The public enterprise sector recorded the highest rate of this violation (12%), while the private sector recorded 4%.
- Stopping the payment of incentives and annual raise

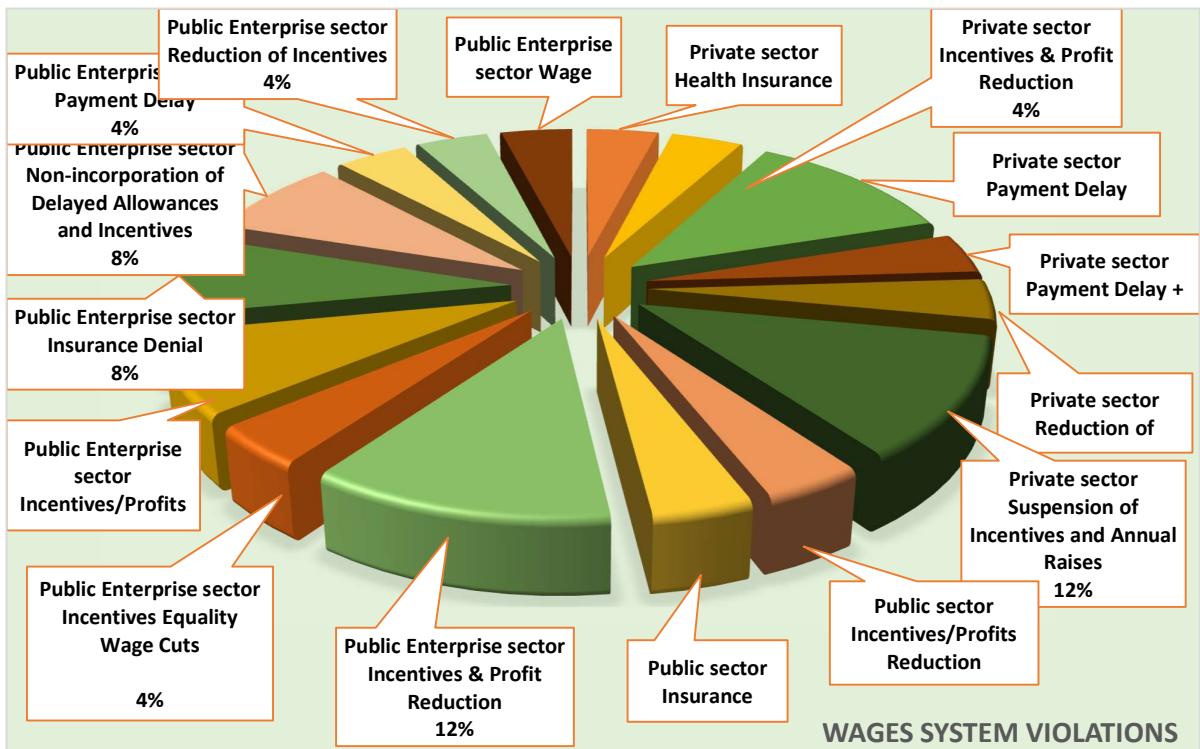
This violation emerges as one of the most common practices in the private sector as it constituted 12% of total violations observed.

- Deprivation from the addition of delayed raises: (public enterprise sector):

The public enterprise sector solely committed the violation of depriving workers from the addition of delayed annual raises and profit shares by a percentage of 20% and for accumulated periods amounting to seven years, leading to increasing rate of protests in this sector in particular.

- Wages cuts or delays because of employing workers through subcontractors

The public enterprise sector and the private sector were equal in the share of violations resulting from dividing wages because of the subcontracting system, amounting for 4% of violations.



➤ Violations related to allowances: (Denial of allowances, inequality in the calculation of allowances)

Sector	Delayed Payment of Allowances	Demanding Equality among Workers in Terms of Allowances	Denial of Increasing Various Allowances	Denial of Various Allowances
Public enterprise sector	1	11	1	
Private sector	2	3		1
Government sector				
Public sector				

➤ Violations related to working hours and holidays

They include employing people for forceful extra hours, deprivation from statutory holidays or substituting them without the consent of the worker.

Type of Violation	Preventing Causal Leave	Settlement of Holiday Balance	Deprivation from Official Holidays and Forced Extratime	Deprivation from Additional Incentive	Deprivation from Official Holidays
Sector					
Private	1	3	1	1	1
Public Enterprise	3				1
Government					

Data shows that there is a total of 11 cases of violation related to holidays and extra working hours, including:

- ✓ Deprivation from official holidays
- ✓ The private sector recorded one direct case, in addition to another case in which “workers were forced to work extra time without extra pay”
- ✓ Deprivation from the payment of extratime, or calculating it for less than its legally determined value.
- ✓ Deprivation from casual leaves
- ✓ Refraining from settlement of holiday balance and payment of its financial equivalent.

➤ Administrative Restrictions and Abuses

This includes forced relocation, arbitrary penalties, unlawful deductions, and using international investigations as a means for pressure or punishment.

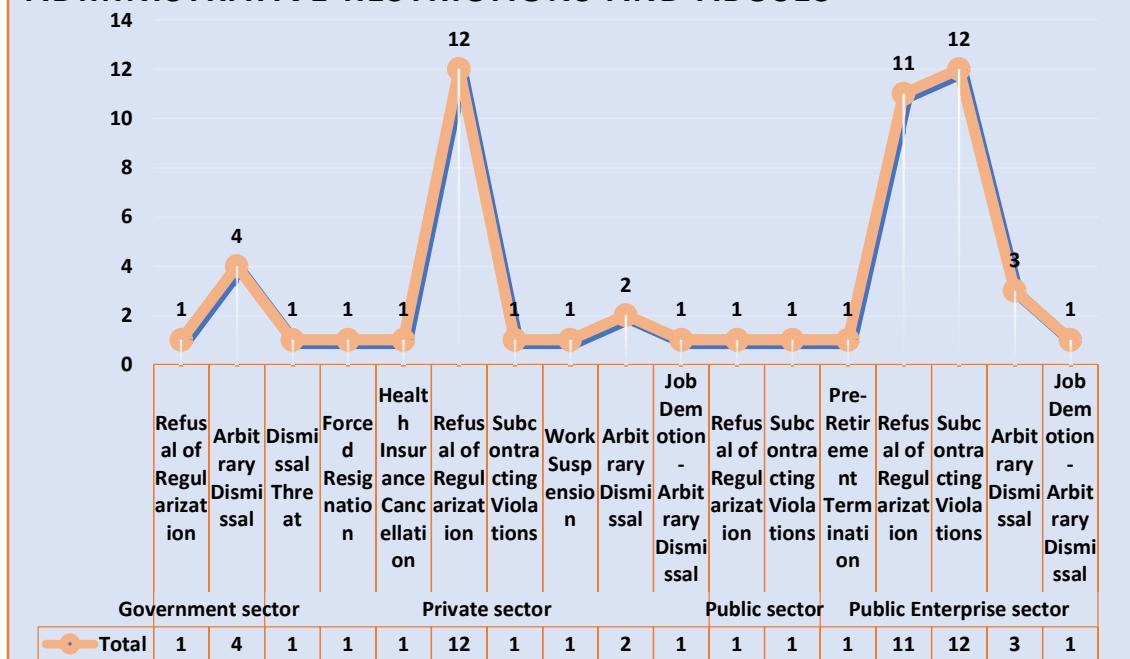
Type of Violation	Contracts with a Contractor	Refusal to Regularize Temporary Workers	Terminating Labour Relation before Reaching Retirement Age	Cancelling Health Insurance	Suspension from Work	Job Grade Demotion	Threatening of Dismissal	Arbitrary Dismissal and Forced Resignation
Sector								
Private Sector	3	1	-	1	1			
Public Enterprise Sector	1			1			1	
Government Sector	4							2
Public Sector								1

Total Number of Violation Being Observed: 55 cases of violation that are distributed on all establishments

The most affected sector: the public enterprise sector comes first with 27 administrative responses to disputes followed by the private sector (23 cases)

- Job security (temporary work and subcontracted workers): There are 25 cases of refusal to regularize temporary Workers 14 cases of subcontracted workers (especially in the public enterprise sector: 12 cases)
- Dismissal and arbitrary penalties: seven cases of arbitrary dismissals and 15 cases of threats of dismissal or arbitrary administrative decisions.
- Relocation and administrative pressures and security threats: data included five cases of security threats (2 in the private sector, 2 in the public enterprise sector and one in the public sector), as well as cases of arbitrary relocation.
- Arbitrary practices were observed including forcing workers who are close to retirement age to take long holidays in order to deprive them from receiving the financial equivalent of their holiday balance when their service ends. Likewise, attempts to force workers to officially forfeit their holiday balance with threats to take punitive measures.

ADMINISTRATIVE RESTRICTIONS AND ABUSES



➤ Workers' responses (thematic and repeated):

Data shows that workers' responses took escalating paths and were dominated by direct forms of protest:

- Sit-in (which may be accompanied with a strike action): 30 cases were recorded (more than 50% of total responses)

The public enterprise sector: 17 cases, the private sector: 11 cases.

- Vigils: 11 cases distributed among the public enterprise sector (4), private (4) and government (3)
- Official complaints: only ten cases were recorded. Workers of the private sector resorted to this method more than others (five cases)
- Other forms: the observatory recorded individual or limited cases like refusal to implement the relocation decision and threatened suicide (one case in the public enterprise sector) and “refusal to sign” (one case in government sector).

Number of cases

30 cases (50%)
11 cases (19%)
One case
11 cases (18%)
One case
One Case
One Case
2 cases

Action

Sit-in

Vigil

Refusal to sign

Complaint in the labour bureau

Vigil and official complaint

Refusal to be relocated and attempted suicide

Vigil - gradual strike action

Strike action - Strike action and open sit-in

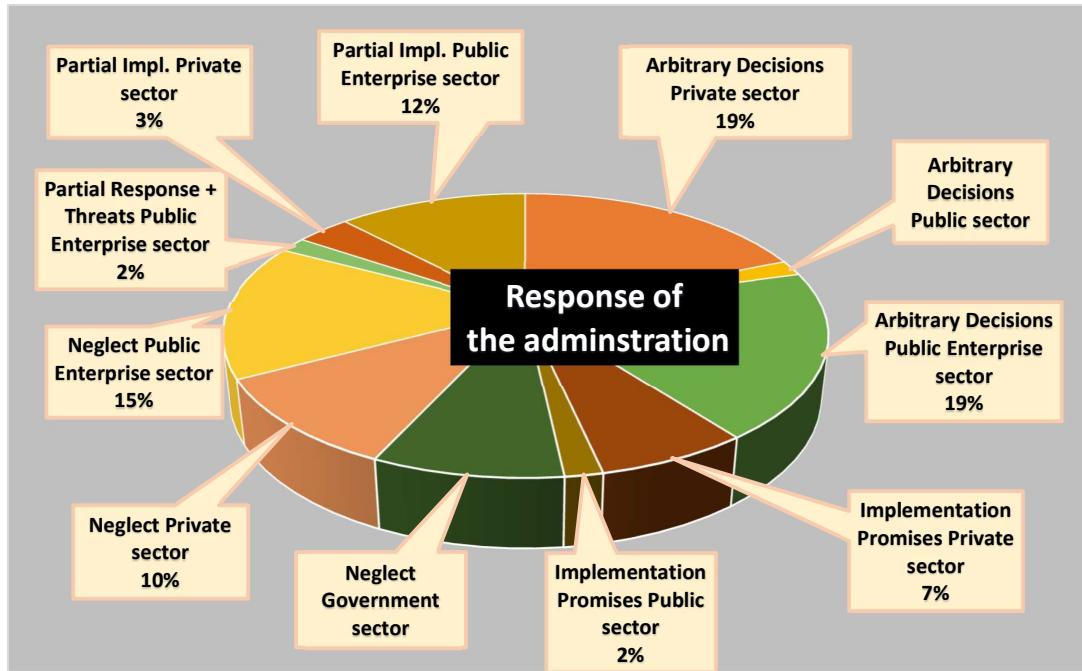
- Workers of the private sector resort to combining more than one method of expression of protest or attainment of rights. They combine complaints with vigils, and sometimes partial or gradual strike action.

➤ **Response of the administration/employer/security apparatuses**

	Arbitrary administrative decisions	Pledges of implementation	Partial implementation - response	disregard	Response
Public enterprise sector	9	8	1	10	
Private sector	5	2	4	12	
Government sector	6				
Public sector					1

- Disregard is the dominant response from administrations and employers (total of 20 cases)
- Arbitrary decisions amounted to 23 cases including arbitrary relocation, arbitrary dismissal, security threats and arresting workers.
- Pledges of implementation may be combined with partial implementation and often accompanied with security threats.
- Severe violation of freedoms: referral to investigation, arresting workers, freezing union activities and referral to trial.

