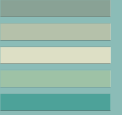


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Syria Justice and
Accountability Centre



About the Syria Justice and Accountability Centre

The Syria Justice and Accountability Centre (SJAC) strives to prevent impunity, promote redress, and facilitate principled reform. SJAC works to ensure that human rights violations in Syria are comprehensively documented and preserved for use in transitional justice and peace-building. SJAC collects documentation of violations from all available sources, stores it in a secure database, catalogues it according to human rights standards, and analyzes it using legal expertise and big data methodologies. SJAC also supports documenters inside Syria, providing them with resources and technical guidance, and coordinates with other actors working toward similar aims: a Syria defined by justice, respect for human rights, and rule of law. Learn more at SyriaAccountability.org

Refuge No More: The Danger of Forced Return to Syria

June 2021, Washington, D.C.

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Cover Photo — Life jackets from crossing the Mediterranean (c) Jenny Bartsch

Table of Contents

Section I. Executive Summary	1
Section II. Introduction	2
Section III. Threats and Dangers to Returnees	4
Section IV. Refugee Law	11
Section V. Recommendations	14
Annex I. Endnotes	16



Refugee camp in Greece © Jenny Bartsch

Section I

Executive Summary

Since the beginning of the Syrian conflict in 2011, Syrians have found refuge outside of the country, predominantly in the Middle East and Europe. Over the last decade, European states have also encountered growing domestic turmoil over immigration and xenophobia. Despite domestic pressure to lower refugee admittance, states are bound by international refugee law to protect those who face credible threats in their home country and to ensure that individuals are not returned to their home country until it is safe.

Over recent months, the Syria Justice and Accountability Centre (SJAC) has been contacted by European governments to gather information on whether it is safe for Syrians to return. In response, SJAC is launching a report highlighting the conditions in Syria, obstacles to return, existing refugee policies, and states' responsibilities under the law. SJAC will determine whether Syria is safe for refugees to return and the barriers that may limit return. In this report, *Refuge No More: The Danger of Forced Return to Syria*, SJAC examines how Syrian law will impact returnees, the threats of returning, as well as remind governments hosting Syrians of their responsibilities under refugee law. Drawing on interviews with returnees and families of returnees, SJAC presents the risks facing Syrians on the ground and offers recommendations for European governments and their immigration offices.

Section II

Introduction

Since 2011, 5.6 million Syrians have fled war and persecution in search of refuge in another country. In 2015 during the peak of the “European migrant crisis,” 1.3 million Syrians requested asylum in Europe, however, this number has fallen in recent years.¹

In 2019, there were 631,000 first-time asylum seekers in the European Union, of which almost 12% were Syrians.² Ten years into the conflict, millions of Syrians have become refugees while another 6.1 million people are internally displaced within Syria. The same government that many Syrians fled continues to govern the country and enjoys impunity for human rights abuses including torture, forced detention, and the use of chemical weapons.

While some have suggested that the war in Syria is over, airstrikes and armed clashes have persisted into 2021. Government forces continue to clash with ISIS, which saw a resurgence throughout Syria in late 2020. The government also launched artillery air strikes on IDP camps in Idlib and on the civilian areas in northwest Syria, accompanied by an increase in Russian airstrikes against civilians. Civilian casualties also increased in northern Syria, as areas under Turkish control saw growth in the use of explosive devices and car bombings.³ Israel has

launched several airstrikes against “Iranian interests” in Syria, however, state media claims that recent attacks have hit civilian targets and led to civilian casualties.⁴ Several reports, including the Danish Immigration Services’ Syria country report and UNHCR’s “International Protection Considerations with Regard to People Fleeing the Syrian Arab Republic,” detail several risks facing civilians in government-controlled areas including kidnappings, unexploded ordinances, and checkpoints where people’s names are checked against wanted lists and individuals have experienced intense questioning.⁵

Syria also faces stark humanitarian challenges, as well as a crippled economy. Areas under government control have experienced widespread inflation and shortages of staples, like bread and fuel. These shortages left many with little choice but to miss school or work to search and wait for a small ration of bread. Families have had to make the difficult choice between buying food or buying a mask to protect themselves against COVID-19.⁶

Looking beyond simply the statistics of fighting, this report looks at risks Syrians would face, or do face, when they return to Syria. For many, little has changed in Syria – the same government remains in power,



Photo of Assad during the election campaign on Hamra Street, Damascus; May 2021 (c) Damascus Voice

opposition voices are silenced, and destructive forces remain. This report begins with an examination of the role Syrian law plays in people's ability to return to their lives in Syria. One such law, compulsory military service, is highlighted as both a driver of flight and a threat to those who face return to Syria. Based on interviews with families of those who have returned and have gone missing, the report discusses security risks that Syrians face on the ground.

