

Country Guidance: Sudan

Country Guidance: Sudan

Common analysis and guidance note

June 2025



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Cover photo/illustration: Dan Kitwood, © Getty Images, 2024, Newly arrived refugees fleeing fighting in Darfur arrive at the border between Sudan and Chad

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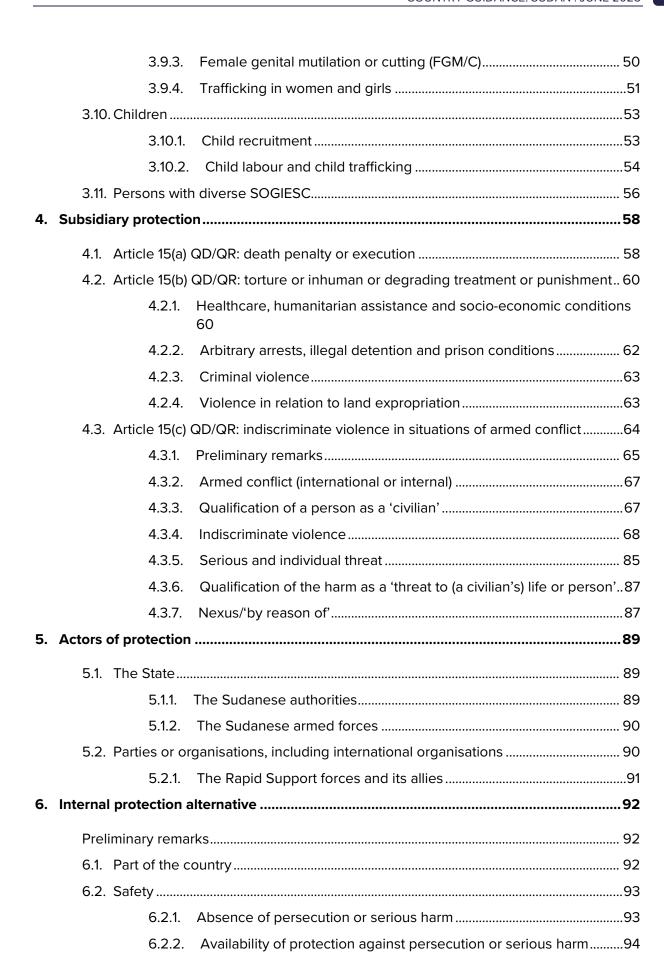
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List of abbreviations and glossary

| Term | Definition |
|---------------|--|
| ACLED | The Armed Conflict Location & Event Data Project |
| ACAPS | Assessment Capacities Projects |
| Agid | Tribal military leaders |
| Amir | Tribal leaders |
| AOAV | Action on Armed Violence |
| CAR | Central African Republic |
| CJEU | Court of Justice of the European Union |
| СРА | Comprehensive Peace Agreement |
| COI | Country of Origin Information |
| CRP | Central Reserve Police |
| CRSV | Conflict-Related Sexual Violence |
| Darfur | Historically refers to the entire Darfur region, which was divided into three states in 1994 and then subsequently into five states in 2011. Sometimes it is also known as Greater Darfur. |
| DUP | Democratic Unionist Party |
| ERRs | Emergency Response Rooms |
| EU+ countries | Member States of the European Union and associated countries |
| EUAA | European Union Agency for Asylum |





| Term | Definition |
|----------------|---|
| Faza'a | An ancient pre-Islamic Sudanese tradition that allows tribes to call on their members and allies for support against attacks by other tribes or to take revenge for killings. |
| FFC | Forces for Freedom and Change |
| FGM/C | Female Genital Mutilation/Cutting |
| GBV | Gender-based Violence |
| Hudud | In Muslim law, <i>hudud</i> (singular <i>hadd</i>) are the penalties explicitly established by the Koran and the Sunnah |
| ICC | International Criminal Court |
| IDP | Internally Displaced Person |
| IOM | International Organisation for Migration |
| Jana jaish | Child soldiers |
| Janjaweed | Arab nomad militia group operating in the Sahel region |
| JEM | Justice and Equality Movement |
| JFASM | Joint Force of Armed Struggle Movements also known as the 'Darfur Joint Forces' or 'Joint Forces' |
| JPA | Juba Peace Agreement |
| Kordofans, The | Referring to all Kordofan States or regions, also known as Greater Kordofan |



| Term | Definition |
|-------------------------------------|---|
| reim | |
| LGBTIQ | LGBTIQ people are persons: |
| | who are attracted to others of their own gender (lesbian, gay) or any gender (bisexual); |
| | whose gender identity and/or expression does not correspond to the sex they were assigned at birth (trans, non-binary); |
| | who are born with sex characteristics that do not fit the typical definition of male or female (intersex); and |
| | whose identity does not fit into a binary classification of sexuality and/or gender (queer). |
| LNA | Libyan National Army (self-styled) |
| LSHTM | London School of Hygiene & Tropical Medicine |
| Mustanfareen | The mobilised, referring to armed popular resistance |
| NCP | National Congress Party |
| NIAC | Non-International Armed Conflicts |
| NMJD | National Movement for Justice and Development |
| NUP | National Umma Party |
| OHCHR | Office of the High Commissioner for Human Rights |
| Omda | Leader of a village |
| QD (Qualification Directive) | Directive 2011/95/EU of the European Parliament and of the Council of 13 December 2011 on standards for the qualification of third-country nationals or stateless persons as beneficiaries of international protection, for a uniform status for refugees or for persons eligible for subsidiary protection, and for the content of the protection granted. |





| Term | Definition |
|-------------------------------------|---|
| Qisas | In Muslim law, <i>Qisas</i> , are proportionate retaliation for intentional bodily harm or murder. |
| QR (Qualification Regulation) | Regulation (EU) 2024/1347 of the European Parliament and of the Council of 14 May 2024 on standards for the qualification of third-country nationals or stateless persons as beneficiaries of international protection, for a uniform status for refugees or for persons eligible for subsidiary protection and for the content of the protection granted, amending Council Directive 2003/109/EC and repealing Directive 2011/95/EU of the European Parliament and of the Council. |
| RCs | Resistance Committees |
| RSF | Rapid Support Forces |
| SA | Sudan Alliance |
| SAF | Sudan Armed Forces |
| SCP | Sudan Congress Party |
| Sharia | The religious law of Islam, Islamic canonical law |
| SLM | Sudan Liberation Movement |
| SLM-AW | Sudan Liberation Movement – Abdel Wahid al-Nur |
| SLM-MM | Sudan Liberation Movement – Minni Minnawi |
| SLM-Tambour | Sudan Liberation Movement – Mustafa Tambour |
| SLM-TC | Sudan Liberation Movement -Transitional Council |
| SOGIESC | Sexual Orientation, Gender Identity and Expression, and Sex Characteristics |
| SPLM-N | Sudan People's Liberation Movement-North |





| Term | Definition |
|----------------|--|
| SPLM-N-Agar | Sudan People's Liberation Movement-North-Malik Agar |
| SPLM-N-al-Hilu | Sudan People's Liberation Movement-North-al-Hilu |
| Ta'zir | In Muslim law, <i>Ta'zir are</i> discretionary punishments that can range from a harsh warning from the judge to corporal punishment such as flogging, imprisonment and exile. |
| UAE | United Arab Emirates |
| UNFPA | United Nations Population Fund |
| UNHCR | United Nations High Commissioner for Refugees |
| UNICEF | United Nations Children's Fund |
| UNOCHA | United Nations Office for the Coordination of Humanitarian Affairs |
| WHO | World Health Organisation |





Introduction

The country guidance documents provide country-specific common analysis and guidance in relation to the assessment criteria established in the recast Qualification Directive (QD)¹ and in the newly adopted Qualification Regulation (QR)², which will repeal the QD with its entry into application on 1 July 2026. They are developed by the European Union Agency for Asylum (EUAA) together with a network of senior-level policy officials from EU+ countries and represent their joint assessment of the situation in main countries of origin, in accordance with current EU legislation and jurisprudence of the Court of Justice of the European Union (CJEU). The European Commission and the United Nations High Commissioner for Refugees (UNHCR) also provide valuable input in this process.

The aim of the country guidance documents is to assist decision-makers and policy-makers in their daily work and to foster convergence in the assessment of applications for international protection and the type of protection granted in the context of the Common European Asylum System.

The development, review and update of country guidance is regulated under <u>Article 11 of the EUAA Regulation</u>³.



In accordance with Article 11(3) EUAA Regulation, Member States have the obligation to take into account the common analysis and guidance notes when examining applications for international protection, without prejudice to their competence to decide on individual applications.



For more details on the process of producing country guidance documents and the exact role of stakeholders involved, see 'Country Guidance: Methodology' (November 2024).

This document encompasses the development, review and update of country guidance and regulates the work of the EUAA Country Guidance Network and all related processes.

³ Regulation (EU) 2021/2303 of the European Parliament and of the Council of 15 December 2021 on the European Union Agency for Asylum and repealing Regulation (EU) No 439/2010.



¹ Directive 2011/95/EU of the European Parliament and of the Council of 13 December 2011 on standards for the qualification of third-country nationals or stateless persons as beneficiaries of international protection, for a uniform status for refugees or for persons eligible for subsidiary protection, and for the content of the protection granted (recast).

² Regulation (EU) 2024/1347 of the European Parliament and of the Council of 14 May 2024 on standards for the qualification of third-country nationals or stateless persons as beneficiaries of international protection, for a uniform status for refugees or for persons eligible for subsidiary protection and for the content of the protection granted, amending Council Directive 2003/109/EC and repealing Directive 2011/95/EU of the European Parliament and of the Council.



This common analysis is based on country of origin information (COI) covering the period 15 April 2024 - 30 November 2024. Some additional information on major political, security, humanitarian and human rights developments covering the period 1 December 2024 - 21 March 2025 has also been reflected. Each section of the country guidance documents also clearly states the timing of its last update.

The analysis and guidance within this document should be considered valid as long as current events and developments in the country fall within the trends and patterns described within the COI on which the assessment at hand is based on.

The analysis and guidance provided within this document are not exhaustive.





Common analysis, guidance note and methodological approach

The country guidance document consists of two components: the guidance note and the common analysis. These two parts focus on the situation in the country of origin and provide analysis and guidance on the assessment of relevant international protection needs.

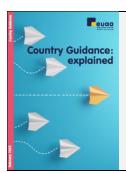
Guidance note

The guidance note is the first part in the structure of the document.

It outlines the key conclusions of the common analysis in a light, user-friendly format.

Common analysis

The common analysis is the second, more detailed, part. It analyses the available COI and provides guidance in accordance with the applicable legislation, relevant jurisprudence and general guidance.



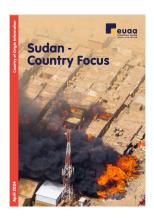
The Country Guidance documents should be read in conjunction with the separate document '<u>Country Guidance: explained</u>' (February 2025).

This document outlines the general guidance relied upon in this analysis, as well as the methodological framework, approach and indicators used to assess the different elements of qualification for international protection.





This development focuses on the international protection needs of the most encountered profiles of applicants for international protection in the caseload of EU+ countries. It covers the situation of Sudanese nationals belonging to main ethnic groups; individuals fearing forced recruitment by the Rapid Support Force (RSF); individuals perceived as political opponents such as members of the Resistance Committees (RCs) and Emergency Response Rooms (ERRs), political party members, community leaders, journalists and humanitarian and healthcare workers; women and girls; children; and persons with diverse Sexual Orientation, Gender Identity and Expression, and Sex Characteristics (SOGIESC). Additionally, this development covers the international protection needs of Sudanese applicants under the meaning of Article 15 QD/QR, as well as the potential availability of an Internal Protection Alternative (IPA). The main actors in Sudan are covered by the sections on actors of persecution or serious harm and actors of protection. Finally, general exclusion considerations to take into account when assessing international protection needs of Sudanese applicants are also dealt with in the present development. This development is mainly based on the following recent COI:









Country Focus 2024

EUAA COI Report: Sudan - Country Focus (April 2024)

Country Focus 2025

EUAA COI Report: Sudan - Country Focus (February 2025)

Security Situation 2025

EUAA COI Report: Sudan - Security Situation (February 2025)

COI Update 2025

EUAA COI Query: Sudan -Major political, security, humanitarian and human rights developments (April 2025)

<u>Annex: Country of origin information references</u> provides further details and links to all COI documents used as a basis for the analysis within this document. References within this document are to the respective sections of these COI documents.



To access EUAA COI reports, visit https://euaa.europa.eu/country-origin-information.





Guidance note

Last update: June 2025

The guidance note on Sudan is produced by the EUAA together with EU+ countries⁴ in accordance with Article 11 of the EUAA Regulation⁵. It is based on and summarises the conclusions of the comprehensive common analysis. The aim of the guidance note and the common analysis is to assist EU+ countries in the examination of applications for international protection, thereby fostering convergence of asylum practices and decisions across the EU.