Type of Violation	Arrests	Security Threats and/or Banning Workers from Entry into the Company	Freezing Union Activities
Private Sector		3	3
Public Enterprise sector	1	5	6
Government sector			
Public sector			1



Total number of documented cases of severe violations of freedom is 19 cases distributed as follows:

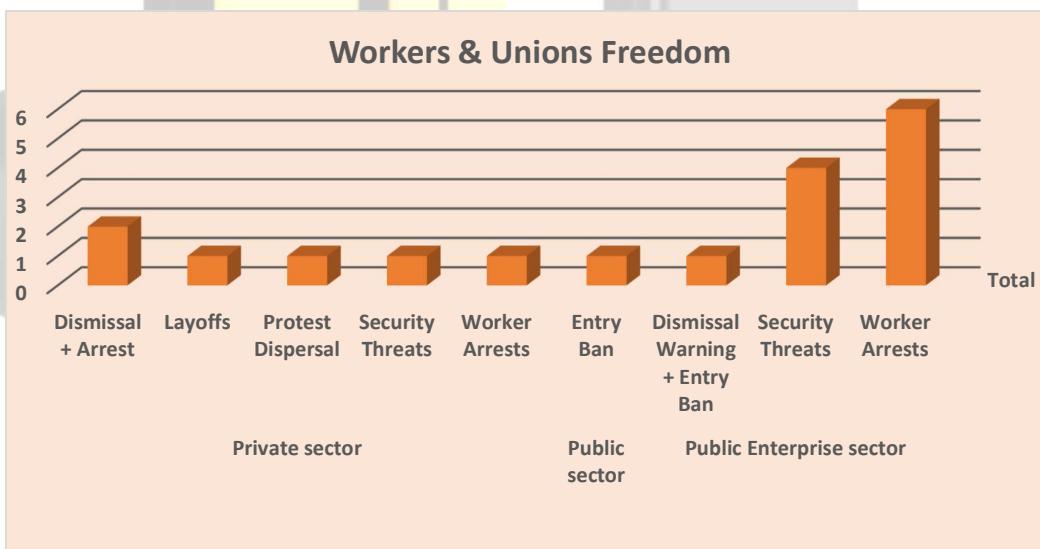
Public enterprise sector: 12 cases, almost 59% of total cases

Private sector: six cases, almost 35%.

Government sector: one case almost 6%

Cases were as follows:

- Arresting workers: 10 cases
- Security threats 9 cases (24%) distributed between the public enterprise sector and the private sector
- Arbitrary dismissal combined with arrests: three cases (around 18%)
- Preventing workers from entering the work places or issuing them dismissal warnings: two cases (around 12%)
- Dismissal combined with security arrest: one case in the private sector (around 6%)



Reading the Outcomes of Monitoring of Violations of Freedoms of Association and Labour Rights

➤ Refusing to Implement the Minimum Wage

Refaining from implementing the minimum wage occupied the top of the list of violations for 2025. The year started with the vast majority of companies and establishments refraining from implementing the minimum wage decided for 2024 (6000 Egyptian pounds). Some companies justified this by submitting requests for exemption from implementation that were not settled or responded to. Other companies just refrained from implementing the minimum wage without even caring to provide a justification. This resulted in increasing the number of labour protests demanding the implementation of the minimum wage.

Then, the National Wage Council decided in its session of 9 February 2025 to increase the minimum wage of workers in the private sector to 7000 Egyptian pounds that should be implemented from the first of March 2025. It also decided that the periodic raise of workers in the private sector is at least 3% of the insurance subscription wage and at least 250 Egyptian pounds. For the first time, the National Wage Council determined a minimum wage for part time workers (at least 28 pounds net per hour). This was issued based on the decision of the Minister of Planning, Economic Development and International Cooperation no. 15 for 2025 to set the minimum wage for workers in the private sector.

In the face of many severe criticisms to the reality of implementation in the private sector and the disputes and protests in the labour scene, the year 2025 witnessed a limited progress regarding the implementation of the minimum wage which is the provision of Labour Law no. 14 for 2025 in article 104 thereof that “establishments governed by the provisions of this law are obliged to implement the decisions of the National Wage Council.” Article 105 also stipulated that inspection apparatuses of the Ministry of Labour have to conduct periodic inspection on establishments governed by the provisions of this Law in order to make sure that the decisions of the national wage council are implemented. Periodic book no. 2 of the Ministry of Labour also stated that no establishment is exempted from the implementation of the minimum wage (except non-governmental associations and institutions) and this formed a good basis for overcoming the miserable conditions of 2024 in which the majority of establishments were exempted and the remaining ones practically refrained from implementation.

Nevertheless, many establishments and companies continued to refrain from implementing the minimum wage. Labour Directorates and inspection personnel were absent and didn't take action in most cases except after workers couldn't stand it and started protesting and striking. The Ministry of Labour didn't start activating some inspection and supervision mechanisms except at the end of October when the Minister of Labour declared that he will chair the inspection committee on some establishments in the 10th of Ramadan city. So, the committee responsible for inspections continued to regularly announce the number of violations and reports written against violators.

It is worth noting that the penalty for not implementing the minimum wage according to the provisions of article 287 of the Labour Law is a fine of at least 2000 pounds and a maximum of 20,000 pounds. The fine is multiplied according to the number of workers against whom this crime has been committed and is doubled in case of repetition.

However, the number of violating cases which are announced are still very limited in comparison to the total number of establishments in the private sector. Moreover, the minister of labour had stated that violations will be referred to the misdemeanors court in order to impose

the statutory penalty. However, the announcement of the number of cases did not include a count of sectors or geographic locations and there was no information regarding the continuation of inspection on violating establishments and the course of action taken after imposing the fine.

Moreover, when they had to implement the minimum wage most companies tried to evade this by different means including calculating the overtime payment in the minimum wage, or calculating the so-called inflation allowance and similar items as part of the minimum wage. Other forms of fraud included cutting some money in the form of unlawful penalties. Among the flagrant examples in this regard are the Nile Linen Group which was revealed by the starking events that took place, and the live testimonies of workers in the establishments of the Free Industrial Zone of Port Said that showed that they receive wages that are less than half of the minimum wage. This actually raises concerns about whether the minimum wage is being applied in these establishments. Some establishments even calculate overtime payment as part of the minimum wage.

It is also worth mentioning that Periodic Book no. 2 for 2024 issued by the Ministry of Labour ignored how the share of the employer in insurance subscriptions may or may not be calculated within the minimum wage. Stipulating that it should not be considered part thereof was a pressing demand by workers as this share should not be considered part of the worker's wage according to the definition of wage in the labour law.

Regarding the government sector, the government announced in the beginning of the year that it intends to increase the minimum wage to 7000 pounds for workers in the government sector as well, and to raise pensions by 15%. However, it didn't issue the decision waiting for the new financial year's budget which started on the first of July 2025.

On 30 July 2025, the Prime Minister issued decision no. 2594 for 2025 which amended the values of the minimum of wages of employees and workers in state apparatuses and service and public economic authorities to be 7000 pounds for the sixth grade and scaling up the wages of different job grades until it amounts to 13500 pounds for the excellent grade starting on the first of July 2025.

Moreover, Law no. 89 for 2025 determined the ratio of the periodic raise for workers addressed by the Civil Service Law to be 10% of the occupational wage (and the minimum is 150 pounds) and granting a special raise for those who are not addressed with the civil service law of 15% of the basic salary (and the minimum of 150 pounds) as well. It also decided to increase the additional monthly incentive for state workers of 700 pounds, and to decide a special grant for workers in the companies of public enterprise sector and public sector that equals the difference between the ratio of their periodic annual raise and the ratio of the raise decided for state employees provided that it is not added to the basic wage and paid as a lump sum.

Although such a raise is not sufficient for livelihood burdens that these workers bear, they don't actually receive it. Government apparatuses and administrations implement these raises in a way that detracts a lot from it in an arbitrary manner that most workers don't know the reasons why their salaries are much lower than the announced numbers which are official and statutory. They affirm that the government calculates the share of the employer in insurance subscriptions as part of the minimum wage, although campaigns during the past two years managed to stop calculating the employer's share as part of the minimum wage in public enterprise sector companies and private sector companies. Moreover, items of complementary wage are calculated in each government agency in a way that practically leads to reducing its actual amount while some categories are being ignored like teachers that most of whom are appointed based on a class-by-class scheme with no rights or commitment to the minimum wage.

➤ **Refraining from the scaling-up of wages**

Employers who reluctantly implement the minimum wage in their establishments tend to consider it as a minimum and maximum wage at the same time. All workers receive the same amount regardless of their years in service or their experience. A worker who worked in the establishment for five or ten years receives the minimum wage just like the beginner who just started working in spite of the difference of years of work, growing experience and increasing family responsibilities. The Labour Law merely sets the standards for the determination of wages according to article 107 which stipulates that “a wage is set according to individual labour contract, collective labour agreement or the establishment’s bylaws. If the wage is not determined by any of these means, the worker would be entitled to the wage of the equivalent if any. Otherwise, the wage is estimated according to what is common in the profession in this area. If not, the Judge of Urgent Matters of the Labour Court determines according to requirements of justice, while taking into consideration the provision of this law.” Whereas, mechanisms of collective bargaining and agreements are almost suspended, employers don’t have anything to oblige them to pay what is higher than the minimum wage although this is a violation of the worker’s right to fair wage and leads to several labour disputes and protests. However, the government disregards this obvious violation.

This problem does not exist in the government sector because the Prime Minister issued a decision that includes minimum wage and scaling up of wages starting from the minimum wage to the highest job grade. Nevertheless, excessive tax cuts and other bizarre deductions practically lead in some circumstances to make the wage of a worker lower than the wage of another who is lower in the job scale. Testimonies of workers in the government sector showed that tax and insurance deductions amount to 33% of the wage, which makes it hard to reach 7000 pounds net. Testimonies of workers in the Egyptian Taxation Authority stated that wages of workers who are in service for more than 20 years may not exceed 6000 pounds, which is contradictory to the decision of the prime minister regarding the scaling-up of wages.

Workers in the public enterprise sector complain that the wage scale lacks justice. Labour protests observed in this sector are related to demands of raises and dues that were not paid for years. Moreover, calculating the profit share of workers as part of the minimum wage leads to a big decrease in its actual monthly amount.

In general, violations related to wages include non-implementation of the minimum wage or escaping it, non-scaling up of wages and even reducing them in the following cases:

- Oriental Weavers Group
- ArabPolvara Spinning & Weaving Co.
- T&C
- Innova
- SEDICO
- Samanoud Textiles
- Al-Watania for Agriculture
- United Company of Pharmacists
- All companies in the Investment Industrial Zone of Port Said
- All companies of Water and Waste water
- All power stations
- Nile Linen Group
- Al-Shamadan for Food Industries
- Factories of the Egyptian Sugar and Integrated Industries Company
- Mffco Helwan

- Egyptalum
- Al-Ahly Sports Club
- Al-Bawaba News newspapers whose crisis was continuous from 16 November until this report was issued.
- Electricity Company - the Red Sea Sector - Hurghada
- The minimum wage was not implemented in the Egyptian Railway for Integrated Services company owned by Egyptian National Railways except at the end of December 2025 after the convening of its general assembly in the aftermath of escalating complaints and protests of workers.

➤ **Violation of the Right to Job Security**

Employing people based on temporary work contracts is not confined to establishments of the private sector. This practice also extends to government agencies and authorities. This "temporary" worker may continue in his/her "temporary" work for ten or 20 years. This is usually accompanied with violation of other labour rights, especially the right to social insurance, and even inequality of wages with permanent workers. The demand to regularize temporary workers has emerged among the repeated demands of labour protests during this year.

➤ **Violation of Rights Related to Working Hours, Official Holidays and Leaves**

This violation is clearly going on in the private sector establishments including forcing people to work for 12 continuous hours and working in the days of weekly rest and official holidays. Many employers seek to deprive workers from their rights to holidays, especially the continuous six day holiday and casual leaves that workers need in emergency conditions.

The financial equivalent of overtime work is often a topic for labour disputes. Some employers calculate it for less than its actual value. Others don't abide by it at all and give workers nothing in return for working on the days of weekly rest and official holidays contrary to the law. Employers are not committed to settling the balance of holidays that the worker didn't get and paying him/her their financial equivalent every three years maximum according to the law. Whenever such a balance and its financial equivalent accumulates, workers can't collect it except when they file a lawsuit after the termination of the labour relations. Of course, few workers do so.