The second section of the report focuses on European states' responsibilities under

both international and European law. This section provides definitions and highlights how European governments have a legal responsibility to ensure the safety of refugees. Finally, the report concludes by offering recommendations to European policymakers to abide by international law by respecting asylum, processing new refugee and asylum claims made by Syrians, and maintaining compliance with international law until trusted actors, including UNHCR, have determined Syria safe for return.

Section III

Threats and Dangers to Returnees

Since the Syrian uprising in 2011, many Syrians have fled their cities and villages as a result of brutal repression and fear of systematic and widespread illegal detention, torture, and extrajudicial killing. These grave violations are a defining characteristic of Syrian government policy. With the intensification of the conflict in Syria over the past years, sizable portions of Syrian cities and towns were destroyed and a significant proportion of civilian infrastructure was destroyed. Hundreds of thousands of residents fled and sought refuge in neighboring countries with thousands crossing the sea on perilous voyages to Europe. With the continuation of the conflict, many risks still threaten refugees and prevent them from returning, from security threats to discriminatory laws.

Security risks

Most Syrians fear returning to their country due to the tight control of the Syrian intelligence services which is characterized by brutality and torture. Tens of thousands of Syrians have been killed in secret detention centers and within the branches of the Syrian intelligence units.⁷ This was documented in the military photographer Caesar's photos⁸ depicting thousands of civilians who died under torture. These images are

only a snapshot of the violence imposed by the intelligence branches. There are many thousands of detainees estimated to remain in Syrian intelligence prisons. We know from those lucky enough to be released that they were subjected to brutal torture.⁹ The cycle of terror begins with detention, disappearance, and brutal torture, and often leads to burial in mass graves.

The Syrian government continues to promote what it calls "status settlements" advertising safe havens for Syrian refugees. But the reality of the matter differs from what is claimed. Syrians who wish to return must fill out a detailed application answering questions about allegiance to the opposition and family members. As noted in a Danish country of origin report, these applications are sent to Syrian intelligence, which is notoriously distrusted by many Syrians.¹⁰ After an application for return is submitted to the government, the information is sent directly to the military security Branch 291 which is based in Damascus. Branch 291 investigates the applicant's area of origins, whether he was been involved in the revolution (whether through protests, posts on Facebook, etc.),¹¹ and whether the person left the country illegally or legally. This process might take

three to six months. Being identified as a revolutionary will lead to detention and torture upon return.

Upon arrival at the Lebanese-Syrian border or the airport in Damascus, the police check whether the returnee appears on any wanted list. If he/she is on such a list, they will be immediately arrested. Those who avoided military conscription are often named on these lists. In many cases, however, a document is given to a returnee inviting him to visit a particular security branch. If the returnee does not follow the orders to appear at the branch, an arrest warrant will be issued against him/her. Upon visiting the branch, the security forces interrogate the returnee. Depending on the outcome of the investigation, the returnee will either be released or arrested.

Security approval of the application does not guarantee any immunity upon arrival. If the returnee is of military age, they still have to serve in the Syrian army. The military authorities may grant a brief reprieve of two months to get prepared for the military service, but they still must serve. If the returnee left the country illegally and has not settled this through the payment of fees or otherwise before their return, they will be sent to a military prison or military security branch.

Even Syrians who do not answer the call to return are subject to surveillance in their places of refuge. The Syrian government uses its embassies and consulates inside the EU to monitor and conduct surveillance of the Syrian diaspora.¹²

Moreover, the Syrian government considers submitting an application for asylum in another country a crime in itself. As the asylum processes often require resettlement in a country that does not have relations with Syria, authorities often assume that the refugee spoke badly about the Syrian government while submitting his/her asylum application. Therefore, the government assumes that resettlement in another country, even if the individual legally left Syria, signals support of the opposition.

In sum, safe return for Syrians remains elusive and unachievable due to the presence of the same authorities that displaced hundreds of thousands of Syrians and a country that remains under the control of the intelligence services.