In view of the ongoing conflict, the situation in Sudan remains fluid, and changes in trends may be observed in the future. It should be highlighted that in Sudan the widespread crackdown on media outlets, along with the recurring communication blackouts significantly impacted the reporting and the conflict media coverage throughout the country. New events and developments that cause substantial changes, new trends or geographical shifts in the violence, may lead to a different assessment. The security situation in a given territory should always be assessed in light of the most up-to-date COI available.

The guidance note is part of the 'Country Guidance: Sudan' and should be read in conjunction with the common analysis.

In Sudan, a wide range of groups and individuals can be considered as actors of persecution or serious harm. These include the Sudanese authorities, the Sudanese Armed Forces (SAF), the Rapid Support Forces (RSF) and their respective allies. In addition, other armed groups are currently active in Sudan, notably the SLM-AW and the SPLM-N-al-Hilu. Beyond these named groups, various other armed actors may be involved in criminal activities and the actor may not always be identifiable. Such criminality may involve militias or criminal gangs. Other non-armed actors of persecution or serious harm may include family members and society at large. See Actors of persecution or serious harm.

Among the most commonly encountered profiles of applicants for international protection, the following would be **highly likely to qualify for refugee status**:

- Individuals belonging to non-Arab Darfuri groups residing in Darfur, in particular the Masalit, the Zaghawa and the Fur.
- Individuals who refused to join the RSF or escaped forced recruitment.
- Members of the Resistance committees (RCs) and Emergency Response Rooms (ERRs).
- Prominent political party members.
- Community leaders, human rights activists, and lawyers perceived as opponents.

Regulation (EU) 2021/2303 of the European Parliament and of the Council of 15 December 2021 on the European Union Agency for Asylum and repealing Regulation (EU) No 439/2010.



The assessment and guidance reflect the conclusions of the EUAA Country Guidance Network, which consists of EU Member States, Iceland, Norway and Switzerland. The guidance note has been endorsed by the EUAA Management Board.



- Journalists and other media workers perceived as critical.
- Humanitarian and healthcare workers.
- Women and girls from conflict-affected areas.
- Women and girls in relation to forced and child marriage.
- Girls who have not been subjected to FGM/C.
- Persons with diverse SOGIESC.

Further guidance is provided on the **risk-impacting circumstances** which may affect the probability of granting refugee status for the following profiles such as:

- Individuals belonging to non-Arab Darfuri groups residing outside Darfur.
- Nuba from the Kordofans.
- Arabs from Darfur and the Kordofans.
- Individuals not yet forcibly recruited by the RSF.
- Non prominent political party members and (perceived) political opponents.
- Civilians from areas associated with the opposing warring party.
- Women and girls from areas not affected by the conflict.
- Women who have not been subjected to FGM/C.
- Women and girls at risk of being (re)-trafficked.
- Children.

If an applicant is not considered eligible for refugee status, Member States should proceed to consider the granting of <u>subsidiary protection</u>. In Sudan, and in the context of the ongoing war, death penalties or executions, as well as torture or inhuman or degrading treatment or punishment, may be inflicted for reasons of (imputed) political opinion and/or belonging to a specific ethnic group, and those individuals would therefore qualify for refugee status. In cases where a link to a Convention ground cannot be established, the need for subsidiary protection under Article 15(a) and (b) QD/QR should be assessed.

If there is a reasonable degree of likelihood of death penalty or execution, and no nexus to a reason for persecution can be substantiated, subsidiary protection under Article 15(a) QD/QR shall be granted. The death penalty remains in force in Sudan, both in law and in practice. Furthermore, extrajudicial killings and executions by both warring parties were also reported.

Article 15(b) QD/QR relating to the risk of torture or inhuman or degrading treatment or punishment may be applicable in certain cases. For example, in the context of the ongoing war in Sudan when the healthcare, humanitarian and socio-economic conditions are the result of an intentional conduct of an actor, they may amount to torture, inhuman or degrading treatment or punishment. Also, Article 15(b) QD/QR may apply in cases involving arbitrary arrests and detentions, life-threatening conditions of detention, or exposure to violent crime and to the violence in relation to land expropriation.





With regard to subsidiary protection under Article 15(c) QD/QR and for the purposes of this document, the assessment of the level of indiscriminate violence in Sudan is made by (non-administrative) regions, defined as follow: the Khartoum region comprises Khartoum state; the Darfur region comprises North Darfur, South Darfur, West Darfur, East Darfur and Central Darfur states; the Kordofan region comprises North Kordofan, South Kordofan and West Kordofan, including Abyei; the Central region comprises Al Jazirah, Sennar, Blue Nile and White Nile states; the North region comprises Gedaref, Kassala and Red Sea states.

Please find below the assessment contained in the common analysis:

- In **Khartoum**, **Darfur**, **Kordofan regions and Al Jazirah state** in the Central region, the degree of indiscriminate violence reaches such an exceptionally high level that substantial grounds are shown for believing that a civilian, returned to the relevant area, would, **solely on account of their presence there**, face a real risk of being subject to the serious threat referred to in Article 15(c) QD/QR.
- Indiscriminate violence in situations of armed conflict reaches a high level in the remaining states of the Central Region, namely Sennar, Blue Nile and White Nile. Accordingly, a lower level of individual elements is required to show substantial grounds for believing that a civilian, returned to the area, would face a real risk of serious harm.
- In the **North region**, indiscriminate violence is taking place, however **not at a high level**. Accordingly, a **higher level of individual elements** is required to show substantial grounds for believing that a civilian, returned to the area, would face a real risk of serious harm.
- In the **East region**, it is considered that there is in general **no real risk** of serious harm under Article 15(c) QD/QR.

The international protection needs of Sudanese applicants are further compounded by the general lack of protection in the country. Neither the Sudanese authorities and the SAF nor the RSF can be considered an **actor of protection** fulfilling the requirements of Article 7 QD/QR and no other relevant actors identified in the country. See Actors of protection.

Furthermore, it is assessed that, <u>internal protection alternative</u> would in general not be applicable to any part of Sudan in accordance with Article 8 QD/QR.

Additionally, <u>exclusion</u> considerations may be relevant in a number of cases concerning applicants from Sudan. Examples include (former) members of the SAF, the RSF and affiliated para-military groups and militias, as well as members of former insurgent armed groups in Darfur. Individuals involved in the commission of serious non-political crimes may also fall within the scope of exclusion under the applicable legal framework.





Common analysis





1. General situation in Sudan

Last update: June 2025

The information below is retrieved from the following EUAA COI reports and query: <u>Country Focus 2024</u>; <u>Country Focus 2025</u>; <u>Security 2025</u>; <u>COI Update 2025</u>. Country Guidance should not be referred to as a source of COI.

Historical background and recent events

Sudan's history since its independence in 1956 is characterised by authoritarianism, instability, numerous *coups*, and two major civil wars. Omar al-Bashir's Islamist-led government (1989–2019) played a key role in shaping the country's politics, including fuelling the Darfur conflict when increasing tensions in the region were met with racially targeted attacks by government-backed Arab militias, known as *Janjaweed*. This led to the International Criminal Court (ICC) indictments against Bashir and some of his associates for genocide and crimes against humanity. The North-South civil war ended in 2005 with the Comprehensive Peace Agreement (CPA), paving the way for South Sudan's independence (2011).

After decades of authoritarian rule and economic decline, mass protests led to Bashir's ousting in 2019. A transitional military-civilian government was formed, and in 2020 the Juba Peace Agreement (JPA) was signed between the main armed rebel groups, while other declined to sign it (see also 2. Actors of persecution or serious harm).

Ultimately tensions between the Sudan Armed Forces (SAF) and the Rapid Support Forces (RSF) triggered by disagreements on the integration of the RSF into the military forces, escalated into a nationwide war in 2023. Both sides have been accused of war crimes and crimes against humanity and have used weapons indiscriminately in civilian areas, the SAF through airstrikes, heavy artillery, and tanks, while the RSF employed hit-and-run tactics. The RSF also continued to employ tactics known from the *Janjaweed* era, including pillaging and looting, and deliberate killings to intimidate residents. In late 2024 and early 2025, Sudan's military leadership reshaped the political landscape by replacing the Sovereignty Council with a SAF military-led council and amending the 2019 Constitutional Document, removing references to civilian forces like the Forces for Freedom and Change (FFC). At the same time, the civilian coalition *Taqaddum* held talks in Kampala about forming a government in exile and eventually decided to split into two groups.

Meanwhile, the RSF and allied political and armed groups signed the Sudan Founding Alliance Charter in Nairobi, aiming to establish a parallel government and joint army in RSF-controlled areas, formalising the territorial control of the RSF in Darfur and of the SPLM-N Al-Hilu in Kordofan. Following the signature, the RSF engaged in meetings with the SPLM-N Al-Hilu in Blue Nile and South Kordofan as well as with the Sudan Liberation Movement —Transitional Council (SLM-TC) and the Sudanese Alliance Forces (SA) Sudanese Alliance Forces in view of the definition of the structures of the Sudan Founding Alliance.

In the ongoing conflict, much of the violence in Sudan is targeted; civilians do not flee solely out of fear of crossfire but because they are actively persecuted based on ethnicity and (perceived) political affiliation. Women, children, and persons with diverse SOGIESC have also





been reportedly targeted. Sources indicate the widespread use of sexual violence as a weapon of war. These attacks have been especially prevalent during invasions of cities, attacks on IDPs and IDP sites, as well as during the occupation of urban residential areas by armed fighters. Mostly attributed to the RSF, these acts have been a 'defining' characteristic of the current conflict. Both the SAF and the RSF are also using food and humanitarian aid control as a weapon and deliberately starving civilians, heightening the risk of imminent widespread famine.

Media restrictions and communication blackouts have further hindered reporting on the crisis, leading to significant underreporting of security incidents and underestimation of death counts. Although not officially documented, war-aggravated factors such as lack of emergency care, essential food, medicine and vaccination programmes have also indirectly led to numerous deaths.

The rule of law collapsed, leading to widespread human rights abuses such as extrajudicial killings, torture, and arbitrary detentions. Meanwhile, the situation remains highly volatile, with territorial control constantly shifting amid unceasing offensives from both primary factions.

Humanitarian situation

The UN has described Sudan's situation as one of the world's worst humanitarian crises, due to ongoing armed conflict, attacks on civilians, and collapsing infrastructure, including healthcare, water, and sanitation systems. Sudan's humanitarian crisis, already severe, had further intensified by early 2025, with an estimated 30.4 million people in need of assistance. Nearly two-thirds of the population required urgent humanitarian assistance, while 11.3 million people were forcibly displaced, including 8.5 million displaced internally and 3.9 million who have crossed Sudan's borders into neighbouring countries. Over 25 million people faced acute food insecurity, with famine confirmed in several areas. Although some food aid resumed in late 2024, ongoing attacks on markets and logistical disruptions left millions without reliable access to basic supplies. Devastated agricultural activities, along with abandoned, looted, or destroyed crops, further deepened the crisis. By October 2024, UN experts warned that Sudan was facing an unprecedented level of starvation, affecting 13 million children. Gender-based violence and harmful coping mechanisms such as child marriage, and child labour increased due to the crisis. Meanwhile, millions lacked access to clean water and sanitation, and the country's health system has been pushed to the brink of collapse, with disease outbreaks spreading rapidly and only a fraction of health facilities remaining fully operational. The suspension of U.S. aid severely affected 335 health facilities, especially in Darfur, while armed blockades and looting further hindered the delivery of humanitarian assistance and essential supplies. Despite humanitarian efforts reaching 12.4 million people, and the reopening of the border with Chad at Adré, the aid delivery continued to face severe obstacles, including bureaucratic restrictions, attacks on aid workers, and deliberate interference by warring parties.





2. Actors of persecution or serious harm

Article 6 QD/QR



The contents of this chapter include:

- 2.1. Map: areas of control and influence
- 2.2. Government of Sudan/Sudanese Armed forces [SAF] and allies
- 2.3. Rapid Support Forces [RSF] and allies
- 2.4. Other armed groups
- 2.5. Other actors

In Sudan a wide range of different groups and individuals can be considered as actors of persecution or serious harm. Moreover, perpetrators of violence, motivations, and alliances are not always clear-cut and may change given the fluid security context.

The primary opposing parties in the conflict were the SAF and the RSF, along with their allied forces as well as other armed groups that were operating more independently.

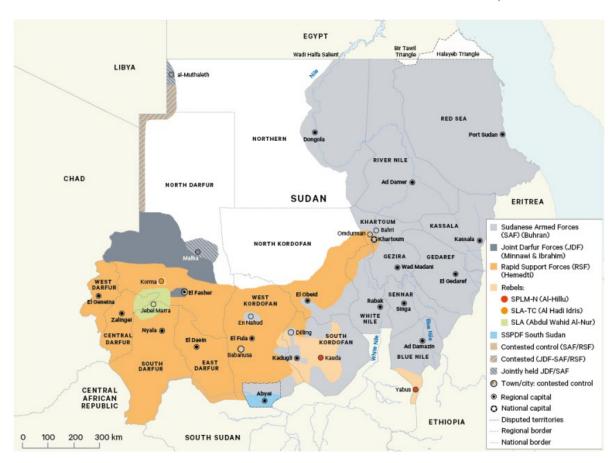
The following sections highlight the current main actors of persecution and serious harm in Sudan as well as their areas of control/ activity, in a non-exhaustive manner.