➤ **Subcontracting or Outsourcing Workers**

Law is circumvented when it comes to the employment of workers through the formation of companies called "service companies." These companies are often fake companies that formally contract an existing company or establishment to provide services thereto like maintenance, guarding or cleaning etc. Workers are employed in the actual company they work in but as if they are workers of the so-called "service company," i.e. those workers are subcontracted to work and the service company plays the role of labour contractor who deducts a percentage of workers' wages for itself.

Workers who are formally registered as employees in the service company cannot claim their rights from their actual employer (the company they actually work in and under the supervision of its personnel).

Article 94 of the Law stipulates that if the employer outsources from another employer some part of its work in one work zone, the latter has to ensure equality between his workers and the workers of the original employer in all rights. The latter shares all obligations prescribed by the provisions of this law. In all circumstances, rights of workers may not be infringed upon.

However, what actually happens in reality is that part of the workers of the original employer are registered as workers of another employer (in fact, a fake company that is often established by the original employer himself) and this entails depriving those workers from considerable part of their rights and wages especially their variable wages, absence of legal protection for them and toughening of their working conditions.

It is worth noting that this form of fraud is almost dominant in some industrial sectors, especially petroleum. Even public enterprise sector firms started doing this, as well as some units and authorities in the government sector. A case of 1000 workers in Misr El-Mahalla Spinning & Weaving applied for working in the company (after it announced that it needs workers). However, they were surprised to find that they were forced to sign employment contracts with a company called (Top Service). Others refused to sign and work under these conditions, but this group had to agree to sign these contracts. Nevertheless, the payment of their wages is delayed than set dates which makes them unable to fulfill their needs.

Another case was observed in this regard. The workers of the Modern Company for Natural Gas (ModernGas) are employed by a company called “the Arab Establishment for Supplies and Contracting.” The number of workers being subcontracted is estimated to be 2500, amounting to 75% of the total workforce of the company. They continue working based on temporary contracts in spite of the permanent nature of their jobs and in spite of the fact that their work is related to the main activity of the modern gas company. These unfair conditions led to the outbreak of protests among workers of the Company in the governorates of Qena, Suhag, Sharqeya and Badr City. They demanded to have contracts with the company they actually work for, especially that the company that plays the role of labour contractor deducts 1300 pounds from their monthly wages which undermines the minimum wage they receive. However, the response to their protests was not dialogue or negotiation. The response was raids by security forces on their homes and arrest of around 25 of them (the number is not precisely known).

In the last days of the year, a case of two workers in the Electricity Company, the Red Sea sector, Hurghada was observed. Two workers have submitted their complaint from being subcontracted and from not receiving the minimum wage. The response of the management was to dismiss them from work.

It is worth noting that the Minister of Labour had stated in the beginning of November that applying the minimum wage on workers of security and guarding faces difficulties.¹⁹ The reason is clear as most of these workers are subcontracted and thus the “labor contractor” who employs them takes a large percentage of their wages.

➤ Not Executing Court Judgements

Lack of respect for the law and refraining from the execution of judicial decisions does not only lead to intensifying sense of injustice, but also leads to threatening the stability of society, especially if the party refraining from abidance is a government entity that should respect law and legal provisions.

¹⁹ The Website of the Ministry of Labour.

The most flagrant example of refusing to implement judicial rulings is the historic judgement of the Court of Administrative Adjudication on 26 June 2024 to cancel the condition of belonging to a trade union imposed on drivers in order to receive a professional driving license. This judgement restored to workers their right to freely join trade union organizations or withdraw from them. This right was violated for decades. This judgment -just like any other judgement from the Court of Administrative Jurisdiction- has to be enforced. Moreover, decisions of the administrative justice system are not personal; they are general rulings that are applied to all similar cases, not just the litigants.

Although one and half years has passed since the issuance of this judgement and all required procedures have been taken, the Traffic Department refrains from executing the judgement.

Moreover, the Water and Waste Water Company in Alexandria refuses to execute the judgement issued for its workers obliging it to pay raises. The Adult Education Authority refuses to execute a judgement to regularize temporary workers therein. Likewise, Telecom Egypt refuses to implement a court judgement that was recently issued to confirm that its workers deserve the special raise of 2008 and that the Company is obliged to pay this raise as 30% of their wages in 2009. The Coke and Basic Chemicals company (which is currently in the process of liquidation) also refuses to execute the judgement that its workers are entitled to get the workers' profit share of 2015.

➤ **Victims of the law no. 73 for 2021**

Thousands of workers in the government sector annually lose their jobs and source of livelihood because of the implementation of law no. 73 for 2021 regarding filling public jobs or continuing therein. This Law made dismissal a penalty for those who are proved to take "drugs" and it is a law that is gravely distorted in terms of constitutionality.

This law stipulated that the service of government employees is terminated by the force of law based on surprise drug tests that are conducted for workers without any guarantees and without enabling the employee to defend him/herself or submit an appeal, in a violation of the rights enshrined by the Constitution.

This Law includes violation of the sanctity of private life of government employees as it stipulates that an employee is punished based on test results without specifying specific ratios for drug use or stating its impact on the performance of one's job. This actually contradicts the rule that punishments should be reformative rather than destructive and the principle of gradual penalties.

Moreover, as stated by people affected by the implementation of the Law, it is highly possible that the employee is sick and treated with analgesics that gives positive drug test results. Many of the employees affected confirm that there are mistakes in the test results.

Thousands of employees who were dismissed from work at the background of implementing this law submitted complaints to all government bodies. In 2024, they organized vigils to defend their livelihood. However, instead of dialogue with and responding to them, a number of them were arrested and they remained in provisional detention throughout 2025 until now.

➤ **Violation of the Rights of Irregular Workers**

Rights of Women Workers in Agriculture and Provisions of Employment of Children

The new Labour Law n. 14 for 2025 achieves some progress by omitting two problematic provisions from the old Labour Law regarding the exclusion of women and child agricultural workers from the provisions of employment of women and children stipulated in the law. However, reality didn't change and no progress what so ever has been achieved pursuant to the issuance of the new Law. Female workers in the agricultural sector still work without any legal protection. We will tackle in detail the conditions revealed by the incident of the grape workers that the Report takes as a case study. Moreover, Manfalout accident reveals the horrible working conditions in which children work in the agricultural sector.

According to what we observed, Manfalout accident took place on the Western Desert Road on Thursday, 2 October, while children were coming back from work on a farm. The accident led to the death of three children and injury of six between moderate and severe injuries. Victims included children who are between 10 and 13 years of age.

Another tragic accident took place the morning of Saturday, 11 November 2025, on the road of Al-Shantour village in front of Al-Amaaer bridge in the district of Samata of the governorate of Beni Suef. This accident led to the injury of 28 workers who were riding a small pickup truck on their way to perform some seasonal agricultural work.

Once again the list of victims included children between 11 and 17. This sheds light on the inhuman conditions in which our children in the countryside live and proves that the following legal provisions are not implemented:

- Regarding irregular employment, the Law stipulates that the Ministry of Labour undertakes the designing of policies and following up the employment of irregular workers, especially seasonal agricultural workers, contracting workers, sea workers, and workers in mines and quarries. The administrative authority is committed to count and register irregular workers according to their categories and classifications, and prepare national databases for them and linking them to state apparatuses and ministries (articles 76 and 77)
- Regarding safe work environment, the law stipulates that anyone who employs workers in places to which ordinary transportation is not available has to provide for them adequate transportation means at his expense (article 271)
- Regarding the employment of children, the law prohibits the employment of children before the age of 15 and prohibits their employment even above this age in jobs, occupations and industries that may expose their physical health, safety or morals to danger or obstruct them from completing their education.

The Law prohibits the employment of children for more than six hours a day. It stipulates that work hours have to be interrupted by one or more rest periods for eating and resting that is not less in total than one hour. This rest period(s) is set so that the child may not work for more than four continuous hours. It is prohibited to make children work for extra hours or be employed on weekly rest days or official holidays (articles 62, 64 and 65).

Beni Suef accident proves -just like previous ones- that seasonal agricultural workers are not counted, registered or inspected on and that owners of the farms they work in don't provide any adequate or safe transportation means that is why they have to take unsafe and inhuman vehicles (like cars used for transportation of goods) on inadequate and unpaved roads.

Children below 15 continue to be employed. Children above 15 continue to work in inhuman conditions for more than 12 hours a day without any rest periods and without providing food or

places for rest and even with no toilets. In return they receive meager wages that are much lower than the minimum wage decided by the National Wage Council per hour (28 pounds per hour).

Exploitation of children as cheap labour in the poorest villages continues amid lack of all forms of supervision and inspection that should be performed by the Ministry of Labour and its agencies, although everyone knows that these workers suffer a lot and in spite of repeated tragic accidents.

Collective Dismissal of Workers

Repeated cases were observed in which workers were dismissed en masse on the pretext that they are surplus labour, in contradiction to the law. This includes:

- In the company of Ceramica Innova, 350 workers were given forced leave before they were dismissed from work.
- 2000 workers were dismissed from the Agricultural Bank
- 100 workers were dismissed from the Eastern Company for tobacco.

Violation of Freedoms of Association and the Right to Strike

It is unfortunate that some managements and employers have very negative responses to strike actions and protests that workers resort to when they can't bear their conditions any more. Workers' industrial actions are usually in protest to non-compliance with the law. No one punishes employers who refuse to abide by the law. Workers don't find anyone to listen except in very few cases for which there is widespread social interaction and sympathy. In most cases, the response is negative and includes disregard, refusal to negotiate, threats and intimidation, arbitrary relocation, and even dismissal, apprehension and arrest, and provisional detention. The following cases were noted:

- In the Oriental Weavers Group in the 10th of Ramadan City, workers went on strike in January 2025 and there was partial response to their demands to re-structure salaries. However, a new manager was appointed in the company and he started his work by a threatening speech in which he threatened workers to take decisive arbitrary measures: stoppage of one machine equals dismissal of a worker. Afterwards, 34 workers were relocated from the Carpets Department to the Spinning Department which was in violation of the Law because the nature of work in the two departments is substantially different. This resulted in the reduction of workers' wages because they couldn't reach the required productivity rate in order to receive the incentive allowance (variable wage).

With the rising tension in the work environment of the company, and amid worsening relationship between the management and workers, in December 2025 a group of 28 workers were forced to take an open leave and six workers were suspended and a request of their dismissal was submitted to the Labour Court.

- In the company of T&C, 11 workers were arrested before they were dismissed from work.
- In SEDICO, a number of workers were forced to take an open leave and all workers were threatened with dismissal.
- In the Easter Company, six workers were arbitrarily dismissed and the raise of 15 workers was cut.

- In Misr El-Mahalla Spinning & Weaving (Ghazl El-Mahalla), a worker was referred to investigation merely because he submitted a complaint from the deterioration of the medical service in the company's hospital.
- During the strike action of the workers of the Egyptian Sugar and Integrated Industries Company in the branches of Edfu, Kom Ombo, Armant and Deshna, workers were threatened by the National Security Apparatus and arrest. Then, six workers were arbitrarily relocated from the branches of Edfu and Kom Ombo in the governorate of Aswan to the branch of the company in Al-Hawamdeya, Giza (displacement).
- In the Canal Mooring & Lights Company which is affiliated to the Suez Canal Authority and which is located in the city of Port Said, negotiation was rejected and workers were intimidated and threatened that security forces would break into the company where they were organizing a sit-in. That is why workers had to leave.
- The Water and Waste Water Company arbitrarily relocated three workers before they were later arrested.
- The Water and Waste Water Company refused negotiation with workers and threatened them with dismissal and arrest.
- Security forces in the governorates of Qena and Suhag raided 26 workers in the Modern Company for Natural Gas (ModernGas) and there was no confirmed information from their families or coworkers about their fate. However, preliminary information points out that the Prosecution decided to put them in provisional detention.
- In Samanoud Textile, unionist leader (delegated by workers) Hesham El-Banna was suspended and then he was dismissed at the end of July at the background of workers' strike action at the end of 2024 demanding the implementation of the minimum wage in the Company.
- In Seba Company in the Investment Zone of Port Said, unionist leader (delegated by workers) Mahmoud Youssef was dismissed after the workers submitted a complaint to the Labour Bureau because the company does not implement the minimum wage.

Moreover, the following violations of freedoms of association were observed:

Labour Directorates continue to obstruct the registration of independent trade unions. They refrain from writing reports of receipt of foundation documents from unions in violation of the Trade Union Organizations Law no. 213 for 2017 and its Executive Regulations. Usually, these directorates justify these practices by saying they wait for the directions of the Ministry although they are the legally competent bodies. The matter may take months or even years before this happens. These administrative obstacles may be combined with pressure on the founders of the independent trade union to join the government-affiliated Egyptian Trade Union Federation (ETUF).