Reality of Syrian Returnees

Return to Syria is still fraught with dangers and challenges. Returnees to Syria, upon reaching the borders, face many questions, which often end with a border guard giving them orders to visit a security branch. Alternatively, they may be subject to arrest after entering Syria, even when they are visiting the specified government department.

Two witnesses who shared their experiences with SJAC described the dangers they encountered. Ahmed* (name changed for security reasons) returned to Syria from Norway at the beginning of 2021 in order to visit his relatives and sell some of his properties:

“I had not visited Syria since 2013 when I

had been living in Turkey. My wife and I arrived at the Syrian border via Lebanon. We received a document ordering us to visit a few security branches, including the Palestine Branch and Military Security. We ended up spending two months in Syria, but I had to pay a large amount of money in bribes to avoid arrest. Despite the bribes, I was interrogated and humiliated in front of my wife.”

Yusuf* (name changed for security reasons) was subjected to the same procedures, visits, and interrogations.

“I work as an engineer at an engineering company in Kuwait. When I returned to Syria from Kuwait, I was given orders to appear for several security interrogations. I believe that the reason for all of these interrogations was because of my long absence from Syria. The intelligence services found this suspicious.”

SJAC’s coordinator conducted two other interviews with families of individuals who had returned to Syria. These individuals, however, were detained and remain under detention. The families of the detainees said that they returned to Syria from Dubai and Qatar respectively in order to complete some paperwork and renew their passports. Both individuals were detained while visiting the government branches where they were ordered to appear. One was detained in Damascus and the other was detained in Aleppo. Following a search, the families discovered that they were arrested by the Syrian intelligence and ended up in Sednaya Military Prison, notorious for torturing

detainees.¹³ They remain in detention to this day. It appears that the reason for their arrest and detention relates to information in some intelligence reports and suspicions that they are supporters of the opposition. One relative shared:

“My daughter and her husband returned from Mersin, Turkey to our home in Aleppo after the government took control in late 2016 to take care of my sister, my daughter’s mother-in-law. In 2018, my sister called and said that the military security raided her house and arrested my son-in-law. They said he would only be gone for 15 minutes, but after a long night of waiting, he didn’t return home. My daughter and sister went to the military security branch, but were told that he was not there.

After a while, a person nicknamed Abo Abdo contacted my sister saying he worked with the security forces and promised to release my son-in-law if she paid 10 million Syrian. He said that my son-in-law had received a death sentence by the military field court.

We tried to raise the money for his release and when we paid part of the amount, he said that my son-in-law was held in Sednaya Prison. He also gave my sister and daughter a card to visit him. During the visit, my son-in-law looked like a different person – the signs of torture were very clear; he’d lost so much weight and looked very sick.



Aleppo after ISIS was defeated in November 2020 (c) Trent Inness

We continued to raise money, but it was very hard. One day my daughter went to Sednaya Prison, and they told her that “he got sick and died” and gave her a document stating that her husband was dead. The document was dated three months back. They told her to go to Tishreen Hospital to claim his body, but the hospital did not cooperate. A few days later, Abo Abdo told my sister that he was executed in March 2019.”

Due to security concerns about the fate of relatives who are still in the areas controlled by the Syrian government, many Syrians are afraid to testify about their relatives who were arrested in Syria upon their return to

Syria. There are still no real guarantees or options for a normal and safe return for Syrians.

Syrian Laws

Property appropriation or destruction has become a major feature of the Syrian conflict perpetrated by most of the parties to the conflict with a variety of objectives - the most important of which is demographic change.

The Syrian government has seized the properties of those who oppose it through directives issued by the National Security Bureau to the Minister of Finance or through

real estate legislation like Law No. 10.¹⁴ These laws threaten Syrians' property and rights with potential property loss and further legal complications. Whereas the Syrian government has completely destroyed towns and villages and prevented thousands of internally displaced people from returning to their homes, it has issued several real estate laws that facilitate the process of seizing or plundering property by legalized means. This is evident in the Syrian government Decree 66 and Law No. 10 pertaining to rezoning and reconstruction.

Although these laws are disguised as redevelopment plans, they have been wielded for political favoritism in Syria. Without government connections, an occupant can lose possession of their property at any time with little notice or compensation. While the government unevenly applied expropriation and rezoning laws before the conflict, execution of the laws has taken on a new dimension since 2011 as the government only targeted opposition areas. For example, the powers authorized by Law No. 10 and Decree 66 were exercised in areas of Eastern Ghouta and the suburbs of Damascus, which were strongholds of the Syrian opposition starting in March 2011.