The situation should always be assessed in light of the most up-to-date COI.



2.1. Map: areas of control and influence

Last update: June 2025



Map 1. Sudan. Approximate Territorial Control as of March 2025, Political Geography Now. Source: COI Update 2025 based on the map produced by Thomas van Linge, url.

Sudan was divided into areas controlled by the SAF and the RSF, with local armed groups also holding regional territories:

- SAF: The group controlled the north, east, and most of southeast of the country, including Port Sudan. They also retained control of Sennar city and parts of El Fasher (North Darfur) in coordination with allies. Additionally, they held most of Omdurman and, since March 2025, have regained control of the capital Khartoum and key strategic locations. Between January and March 2025, the SAF retook Wad Madani and most of the Al Jazirah state's territory as well as most of Sennar state from the RSF.
- **RSF**: Since the end of 2023, the RSF is in control of all Darfur states except for the state capital of El Fasher (North Darfur) and some parts of North Darfur. They also held large areas in West and North Kordofan. In addition, the RSF extended control in Al Jazirah, though the SAF retook it in January 2025. The RSF used to control key cities in Sennar state, recaptured by the SAF in late 2024.





Other groups: The Sudan Liberation Movement Abdel Wahid al-Nur (SLM-AW) controlled parts of Jebel Marra, and the SPLM-N-al-Hilu held areas in Blue Nile and parts of the Nuba Mountain region in South Kordofan. The conflict saw shifting control and ongoing offensives by both primary factions. The situation should always be assessed in light of the most up-to-date COI available.

2.2. The Sudanese authorities, the Sudanese Armed Forces [SAF] and main allies

Last update: June 2025

The analysis below is based on the following EUAA COI reports and query: <u>Country Focus</u> 2024, 1.1.3. (b) (e); <u>Country Focus</u> 2025, 1.3. (a) (e), 1.4.; <u>Security 2025</u>, 1.2.1 (a); <u>COI Update</u> 2025 1., 2.1.. Country Guidance should not be referred to as a source of COI.

The SAF, led by Lieutenant General Abdel Fattah al-Burhan and dominated by members of Arab tribes from central Sudan, includes the Land Force, Sudanese Navy, Sudanese Air Force, SAF Military Intelligence, and Border Guards, and the Central Reserve Police (CRP) also referred to as 'Abu Tira'.

After the outbreak of the conflict, Al-Burhan and the local authorities imposed or expanded the state of emergency declared in 2021 to most states, granting security forces extensive powers and immunity in the course of their duties. This confirms the SAF and its allied groups as the main state actor in the country.

Air superiority has been a key advantage for the SAF, which has enhanced its capabilities since late 2023 and early 2024 with combat drones acquired from Türkiye and Iran. Additionally, the SAF reportedly received arms shipments and aerial support from Egypt.

The SAF strengthened its operational capabilities, including personnel numbers, aviation systems, and defence industries. However, it continued to face structural challenges such as lack of discipline, political infighting, and competing personal interests. Since 2005, the SAF has been subject to sanctions under UN Security Council Resolution 1591, including an arms embargo due to its involvement in the Darfur conflict.

The Sudanese army oversees a network of national and international companies across various sectors, including defence, agriculture, banking, mining, transport, construction, and private security.

Several armed groups have backed the SAF in the conflict, including:

• The Sudan People's Liberation Movement–North-Agar (SPLM-N-Agar), signatory of the JPA, is led by Malik Agar, member of the *Ingessana* tribe and deputy chairman of the Transitional Sovereign Council. The group is based in Blue Nile State and supports the SAF. It is to be noted that the SPLM-N-Agar was originally part of the Sudan People's Liberation Movement-North (SPLM-N) which split in two factions in 2017. For the other faction, namely the Sudan People's Liberation Movement–North-al-Hilu (SPLM-N-al-Hilu), see 2.4. Other armed groups.





- The Justice and Equality Movement (JEM), signatory of the JPA, is an Islamist rebel group established in 2003, mostly dominated by the Kobe, a Zaghawa sub-group. According to a source, the group split into two new groups in August 2023 after the suspension of several key leaders for engaging in a meeting with General Dagalo. The JEM, along with Sudan Liberation Movement-Minni Minawi (SLM-MM), announced its intention to abandon its neutrality in November 2023, accusing the RSF of systematic killings in captured towns. It declared its commitment to protecting civilians and sided with SAF against the RSF. The group was involved in active fighting against the RSF in Khartoum, Darfur (especially in El Fasher), the Kordofans, Al Jazirah, and in the East region.
- The SLM-MM, signatory of the JPA, is a largely Zaghawa faction controlling some territories in North Darfur and led by the Governor of the Darfur region. First neutral, the faction allied with the SAF since November 2023 and formed, together with the JEM, a large portion of the pro-SAF forces fighting in El Fasher. The Sudan Liberation Movement-Mustafa Tambour (SLM-Tambour), signatory of the JPA, is allied with the SAF since the beginning of the conflict and is mostly present in Central Darfur. It is to be noted that the SLM-MM and the SLM-Tambour were originally part of the Sudan Liberation Movement (SLM) that split into factions in 2005. For the SLM-AW, see 2.4. Other armed groups.
- Sudanese Alliance (SA) is a group led by West Darfur Governor Khamis Abdallah
 Abkar. The Governor was killed in June 2023 after he accused the RSF and Arab
 armed militia of killing civilians in El Geneina and called for international protection.
- Islamist militias, such as the Al-Bara bin Malik Brigade.
- Civilian volunteers known as 'Popular Resistance' or 'National Civil Resistance', Popular Mobilisation ('mustanfareen') battalions: since June 2023, the SAF has encouraged civilian mobilisation and armed movements across the country.
- The National Movement for Justice and Development (NMJD) and the Eastern Corps, both Eritrea-backed militias.

Finally, it should be noted that some of the above-mentioned armed groups, namely the SLM-MM, the JEM and the Sudanese Alliance, are part of a coalition called the **Joint Force of Armed Struggle Movements (JFASM)**, also known as the 'Darfur Joint Forces' or 'Joint Forces'. Following the involvement of the SLM-MM and the JEM along with smaller armed groups who joined the SAF in November 2023, the coalition formally announced the abandonment of its previous neutrality and declared war on the RSF in April 2024.

For additional information see also 4.3.4. a) Presence, methods and tactics of actors.

The SAF and affiliated armed militias have committed widespread human rights abuses, including extrajudicial killings of civilians as well as enforced disappearance. Arbitrary arrest and detention of individuals based on perceived political affiliations or ethnic origin and child recruitment were also reported. Prisoners detained by the SAF endured severe overcrowding, food shortages, inadequate healthcare, poor ventilation, and physical abuse. Reports indicate that detainees were subjected to torture, starvation, sexual violence, beatings, and other cruel treatment, with credible evidence of deaths in custody. The SAF also used hunger and starvation as a weapon of war and blocked, looted and exploited humanitarian aid. The SAF has also reportedly used chemical weapons on at least two occasions, alongside





'indiscriminate bombing' of civilian infrastructure, attacks on schools, markets and hospitals and extrajudicial executions.

Sudan retains the death penalty for ordinary crimes, and since the onset of the conflict, individuals rejecting the war or refusing to align with the army have faced charges of espionage for the RSF or being part of 'sleeper cells', offences punishable by death.

For additional information regarding targeted human rights violation at the hand of the SAF see also 3.1.2. Nuba from the Kordofans, 3.1.3. Arabs from Darfur and the Kordofans, 3.3. Members of the Resistance committees (RCs) and Emergency Response Rooms (ERRs), 3.4. Members of political parties, unions and civil society organisations, 3.5. Community leaders, human rights activists and lawyers, 3.6. Journalists and other media workers, 3.7. Humanitarian and healthcare workers, 3.8. Civilians from areas associated with the opposing warring party, 3.9. Women and girls, 3.10. Children, 3.11. Persons with diverse SOGIESC.

2.3. The Rapid Support Forces [RSF] and allies

Last update: June 2025

The analysis below is based on the following EUAA COI reports and query: <u>Country Focus</u> 2024, 1.1.3. (b); <u>Country Focus</u> 2025, 1.1., 1.4.; <u>Security 2025, 1.2.1.</u> (a); <u>COI Update 2025</u>, 1... Country Guidance should not be referred to as a source of COI.

The RSF is a paramilitary group formed in 2013, led by General Mohamed Hamdan Dagalo, also known as 'Hemedti', former deputy chairman of the Transitional Sovereign Council. The group has its origins in the *Janjaweed*, an ethnic militia formerly supported by the Bashir government, which gained notoriety for its role in the Darfur conflict during the 2000s. The RSF played a key role in both the 2019 *coup* and the October 2021 *coup* and was officially dissolved on 18 April 2023, by Lieutenant General Abdel Fattah al-Burhan. Subsequently RSF was declared a rebel force.

With a complex financial network controlling the gold market and engaging in mercenary operations abroad (Yemen and Libya), the RSF developed independent sources of income. The RSF also received support and weapons supplies from Russia's former Wagner Group, as well as from the United Arab Emirates (UAE). Its main goal is to seize control of the security sector and establish a new army, replacing the SAF.

Several armed groups have backed the RSF in the conflict, notably:

- Local militia groups, especially those from the Arab communities in Darfur, and in South Kordofan.
- **Third Front**, or **Tamazuj:** signatory of the JPA, is an armed group led by Mohammed Ali Qureshi. It holds forces across the Darfur and the Kordofans border regions. It pledged its support to the RSF on 17 August 2023.
- Foreign combatants from Chad, Central African Republic (CAR), Libya, and Colombia

For additional information see also 4.3.4. a) - Presence, methods and tactics of actors.





The RSF committed widespread human rights violations including extrajudicial killings of civilians, execution of war prisoners from opposing forces, torture, forced disappearance, unlawful detention of individuals based on imputed political affiliations, and ethnic targeting of non-Arab groups especially in Darfur. In areas controlled by the RSF, individuals have been forcibly disappeared, with their families coerced into paying ransom for their release. Additionally, there were reports of degrading and humiliating treatment and torture of detainees, including whipping, beatings, and forcing individuals to walk on their knees over gravel roads. Victims were also subjected to electric shocks, burns, and other forms of torture. Sources highlighted instances of sexual violence, including forced nudity, genital beatings, and threats of rape, particularly against men and boys in detention, during or prior to their interrogations.

Additionally sexual violence was used by the RSF as a weapon of war, including as an ethnic-cleansing tool. Rape and gang rape, predominantly targeting women and girls, occurred on a large scale, particularly during the invasion of cities, attacks on IDP camps, and the occupation of urban areas by armed fighters. The RSF also deliberately hindered the delivery of humanitarian assistance and blocked access to aid for those in need, turning food into a weapon of war.

For additional information regarding targeted human rights violation at the hand of the RSF see also 3.1.1. Non-Arabs/Africans from Darfur, 3.1.2. Nuba from the Kordofans, 3.2. Individuals fearing forced recruitment by the RSF, 3.3. Members of the Resistance committees (RCs) and Emergency Response Rooms (ERRs), 3.4. Members of political parties, unions and civil society organisations, 3.5. Community leaders, human rights activists, and lawyers, 3.6. Journalists and other media workers, 3.7. Humanitarian and healthcare workers, 3.8. Civilians from areas associated with the opposing warring party, 3.9. Women and girls, 3.10. Children, 3.11. Persons with diverse SOGIESC.

2.4. Other armed groups

Last update: June 2025

The analysis below is based on the following EUAA COI reports and query: Country Focus 2024, 1.1.2 (b), 1.1.3 (a) (b), 1.2.1. (b) (c), 1.2.4. (b) (c); Country Focus 2025, 1.2., 2.5 (a), 2.7. (b); Security 2025, 1.1.2, 1.1.3., 1.2.1. (a), 1.3.1. (a), 2.1.1., 2.2.1., 2.3.1, 2.4.1., 2.6.1; COI Update 2025, 1... Country Guidance should not be referred to as a source of COI.