These practices not only violate the right of independent trade unions to be registered, but lead to violating the right of all workers to freely form their own organizations. These practices make workers refrain from forming their independent unions feeling that their efforts would be useless and that their attempts will face several hardships or even make them pay a huge price. Founders of trade unions are sometimes summoned by security forces and asked why they want to establish a trade union organization.

Testimonies show that the following unions (although they have all their foundation documents and legal requirements complete and ready) are still not registered because of administrative obstructions:

- The Union of Workers in the National Authority for Quality Assurance and Accreditation in Cairo.
- The Union of Workers in the National Authority for Quality Assurance and Accreditation in Ismailia.
- The Union of Cement Workers in Cairo
- The Union of Workers in Courts and Prosecution of New Cairo.

Moreover, the Union of Workers in the Clubs of the Suez Canal Authority was subjected to severe pressures that ended up in the freezing of its activity. The Labour Directorate of Ismailia addressed the management of the Suez Canal Authority claiming that the union didn't complete the procedures of formation of its executive board. This is not true as the Union had held its general assembly which elected its board and submitted a copy of the meeting minutes report along with all required procedures to the Directorate. Later on, the management of the Authority refrained from dealing with the Union and stopped its activities.

Similarly, the Union of Workers in Real Estate Taxation Authority in the governorate of Qena was frozen because the Labour Directorate refused to recognize the meeting of its general assembly and the elections of its executive board.

Other independent trade union organizations managed to overcome the administrative obstacles and regulate their legal status. However, they still face severe obstacles that prevent them from practicing their activities. Among the flagrant examples is the Union of Drivers' Services in Qalyoubeya which can't work since its registration in 2018 until now because the Labour Directorate of Qalyoubeya refused to give it the required documents to open a bank account and publish its registration in the Official Gazette and notify the Traffic Authority in order to facilitate its work.

On the other hand, some unionists are still in provisional detention because of their trade union activities. They are:

- Sameh Zakareya Ali Ramadan
The Egyptian Ambulance Authority
He is in provisional detention in Badr Prison since 22 August 2022 pending investigations in case no. 1412 for 2022.
- Shady Ali Ali Mohamed
IV Company for Weaving and Spinning
He is detained in the prison of 10th of Ramadan city from 29 April 2024.
After his arrest, the Company terminated his contract and his family lost its only source of livelihood.
- Ahmed Abdelfattah Yehya Hassan
The Assistant General Secretary of the Union of Workers in Delta Company for Transport and Tourism. He is in provisional detention in Badr Prison pending investigation in case no. 2214 for 2023.

It is worth noting that accusations made to these workers are the usual charges of joining an illegal group, dissemination of false news and abusing social media.

➤ Case Studies

We provide here two case studies to clarify the general environment in which these violations take place:

1- The Case of the Workers of Nile Linen Group

The Nile Linen Group witnessed a tragic event on Tuesday, 9 September 2025, when the worker Doaa Mohamed lost her three-month-old baby girl while she was holding her in her arms in front of the gates of the company. This accident instigated a wave of anger and protests among workers. The Tailoring Departments and the Automatic Department instantly started a strike action before the rest of the company's workers joined them the next morning.

These painful events started when the worker Doaa Mohamed took her baby girl to the company at 7am on Tuesday trying to take a leave or permission to exit the premises so that she can take the baby to the hospital because she has severe gastroenteritis.

The worker couldn't be absent from work on that day because she was absent the day before because her child was sick and she had to spend the day with her at the hospital. When a worker is absent for two days, s/he is denied the addition of the inflation allowance (2000 pounds) to his wage, which means that the worker and his/her family would starve.

The worker begged for three hours starting from 7 am so that she gets a leave or a permission to leave the company. We may say that she was forcibly detained inside the company as its security prevents any workers from leaving it during the day.

In the face of this painful situation, an HR employee volunteered to sign a leave for Doaa although his manager refused (according to what he told Doaa). So, she left but her baby girl died just when she was at the gates of the company. When she arrived at the hospital, she was blamed for coming too late to save the baby.

Doaa's men and women coworkers at the Tailoring Departments and the Automatic Department went immediately on strike protesting what happened to their coworker and demanding holding those responsible for the baby's death accountable. The next day, the rest of the company's workers joined the strike action and all machines in the company stopped in protest of the company's practices that lead to their suffering and oppression.

On Thursday, Doaa went to Dekheila Police Station and made a report accusing the Company of causing her daughter's death.

It is worth noting in this regard that the Company calculated the so-called "inflation allowance" which is 2000 pounds as part of the minimum wage that should be applied. It also made very strict conditions in order for the worker to receive it. Any worker who is absent for two days is deducted from this allowance, i.e. 2000 pounds are deducted from his/her wage which is supposed to be the minimum wage. This is actually circumventing the minimum wage decision as this so-called inflation allowance is not a bonus to encourage workers to be regular at work but rather an essential part of the minimum wage which is decided for confronting rising prices and deteriorating living conditions.

It is also worth noting that the management of the Company put very restrictive conditions for getting a leave from work and deprived workers from their legal right to casual leave so that workers have to be absent whenever they have compelling conditions, and thus get their wages decreased by 2000 pounds. The few months preceding this tragic event also witnessed delayed payment of wages until the 8th or 10th day of the month. So, workers cannot pay for their needs

and the needs of their families and kids. For example, the wages of August were not paid until after the incident of the death of Doaa's daughter and the workers' starting their strike action in the Tailoring Department and the Automatic Department (i.e. on 9 September).

For all these reasons, the angry workers of the factories of Nile Linen Group went on strike demanding the following:

- Holding those responsible for the death of the daughter of worker Doaa Mohamed accountable
- Amending and increasing wages and canceling the unjust and unlawful conditions put by the management in order to receive the so-called inflation allowance which is already treated as part of the minimum wage.
- Cancelling all complicated procedures to get a leave and approving the right of workers to have casual leave when they need it.
- Refraining from delayed payment of wages provided that they are paid at the maximum of the 5th day of the month.

The death of the baby girl created a state of anger and sympathy in Egyptian society. So, the Ministry of Labour had to interfere and send a representative of the Ministry (director of the Labour Directorate of Alexandria) to investigate the events. Security men talked with workers asking them to leave, promising them that their demands will be met and that their representative will negotiate with the management of the Company about these demands. Workers agreed to give the Company's management two days until the end of Sunday, the 14th of September, while 15 representatives of workers (including a number of the members of the independent Union) started negotiating with the CEO of the Company and its owner (Saied Ahmed) regarding workers' demands. This bargaining process continued for two days in the presence and under the mediation of the representative of the Ministry of Labour.

Negotiations led to good results. However, the outcomes of the negotiation are actually obliging the company to implement the Labour Law because the Law was not implemented when it comes to the following:

- The right of workers to have six consecutive days within their annual leave, and the right of workers to have casual leaves according to the provisions of the Law and their right to all holidays stipulated by law.
- The Company's abidance by implementing the minimum wage according to the provisions of the Labour Law and the decision of the Minister of Planning (President of the National Wage Council) no. 15 for 2025 on the conditions set out in the Periodic Book which puts this decision into effect.
- Penalties' regulations are in violation of the Law, and they are not declared to workers. Administrative penalties are deducted from the total wage, which is contradictory to the provisions of the Law.
- Not abiding by statutory working hours and payments for overtime hours and working on rest days and official holidays.
- Not abiding by social insurance or health insurance for all workers.

We have to ask what is the role of the Labour Bureau of Al-Amreya and the Labour Directorate of Alexandria regarding all these violations? Should a worker lose her baby girl, workers get angry and protest to this inhuman treatment and go on strike and the security forces come to follow up the crisis for action to be taken? Was it necessary that all this happen so that the

Director of the Labour Directorate goes to the company -based on the directions of the Minister- and registers all these legal violations that the Nile Linen group commits so that the management accepts to negotiate with workers? The management used to refuse any negotiation in the preceding period and ignore the demands of the union of workers before it was being pressured by the Labour Bureau to accept collective bargaining.

Although workers are back to work, a considerable part of them are still frustrated because the demand of structuring or actually scaling up wages was not met. It is worth noting that workers' representatives were shocked when the Director of the Labour Directorate intervened against them saying that this demand relates to workers in the government sector and that the Law didn't stipulate it for workers in the private sector. Nevertheless, Labour Law is the minimum level of workers' rights that should not be detracted from and any agreement that detracts from these rights becomes invalid. Labour agreements should give workers more rather than less rights. Rights stipulated in the Labour Law are obligatory rights that may not be negotiated. Negotiation should be conducted regarding rights and rules that are not mentioned in the law and left by the legislator for negotiation between the two parties of the labour relation and collective labour agreements.

Moreover, the minimum wage is universal and binding. Violation thereof necessitates the infliction of a criminal and non-criminal punishment on the violators (ILO Convention no. 131 and ILO Recommendation no. 135). This minimum wage is the wage of the beginner worker with no regard for his/her qualifications, previous experience or period at work. Wage is supposed to increase above this minimum wage based on qualification, years of work and experience.

2- The Case of Grape Girls

On Friday, 27 February, a tragic event that shocked Egyptian society and instigated angry and sad responses took place. A huge road accident took place near the district of Ashmoun in the governorate of Menofeya. A large number of girls died on their way from their village of Kafr Al-Sanabsa to their work in a grape farm riding a microbus when it was completely smashed by a lorry. 18 girls died, as well as the driver of the microbus. Three were injured and one of them died later. So, the death toll of the accident was 20.

This tragic event took place on a road (the Regional Ring Road) which is defective in many ways that make it lack most basic safety measures and required reform. That is why, according to the justifications of government officials, there were unpaved parts and two way lanes without a medium strip. So, society's anger was mainly focused on this aspect. Some parliament members submitted parliamentary inquiries to the executive authority demanding holding those responsible into account, especially that this is a new road.

However, this accident also reveals the horrible working conditions that these girls work in. It revealed the following facts:

- These girls were pushed by poverty and want to work in the worst conditions. Some of them are the heads of their households and others contribute to family expenses. The government bears the responsibility as it is incapable of providing social support and protection for the vast majority of families, especially in the countryside.
- These girls work for 12 hours a day for 130 pounds (2.5 dollars), while the labour law states that working hours should not exceed eight hours a day. Most of these girls were under 18, so provisions on the employment of children should apply to them. Law prohibits their employment for more than six hours a day, and stipulates that work hours have to be interrupted by one or more rest periods for eating and resting that is not less

in total than one hour. This rest period(s) is set so that the child may not work for more than four continuous hours. It is prohibited to make children work extra hours. However, in this case girls worked for 12 consecutive hours with no rest periods or food, and of course no resting or not even toilets.

- These girls receive 130 pounds (2.5 dollars) for working 12 hours, while the decision of the National Wage Council is that the minimum wage for irregular workers is 28 pounds per hour, which means that 12 hours should be for 336 pounds.
- Article 271 of the Labour Law stipulates that anyone who employs workers in places to which ordinary transportation does not arrive has to provide for them adequate transportation means at his expense. In this case, these girls move on the Regional Ring Road in which there are no ordinary transportation means and the road itself is not suitable so they have to take a microbus. Counting the dead and injured, we know that there were 21 girls in this microbus, while a microbus should only take 14 passengers at maximum. So, these under age girls are victimized and pay the price of bad roads.
- This horrible accident also reveals total absence of supervision and inspection on farms and work places in the agricultural sector. What is really remarkable and actually bizarre is that the grape farm (or what sometimes was referred to as a “grape exporting station”) in which the victims worked was not mentioned in the House of Representatives or on the pages of newspapers and websites. All we know is that the accident took place on the Ring Road near the district of Ashmoun of the governorate of Menofeya as if what happened to those girls is not related in any way to their work, although the provision of safe transportation means is the responsibility of the employer. The talks of families and injured girls was sufficient to reveal the horrible working conditions they work in.
- This tragic event didn't only reveal violations of the rights of women and children working in the agricultural sector, but also absence of protection for irregular workers. According to article 77 of the Labour Law, the competent administrative body is supposed to count and register those workers and according to article 75 it should protect them during work.
- It is worth noting that the National Census of the phenomena of child labour in Egypt showed that there are 2.76 million children who work in Egypt, primarily in the sectors of agriculture, brick making, and industrial shops. Although the Ministry of Labour issued the National Action Plan for Combating the Worst Forms of Child Labour in Egypt and Supporting Family (2018 – 2025) in cooperation with the ILO in accordance with fundamental Conventions no. 138 and 182, we didn't see any indicators of progress in reality in terms of prohibition of under age employment or guaranteeing protection for child workers.
- In spite of the anger and dismay that followed this tragic event especially when the village of Kafr Al-Sanabsa paid farewell to the girls in a heart breaking scene, the payment of reasonable compensations to the victims' families in which some businessmen contributed, and the statements of Mahmoud Fawzy, the Minister of Parliamentary Affairs and Political Communication, that this “accident will be a starting point for correcting what should be corrected and upholding the principle of accountability as human souls are a responsibility that we should respect”, in October 2025 the Felonies Court of Shebein Al-Koum sentenced the driver of the lorry to 15 years in prison and its owner for five years. This ruling was upheld in the Appellate Court. So, these two men alone bear the full responsibility for what happened and apart from this no correction and no upholding of the principle of accountability took place.