In conjunction with expropriation, the government uses rezoning laws to reshape urban areas. Decree 66, passed after the start of the conflict, was intended to redevelop unauthorized housing and poor slums in Damascus. In Basateen al-Razi, a slum in Damascus that has been the site of political protests, residents were given notice that the area would be rezoned under the new decree and that they should register with the

governor to preserve their rights as owners or occupants. Registration, however, required prior approval from Syria's security agency.¹⁵ In practice, this has prevented government critics and those living as refugees outside of Syria from claiming their rights. The slum has since been destroyed, to be replaced by a high-scale residential and commercial neighborhood, 'Marota City.' The law was unclear as to how previous residents of Basateen al-Razi may secure new housing. Syrians who owned property that has since been destroyed were never compensated.¹⁶ In practice, the government distributed housing shares that can be used to acquire new housing or sold to some property owners. Residents, however, do not have any assurances that they will be given priority to use the shares to return to their original homes or whether the shares will be sufficient to secure housing elsewhere.

Law No. 10

In 2018, the government issued a new rezoning law known as Law No. 10⁷. The law covers the entire country by creating regulatory areas without regard to whether the area constitutes illegal settlements or had been previously zoned and properly organized. By creating regulatory areas, the government expropriated and rezoned land to exert complete control over how the land is rebuilt or developed, particularly in areas that have been damaged or destroyed during the conflict. By creating barriers for the original inhabitants to eventually return to their properties, the law has enforced demographic change in these areas.

Like other expropriation and rezoning

decrees in Syria, Law No. 10 allowed for a notice period whereby owners and occupants may submit documents, such as deeds and leases, to prove their rights to the property in question and secure an interest in the new zones. While the notice period was originally only one month - despite the fact that many property owners were outside of the country - the Foreign Minister stated that it would be extended to a full year.¹⁷ No new legislation was passed to formalize this change. If a claimant's right to the property was deemed valid, the government issued the claimant shares in the regulatory area, not monetary compensation or a continued right to the property itself. Although the law explained that shares are to be allocated based on the claimant's property value, it did not specify how the percentages would be determined among the entire population claiming a right to common property in the area. There have been several delays in this compensation system and in July 2020, 9,000 individuals were still waiting for rehousing or rent compensation.¹⁸ Following the expiration of this legal period and the issuance of the organizational chart, some of the owners who received shares have sold their shares while others bought into building contractor projects to obtain shares in apartments, though not an entire apartment. Due to these complications, most of the owners are unable to return to their home areas.

These laws and other property legislation, as well as the confiscation of property by direct and illegal means, are considered one of the most significant challenges that refugees and displaced people will face while attempting to return to their homes. The

government's property policies will create future property disputes.¹⁹ In addition to continued persecution, arbitrary detention, and torture, this will be one of the persisting dangers threatening future return as refugees or displaced persons will find their towns and properties destroyed or confiscated and find themselves homeless.

Compulsory Military Service

Since the beginning of the uprising in 2011, the Syrian army, affiliated with the Syrian government, has been implicated in numerous human rights and international law violations. During that same time, mandatory military service has become more stringent. Most reservists and soldiers subject to compulsory service are bound to an indefinite obligation. Males born in 1983 or later must serve in the reserves for seven years while males born prior to 1982 must serve for two years. It should be noted, however, that some draftees were not discharged until serving a much longer term with reports of some forced to serve a nine-year term.²⁰ The commanding officers have become more and more ruthless with soldiers and conscripts. For example, if they suspect that a soldier is anti-government or refuses to obey an order (even where the orders constitute criminal offenses including illegal orders to kill civilians or destroy civilian objects), the commanding officer will kill this soldier directly. Alternatively, they may send him to an exceptional military court to be tried, where the punishment may be death.²¹ Those who have deserted or avoided the draft are often named on wanted lists, leaving them vulnerable to detention.²²



Security forces in Damascus © Damascus Voice

Among the millions of Syrians living outside of Syria are hundreds of thousands of young men who did not perform mandatory military service for fear of the certain dangers and possible death that conscription entails. Many are unwilling to be involved in human rights violations committed by the Syrian army like arbitrary detention, torture, indiscriminate bombings, and the use of chemical weapons. Most of these men cannot afford the exemption fee to avoid conscription (noted below), as many are living in dire economic conditions in the countries where they found asylum.²³