Other armed groups currently present and operating in Sudan include the following:

- The SLM-AW, non-signatory of the JPA. It is a mostly Fur faction that officially declared neutrality in the ongoing conflict and is controlling parts of the Jebel Marra mountains. It was originally part of the SLM that split into factions in 2005. For the other splinter factions, namely SLM-MM and SLM-Tambour see 2.2. The Sudanese authorities, the Sudanese Armed forces [SAF] and main allies.
- The SPLM-N-al-Hilu, non-signatory of the JPA, is led by Abdelaziz al-Hilu. It is controlling parts of the Nuba Mountain region in South Kordofan and part of Blue Nile state. The SPLM-N-al-Hilu had occasional fights with both sides of the conflict. SPLM-N-al-Hilu remained officially neutral until February 2025 when, together with the RSF (see





2.3. The Rapid Support Forces [RSF] and allies) and 22 other 'smaller rebel movements, and political and civil society groups', they signed an alliance aiming to establish a parallel government in RSF-controlled areas. Amid inter-ethnic violence around Dilling, the SPLM-N-al-Hilu joined the SAF to maintain control of the city, leading to continued clashes with the RSF. A surge in mining activities has been reported in the area, including the alleged use of harmful extraction practices exposing the population to lethal risks. It is to be noted that the SPLM-N-al-Hilu was originally part of the Sudan People's Liberation Movement—North (SPLM-N) which split in two factions in 2017. For the other faction, namely, the SPLM-N-Agar see 2.2. The Sudanese authorities, the Sudanese Armed forces [SAF] and main allies.

2.5. Other actors

Last update: June 2025

The analysis below is based on the following EUAA COI reports and query: <u>Country Focus</u> <u>2024</u>, 2.5.1.; <u>Country Focus 2025</u>, 2.6. (d), 2.7. (c). Country Guidance should not be referred to as a source of COI.

Other than the armed groups mentioned above, a range of other armed actors may also be involved in criminal activities and the actor may not always be identifiable. Often, criminality may involve militias or criminal gangs.

Other non-armed actors of persecution or serious harm may include family members (e.g. in the case of <u>3.9.1. Violence against women and girls</u>, <u>3.9.2. Forced and child marriage</u>, <u>3.9.3. Female genital mutilation or cutting (FGM/C)</u>) and society at large (e.g. in the case of violence towards <u>3.11. Persons with diverse SOGIESC</u>).



For further information on human rights violations committed by different state and non-state actors and their relevance as potential exclusion grounds, see <u>7.</u> <u>Exclusion.</u>





3. Refugee status

Article 2(d) QD/3(5) QR

Article 9 QD/QR

Article 10 QD/QR

This chapter provides analysis and guidance on the potential international protection needs of selected profiles of applicants. These profiles were selected based on their relevance in the caseload of EU Member States.

The list of profiles addressed in this chapter is non-exhaustive and the fact that a certain profile is included or not is without prejudice to the determination of their international protection needs. Furthermore, the order of listed profiles does not reflect any ranking of the potential level of risk of persecution.



The contents of this chapter include:

General remarks

- 3.1. Ethnic groups
 - 3.1.1. Non-Arabs/Africans from Darfur
 - 3.1.2. Nuba from the Kordofans
 - 3.1.3 Arabs from Darfur and the Kordofans
- 3.2. Individuals fearing forced recruitment by the RSF
- 3.3. Members of the Resistance committees (RCs) and Emergency Response Rooms (ERRs
- 3.4. Members of political parties, unions and civil society organisations
- 3.5. Community leaders, human rights activists, and lawyers
- 3.6. Journalists and other media workers
- 3.7. Humanitarian and healthcare workers
- 3.8. Civilians from areas associated with the opposing warring party
- 3.9. Women and girls
 - 3.9.1. Violence against women and girls





3.9.2. Forced and child marriage

3.9.3. Female genital mutilation or cutting (FGM/C)

3.9.4. Trafficking in women and girls

3.10. Children

3.10.1. Child recruitment

3.10.2. Child labour and child trafficking

3.11. Persons with diverse SOGIESC

General remarks

Last update: June 2025

While the conclusions under this common analysis provide general guidance, the international protection needs of each applicant should be **examined individually**. The non-exhaustive lists of examples with regard to sub-profiles at a differentiated risk and circumstances, which would normally increase or decrease the risk, are to be taken into account in light of all circumstances in the individual case.

The considerations under each profile should, furthermore, be viewed without prejudice to the credibility assessment of the applicant's claims. This common analysis deals solely with issues of risk analysis and qualification.

For each profile, the guidance responds to the following questions:

Step 1: Do the reported acts qualify as persecution?

This part provides examples of acts reported to be committed against individuals belonging to the profile as well as guidance on whether such acts would reach the level of persecution according to Article 9 QD/QR.

Step 2: What is the level of risk of persecution?

This part assesses how likely it is for applicants within the profile to have a well-founded fear of persecution. Further guidance is provided with regard to the circumstances which should be taken into account in the individual assessment, addressing also how they would impact the risk.

Step 3: Is there a ground for persecution?

This part provides guidance on whether, in case of established well-founded fear of persecution, this would be connected to a reason falling within the provision of Article 10 QD/QR (nexus).

Relevant COI is also included in the analysis to substantiate the assessment provided. Links to the relevant EUAA COI reports and/or queries are also added.







For more guidance on how to read the following subsections, please refer to 'Country Guidance: explained' (February 2025): Refugee status.

3.1. Ethnic groups

In Sudan, which has an estimated population of 48.1 million inhabitants according to the UN, about 500 ethnic minorities form a complex mosaic, with 80 different tribes living in Darfur alone.



The non-exhaustive content of this section covers the following ethnic groups:

3.1.1. Non-Arabs/Africans from Darfur

3.1.2. Nuba from the Kordofans

3.1.3. Arabs from Darfur and the Kordofans

The analysis below is based on the following EUAA COI reports and query: <u>Country Focus</u> 2024, 2.4.; <u>Country Focus</u> 2025, 2.5.; <u>Security 2025</u>, 1.1.2., 1.3.1.(e), 1.3.2.(b), 2.2.2., 2.3., 2.4.2. (a); <u>COI Update 2025</u>, 4.. Country Guidance should not be referred to as a source of COI.

Historical disputes over land and resources have been broadly simplified into an opposition between (generally sedentary) 'non-Arab' or 'African' tribes and (nomadic) 'Arab' tribes that became a conflict-driver in itself. Reports indicate that the outbreak of the current conflict led to an escalation in the targeting of both African and Arab communities, each of whom is seen as supporting the opposing warring party. In particular, non-Arab tribes are targeted by the RSF and allies, particularly in Darfur, but also in other regions such as South Kordofan. On the other hand, Arabs from Darfur and the Kordofans are targeted by the SAF and allies.

3.1.1. Non-Arabs/Africans from Darfur

Last update: month year

This sub-profile refers firstly to individuals belonging to one of the three largest 'non-Arab' (or 'African') ethnic groups originating from Darfur, namely the Fur, the Zaghawa and the Masalit. The risk of persecution of individuals from other non-Arab groups is also assessed, including Borgo, Dajo, Erenga and Tama groups.

The analysis below is based on the following EUAA COI reports and query: <u>Country Focus</u> 2024, 1.2.1. (c), 2.4, 2.5.; <u>Country Focus</u> 2025, 2.3., 2.5.; <u>Security 2025</u>, 1.1.2., 2.2.: <u>COI Update</u> 2025, 4.. Country Guidance should not be referred to as a source of COI.

Estimates indicate that non-Arab (or 'African') groups represent between two-thirds and three-quarters of the Darfur population.





Although the ethnic targeting predates the April 2023 outbreak of the hostilities, the ongoing conflict has led to an escalation of the violence against non-Arab minorities.

The Fur, the Zaghawa, and the Masalit composed the majority of the former rebel Darfuri groups that have taken part in the current conflict, mainly supporting the SAF and its allies. For additional information, please refer to 2. Actors of persecution or serious harm.

Step 1: Do the reported acts amount to persecution?

Acts to which persons falling under this profile could be exposed are of a such severe nature that they would amount to persecution.

Multiple sources and some governmental institutions labelled the events unfolding in Darfur as 'ethnic cleansing' campaigns or genocide. In January 2025, the US administration has formally declared that the RSF has perpetrated genocide and crimes against humanity in Sudan.

Sources reported that much of the violence in Darfur is attributed to the RSF and its allied militias, and it is ethnically-driven as the RSF follows a 'racist Arab supremacist ideology', seeking to push non-Arabs out of certain areas. Examples of ethnically-driven acts against non-Arab individuals and groups include mass killings, summary executions, torture, body mutilations, illegal detentions, forced displacements, attacks on IDP camps and villages and harassments as well as lootings, pillage and destructions of objects indispensable to the survival of the civilian population. These acts have been reported in Darfur, notably in West Darfur and North Darfur where the Masalit and the Zaghawa respectively have been targeted by the RSF. Reports also indicate that women and girls from African tribes, such as Fur, Masalit and Zaghawa have been subjected to forced displacement and sexual violence, used as an ethnic cleansing tool by the RSF and allied militias. For more details, please refer to 3.9.1. Violence against women and girls.

In North Darfur, reports show that RSF's attacks and bombings on localities and IDP camps follow a pattern of ethnically-motivated targeting of non-Arab groups, particularly the Zaghawa and the Fur. Finally, ethnically-motivated violence against non-Arab communities originally from Darfur has been reported in other parts of Sudan, such as Al Jazirah.

Step 2: What is the level of risk of persecution?

A well-founded fear of persecution would in general be substantiated for individuals belonging to non-Arab Darfuri groups residing in Darfur, in particular the Masalit, the Zaghawa and the Fur, as they face targeting by the RSF and its allies.

For individuals belonging to non-Arab Darfuri groups, residing outside Darfur, the individual assessment of whether there is a reasonable degree of likelihood for an individual to face persecution, should take into account **risk-impacting circumstances**, such as:

- Political profile/visibility: individuals from a non-Arab group with a political profile or a
 visible role or profession (such as academics, lawyers, Imams, human rights activists) in
 their community are more likely to be targeted. For more details, please refer to
 3.5. Community leaders, human rights activists, and lawyers.
- **Displacement:** individuals who have been forcibly displaced are more likely to be targeted with ethnically-driven violence.





- Gender: due to the general situation of women and girls in Sudan and, in particular in Darfur where sexual violence has been used as a weapon of war by the RSF and its allies, non-Arab/'African' women and girls are at higher risk. Please refer to 3.9.1. Violence against women and girls.
- Age: young individuals are more likely to be targeted on an ethnical basis.
- Area of origin or residence: individuals originating or residing in areas taken or retaken by the RSF are exposed to a higher risk also because of their perceived affiliation with the SAF.

Step 3: Is there a ground for persecution?

Where well-founded fear of persecution is substantiated for individuals under this sub-profile, this is highly likely to be for reasons of **race**. Most of the violence in Darfur is ethnically-driven as the RSF follows a 'racist Arab supremacist ideology', seeking to push non-Arabs out of certain areas.

Persecution may also be for reasons of **(imputed) political opinion**, as individuals belonging to a non-Arab ethnic minority are perceived as supporters of the opposing warring party by the RSF and their allies. In addition, conflict related sexual violence (CRSV), widely reported against non-Arab women and girls, may also have a political motive as it is used as a weapon of war, as a part of 'ethnic cleansing' by the RSF and its allies. See also <u>3.9. Violence against women</u>.

3.1.2. Nuba from the Kordofans

Last update: month year

This sub-profile refers to the Nuba minority, a group of 3.7 million people divided into more than 50 autonomous and ethnically diverse communities inhabiting and originating from the Nuba mountains, in South Kordofan.

The analysis below is based on the following EUAA COI reports and query: <u>Country Focus</u> 2024, 1.2.4., 2.3., 2.5.; <u>Country Focus</u> 2025, 2.5.; <u>Security 2025</u>, 2.3.; <u>COI Update 2025</u>, 4.. Country Guidance should not be referred to as a source of COI.

The majority of the SPLM-N-al-Hilu is composed of Nuba who control most parts of the Nuba mountains in South Kordofan. The armed group has formally remained neutral until February 2025 when, together with RSF and 22 other 'smaller rebel movements, and political and civil society groups', they signed an alliance aiming to establish a parallel government in RSF-controlled areas. Before the alliance the SPLM-N-al-Hilu had occasional fights with both sides of the conflict. In addition, Nuba people form a large part of SAF local troops, notably of the Dilling's SAF garrison. On the other side, the RSF took advantage of the divisions within the local ethnic minorities to mobilise Arab local tribes from South Kordofan, primarily the Hawazma, and recruiting them on a racial basis and with promises of land grabbing. However, the situation remains fluid (e.g. reported defection, ending of the neutrality, shifting side). See the chapter on 2. Actors of persecution or serious harm.





Step 1: Do the reported acts amount to persecution?

Acts to which persons falling under this profile could be exposed are of such severe nature that they would amount to persecution. Examples of ethnically driven violence against the Nuba include killings, sexual violence, kidnappings, forced disappearances, unlawful detentions and forced displacements. Reports indicate that the RSF and allied militias carried out attacks on localities and burned down villages in South and West Kordofan resulting in hundreds of deaths within the Nuba communities. The SAF and affiliated forces were also reported to have carried out retaliatory and ethnically-driven attacks against civilians targeting the Nuba communities, particularly in Al Jazirah state. Deaths due to starvation and malnutrition were also reported in the area.