Violations of Occupational Health and Safety Measures

➤ Martyrs and Victims of Breadwinning

2025 was the year of work accidents par excellence. We witnessed a considerable increase in the number of these accidents and their frequency especially if we add to accidents and injuries in the workplace, bad road accidents in which workers die on the way to and from work. Also, the hot summer of 2025 witnessed an unprecedented rate of fires that all revealed the absence of measures of occupational health and safe work environment.

The following includes a table of work accidents whether in the workplace or on the way to work and a table of fires that occurred during the period from January to August 2025, as well as a qualitative and quantitative analysis of work accidents and their victims.

But we have to take the following into consideration:

- This count was conducted -except for few reports and testimonies- via the media. Although we tried to verify it as much as possible and exclude repetition, it still lacks total accuracy. CAPMAS or any specialized agency didn't produce any official statement in this regard.
- The count of fires is limited to fires taking place in places in which workers work.
- Most fires were observed in the governorates of Cairo and Giza. This may be due to the fact that these two governorates have the highest numbers of establishments or the fact that other governorates don't have comparable media coverage.

The Following Table of a detailed account of accidents including fires is attached.

Record of Accidents' Victims and Record of Fires

Month	Accident, its Place and Number
February	Death of one workers and injury of three because an explosion in the company of Misr El-Mahalla Spinning & Weaving (Ghazl El-Mahalla)
	Death of a worker and injury of another as a result of a crash in Menya
	Injury of nine workers in Beheira
	Death of one person and injury of two in Al-Badrashin, Giza
	Death of a workers and injury of six, Al-Zafarana, Al-Galala Road
	Injury of eight in a crash in Helwan
	Death of a worker and injury of two in a crash in Menya
	Death of one and injury of four in Kerdasa, Giza crash
March	Death of three who drowned in sewage in Menya
	Injury of three in Menya, crash
	Death of three and injury of eleven, Matrouh, crash

	Death of two and injury of 23, Dahshour, Giza
	Death of one and injury of eleven, Beni Suef, crash
	Injury of ten, Menya, Crash
	Death of one and injury of three, Daqahleya, Crash
	Death of one and injury of six, Menofeya, Crash
	Death of two and injury of 18, Qena, Crash
april	Death of eight and injury of 25, Menya, Crash
	Death of three and injury of two who drowned in the sewage in Sharqeya
	Death of two as a result of the fall of the roof of a factory, Sharqeya
	Death of four as a result of the fall of a roof in Al-Obour
May	Death of seven and injury of nine, Al-Alamein Road, crash
	Death of one and injury of four as a result of the fall of a roof of a building under establishment, Beni Suef
	Death of one and injury of 21, Assiut, crash
	Death of three and injury of 20, The New Valley, crash
	Death of one and injury of another, Al-Haram, Giza, crash
June	The accident of the grape girls on 27 June: death of 19 working girls and the driver and injury of two. (crash near the District of Ashmoun)
	Death of one and injury of 11, Benisuef, crash
	Injury of ten, Menya, crash
	Death of three and injury of 15, Beheira, crash
	Death of one person and injury of 11, Menya, crash
	Injury of six, Menya
	Death of one worker and injury of a driver, Menya
	Death of one person and injury of 11, Beni Suef
July	Death of one worker and injury of three workers who suffocated in the company of Misr El-Mahalla Spinning & Weaving (Ghazl El-Mahalla)
	Injury of 19 in Port Said
	Death of one and injury of nine in Siwa
	Death of one and injury of 21, Assiut
	Death of one and injury of 14, Al-Sokhna, Suez
	Death of a driver and injury of three workers, Giza
August	Death of a worker and injury of 16, Suez, crash
	Death of one worker and injury of 20, Ismailia, crash
	Injury of six workers, Suez, crash

	<p>Injury of 24 and death of one, Menya, crash</p> <p>Death of three sewage workers, Menya</p> <p>Injury of 19, Beheira, crash</p> <p>Injury of 11, Al-Qanater, crash</p>
September	<p>Death of one and injury of ten, Beni Suef, crash</p> <p>Injury of 8, Menya, crash</p> <p>Injury of eight workers, Fayoum Road, Giza</p> <p>Death of one worker and injury of another who fell in the sewage in Beheira</p> <p>Injury of six workers, Kafr El-Sheikh, fall of a roof</p> <p>Death of two and injury of six, gas explosion, Ismailia</p> <p>Death of 13 and three civil defense men and the owner of a small factory; injury of 40 in a factory under establishment in El-Mehalla</p> <p>Death of one worker and injury of ten, Beni Suef</p> <p>Death of a worker from Fayoum who fell from the scaffolds.</p> <p>Death of worker who fell from the scaffolds, Assiut</p> <p>Death of a worker and injury of another, Beheira</p>
	Death of a worker and injury of 19, Sheikh Zayed, crash
	Death of seven workers, Ismailia
	A huge accident in the city of El-Mahalla El-Kobra, Al-Beshbeishy factory for Weaving. A fire then an explosion of a boiler and fall of a roof. Death of 13 workers and three civil defense men. Injury of 40 workers.
	A road accident near Manfalout, death of three and injury of six workers. Most victims are children.
	Injury of 12 in Giza
	Death of a worker in AL-Saf upon whom marble slabs fell
	Death of a worker and injury of another who fell from the towtruck, giza
	Death of a worker in 6 October city
	Death of a worker and injury of 18, Beheira
November	Injuries of 12 workers ranging between moderate and severe in an accident of the fall of a roof in a factory under establishment in the city of El-Mahalla El-Kobra. Workers work for a contractor who violated building codes.
	Injury of 28 workers in a road accident before Al-Santa district in the governorate of Beni Suef. Victims included children between 11 and 17 years of age.
	Death of two cameramen because of falling from a high towtruck. The two cameramen were working for a commercials company
	Injury of 15 workers, the 6 th of october city

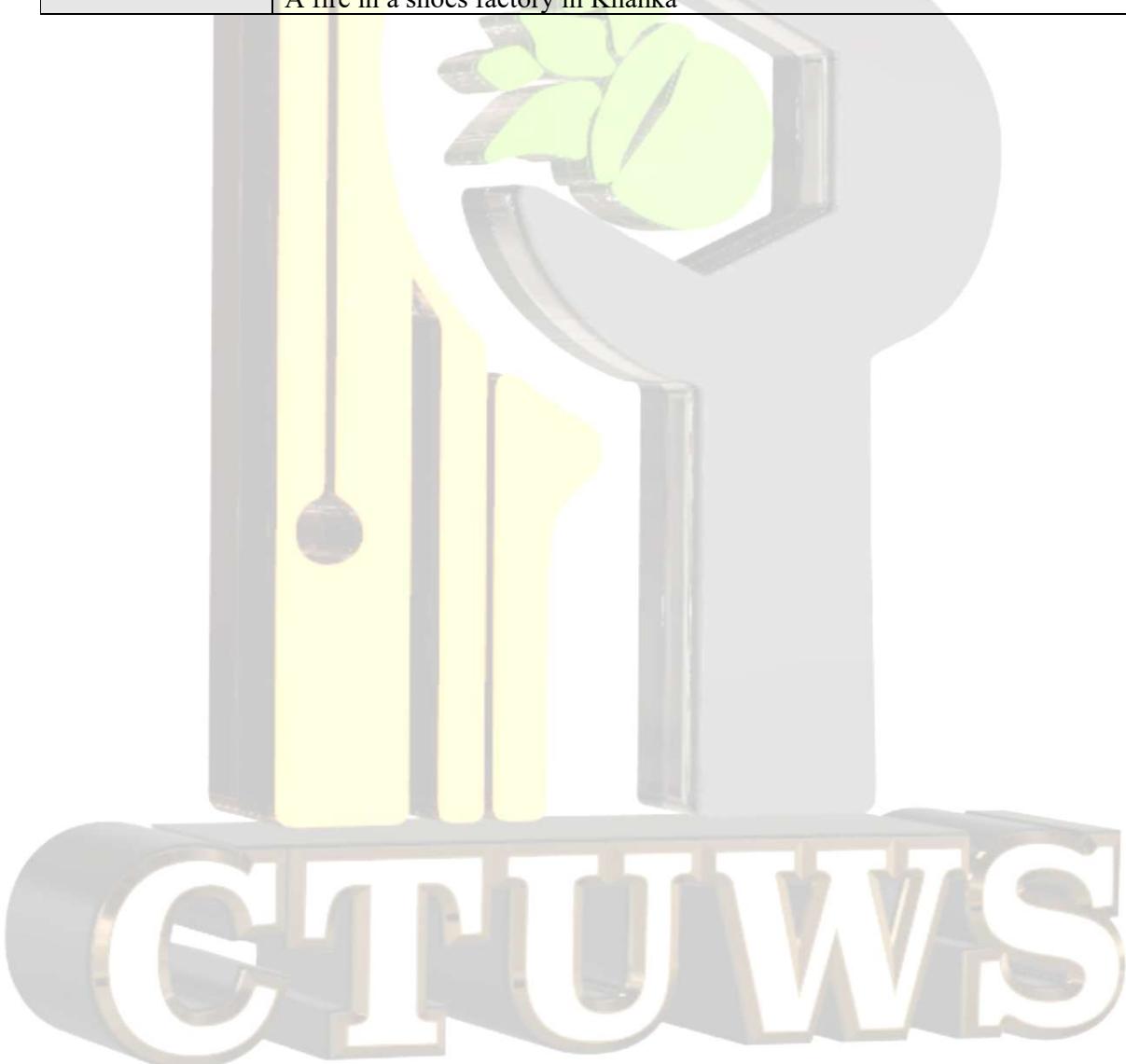
Death of 10 workers and injury of 12 in Giza, crash
Death of a worker, Sheikh Zayed, crash
Death of a worker and injury of another in the explosion of a gas cylinder in Al-Warraq, Giza
Injury of 20 workers in Assiut
Injury of five workers as a result of the collapse of a roof in El-Mahalla
Death of four, Al-Tagamou, Cairo, crash
Injury of 15 workers in Menya
Death of a worker and injury of 15 in Menya, crash
Death of four workers in Al-Saf, Giza, crash
Death of a worker in a fire in Studio Masr

Fire Record

Month	Accident
January	A fire damaging a famous syrian restaurant
	A huge fire in a workshop for the manufacturing of ships in Suez
	A huge fire in Monshaeit Nasser extended to ten buildings.
	A fire in two storehouses for chandeliers in Al-Attaba Square
February	A fire in a workshop for the manufacturing of ships in Bahari in Alexandria
	A fire in plastic waste water pipes in the city of 6 th of October
March	A huge fire destroying the “Welcome Ramadan” Fair in Menya
	A fire in a factory for chandeliers and crystals in Beni Suef without human injuries
	A fire in a cafe in Dokki
	A huge fire in the mall of Dar Masr in Al-Shorouq City, Cairo
	A huge fire destroying a storehouse in Moqattam and three fire trucks were used
	A fire in the garage of Al-Khosous in the governorate of Qalyobeya
	A fire in a tourists village in which an Egyptian governor was injured
	A huge fire in the kiosks of Downtown Cairo. Conflicting news about it affecting the building of the Central Labs of the Ministry of Health. One case of suffocation and damages in an administrative building.
April	A huge fire in timber workshops in Ezbet Al-Ward in the neighborhood of Al-Sharabeya
	A huge fire resulting from the explosion of a gas line in Al-Wahat Road destroying a number of cars in the 6 th of October City

May	A fire in a factory in the 10 th of Ramadan City
	A fire in a gas station in Menya
	A fire in a famous restaurant in Cairo. Fire destroyed three stories and caused death of a worker
	A fire in part of a scrap market in Menofeya
June	A huge fire in Al-Banafseg Mall in the 6 th of October City and ten fire trucks intervened
	A huge fire in a gym in Nasr City without injuries
	Eruption of a fire in an ink factory in Al-Robeiki in the city of Badr
	A huge fire in Al-Kheir Markets in Al-Shorouq
	A huge fire in a pharmaceuticals factory in Al-Sadat city and civil defence fought its extension to nearby factories
	A fire in the Union of Workers in Shebein Al-Koum in the governorate of Menofeya.
	A fire erupting in a wedding hall in Menya
	A fire in Negmet Heliopolis Hyper Market in Nozha
	A fire in two shops in Abu Sultan Village in Ismailia without casualties
	A fire in an international school east of Alexandria
	A fire in a factory in Al-Qanater Al-Khayreya and Civil Defence bring fire trucks
	A fire in a gas station in the 10 th of Ramadan City. A brave Egyptian driver saves the neighborhood
	A huge fire in storehouses of Al-Barageil, North of Giza
	A fire in Future Schools in Alexandria
July	A fire in the vicinity of a paper factory in Beni Suef
	A huge fire inside Aluminum factory in Al-Basatein
	A fire in the company of Ceramica Cleopatra in Al-Ain Al-Sokhna
	Injury of 31 persons as a result of suffocation because of a fire in a store house in a factory for the production of coffee in the industrial zone of the governorate of Giza
	Controlling a fire that erupted in a railway workshop in Sharqeya
	Ramsis Catastrophe: A huge fire in Ramsis Telephone Exchange building disrupts services in Cairo and leads to the death of four engineers and injury of a large number of workers and civil defense men
	A fire in a paints store in Al-Barageil
	A fire in a furnishings shop in the 30th of June village in North Sinai. The fire resulted in 30 cases of suffocation, none of which were fatal.