With economic sanctions biting and in need of financial sustenance, the Syrian government threatened to confiscate money and property from Syrian men living outside the country and above the age of conscription, if they have not performed compulsory military service or paid the exemption fee.²⁴ Following its amendment in 2017, the Military Service Law stipulates that those who are over the age of 42 and have not completed their military service must pay an exemption fee totaling \$8,000, on top of a late fee of \$200 for

every year that they failed to serve or pay.²⁵ Due to a variety of economic constraints that many refugees face, the fees are unattainable and place additional burdens on Syrians in their countries of asylum. In practice, this means that family members who remain in Syria, often women without legal title to property, are subject to mafia-like shakedowns and financial extortion.

Furthermore, there are no specific considerations taken into account when deciding who should be called up. All eligible individuals are under consideration. Individuals residing outside of Syria who are called upon to perform reserve military service may be exempt after paying \$5,000 USD, privileging the rich and further entrenching corrupt systems of governance. For the thousands of young Syrians who fled the ravages of war and refuse to take part in these widespread violations committed by many parties, compulsory military service would contribute to making their lives extremely vulnerable if forced to return.

Section IV

Refugee Law

International Refugee Law

As long as conditions in Syria remain unsafe for return, European governments have a series of obligations under both international and regional refugee law.

The 1951 Refugee Convention and the 1967 Protocol are the foundation of international refugee law.²⁶ The Convention explains who is a refugee and outlines the rights to which refugees are entitled, many of which require the same treatment as nationals or foreign nationals, including the rights to education, access to courts, wage-earning employment, and property rights. Separately, the Protocol ensures that the Convention is applied to any state that signs the Protocol, regardless of time or place.²⁷

Both the Convention and Protocol are based on the principle of *non-refoulement* which means that refugees cannot be forced (directly or indirectly) to return to their country of origin where their life or freedom is threatened because of their race, religion, nationality, membership of a particular social group or political opinion. A person does not need to be formally recognized as a refugee by a state or agency, like UNHCR, to be covered by the principle of *non-refoulement*. Even asylum seekers whose status are undetermined are protected. An exception to the rule is

if a state reasonably believes that a refugee is dangerous to national security or if the refugee was convicted of a serious crime and is consequently a danger to the community. There are 149 states parties to the Convention and/or Protocol.

The principle of *non-refoulement* takes effect when a refugee or asylum seeker is within a state's jurisdiction, which includes its territory on land or at sea.²⁸ It is a rule of customary international law, meaning that it generally applies to all states regardless of whether it has signed the Convention or Protocol. Additionally, a state usually has jurisdiction over spaces where it operates extraterritorially, such as a rescue operation at sea. There is still some debate whether the principle of *non-refoulement* applies to border closures or “pushbacks.” Nevertheless, a state violates international refugee law in these scenarios if it forces refugees and asylum seekers to turn around without allowing them to be screened.²⁹

Despite their obligations under international refugee law, some host states have failed to guarantee the rights of Syrian refugees. Failing to uphold these rights has social, political, and economic implications for refugee communities and local populations. For example, Syrians are not automatically permitted to work in Jordan and Lebanon—



Refugees Welcome - Germany (c) Montecruz Foto

neither of which is a signatory to the Refugee Convention or Protocol and both of which have contributed to forced returns to Syria.³⁰ Denying refugees the right to work limits their ability to legally contribute to the Jordanian and Lebanese economies, both of which are increasingly strained.³¹ For refugees living in urban areas, denying work permits limits the likelihood that Syrian refugees will successfully integrate into host communities. Meanwhile, individuals residing in camps become more isolated and alienated. In Turkey, authorities continued to unlawfully deport Syrians to Idlib in violation of the *non-refoulement* principle.³² Given that most deportees are adult males, families struggle to survive without their male breadwinners. They often have no other choice but to return to Syria where, at the very least, parents and children can reunite.