Step 2: What is the level of risk of persecution?

The individual assessment of whether there is a reasonable degree of likelihood for a Nuba to face persecution should take into account risk-impacting circumstances, such as:

- Political profile/visibility: Nuba people with a political profile or a visible role or profession in their community are more likely to be targeted. For more details on community leaders, please refer to <u>3.5. Community leaders, human rights activists, and</u> lawyers.
- Area of residence: regarding the shifting alliances and internal divisions among the main actors, exacerbated by the alliance signed between the SPLM-N-al-Hilu and the RSF in February 2025, Nuba individuals residing in disputed areas between the RSF and the SAF are exposed to a higher risk of being targeted.
- **Displacement:** individuals who have been forcibly displaced are more likely to be targeted with ethnically-driven violence.
- **Gender:** due to the general situation of women and girls in Sudan and, in particular in conflict-affected areas⁶ where sexual violence has been used as a weapon of war by both parties in the conflict, Nuba women and girls are at higher risk. Please refer to 3.9.1. Violence against women and girls.
- Age: considering the prevalence of child recruitment in the current conflict, Nuba children are exposed to a higher risk. For more details, please refer to 3.10.1. Child recruitment.

Step 3: Is there a ground for persecution?

Where well-founded fear of persecution is substantiated for individuals under this sub-profile, this is highly likely to be for reasons of **race and/or nationality** as the violence is ethnically-driven. Persecution may also be for reasons of **(imputed) political opinion** as, depending on the place of residence and the political position of the local community, Nuba individuals can be seen as supporters of the opposing warring party by the SAF or the RSF and their allies.

Conflict-affected areas include regions assessed under 'mere presence' category, 'high level of indiscriminate violence' category as well as 'not a high-level' category. See b) Assessment of indiscriminate violence per region.





In addition, conflict related sexual violence (CRSV), reported against women and girls, may also have a political motive as it is used as a weapon of war by the RSF and its allies. See also 3.9.1. Violence against women and girls.

3.1.3. Arabs from Darfur and the Kordofans

Last update: July 2025

Sudanese Arabs comprise about 70 % of the total population but represent approximately only 1/4 to 1/3 of the population in Darfur. This sub-profile refers only to individuals belonging to Arab groups from Darfur and the Kordofans.

Historically, the central and northern Arabs, also referred to as Riverain Arabs, have dominated the political landscape of Sudan and therefore are still seen as supporters of the SAF and the old regime by the RSF and their allies. Central and northern Arabs may also be subjected to targeting but this falls outside the scope of this profile. For additional information please refer to 3.4. Members of political parties, unions and civil society organisations.

The analysis below is based on the following EUAA COI reports: <u>Country Focus 2024</u>, 1.1., 1.2., 2.4., 2.5.; <u>Country Focus 2025</u>, 2.5., 3.2.; <u>Security 2025</u>, 1.2.1.. Country Guidance should not be referred to as a source of COI.

Arabs from the peripheries, especially Rizeigat and Misseriya from Darfur and Hawazma from South and West Kordofan, make up the majority of the RSF and allied militias. For additional information, please refer to 2. Actors of persecution or serious harm.

Step 1: Do the reported acts amount to persecution?

Acts to which persons falling under this profile could be exposed are of such a severe nature that they would amount to persecution. Reports indicate that the SAF, also through the military intelligence and the SAF-backed Zaghawa armed groups, targeted people based on their actual or presumed ethnicity or affiliation with Arab tribes from Darfur and the Kordofans which are suspected of supporting the RSF and its allies. Examples of acts included torture, illegal detention and harassment. Ethnically motivated sexual violence against Arab women by Masalit armed groups in Darfur has also been reported.

Step 2: What is the level of risk of persecution?

The individual assessment of whether there is a reasonable degree of likelihood for Arabs from Darfur and the Kordofans to face persecution should take into account risk-impacting circumstances, such as:

- Political profile/visibility: Arabs with a political profile or a visible role in their community are more likely to be targeted. See <u>3.3. Members of the Resistance</u> <u>committees (RCs) and Emergency Response Rooms (ERRs)</u> and <u>3.5. Community</u> <u>leaders, human rights activists and lawyers.</u>
- Area of residence in relation with area of origin: Arabs originating from Darfur and the Kordofans are more likely to be targeted in territories controlled by the SAF and its allies, including Port Sudan.





- **Gender:** considering the general situation of women and girls in Sudan, in particular in the areas most affected by the conflict where sexual violence is prevalent, Arab women and girls are at higher risk. For more details, please refer to <u>3.9.1. Violence</u> against women and girls.
- Ethnic background: individuals belonging to Rizeigat and Misseriya ethnic groups from Darfur and Hawazma from South and West Kordofan are exposed to a higher risk as they make up the majority of the RSF and allied militias.

Step 3: Is there a ground for persecution?

Where well-founded fear of persecution is substantiated for individuals under this sub-profile, this is highly likely to be for reasons of **race/nationality** and/or (**imputed**) **political opinion**, as Arabs from Darfur and Kordofans are seen as supporters of the RSF and its allies. In addition, conflict-related sexual violence (CRSV), reported against women and girls, may also have a political motive as it is used as a weapon of war by the SAF and its allies. See also <u>3.9.1</u>. <u>Violence against women and girls</u>.



Exclusion considerations are particularly relevant to this profile, as Arabs from Darfur and the Kordofans composed the majority of the RSF and allied militias and therefore may have been involved in excludable acts. See 7. Exclusion.

3.2. Individuals fearing forced recruitment by the RSF

Last update: June 2025

This profile refers to individuals who are targeted by the RSF for forced recruitment, either as combatants, logistical support personnel, or for other military-related roles.

For child recruitment, see <u>3.10.1. Child recruitment</u>.

The analysis below is based on the following EUAA COI reports and query: <u>Country Focus</u> 2024, 1.1.3 (e); <u>Country Focus</u> 2025, 2.2.; <u>Security 2025</u>, 1.2.1. (c); <u>COI Update 2025</u>, 2.1.. Country Guidance should not be referred to as a source of COI.

In areas under RSF control, the group relies heavily on tribal affiliations for recruitment. In 2024, the RSF leader reportedly called for a 'general mobilisation' in Darfur and the Kordofans to enlist one million fighters, primarily along tribal lines, to be deployed to conflict zones such as Khartoum, North Darfur, and Al Jazirah. As part of its recruitment campaigns, the RSF frames its fight as 'fighting for democracy' or a 'sacred duty'. Additionally, the group invokes *Faza'a*, 'an ancient' pre-Islamic Sudanese tradition that allows tribes to rally their members and allies against attacks by other tribes or to take revenge for killings. Some elements within the RSF continued to pursue an ideology of 'Arab supremacy' upheld by the *Janjaweed* militias in the 2000s.

Step 1: Do the reported acts amount to persecution?

Forced recruitment is of such severe nature that it would amount to persecution.





Other acts to which individuals targeted for forced recruitment by the RSF could be exposed are of such a severe nature that they would amount to persecution. Since the outbreak of the conflict in April 2023, the RSF has significantly escalated its forced recruitment campaigns and adopted methods such as public execution and torture, abductions and kidnappings, coercion, particularly in internally displaced persons (IDP) camps. Withholding of food or medicine is also widely used as a method of coercion. Men and boys taken from their homes, villages, or IDP camps are forced into combat roles under threat of execution or torture.

The consequences of refusing (forced) recruitment would also amount to persecution. In particular, killings, public executions and torture, the withholding of food or medicines and looting against those who refuse to join have been reported. Individuals who attempt to escape forced recruitment have been executed, tortured, or forcibly disappeared.

The consequences of refusing (forced) recruitment could also affect other persons from the targeted community; sources reported torching and looting of villages, sexual violence (with survivors reportedly committing suicide after the assaults), and forced displacement.

Step 2: What is the level of risk of persecution?

A well-founded fear of persecution would in general be substantiated for individuals who refused to join the RSF or escaped the forced recruitment, as reported consequences of refusal are very serious (e.g. killings, public executions and torture) and enforced in a widespread and pervasive manner.

The individual assessment of whether there is a reasonable degree of likelihood for individuals to be forcibly recruited by the RSF should take into account risk-impacting circumstances, such as:

- **Age and Gender:** young males are exposed to a higher risk, as they are the primary target for the forced recruitment. See also 3.10.1 Child recruitment.
- Ethnic background: RSF relies heavily on tribal affiliations for recruitment also locally known as Faza'a. RSF recruited Hawazma, Kenana and Misseriya in South Kordofan, as well as Misseriya and Rizeigat in Darfur by invoking 'Arab, pan-Sahelian tropes that appealed to members of the Al Attawa tribal umbrella'. RSF also recruited young members from ethnic minorities such as Tarjam, Beni Halba, Habbaniyah, Taisha, Sa'ada, Misseriya and Fellata local Arab communities.
- Displacement: displaced persons are more vulnerable and exposed to forced recruitment; reportedly RSF is forcibly recruiting male IDPs in North Darfur to bolster its ranks amid increasing losses.
- Place of residence or origin: recruitment by the RSF was especially reported in the Darfur and Kordofan regions, and Al Jazirah state.
- Previous military activity: SAF veterans are required by the RSF to join their ranks to avoid being detained. Former *Janjaweed* militia members are pressured to join RSF under threat of imprisonment.





Step 3: Is there a ground for persecution?

While the risk of forced recruitment as such may not generally imply a nexus to a reason for persecution, the consequences of refusal would lead to persecution which is highly likely to be for reasons of **(imputed) political opinion**, as those refusing to join RSF are often perceived as opposition sympathisers or SAF collaborators.



Exclusion considerations are **particularly** relevant to this profile, as individuals with past experience within SAF or RSF may have been involved in excludable acts. See 7. Exclusion.

3.3. Members of the Resistance committees (RCs) and Emergency Response Rooms (ERRs)

Last update: June 2025

This profile covers the situation of members of Sudan's Resistance Committees (RCs), which consist of a diverse range of pro-democracy groups, including political parties, university students and staff, professional associations and unions, and civil society organisations. It also addresses the situation of members of the Emergency Response Rooms (ERRs), or simply 'emergency rooms' which include volunteer medical staff, engineers, and other emergency specialists across the country.

The analysis below is based on the following EUAA COI reports and query: <u>Country Focus</u> 2024, 1.1.5., 2.2.1., 2.3.; <u>Country Focus</u> 2025, 1.2, 2.1 (b), 2.1.1.; <u>COI Update</u> 2025, 4.. Country Guidance should not be referred to as a source of COI.

The 5 000 neighbourhood-organised resistance committees, which existed in Sudan before the outbreak of the ongoing conflict and played a major role in the removal of Al-Bashir in 2019, are reported to be one of the few forces trusted by the population. Targeted already in previous periods, the RCs and ERRs continued to be targeted by both warring parties. Official decrees banning grassroots committees further exposed RC members to state persecution.

Patterns of human rights violations against protesters and (perceived) political opponents, common during the Bashir regime, have persisted since the outbreak of the war. Both the SAF and the RSF suspected members of RCs and ERRs for having led the pro-democracy protests that toppled the al-Bashir regime in 2019.

See also 3.4. Members of political parties, unions and civil society organisations.

Step 1: Do the reported acts amount to persecution?

Acts to which persons falling under this profile could be exposed are of such a severe nature that they would amount to persecution. More specifically, members of RCs and ERRs have been repeatedly targeted by both the SAF and the RSF. Reports indicate cases of





violence at the hands of both warring parties including killing, and execution, torture, physical and sexual violence, arbitrary detention, enforced disappearance, and deliberate attacks, particularly in areas controlled by SAF's military intelligence and RSF-affiliated forces. SAF targeted RC members and sought to dismantle their structures to regain control over humanitarian aid. The RSF has similarly detained and abducted them, often using sexual and physical violence.

Step 2: What is the level of risk of persecution?

A well-founded fear of persecution would in general be substantiated for members of the RCs and ERRs given the severity and persistent nature of the targeting by both warring parties. The documented state complicity, particularly through military intelligence and official decrees banning grassroots organisations, further increases the risk level.

Step 3: Is there a ground for persecution?

Persecution of individuals under this profile is highly likely to be for reasons of (imputed) political opinion. Members of RCs and ERRs have been persistently targeted by both the SAF, also through the military intelligence, and the RSF due to their (perceived) political affiliations or collaboration with rival parties. They have been also targeted because of their monitoring work against violations that they (had) performed before and during the conflict as well as on other grounds. Additionally, the RSF and SAF-affiliated intelligence agencies interpreted protests against the war as expression of criticism directed towards themselves and rounded up peace demonstrators.

3.4. Members of political parties, unions and civil society organisations

Last update: June 2025

This profile covers the situation of political party members (including the National Congress Party (NCP), the National Umma Party (NUP), and the Sudanese Congress party (SCP)) as well as members of the two factions of the Forces for Freedom and Change (FFC-CC and FCC-DB) which are coalition of political parties, unions, and civil society organisations.