	A limited fire in Hotel Sofitel in Cairo
	A huge fire under Al-Mahrousa Hotel in Alexandria
	A huge fire destroys a shop under a building and extends to an apartment in Menya
August	Death of four including two children and injury of ten in a huge fire in a plastics factory in Shoubra Al-Kheima
	A huge fire in the shops of Shoubra AL-Kheima
	A fire in a shoes factory in Khanka



Qualitative and Quantitative Analysis

Total number of victims 1746 (231 deaths and 1515 injuries)

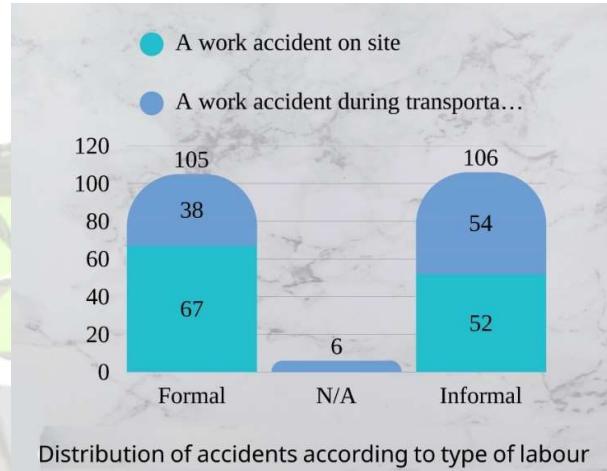
➤ Sectoral Distribution

The formal sector registered 105 accidents (48.4%) while the informal sector registered 106 accidents (48.8%). There are six accidents that are not classified.

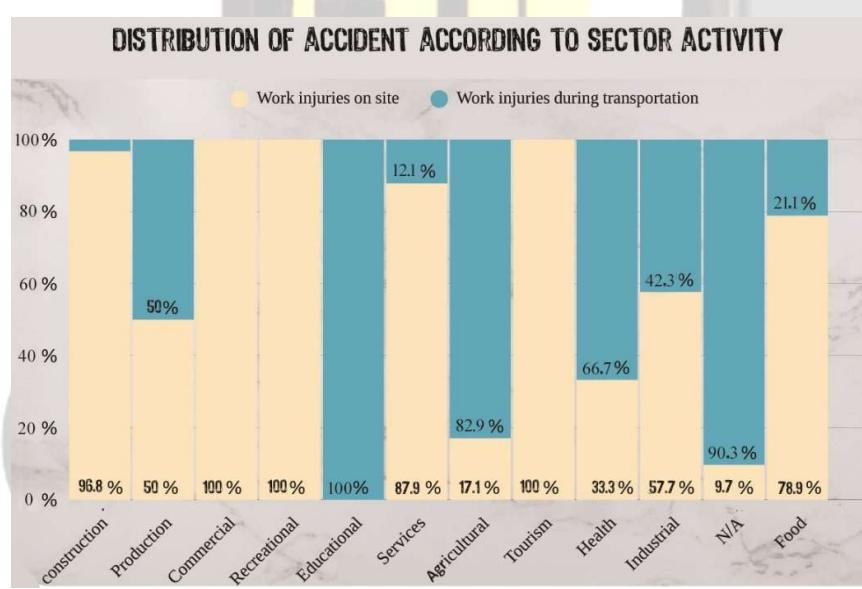
Pattern of accidents in the formal sector:
Most accidents are on site.

Pattern of accidents in the informal sector:
Accidents in this sector are almost equally distributed between accidents taking place on site (52) and accidents taking place during transportation. This reflects the nature of irregular work which lacks fixed and safe workplaces and relies on constant movement (like agricultural labourers and subcontracted construction workers).

It is noted here that a worker in the formal sector is theoretically supposed to enjoy insurance coverage so that these injuries are considered work injuries and s/he receives insurance dues. But in the informal sector, an accident represents a double social and economic tragedy.



➤ Distribution of accident according to sector activity



Analysis shows that the most dangerous activities are as follows:

Industrial Sector: Comes on top of the list. Total of 52 accidents (30 on site and 22 during transportation)

Agricultural Sector: 41 accidents but what is remarkable here is that transportation accidents (34) are far higher than on site accidents (7).

Service Sector: 33 accidents most of which are on site (29)

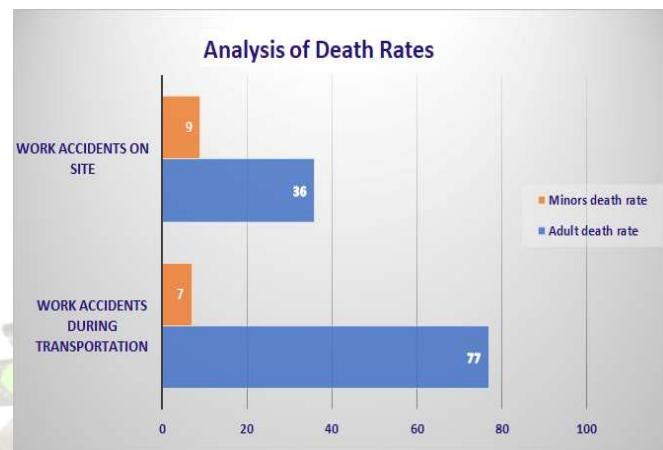
Building and Construction Sector: 31 accidents almost all of them are on site (30) and one only during transportation

Food Sector: 19 accidents most of them are on site (15)

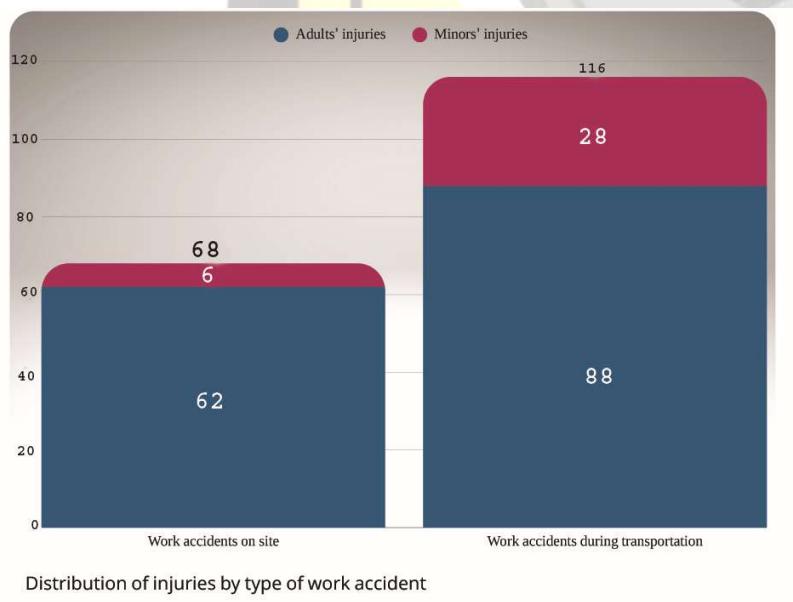
➤ Analysis of Death Rates (according to type of accidents):

Adult death rate (113 accidents): accidents on site were 77 while road accidents during transportation were 36 accidents that led to deaths.

Minors death rate (16 accidents): an alarming rate around 15% of total deaths.



➤ Distribution of accidents according to age group of injured people:



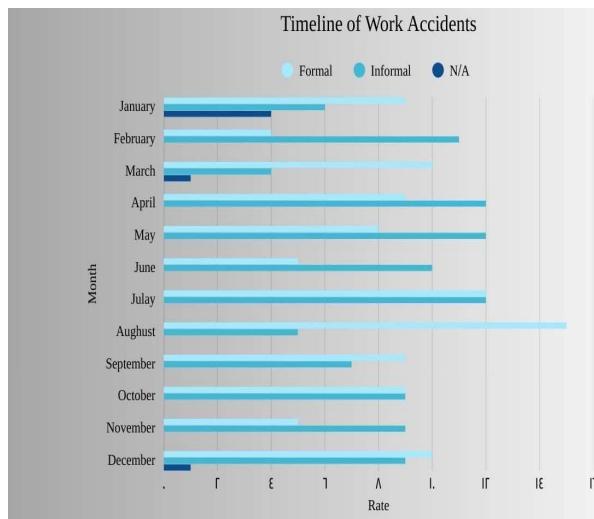
Total number of injured people: 184 injuries (survived death) including 150 adults and 34 minors.

Adults' injuries: majority of cases are accidents during transportation (88 injuries), while accidents on site were 62.

Minors' injuries (vulnerable group): This shows severe variation. There were 28 injuries during transportation and six injuries on site.

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➤ Timeline of Work Accidents:



Seasonal Curve:

There is a continuous pattern throughout the year, but the rate of accidents increases in August and this may be due to rising temperature and increasing fires. Concentration of accidents in the months of April, July and August may be linked to the peak of activity in the sector of construction and building and the agricultural sector. Moreover, deaths of minors amounted to 16 cases that are mostly concentrated

in the season of school holidays (summer months) when children are pushed to the informal job market to have more cheap labour.

➤ Geographic and Sectoral Analysis (High Risk Hotspots):

The following graph of the distribution of accidents of industrial activities on governorates shows that danger is concentrated in the strongholds of Egyptian industry:

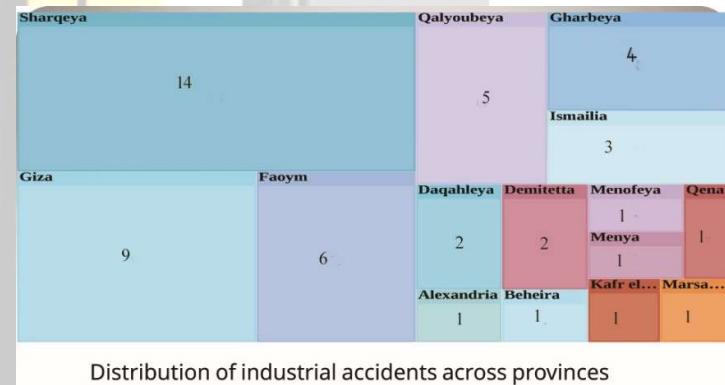
The governorate of Shaareya is on the top of the list of accidents as the city of 10th of Ramadan is therein.

Giza was in the second rank and accidents were concentrated in the areas of the 6th of October city and Abou Rawash Industrial Zone.

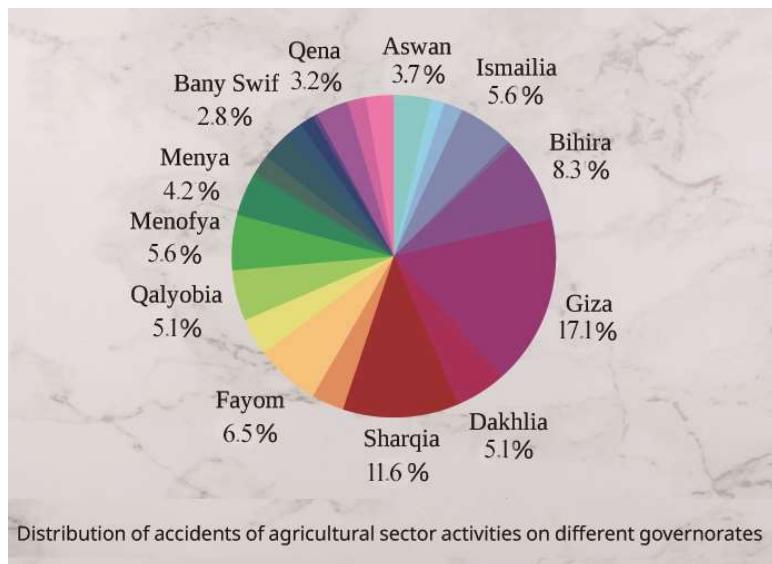
Then comes the governorate of Fayoum in which accidents of brick factories and large workshops take place.