European Law & State Responsibility

European Union member states follow a common asylum system, the goal of which is to “offer appropriate status to any third-country national requiring international protection...and ensure compliance with the principle of *non-refoulement*.”³³ The system is rooted in Article 18 of the EU Charter of Fundamental Rights which guarantees the right to asylum and respects the Refugee Convention and Protocol.³⁴ Yet the challenges of mass migration have called into question the efficiency and ethicality of the EU’s approach to asylum. Consequently, the European Commission issued the *New Pact on Migration and Asylum* in September 2020.³⁵ The Pact is meant to protect refugees and asylum-seekers while safeguarding the EU’s external border.

Furthermore, many states have turned to third-country agreements in an attempt to stem the flow of refugees. Under the European Convention of Human Rights (ECHR), however, European states must ensure that refugees will not face refoulement by the third “safe” country. This means that states which have a history of violating non-refoulement, such as Turkey, should not constitute as safe third-country destinations.³⁶ The burden of proving that a refugee will be safe and secure in this third country is the responsibility of the European member state.³⁷

Treatment of refugees and asylum seekers is further codified in the European Convention of Human Rights. Following international standards of human rights, European states must ensure refugees and asylum seekers are afforded basic liberties and freedoms. If a state does deem that a person is safe to return to their home country, pre-return detention must be as short as possible and provide each case with speedy judicial review.³⁸

In reality, member states have been inconsistent in honoring their responsibilities to refugees and asylum-seekers. Human rights organizations continue to document egregious violations committed at the EU’s external borders and along migration routes, specifically those by Greece, Italy, Croatia, and Bosnia. This past January, SJAC submitted a communication to the Office of the Prosecutor of the International Criminal Court requesting an investigation into crimes against humanity that may have been committed by Greek and Frontex authorities against refugees at the Greek-Turkish border and reception and identification centers on the Aegean islands.³⁹

German courts have since found that refugees deported to Greece would be at serious risk of inhumane and degrading treatment if they are sent back.⁴⁰

Safely reaching a host country is not the only challenge facing Syrian refugees. Several states have enacted policies that severely risk refugee protections, even for those who have been in Europe for years. Notably, Denmark has classified greater-Damascus as safe for returnees and has either revoked or refused to renew residency permits for nearly 400 Syrians, despite the risks that refugees would face upon their return.⁴¹ Further, it passed a law in June 2021 through which refugees could be transferred from Danish soil to asylum centers in other countries where their cases would be reviewed and protection potentially granted in the host state.⁴² Although Denmark has not yet formed an agreement with potential host states, enactment of the law would severely limit refugees’ right to accessible asylum procedures and adequate protection, particularly if host states are willing to deport refugees to their country of origin. Without ensuring that the third country does not prematurely force Syrians to return to Syria, Denmark will fail to uphold European refugee protections. These practices are part of Denmark’s goal to reduce asylum applications to zero.⁴³

Elsewhere, Germany did not extend its ban on deportations of Syrian nationals who pose a national security risk, allowing for criminals and dangerous persons to be deported upon an individual assessment.⁴⁴

Section V

Recommendations

Thousands of Syrians have made a new home in Europe after fleeing Syria. While the conflict is now in its eleventh year, Syrian cities and towns remain in rubble, human rights abuses continue unabated and unchecked, and Syrians face real threats if forced to return. Many of the drivers for migration and seeking asylum remain present in Syria today. European states are legally obligated to ensure that Syrians within their borders who qualify for asylum are not forcibly returned or face the risk of deportation to Syria. Eleven years into the conflict, Syria is not safe for return, including government-controlled areas.

SJAC urges the following actions for European governments:

- ***Halt*** forced returns whether through deportation or indirect means and abide by the principle of non-refoulement;
- ***Adopt*** a holistic asylum procedure and bolster integration efforts for Syrian refugees;
- ***Consult*** Syrian civil society to determine the level of threat to returnees on the ground in Syria;
- ***Ensure*** that other European counterparts follow the Refugee Convention and Protocol and do not pursue policies that would endanger refugees or be counter to EU policy;
- ***Respect*** obligations under International and European law to protect Syrian refugees from refoulement throughout all phases of the asylum process, including through unlawful pushbacks;
- ***End*** detention practices in which refugees with no prospect of return to Syria are indefinitely held in deportation centers.



Top right: Refugee camp in Greece © Jenny Bartsch; Bottom left: Syrian refugees walking on Turkey-Syria border, 14 May 2014 (c) Kafeinkolik/Shutterstock

Annex I

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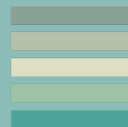
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