

Registrar Ilse Freiwirth, First Section
European Court of Human Rights
Council of Europe
67075 Strasbourg Cedex
France

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07 July 2025

**Request for permission to intervene as third-party in the case of M.A. v Sweden,
Application No. 6559/25.**

Dear President Ivana Jelić,

The below organisations, the AIRE Centre (Advice on Individual Rights in Europe), the Dutch Council for Refugees (DCR) and the European Council on Refugees and Exiles (ECRE), request permission to submit a third-party intervention in the case of *M.A. v Sweden*, Application No. 6559/25. The application in this case was communicated to the respondent Government on 29 March 2025 and published on the website of the European Court of Human Rights (ECtHR) on 14 April 2025. This request is submitted within twelve weeks following the date of publication of the communication (under Rule 44(3)b of the Rules of the Court).

The AIRE Centre is a London-based NGO that promotes awareness of European law rights and assists individuals in relation to asserting those rights by providing legal advice, direct legal representation to individuals, other advisers and lawyers and submitting third-party interventions in national and European Courts. The Centre has been involved in the litigation of over 150 cases either as applicants' representatives or as third-party interveners before the ECtHR namely *Khlaifia and others v. Italy* (GC), *N.D. and N.T. v. Spain* (GC), *Saadi v. Italy*, *Sufi and Elmi v. UK*, *Hirsi Jamaa and Others v. Italy* (GC), *Sharifi v. Italy and Greece*, *MSS v. Greece and Belgium*, *Tarakhel v. Switzerland*, *Sh. D. v. Greece*, *H.A. v. Greece*, *Darboe and Camara v. Italy*, *HMM v. Latvia* (GC, pending), and some 15 cases before the CJEU including the asylum related cases of *NS v. SSHD*, *ME v. ORAC*, *MA and BT v. SSHD*.

The Dutch Council for Refugees (VluchtelingenWerk Nederland) is a non-governmental organization that represents the interests of refugees and asylum seekers



across the Netherlands since 1979. With over 13,500 volunteers and 600 staff members, DCR is the primary independent organization supporting refugees in the country from reception to integration through 310 branch offices. Domestically, DCR provides guidance during the asylum procedure, coordinates a vast network of asylum lawyers and manages the leading asylum law database (Vluchtweb) with up-to-date developments on law, policy, jurisprudence and country of origin information. Regionally, DCR aims to contribute to improving the protection of asylum seekers and refugees across Europe. To that end, it has provided technical support to a variety of partner organizations, including in Northern Macedonia, Hungary and Greece. The Dutch Council for Refugees was a third-party intervener, among others, in the cases of *A.N. v. the Netherlands* and *S.A. v. the Netherlands*, *J.B v. Greece*, *H.A. v. Greece*, *Darboe and Camara v. Italy*, *Ilias and Ahmed v. Hungary* (GC), *M.K. and others v. Poland*, *H.T. v. Germany and Greece*, *M.N. v. Belgium*, and *C.O.C.G. and Others v. Lithuania* (GC, pending).

The European Council on Refugees and Exiles (ECRE) is an international alliance of 128 NGOs across Europe working together to protect and advance the rights of refugees, asylum seekers and displaced persons. Their mission is to promote the establishment of fair and humane European asylum policies and practices in accordance with international human rights law. ECRE engages in legal research, litigation advice and training concerning the application and interpretation of EU law, and relevant international human rights instruments, including the 1951 Refugee Convention and the European Convention on Human Rights. ECRE was a third-party intervener in numerous cases before this Court including: *A.R.E. v. Greece*, *S.B. and others v. Croatia*, *T.K. and S.R. v. Russia*, *A.D. v. Malta*, *Al H. and others v. Greece*, *M.H. v Serbia*, *N.D. and N.T. v. Spain* (GC), *Ilias and Ahmed v. Hungary* (GC) (no. 47287/15).

If granted permission, the interveners would seek to assist the Court by submitting observations relating to:

- The Contracting Parties' procedural obligations under Article 2 and 3 ECHR in the context of forced returns to a third state;
- The assessment and safeguards under the *non-refoulement* principle concerning specifically targeted groups;
- The Contracting Parties' obligations under EU and international law applicable to the forced return to a third state of specifically targeted groups.

If granted permission the prospective interveners would not comment on the specific facts or merits of the application. The intervention would be of a general nature and would be limited to the usual ten pages allocated to the third-party intervenors.

In the event of the Court granting this request, to ensure that we dispose of the maximum time to draft our intervention, we should be most grateful if the Court would notify the



THE AIRE CENTRE
Advice on Individual Rights in Europe



**Dutch Council for
Refugees**



ecre

European Council
on Refugees and Exiles

contact person for this intervention Sadhia Rafi (DCR) via e-mail at srafi@vluchtelingenwerk.nl, once the decision has been taken.

Yours faithfully,

Sadhia Rafi

Sadhia Rafi

Head of Strategic Litigation

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