Please note that also other individuals falling under other profiles may be perceived as political opponents. See also 3.3. Members of the Resistance committees (RCs) and Emergency Response Rooms (ERRs), 3.5. Community leaders, human rights activists, and lawyers, 3.6. Journalists and other media workers, 3.7. Humanitarian and healthcare workers.

The analysis below is based on the following EUAA COI reports and query: <u>Country Focus</u> 2024, 1.1.1., 2.3.; <u>Country Focus</u> 2025, 1.1., 2.1(c); <u>COI Update</u> 2025, 1.. Country Guidance should not be referred to as a source of COI.

Political parties in Sudan are described as largely ineffective, with a source reporting that they are unable to operate as they do not have the power to mediate between the two main warring forces. They have also lost the popular appeal they once had. The FFC was initially





meant to guide the country toward democratic governance alongside the SAF and the RSF. However, the coalition split into two factions between 2021 and 2022:

- The FFC Central Command or Council (FFC-CC): allegedly aligned with the RSF, this faction comprises over 40 parties, movements, and professional groups that signed the political framework agreement with the military junta in December 2022.
- The FFC Democratic Block (FFC-DB): reportedly aligned with the SAF, this faction is described as a coalition of pro-coup armed groups and political party factions that reject the framework agreement.

The establishment of the *Taqaddum* coalition, which includes the Forces of Freedom and Change (FFC-CC), has led to SAF and its supporters branding them as RSF allies, resulting in demonisation and repression. In February 2025, the announced amendments to the 2019 Constitutional document included the removal of references to the FFC. In March 2025, discussions about establishing a government in exile took place in Kampala, organised by the *Taqaddum* and led to its division into two distinct groups.

Step 1: Do the reported acts amount to persecution?

Some acts to which persons falling under this profile could be exposed are of a such severe nature that they would amount to persecution. More specifically, sources highlight the ongoing repression and targeting of political party members and perceived opponents in Sudan amid the ongoing conflict. The SAF, the RSF, and other intelligence, security and police forces, have engaged in campaigns to silence political opponents. This includes human rights violations such as extrajudicial killing, arbitrary arrest, detention, ill-treatment, torture, and the use of excessive, lethal force of political figures. While enforced disappearances have been a persistent issue in Sudan for decades, particularly as a means of silencing human rights defenders and opposition figures, the practice has escalated significantly since the outbreak of the ongoing conflict. The Military Intelligence arrested two leaders of the Unionist Alliance in Port Sudan, while other members have been arrested in various locations across the country. In West Darfur, prominent political figures, such as the Masalit Wali of West Darfur and leader of the SA, were impacted by the violence.

The severity and/or repetitiveness of other acts to which (perceived) political opponents could be subjected and whether they occur as an accumulation of various measures, should also be considered. For example, government authorities in Port Sudan have been confiscating identity cards from members of the Sudanese Congress Party, preventing them from renewing their passports.

Step 2: What is the level of risk of persecution?

A well-founded fear of persecution would in general be substantiated for prominent political party members in light of the severity of the ongoing campaign to silence the political dissent in Sudan

The individual assessment of whether there is a reasonable likelihood for other political party members and (perceived) political opponents to face persecution should consider risk-impacting circumstances such as:





- Place of residence or origin: the level of risk also varies by location, as areas under the SAF or the RSF control pose different dangers depending on each faction's stance toward political opposition. For more details about the presence and influence of the actors of persecution in Sudan please see 2.1. Map: areas of control and influence under 2. Actors of persecution and serious harm, and Presence, methods and tactics of actors under a) Security situation in Sudan.
- Profession: the SAF and the RSF engaged in similar campaigns targeting noncombatants they perceive as their opposition – including doctors, journalists, and humanitarian workers. See also <u>3.6. Journalists and other media workers</u> and <u>3.7.</u> Humanitarian and healthcare workers.
- **Ethnic background:** Individuals belonging to ethnic groups may be perceived as supporters of the opposing warring party and therefore exposed to a higher risk of persecution. See also <u>3.1. Ethnic groups</u>.

Step 3: Is there a ground for persecution?

Where well-founded fear of persecution is substantiated for individuals under this profile, persecution is highly likely to be for reasons of **(imputed) political opinion** as applicants falling under this profile are seen by SAF or RSF as opposing their political stance.





3.5. Community leaders, human rights activists and lawyers

Last update: June 2025

This profile refers to community leaders, including imams, *omda*, *amir*, and *agid*, human rights activists as well as lawyers perceived as opponents by either the SAF or the RSF and their allies.

The analysis below is based on the following EUAA COI reports and query: Country Focus 2024, 2.3.1, 2.3.2., 2.3.4., 2.5.1.; Country Focus 2025, 1.1., 1.3., 2.1. (a), 2.1. (b) 2.5. (b).; COI Update 4.. Country Guidance should not be referred to as a source of COI.

In the context of the ongoing war, political targeting has expanded beyond traditional political opponents to include community leaders, human rights activists, and lawyers who are now perceived as adversaries by both warring parties.

See also 3.3. Members of the Resistance committees (RCs) and Emergency Response Rooms (ERRs), 3.4. Members of political parties, unions and civil society organizations, 3.6. Journalists and other media workers, 3.7. Humanitarian and healthcare workers.

Step 1: Do the reported acts amount to persecution?

Acts to which persons falling under this profile could be exposed are of such a severe nature that they would amount to persecution. More specifically, killings, torture, physical abuse, arbitrary arrests and prolonged detention without access to legal representation, ill-treatment and targeting, widespread harassment, and threats by both warring parties have been reported. Additionally, sexual violence was used as a tool of repression. Masalit women who are human rights defenders, journalists, and lawyers are specifically targeted by the RSF, including through gang-rape and other forms of sexual violence, torture and incommunicado detention.

Lawyers face harassment and arrest in exercising their functions by both warring parties. Additionally, it is reported that lawyers defending civilians in complex criminal cases brought forward by the authorities as part of the National Committee of Investigation on Human Rights Violations, War Crimes, and Violations by the RSF and Other Crimes, face arrest over alleged affiliation or support to the RSF. In Darfur, the RSF militias specifically target prominent Masalit community members based on their ethnicity or their public denunciation, while targeted killings, ethnic profiling, and forced disappearances occur across Sudan.

Step 2: What is the level of risk of persecution?

A well-founded fear of persecution would in general be substantiated for community leaders, human rights activists, and lawyers as they face widespread, consistent, and severe abuses by both the SAF and the RSF.





Step 3: Is there a ground for persecution?

Persecution of individuals under this profile is highly likely to be for reasons of **(imputed) political opinion** as they are targeted due to their political activism, and their (legal) work, 'before and during the conflict'. They are monitors, advocates and reporters against violations committed by the warring parties and are seen as critical of the relevant actor.

Moreover, for community leaders, human rights activists, and lawyers, belonging to certain ethnic groups, **race and/or nationality** is also highly likely to be a relevant ground for persecution. For example, prominent Masalit community leaders, human rights activists, lawyers, and teachers have been used as targets of systematic attacks in the context of ethnically-motivated and targeted killings by RSF and its allied militias.

3.6. Journalists and other media workers

Last update: June 2025

This profile refers to journalists and other media workers perceived by the Sudanese authorities, the SAF, the RSF, or other armed groups as critical including those covering sensitive issues such as human rights violations, corruption or military activities.

The analysis below is based on the following EUAA COI reports and query: <u>Country Focus</u> 2024, 1.1.4., 2.1., 2.3.; <u>Country Focus</u> 2025, 2.1, 2.3., 3.2.1.; <u>Security 2025</u>, 1.1.4., 1.3.1. (e), 1.3.2.; <u>COI Update</u>, 2.2.. Country Guidance should not be referred to as a source of COI.

Since the outbreak of the hostilities, journalists and other media workers have been targeted by both sides of the conflict, while many media outlets were forced to shut down and an estimated 90 % of the country's media infrastructure has been destroyed. The difficult and dangerous environment for media work and reporting in general has led to significant underreporting of security incidents in Sudan.

Step 1: Do the reported acts amount to persecution?

Some acts to which persons falling under this profile could be exposed are of such a severe nature that they would amount to persecution. These include targeted and extrajudicial killings, shootings, enforced disappearances, kidnappings, arbitrary and mass detentions, physical and sexual violence, lootings, injuries, beatings, assaults and death threats. Journalists faced torture and inhumane or degrading treatment in detention facilities, including prolonged solitary confinement and rape. The rise in number of attacks was especially reported in Khartoum, Darfur and the Kordofans since the beginning of the conflict. Genderbased violence (GBV) against female journalists, including rape and sexual assault were also reported. See 3.9.1. Violence against women and girls.

The severity and/or repetitiveness of other acts that journalists and media workers could be subjected to, and whether they occur as an accumulation of various measures, should be taken into account. Journalists and other media workers have been subjected to continuous harassment and intimidation reportedly to prevent them from reporting on the conflict or to pressure them to present a more favourable view of one side of the conflict. Methods of intimidation include surveillance, social media hate speech or threats, travel bans,





warnings against publishing certain information or expressing certain views. Also, defamation campaigns, including the publication of anonymous lists that classified journalists as working for one of the conflict parties have been reported, leading to many of them going into hiding. Systematic censorship and restrictions to the exercise of the profession were also reported such as forced shutdown of independent media outlets, revocation of press credentials, armed takeovers of media buildings, damage or confiscation of equipment, raiding media stations and homes of journalists, repeated network disruptions and shutdowns of the internet. Reportedly Sudan experiences a 'systematic censorship' and suppression of information by both the SAF and the RSF, and journalists are restricted from speaking to international media and engage in self-censorship.

Relatives of journalists have also come under attack, including through killings, physical attacks and damages to their homes.

Step 2: What is the level of risk of persecution?

A well-founded fear of persecution would in general be substantiated for journalists and other media workers as they are systematically targeted by both warring parties. Additionally, their family members may also be targeted during attacks and house searches directed to journalists.

Step 3: Is there a ground for persecution?

Persecution of individuals under this profile is highly likely to be for reasons of **(imputed) political opinion** as journalistic work covering human rights violations and GBV, corruption, ethnic violence or military actions is perceived as political dissent, an attack on the legitimacy, and/or a threat to the warring parties.

For persecution of female journalists, by means of GBV, see <u>3.9.1. Violence against women and girls</u>.

3.7. Humanitarian and healthcare workers

Last update: June 2025

This profile refers to Sudanese staff of national or international NGOs, UN agencies and local humanitarian actors (such as community kitchens), along with healthcare workers.

For the situations of Emergency Response Rooms (ERRs) volunteers, please refer to 3.3. Members of the Resistance committees (RCs) and Emergency Response Rooms (ERRs).

The analysis below is based on the following EUAA COI reports and query: <u>Country Focus</u> 2024, 2.2; <u>Country Focus</u> 2025, 2.4., 2.6. (b); <u>Security 2025</u>, 1.3.1. (c).; <u>COI Update</u>, 2.2., 3., 4.. Country Guidance should not be referred to as a source of COI.

The outbreak of the conflict has led to a catastrophic deterioration of the humanitarian situation and the working environment for humanitarian and healthcare workers.





Step 1: Do the reported acts amount to persecution?

Some acts to which persons falling under this profile could be exposed are of such a severe nature that they would amount to persecution. Reportedly, numerous cases of killing, beating, detention, sexual assault, kidnapping as well as looting have been committed by both warring parties. Violent targeted attacks on medical and humanitarian convoys and ambulances are also reported. Since the beginning of the ongoing conflict, humanitarian workers face extremely dangerous conditions, among the worst in the world according to the IOM.

Female healthcare workers have been specifically targeted with sexual violence as means of punishment for their activities. See 3.9.1. Violence against women and girls.

The severity and/or repetitiveness of other acts to which individuals under this profile could be subjected and whether they occur as an accumulation of various measures, should also be considered. For example, aid workers face insults, pressure, intimidation, extorsion and administrative barriers.

Step 2: What is the level of risk of persecution?

A well-founded fear of persecution would in general be substantiated for humanitarian and healthcare workers as they face targeting by both the SAF and the RSF, and their allies.

Step 3: Is there a ground for persecution?

Persecution for applicants falling under this profile is highly likely to be for reasons of **(imputed) political opinion**, as aid workers have been accused of fuelling the conflict and spying for the enemy while healthcare workers have been accused of collaborating with and providing treatment to members of the opposing camp or victims of conflict-related sexual violence.

3.8. Civilians from areas associated with the opposing warring party

This profile includes civilians who originate from or reside in areas associated with the opposing warring party, including those targeted, for example, in retaliation for some members of their village who are perceived as supporters of the opposing warring party. It also addresses the situation of civilians from areas under the influence of the opposing warring party and those from recaptured areas.

For more details about the presence and influence of the actors of persecution in Sudan please see <u>2.1. Map: areas of control and influence</u> under *2. Actors of persecution and serious harm*, and <u>Presence</u>, <u>methods and tactics</u> under *a) Security situation in Sudan*.