Then comes the governorate of Qalyoubeya which includes the Industrial Zone of Shoubra Al-Kheima

Followed by the governorate of Gharbeya (El-Mahalla El-Kobra)



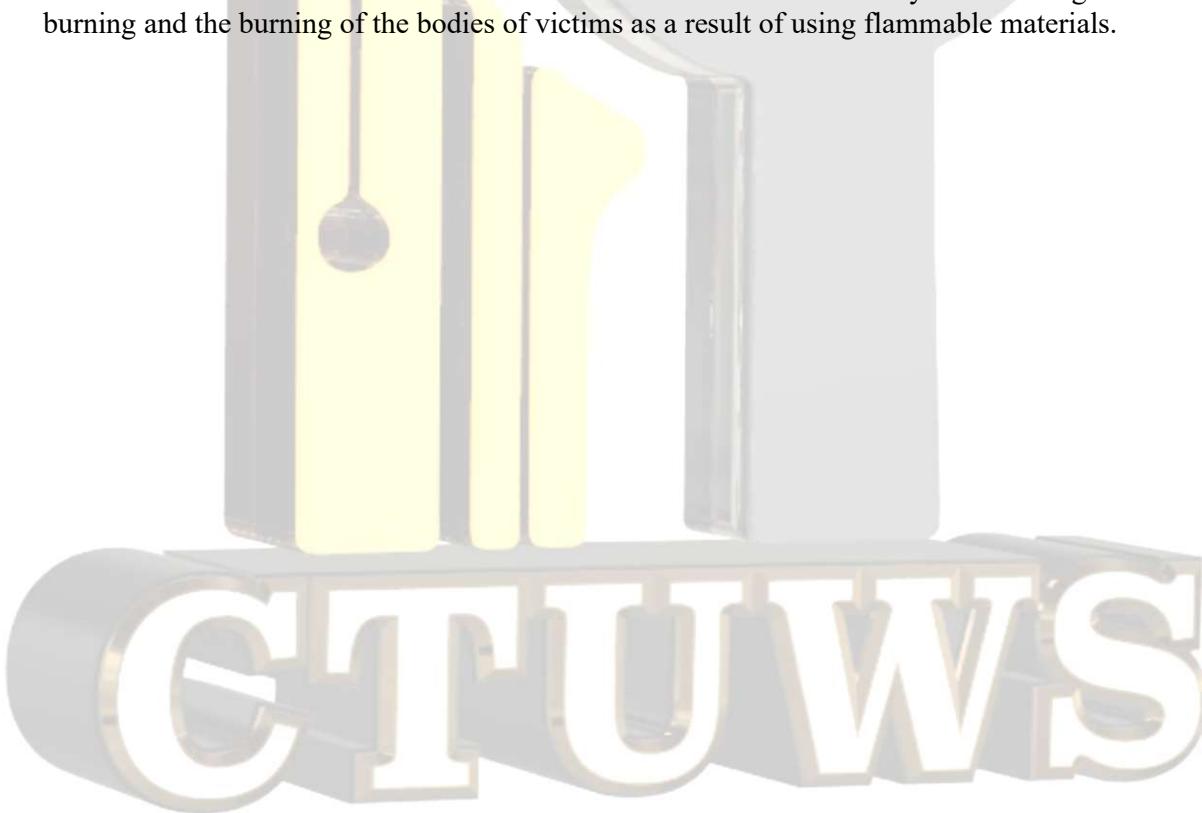
➤ **High risk hotspots for agricultural labour (governorates of Delta and Upper Egypt):**



Given data and statistics related to road accidents in the governorates in which agriculture is the main economic activity, the agricultural activity is the main source of transportation accidents as it registers around 34 accidents that lead to deaths among women and children.

Among the road accidents stands out the accident of grape girls and the accident of the pickup truck that was taking agricultural workers in Fayoum leading to its

burning and the burning of the bodies of victims as a result of using flammable materials.



Reading the Outcomes of Monitoring of Violations of Occupational Health and Safety and Safe Work Environment Measures

All accidents and fires in workplaces revealed grave violations of occupational health and safety and safe work environment measures. In the vast majority of cases of fire and accidents, no inspection was previously conducted on establishments in which these accidents and fires took place. Work inspectors hurry to write reports and register fines after the occurrence of accidents or prove that inspection was previously conducted and done in any way.

ILO Occupational Health and Safety Convention no. 155 is one of the fundamental labour conventions that all member states in the ILO have to abide by even though the Egyptian government didn't ratify it. This Convention stipulates that each Member shall formulate, implement and periodically review a coherent national policy on occupational safety, occupational health and the working environment in the light of national conditions and practice, and in consultation with the most representative organisations of employers and workers. The aim of the policy shall be to prevent accidents and injury to health arising out of, linked with or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.

This Convention obliges the authorities to hold inquiries, where cases of occupational accidents, occupational diseases or any other injuries to health which arise in the course of or in connection with work appear to reflect situations which are serious; and to publish, annually, of information on measures taken in pursuance of the national policy and on occupational accidents, occupational diseases and other injuries to health which arise in the course of or in connection with work.

The Conventions states that "representatives of workers in an undertaking are given adequate information on measures taken by the employer to secure occupational safety and health and may consult their representative organisations about such information provided they do not disclose commercial secrets" and that "workers or their representatives and, as the case may be, their representative organisations in an undertaking... are enabled to enquire into, and are consulted by the employer on, all aspects of occupational safety and health associated with their work."

The tragic events of 2025 definitely require the development and announcement of a national policy for guaranteeing occupational health and safety for workers and safety of the working environment. Labour Law no. 14 for 2025 stipulates in article 264 thereof the formation of the Supreme Council for Occupational Health and Safety and Safe Work Environment that should be headed by the Minister of Labour and includes in its membership representatives of competent ministries and authorities and an equal number of representatives of employers and workers so that it assumes the formulation of public policies in these fields. However, this policy was not announced and whenever it is adopted it will need mechanisms for implementation.

The events of 2025 also require the issuance of a detailed and honest report about all accidents and fires that took place during the year, as well as bloody road accidents. But no report was declared. On the contrary, the government hurries to close any open files as soon as possible. In this regard, we may mention the following examples:

- ❖ Monday the 7th of July was an extraordinary day in Cairo. Fire erupted in Ramses Telephone Exchange which alone processes 40% of communication and data movement in the country, and represents the connection point with sea cables coming into Egypt

and those responsible for providing the state with internet service. It is also a linking point between the networks of internal phones and external networks in order to guarantee receiving international calls inside the country. It is also a transition point between internal communications as it is directly used in the delivery of calls between mobile phone networks and land lines.

Ramses Telephone Exchange building includes a special section for databases of banking services and financial transactions of the most famous banks of Egypt, in addition to the digital instant payment network. All this is housed in an unequipped building that was built in 1927 and was not sufficiently developed or secured to do all these services.

The fire was a challenge for the state. Attempts to control it continued for twenty hours. Fires also returned in a limited way three days later. The building remained out of service for more than ten days. Internet efficiency in Egypt dropped to 62% of its main power according to reports. Services that stopped included phone communication via mobile phone networks and land lines, as well as different means of internet connection and even usual services in some banks whether they take place inside the bank or at ATM machines. Moreover, single hotline number services, Whatsapp service and other digital services went down. Putting down the fire was not enough to have these services back. A large part thereof continued to be affected for several days.²⁰

Of course this accident shook Egyptian society. The voices of opposition parliament members (who are already few in numbers) rose in the House of Representatives calling for holding those responsible for occupational health and safety and fire fighting measures in such an important place accountable and the provision of a clear and transparent report about what happened.

In spite of denying any human losses in the beginning, the death of four young engineers and the injury of at least 21 other people came to be known. The four engineers work for Telecom Egypt as fire erupted “inside one of the halls of the floor designated for hosting communication operators, which included separate halls for each operator. The fire was strong enough to extend to other floors.”²¹ Maintenance operations that used to be conducted were not secure enough.

Financial statements of Telecom Egypt at the end of the year revealed that the company incurred capital losses of 1.48 billion pounds as a result of the fire of Ramses Telephone Exchange which caused partial loss in a number of fixed assets and temporary disruption of communication services. The Company received 200 million pounds from the insurance company on account of compensation because official investigations on the fire were not concluded yet.²²

Investigations are not over yet. The government didn't provide a report on the severe negligence and the gross violations of occupational health and safety in this huge edifice on the pretext of waiting for the findings of the investigations that were not declared.

- ❖ In the city of El-Mahalla El-Kobra, a huge accident took place on the first of October inside a building that includes a number of factories. A fire erupted in one of the floors and extended to other floors. While it was put down, a boiler in the first floor exploded

²⁰ RT Arabic. Al-Jazeera Net, CNN Arabic.

²¹ Statements of the managing director and the CEO of Telecom Egypt.

²² Mubasher Info, KSA, 31 December 2025.

leading to the fall of the roof on workers and civil defence men who were present to fight the fire.

This tragic event resulted in the death of 13 workers and three fire fighters and the injury of 40 including workers and fire fighters and some citizens who were present to help put off the fire.

Investigations revealed astonishing results. The building in which the fire took place was not licensed to establish industrial establishments. Al-Beshbeshey factory for weaving in which the boiler exploded is almost an informal establishment. It is not licensed and its workers are not registered and consequently they were not ensured and have no form of protection. No establishment should have a boiler without strict conditions related to the specifications of the building and operation measures, and of course no conditions were met in this case.

This grave event resulted in the loss of many lives. It reveals gross violations of occupational health and safety rules. It at least requires the announcement of a transparent report about the findings of investigations and holding those responsible accountable for such negligence but the file was swiftly closed.

- ❖ In the company of Misr El-Mahalla Spinning & Weaving (Ghazl El-Mahalla), on the 29th of July, worker Mostafa Al-Kilami died and three of his coworkers suffered suffocation in the spinning factory no. 1 because of the lack of ventilation. The Company's management surprised everyone by issuing a statement claiming that the worker died due to a heart attack for health reasons of his own and that his three coworkers fainted because of being emotionally affected by the death of their colleague. However, one hour later it had to remove this statement because of the widespread criticisms it received.

This accident does not only reveal defects and violations of the rules of occupational health and safety in this great industrial edifice, it also reveals complete lack of transparency and resorting to all forms of deception to escape responsibility.

In the past, before public sector companies were affected by privatization programs, occupational health and safety committees were formed and they included representatives of workers. In spite of shortcomings in workers' representation then, they used to play a role in following up occupational health and safety measures, register work injuries and guarantee rights of injured workers. However, these committees no longer exist in the private sector or even in the government sector which is also governed by provisions on occupational health and safety in the Labour Law. Although the aforementioned Convention stipulates that representatives of workers have the right to be given adequate information about measures taken by the employer to secure occupational health and safety and to be consulted about them, workers' representatives are absent. When workers find that one of their colleagues is dead or injured, they may engage in protests but this doesn't lead to holding anyone accountable or changing the existing conditions.

Labour Law no. 14 for 2024, and the previous labour law as well, stipulates that establishments are obliged to undertake necessary measures and precautions to secure the work environment and guarantee protection from physical, metallurgical, biological and chemical hazards. It also lists these hazards and their types. It also stipulated that establishments are obliged to take necessary measures and conditions to prevent fire hazards and provide occupational health and safety and safe work environment measures, including protection from every hazard that results from working in closed or narrow places.

It also obliges establishments and their branches to conduct an evaluation and analysis of risks and expected natural and industrial catastrophes and those resulting from operation, and preparation of emergency plans to protect the establishment, workers and trainees whenever accidents and disasters happen. The effectiveness of these plans have to be tested and practical tests thereon have to be conducted to make sure they are efficient, and workers have to be trained therein and they have to be corrected when necessary.

For sure none of these measures is taken in any workplace no matter how huge it is. There was no training for workers in Ramses Telephone Exchange building to deal with fires, as was admitted by government officials. Worker Mostaka Al-Kilani was not protected from the hazard of working in a closed place. Workers were left to die in a factory in which there is a boiler ready to explode. No evaluation or analysis of hazards was conducted in any of these establishments starting from Ramses Telephone Exchange and Ghazl El-Mahalla company, and including the plastic factory of Shoubra in which a fire erupted in August resulting in the death of four persons including two children.