The analysis below is based on the following EUAA COI reports and query: Country Focus 2024, 2.4.2.; Country Focus 2025, 1.4, 2.4. (b), 2.5. (b); Security 2025, 1.1.2., 2.2., 2.3., 2.4.2., 2.4.4.; COI Update 2025, 4.. Country Guidance should not be referred to as a source of COI.





Step 1: Do the reported acts amount to persecution?

Acts to which persons falling under this profile could be exposed are of such a severe nature that they would amount to persecution. Examples of reported incidents include mass and extrajudicial killings, executions, starvation, sexual violence, kidnappings, arbitrary arrests and unlawful detentions, forced displacement, looting, poisoning of food supplies, restricted access to food, water and/or medical care.

Reports indicate that both warring parties have used the deprivation of humanitarian aid and food as a weapon of war, causing thousands of deaths due to starvation, lack of access to health services and humanitarian assistance. This includes blocking convoys and forbidding the purchase of goods in areas controlled by the opposing party. Examples included the SAF not allowing people to buy goods in SAF-controlled areas to bring into RSF-controlled areas, or the RSF preventing the transit of humanitarian aid through El Fasher alleging that it would benefit the SAF.

Reports indicate that in Al Jazirah and South Kordofan, the RSF in retaliation for the perceived support of the SAF, killed hundreds of people, kidnapped, perpetrated sexual violence against women, including medical personnel. Dozens of men and boys were missing, and over 40 000 people were displaced after one episode. The RSF has also been accused of looting markets, destroying and burning villages, as well as poisoning food supplies entering the besieged Hilaliya town, and blocking the arrival of food, water, and medical care due to the imposed siege, resulting in a high number of deaths. Reportedly, the RSF was involved in the extrajudicial killings of unarmed civilians in North Darfur and in RSF-controlled areas, while houses holding execution rooms were found in Khartoum. For additional information on extrajudicial killings, see also 3.9.1. Violence against women and girls and 3.1.2. Nuba from the Kordofans.

The SAF reinforced repression through the 'Law on Unfamiliar Faces', a harsh policy that arbitrarily targets individuals based on perceived social affiliations, labelling them as RSF sympathisers without evidence. Death sentences were issued by courts in SAF-controlled areas under article 50 and 51 of the Criminal Law ('undermining the constitutional system' and 'waging war against the state') against civilians accused of supporting the RSF (spying for the RSF or being 'sleeper cells') or opposing the war.

See Article 15(a) QD/QR: death penalty or execution.

Step 2: What is the level of risk of persecution?

The individual assessment of whether there is a reasonable degree of likelihood for civilians from areas associated with the opposing warring party to face persecution should take into account risk-impacting circumstances, such as:

- Area of origin, residence: Persons from conflict-affected areas, notably, Al Jazirah,
 South Kordofan and North Darfur and retaken territories, are exposed to a higher risk.
- Community ties or other connection to suspected members of the opposing warring party: Reportedly, entire villages have been associated with the defection of one of their residents exposing the whole community to persecution.





- **Visibility in relation to role in the community/profession:** Individuals with a role within the community or exercising some professions may be more exposed to higher risk.
- **Displacement:** IDPs originating from areas associated with the opposing warring party are exposed to a higher risk. Reportedly, arbitrary arrests and detention by both parties frequently involved individuals on their way to the border.
- **Ethnic background:** Individuals belonging to ethnic groups may be perceived as supporters of the opposing warring party and therefore exposed to a higher risk of persecution. See also 3.1. Ethnic groups.

Step 3: Is there a ground for persecution?

Where well-founded fear of persecution is substantiated for an applicant falling under this profile, this is highly likely to be for reasons of **(imputed) political opinion**, as civilians may be seen as supporting the SAF or the RSF and allies, for example, because they originate, or reside in areas under the control of the opposing warring party.

3.9. Women and girls



The contents of this section include:

3.9.1. Violence against women and girls

3.9.2. Forced and child marriage

3.9.3. Female genital mutilation or cutting (FGM/C)

3.9.4. Trafficking in women and girls

In Sudan, perpetrators of widespread crimes against women and girls, including during armed conflicts, have generally enjoyed impunity. Moreover, despite the guarantees of equal treatment in the interim constitution and legal reforms introduced in 2020, women continue to face disadvantages in many areas of the law, including being denied equal rights to property and inheritance under both laws and customary practices.



It should be noted that the different forms of violence against women and girls in Sudan are often significantly interlinked. Therefore, the following subsections should be read in conjunction.

3.9.1. Violence against women and girls

Last update: June 2025

The analysis below is based on the following EUAA COI reports and query: <u>Country Focus</u> 2024, 2.5.1., 2.5.2., 2.5.2. (a) (b) (c) (d), 2.5.3.; <u>Country Focus</u> 2025, 2.6. (a) (b); <u>Security 2025</u>,





1.2.1. (b), 1.3.1. (a) (e), 1.3.2.(a), 2.4.2. (a) (b), 2.4.3.; COI Update 2025, 4.. Country Guidance should not be referred to as a source of COI.

Step 1: Do the reported acts amount to persecution?

Some acts to which women and girls in Sudan could be exposed are of such severe nature that they would amount to persecution. In particular, they have reportedly been subjected to intimate partner and domestic violence as well as sexual violence, the latter historically used as a weapon of war to terrorise communities. Reports indicate that conflict-related sexual violence (CRSV), including rape, child rape of children as young as one year old, gang-rape, and sexual slavery, is committed by both warring parties, and systematically by the RSF accounting for 80% of the documented cases.

Sources also document cases of enforced disappearances, abductions, kidnappings for ransom, including eyewitness accounts of 'women and girls chained up and taken away'. Victims detained by the RSF have reportedly been held in inhumane or degrading conditions.

Victims of GBV are often rejected by their families and communities, leaving them vulnerable to further violence.

Pattern of killings involving unarmed individuals who were attempting to protect their female relatives from sexual violence by the RSF are also reported. Sexual violence incidents often take place in the presence of relatives, including children, who are also subjected to lashing and beatings.

The severity and/or repetitiveness of other acts that women and girls in Sudan could be subjected to, and whether they occur as an accumulation of various measures, should also be considered. Due to the breakdown of the country's institutions women and girls can be denied legal permission for abortion, including for cases of pregnancies as a result of rape, and thus forced to undergo unsafe abortion outside medical facilities. Moreover, women are denied equality of rights regarding property and inheritance laws, both under *Sharia* and customary practices.

Step 2: What is the level of risk of persecution?

For women and girls from conflict-affected areas⁷, a well-founded fear of persecution would in general be substantiated, in light of the widespread use of CRSV as a weapon of war and the general impunity enjoyed by the perpetrators. See also 3.1. Ethnic groups. For more details about the presence and influence of the actors of persecution in Sudan please see 2.1. Map: areas of control and influence under 2. Actors of persecution and serious harm, and Presence, methods and tactics under a) Security situation in Sudan.

In areas non affected by the conflict, the individual assessment of whether there is a reasonable degree of likelihood for women and girls to face persecution should take into account risk-impacting circumstances, such as:

¹⁷ Conflict-affected areas include regions assessed under 'mere presence' category, 'high level of indiscriminate violence' category as well as 'not a high-level' category'. <u>See b) Assessment of indiscriminate violence per region</u>.





- **Displacement:** women and girls on the move and in transition points, and more generally IDP women and girls living in IDP sites, are most vulnerable to GBV threats and exploitation.
- Socio-economic situation: women and girls from lower-income backgrounds are more vulnerable to sexual violence due to economic constraints and lack of alternatives.
 Additionally, single women or women at the head of a household, without a male or social network, are more vulnerable to GBV.
- Political profile: women activists, journalists, and protesters perceived as critical are at high risk of physical, psychological, and sexual violence, including state-sanctioned torture, enforced disappearances, and inhumane treatment in detention. Female human rights defenders and women advocating for gender equality face targeted repression, including public harassment, surveillance, and imprisonment. See also 3.5. Community leaders, human rights activists, and lawyers, 3.6. Journalists and other media workers.

Step 3: Is there a ground for persecution?

Persecution of women and girls from conflict affected areas is highly likely to be for reasons of (imputed) political opinion, race and/or nationality, due to their or their relatives' (perceived) affiliation with the opposing warring party, and the widespread use of conflict-related sexual violence (CRSV) as a weapon of war by both warring parties, including as a part of 'ethnic cleansing' by the RSF and allies. See also 3.1. Ethnic groups and 3.6. Journalists and other media workers, 3.7. Humanitarian and healthcare workers, 3.8. Civilians from areas associated with the opposing warring party. Membership of a particular social group⁸ may also apply.

For other women and girls under this sub-profile, where a well-founded fear of persecution is substantiated in relation to GBV, this is highly likely to be for reasons of **membership of a particular social group**⁹. For example, survivors of sexual violence may be subjected to persecution because of their common background (past sexual abuse) and their distinct identity in Sudan (stigmatisation by their communities and families due to perceived dishonour associated with sexual violence). Additionally, other grounds such as **(imputed) political opinion** may also apply. See <u>3.6. Journalists and other media workers</u>, <u>3.7. Humanitarian and healthcare workers</u>.

3.9.2. Forced and child marriage

Last update: June 2025

This profile refers to women and girls in Sudan who are subjected to forced and early marriage, whether through coercion by family, community pressure, armed groups, or legal loopholes that allow child marriage.

CJEU, <u>Intervyuirasht organ na Darzhavna agentsia za bezhantsite pri Ministerskia savet v WS</u>, case C-621/21, judgment of 16 January 2024, para. 57



⁸ CJEU, <u>Intervyuirasht organ na Darzhavna agentsia za bezhantsite pri Ministerskia savet v WS</u>, case C-621/21, judgment of 16 January 2024, para. 57



The analysis below is based on the following EUAA COI reports and query: <u>Country Focus</u> 2024, 2.5.2, 2.5.3.; <u>Country Focus</u> 2025, 2.6. (a) (c) (d); <u>Security 2025</u>, 1.3.1., 1.3.1. (b); <u>COI Update 2025</u>, 4.. Country Guidance should not be referred to as a source of COI.

Forced marriages are legal as per Sudanese law. The Muslim Personal Status Act of 1991 allows girls as young as 10 years old to be married with judicial approval. Also customary law and societal norms pressure families to surrender their daughters into forced marriages, often with much older men.

Step 1: Do the reported acts amount to persecution?

Forced and child marriage amounts to persecution. These marriages, which are legal as per Sudanese law, often involve coercion, lack of consent, and long-term physical and psychological harm, including domestic violence, marital rape, and denial of education. Abductions and trafficking of women and girls for the purpose of forced marriage and sexual slavery have been documented, with survivors describing being chained, locked in houses, and transported in vehicles for marriage arrangements. Survivors of forced marriage who escape often face stigma, honour-based violence, or rejection by their families. See also 3.10.2. Child labour and child trafficking.

Step 2: What is the level of risk of persecution?

For women and girls in Sudan, a well-founded fear of persecution, in relation to forced and child marriage would in general be substantiated. Forced/child marriage is not just legal, but the practice of child marriage is widespread due to the belief that by doing so, parents protect their girls from rape and preserve their (perceived) honour. Forced marriages of girls and women to RSF members are increasing, with cases involving parents surrendering their daughters under threat or in exchange for financial compensation.

Step 3: Is there a ground for persecution?

Persecution of women and girls in relation to forced and child marriage is likely to be for reasons of **membership of a particular social group**¹⁰. For example, women and girls who refuse to marry would have a common background which cannot be changed (refusal to marry) and/or a characteristic or belief that is so fundamental to identity or conscience that a person should not be forced to renounce it (the right to choose whom to marry) and have distinct identity in Sudan (stigmatisation by the surrounding society for violating the honour of the family).

For women and girls from RSF controlled areas, (imputed) political opinion may also be substantiated due their or their relatives' (perceived) affiliation with the opposing warring party.

3.9.3. Female genital mutilation or cutting (FGM/C)

Last update: (Month) year

This profile refers to women and girls in Sudan who have not been subjected to FGM/C.

CJEU, <u>Intervyuirasht organ na Darzhavna agentsia za bezhantsite pri Ministerskia savet v WS</u>, case C-621/21, judgment of 16 January 2024, para. 57.





The analysis below is based on the following EUAA COI reports: <u>Country Focus 2025</u>, 1.3. (a), 2.6. (e). Country Guidance should not be referred to as a source of COI.

Despite legal prohibition since 2020 (Criminal Law amendment criminalising FGM/C), sources report that there is no enforcement of such law and, in Sudan, FGM is generally carried out on girls between the ages of 4 and 14, but also on infants, women before marriage, and even women or girls pregnant with their first child before childbirth or who have just given birth.

Step 1: Do the reported acts amount to persecution?

FGM/C amounts to persecution.

Step 2: What is the level of risk of persecution?