There is no supervision. There is no inspection. There is no transparency or accountability. It seems as if there is a complicit agreement on non-implementation of the law. In fact, the number of labour inspectors is very small compared to the number of establishments that have to be inspected and to the standards of the ILO. It is worth noting here that the Egyptian government ratified Convention no. 81 on labor Inspection (in industry and trade) which stipulates that each member state “shall take the necessary measures to ensure that duly qualified technical experts and specialists, including specialists in medicine, engineering, electricity and chemistry, are associated in the work of inspection... for the purpose of securing the enforcement of the legal provisions relating to the protection of the health and safety of workers” and that “the number of labour inspectors shall be sufficient to secure the effective discharge of the duties of the inspectorate.”

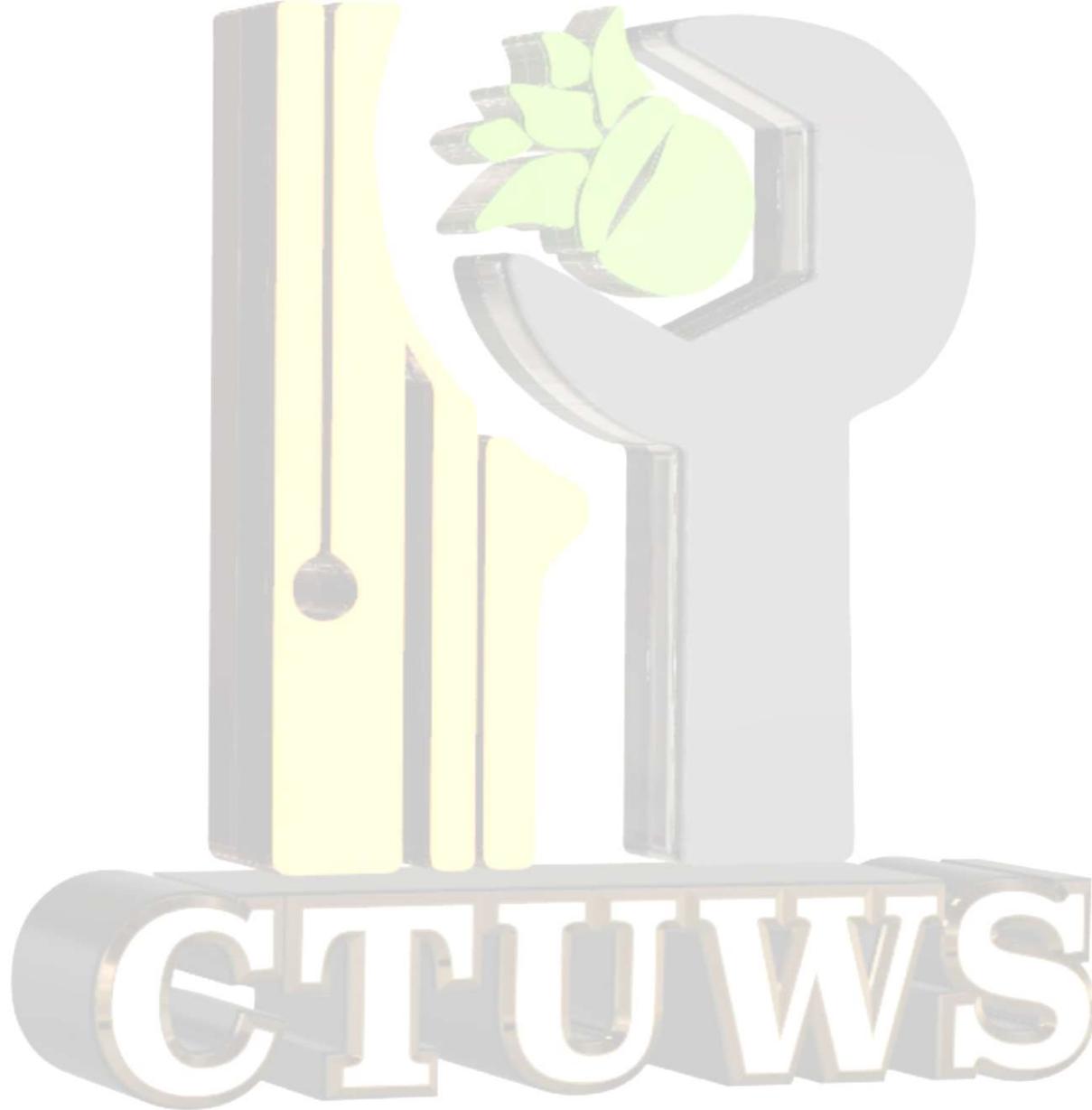
Likewise, Convention no. 129 on Labour Inspection in agriculture stipulates that “arrangements shall be made to ensure that the number of labour inspectors in agriculture is sufficient to secure the effective discharge of the duties of the inspectorate” and this number is determined with due regard for the importance of the duties which inspectors have to perform, the material means placed at their disposal and the practical conditions under which visits of inspection must be carried out in order to be effective. It also stated that “the labour inspection staff in agriculture shall be composed of public officials whose status and conditions of service are such that they are assured of stability of employment and are independent of changes of government and of improper external influences.”

The government was supposed to submit its report this year about the implementation of these two Conventions in reality.

Labour Law in article 256 the formation of a specialized agency called the Agency for Inspection of Occupational Health and Safety and Safe Work Environment. It should be composed of members who have necessary qualifications and experiences in order to inspect establishments and supervise the implementation of the law. This Agency issues a report based upon which the competent administrative authority takes the decision to wholly or partially close an establishment until its conditions are corrected.

This body will be useful if it becomes active and really undertakes the jobs given to it. However, past experiences don't let us expect so. It is noteworthy that the new Labour Law included a surprising article no. 245 which stipulates that “the Minister of Labour may issue a decision to license the establishment of compliance offices that aim at verifying whether occupational health and safety and safe work environment conditions are met or not in the establishments governed by its provisions, and to provide necessary technical support and consultation.”

Why do we need these offices - or actually private firms- to verify whether the conditions of occupational health and safety and safe work environment are met? They, of course, will not have the power to inspect. Or, will the Ministry of Labour delegate some of its supervision competences to them? Won't this allow for corruption and conflict of interest? We believe that this will not help us advance at all towards developing the deteriorating conditions of inspection and supervision. We will be faced with the dilemma of the small number of labour inspectors and weak capabilities of labour directorates and bureaus, as well as lack of transparency and fair legal accountability mechanisms.



Main Conclusions

At the end of the Report, we would like to summarize its the main conclusions as follows:

- ❖ 2025 was the year of work accidents par excellence. It witnessed a considerable increase in the number of these accidents and their frequency, especially if we add to accidents and injuries in the workplace bad road accidents in which workers die on the way to and from work. The hot summer of 2025 witnessed an unprecedented rate of fires that all revealed lack of measures of occupational health and safety. In the vast majority of cases of fire and accidents, no inspection was previously conducted on establishments in which these accidents and fires took place. Work inspectors hurry to write reports and register fines after the occurrence of accidents or prove that inspection was previously conducted and done in any way. There is no supervision. There is no inspection. There is no transparency or accountability. It seems as if there is a complicit agreement on non-implementation of the law.
- ❖ Labour protests escalated in a remarkable manner this year. They extended to major companies in the public enterprise sector that have multiple branches. The Sugar and Integrated Industries Company witnessed frequent actions from workers in a number of its factories especially in Upper Egypt. Protests were also observed in Egyptalum in Naga Hamadi. There were several labour protests in companies of the private sector whose workers combined submission of complaints with total or partial strike action and vigils. In all these protests, low wages and deterioration of living conditions were the first instigator of protests.
- ❖ Labour movements in a considerable number of cases were met with abusive measures. Workers were apprehended, arrested or held in provisional detention more than once in a flagrant violation of freedoms of association. Moreover, abusive measures against workers were taken by employers and management of companies including excessive penalties, arbitrary relocations and dismissal.
- ❖ In spite of the gravity of the events of last year including problems of implementation of the minimum wage and escalating labour protests and unprecedented toll of work accidents victims, the government-affiliated ETUF almost disappeared and its sectoral federations were not seen amid these events.
- ❖ On the other hand, workers continue to attempt forming and registering their independent trade unions. And their endeavors still meet administrative obstacles and refusal of labour directorates to receive their documents. Moreover, some already existing trade union organizations are being prevented from exercising their activities.
- ❖ Moreover, court rulings issued in favor of worker's rights or which support freedoms of association are not being executed.
- ❖ With rising rates of inflation and price increases in an unprecedented manner during the past years, the living conditions of workers and other poor classes deteriorated. The middle class is eroding and many of its middle and lower strata declined and actually became below the poverty line. The spectre of hunger is no longer away from many Egyptian people.
- ❖ Nevertheless, the government sticks to its economic policies and does not reconsider its priorities. It reduces subsidies for fuel, electricity and basic food products. Spending on services, health and education is declining although it was supposed to increase as a

ratio of national income -according to the constitution- creating more burdens on workers who had to bear the outcomes of accumulated debts and the IMF's recessionary plan to deal with the budget's imbalances.

Although the government announced in February a "social package" including some measures to absorb the impact of economic policies and mitigate burdens on Egyptian citizens. This package included raising the minimum wage, payment of aid for a limited percentage of "registered" irregular workers, and raising the amount of the *Takaful* and *Karama* pension and the number of beneficiaries thereof who are not insured and who have no other form of social protection. However, this package of measures was not sufficient at all to treat deteriorating living conditions for the majority of social categories and strata, especially workers.

- ❖ The minimum wage was increased to 7000 pounds a month, and the National Wage Council decided to implement this minimum wage in the private sector starting from the first of March. The Prime Minister issued decision no. 2594 to amend the values of the minimum wage for workers in the government sector to 7000 pounds for the lowest job grade starting from the first of July. However, these increases are still incompatible with rising living burdens and cannot meet the basic needs of workers and their families.
- ❖ 2025 witnessed limited progress regarding the implementation of the minimum wage. Labour Law no. 14 for 2025 stipulated in article 104 that "establishments governed by its provisions have to abide by the decision of the National Wage Council" and in article 105 that inspection apparatuses in the Ministry of Labour have to conduct periodic inspection on the establishments governed by the provisions of this law in order to make sure that the decisions of the National Wage Council are implemented." The Periodic Book no. 2 of the Ministry of Labour stated that no establishment is exempted from the implementation of the minimum wage. However, many establishments and companies continue to refrain from the implementation of the minimum wage. In most cases, labour directorates and inspection personnel don't move except after worker's anger escalates and they start staging protests and strikes. The Ministry of Labour did not start activating the mechanisms of inspection and supervision except at the end of October when it formed a central committee to undertake inspection work that regularly announces the number of fines. However, monitoring of violations shows that a large number of establishments refuse to implement the minimum wage.
- ❖ Employers, who reluctantly implement the minimum wage in their establishments, tend to consider it a minimum and maximum at the same time. They give all workers the same amount of money regardless of their years in service and their experiences. A worker who worked for five or ten years receives the minimum wage just like the beginner who just started working in spite of differences in years of service and experience and increasing family burdens. Whereas mechanisms of collective bargaining and agreements are almost disabled, employers don't find anything that obliges them to pay anything higher than the minimum wage although this represents violation of the worker's right to fair wage leading to labour disputes and repeated protests. Nevertheless, the government turns a blind eye to this clear violation.
- ❖ Although the decision of the Prime Minister no. 2594 for 2025 stipulated that wages of workers in the government sector have to be scaled from 7000 pounds for the sixth grade up to the amount of 13500 for the excellent grade, these workers don't actually receive these values as government agencies and departments implement these raises in a way that considerably detracts from their values in an arbitrary manner. Most workers don't know why their salaries are much lower than the declared numbers which are

determined by a law and a decision. They affirm that the government considers the employer's share of insurance subscriptions as part of the minimum wage. Moreover, the complimentary wage items in each government agency are calculated in a way that practically leads to reducing the wage's amount.

- ❖ Manifestations of unfair labour relations are not limited to low wages, but they also include the employment of workers based on temporary labour contracts, toughening of working conditions, arbitrary infliction of penalties without justification, and sometimes inhuman treatment, as well as low insurance wage whose statutory minimum is much lower than the minimum wage, leading to reducing insurance dues in cases of retirement, injury or sickness. Moreover, some sections of workers are not insured and some workers are employed as employees of other companies which are contracted as service companies in circumvention of the law. These companies actually work as labor contractors. This practice is no longer confined to the private sector, but it also extends to companies of the public enterprise sector and some government administrations and agencies. Moreover, there are frequent cases of collective dismissal of workers (en masse) claiming that they are surplus labour which is against the law.
- ❖ Although the Labour Law states that it aims at regulating and supporting irregular workers and workers in the informal sector and protecting them during work, the events of the year reveal lack of protection for these workers especially in the agricultural sector. They also revealed the horrible working conditions in which women workers work in the agricultural sector in violation of the provisions of the employment of irregular workers and the employment of women, in addition to flagrant violations of the Law regarding the employment of children.