For girls who have not been subjected to FGM/C a well-founded fear of persecution would in general be substantiated, as in Sudan, FGM/C is a widespread and deeply rooted practice, generally carried out on girls between the ages of 4 and 14.

The individual assessment of whether there is a reasonable degree of likelihood for a woman who has not been subjected to FGM/C should take into account risk-impacting circumstances, particularly:

- **Age:** younger women would be exposed to a higher risk.
- Personal status: women who are about to be married and, sometimes, women who
 are pregnant with their first child or who have just given birth would be exposed to a
 higher risk.
- Views of the family/community on the practice: women originating from families/communities with more traditional views, regardless of the socio-economic situation, would be exposed to a higher risk.

Step 3: Is there a ground for persecution?

Persecution of women and girls falling under this profile is highly likely to be for reasons of **membership of a particular social group**. Women and girls who have not been subjected to FGM/C may be persecuted for reasons of an innate characteristic and/or common background which cannot be changed (not being subjected to FGM/C) and their distinct identity within their community in Sudan.

3.9.4. Trafficking in women and girls

Last update: June 2025

The analysis below is based on the following EUAA COI reports and query: Country Focus 2024, 2.5.2, 2.5.3, 2.6; Country Focus 2025, 1.3.(e), 1.4., 2.6.(a) (c) (d), 2.7.(b) (c) (d); Security 2025, 1.2.1. (c), 1.3.1.. Country Guidance should not be referred to as a source of COI.

The 2014 Anti-Human Trafficking Law criminalises sex and labour trafficking, with penalties of three to ten years' imprisonment for offences involving adult male victims and five to 20 years'





imprisonment for offences involving adult female and child victims. Nevertheless, Sudan has historically been and continues to be a country of origin, transit, and destination for victims of modern slavery and human trafficking. See also <u>3.10.2</u>. Child labour and child trafficking.

Step 1: Do the reported acts amount to persecution?

Trafficking in women and girls amounts to persecution.

In Sudan, common forms of exploitation for which trafficking is currently perpetrated include slavery, sexual slavery, forced and bonded labour, domestic servitude, and sexual exploitation.

Step 2: What is the level of risk of persecution?

The individual assessment of whether there is a reasonable degree of likelihood for a woman or girl to be (re)-trafficked should take into account risk-impacting circumstances, such as:

- **Age:** girls under 18 are at the highest risk of trafficking for the purpose of child marriage or domestic work and sex exploitation.
- Home area: women and girls from conflict-affected areas¹¹ are exposed to a higher risk.
- Access to education/support services: women and girls with limited access to
 education and health services, lack of awareness regarding available services, and
 insufficient service provision are reported to be more at risk.
- **Absence of protection and shelter**: homeless, orphaned and unaccompanied girls are exposed to a higher risk of persecution.
- **Displacement:** women and girls internally displaced are more vulnerable and, also due to lack of knowledge of the area of displacement, may be exposed to a higher risk.
- Socio-economic situation of the family: food insecurity, poor livelihood conditions of the girls and women and/or of their families expose them to a higher risk of being trafficked.

Step 3: Is there a ground for persecution?

Persecution of women and girls under this profile may be for reasons of **membership of a particular social group**. For example, women and girls victims of trafficking for the purpose of sexual exploitation may be subjected to persecution based on their common background which cannot be changed (the past experience of having been trafficked) and a distinct identity, because they are perceived as being different by the surrounding society in Sudan (e.g. stigmatisation).

The individual circumstances need to be taken into account to determine whether a nexus to a reason for persecution can be substantiated for women and girls at risk of trafficking. See also 4.2.3. Criminal violence.

Conflict-affected areas include regions assessed under 'mere presence' category, 'high level of indiscriminate violence' category as well as 'not a high-level category'. <u>See b) Assessment of indiscriminate violence per region</u>.





3.10. Children

This profile refers to nationals of Sudan under the age of 18.

For the situations of child marriage, please refer to 3.9.2. Forced and child marriage.



The contents of this section include:

3.10.1. Child recruitment

3.10.2. Child labour and child trafficking

3.10.1. Child recruitment

Last update: Month year

The analysis below is based on the following EUAA COI reports: <u>Country Focus 2024</u>, 2.6.; <u>Country Focus 2025</u>, 2.7.; <u>Security 2025</u>, 1.2.1. (c), 2.1.2., 2.6.2.. Country Guidance should not be referred to as a source of COI.

Whereas Sudan is party to the Optional Protocol on the Involvement of Children in Armed Conflict (OPAC) and has domestic legislation prohibiting the recruitment of children, no sanctions are provided by the criminal legislation. Child soldiers in Sudan are known as *Jana jaish* and have long been used in past armed conflicts.

Step 1: Do the reported acts amount to persecution?

Child recruitment amounts to persecution.

Cases of child recruitment by both the SAF and the RSF and their allies, have been reported by various sources. Despite the lack of precise statistics, different sources report that thousands of children have been recruited and used in the ongoing conflict. It was reportedly occurring across the country and was carried out by all belligerents, including those who had signed the JPA. In addition to being deployed in combat, recruited children are also used by armed groups for tasks such as operating checkpoints, transporting ammunition, conducting basic reconnaissance and surveillance, and performing labour in military camps. The RSF reportedly uses children as human shields, bodyguards, informants, and combatants, as well as for conducting security patrols, manning checkpoints, carrying out searches, monitoring detainees, looting, committing arson, perpetrating acts of torture in detention centres, and recording crimes to post on social media.

Furthermore, reports indicate that means of recruitment include coercion, threats, violence and abduction, intimidation, torture, summary execution and denial of food and medical care.

Finally, it should be noted that children who have actually been recruited and who suffer from complex trauma or other medical conditions will face a lack of adequate care and rehabilitation.





Step 2: What is the level of risk of persecution?

For children the individual assessment of whether there is a reasonable degree of likelihood to face persecution, in relation to child recruitment, should take into account **risk-impacting circumstances**, such as:

- Past recruitment: children who were actually recruited and escaped recruitment or were released face a higher risk as they are more vulnerable since they are already known to the actors.
- **Gender:** boys are more likely to be targeted for recruitment.
- **Age:** teenagers and children of 'fighting age' (11 to 17 years old) are more likely to be targeted for recruitment.
- Background of the child and the family: children affected by the conflict and/or
 having affected relative(s) are more likely to be lured into child recruitment (by desire
 of revenge, to defend their family/community, with promises of material or monetary
 gain through a mix of narratives of 'coercion, fear, and manipulation').
- Displacement: displaced school-aged children coupled with the closure of the school system and the limited access to social services, have further exacerbated children's vulnerability to recruitment.
- Socio-economic situation of the child and the family: unaccompanied and poor children are more likely to be targeted for recruitment.
- Ethnic background in relation to home area: depending on the area, children from certain communities are more likely to be targeted for recruitment. Sources reported that, particularly in Darfur and the Kordofans, the RSF and Arab militias recruit men and boys by calling on their members and allies to defend the community under the ancient Sudanese tradition of the Faza'a.

Step 3: Is there a ground for persecution?

Where well-founded fear of persecution is substantiated for children falling under this profile, this is likely to be for reasons of **(imputed) political opinion**, since a child who refused or escaped recruitment from the SAF or the RSF may be seen as a political opponent. It could also be for reasons of **membership of a particular social group** e.g. boys who refuse to join an armed group or to take up arms to defend their community, as they may be stigmatised by the surrounding society and/or seen as dishonouring the family/community for departing from Sudanese tradition (*Faza'a*) and because of their common background which cannot be changed (refusal to take up arms).

3.10.2. Child labour and child trafficking

Last update: June 2025

The analysis below is based on the following EUAA COI reports: <u>Country Focus 2024</u>, 2.5.2., 2.5.3.; <u>Country Focus 2025</u>, 2.6. (a) (d), 2.7. (c) (d); <u>Security 2025</u> 1.3.1.. Country Guidance should not be referred to as a source of COI.





The 2010 Sudanese Children's Act indicates that the minimum working age is 14 years old, although persons under that age can work in pastoral and agricultural activities. The conflict has forced many children into child labour, a phenomenon already widespread in the country. It is reported that child labour is often one of the purposes of child trafficking.

The 2014 Anti-Human Trafficking Law criminalises sex and labour trafficking, with penalties of three to ten years' imprisonment for offences involving adult male victims and five to 20 years' imprisonment for offences involving adult female and child victims. Nevertheless, Sudan has historically been a country of origin, transit, and destination for victims of modern slavery and human trafficking. See also 3.9.4. Trafficking in women and girls.

Step 1: Do the reported acts amount to persecution?

Child labour amounts to persecution.

Not all work done by children should be classified as child labour, an assessment should be made in light of the nature of the work and the age of the child. Work that is likely to harm the health, safety or morals of children could be considered to reach the severity of persecution. ¹² In Sudan business owners, informal mining operators, community members, and farmers reportedly exploit children working in brick-making factories, gold mining, collecting medical waste, street vending, and agriculture; victims endure threats, physical and sexual abuse, and hazardous working conditions with limited access to education or health services, and in these cases acts are of such severe nature that they amount to persecution.

Being a child is to be taken into account in the assessment on whether an act reaches the threshold of persecution. The impact of child labour on access to education should also be taken into account. Other risks, such as involvement in criminal activities and trafficking should also be considered.

Trafficking in children amounts to persecution. Common forms of trafficking include early and forced marriage, forced or bonded labour, child labour, child recruitment, domestic servitude, and forced prostitution.

Step 2: What is the level of risk of persecution?

The individual assessment of whether there is a reasonable degree of likelihood for a child to be forced into labour or trafficked should take into account risk-impacting circumstances, such as:

- Gender: girls are more likely to be victims of trafficking for the purpose of sexual exploitation, sexual slavery, domestic servitude, child marriage, while boys are trafficked for the purpose of forced labour or child recruitment in armed conflicts. See also 3.9. Women and girls.
- Socio-economic status of the child: unaccompanied and homeless children are exposed to a heightened risk of being forced into labour or being trafficked.



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- Displacement: displaced children are more vulnerable and exposed to be forced into labour or trafficked.
- **Family status**: unaccompanied children or children without a caretaker are exposed to a higher risk.

Step 3: Is there a ground for persecution?

The individual circumstances of the child need to be taken into account to determine whether a nexus to a reason for persecution can be substantiated in relation to the risk of child labour as well as the risk of trafficking in children.

3.11. Persons with diverse SOGIESC

Last update: June 2025

This profile refers to persons who are perceived as not conforming to religious and/or social norms because of their sexual orientation (SO) and/or gender identity and expression (GIE), and sex characteristics (SC), including the treatment of lesbian, gay, bi-sexual or trans-gender, intersex and queer, also commonly referred to as LGBTIQ+ individuals.

The analysis below is based on the following EUAA COI report: <u>Country Focus 2025</u>, 2.8.. Country Guidance should not be referred to as a source of COI.

Despite minor reforms same-sex relations in Sudan are criminalised under Section 148 of the Criminal Act of 1991, and additional laws criminalise 'gross indecency' and acts against 'public morals', further targeting individuals with diverse SOGIESC, while discrimination and violence against LGBTIQ+ people by authorities, family and society are common.

Step 1: Do the reported acts amount to persecution?

Some acts to which persons with diverse SOGIESC could be exposed are of such severe nature that they would amount to persecution. More specifically, the criminalisation of same-sex relations under Sudanese law, with penalties ranging from imprisonment to potential life sentences, along with the risk of arbitrary punishments such as flogging or even the death penalty, constitute severe legal and physical harm. The use of vague legal provisions like 'gross indecency' and 'acts contrary to public morals' allows for arbitrary interpretation and enforcement, increasing the risk of persecution. Arbitrary punishments persist, with courts using digital evidence, such as private chats, to convict individuals. Instances of physical violence, such as family abuse and torture by authorities are also reported.

The severity and/or repetitiveness of other acts to which persons with diverse SOGIESC could be subjected, and whether they occur as an accumulation of various measures, should be taken into account. Widespread societal discrimination, stigma, the association of LGBTIQ+ identities with mental illness or paedophilia and social exclusion are reported. Transgender individuals struggle to obtain identity documents reflecting their gender and face difficulties crossing borders.





Step 2: What is the level of risk of persecution?

A well-founded fear of persecution would in general be substantiated for persons with diverse SOGIESC, given the severity of punishments regulated by the law along with the arbitrary nature of judicial decisions, and the lack of legal protections. They also face discrimination, stigmatisation, dismissal, social exclusion and mistreatment if their sexual orientation and/or gender identity were to become known, and in Sudanese society, the LGBTIQ+ community 'was associated with mental illness and paedophilia'.

It has to be noted that an applicant cannot be expected to conceal their sexual orientation¹³ or gender identity to avoid persecution.

Step 3: Is there a ground for persecution?

Persecution of individuals under this profile is highly likely to be for reasons of **membership of a particular social group**, based on a shared characteristic or belief that is so fundamental to the identity of the applicant, that they should not be forced to renounce it, and based on their distinct identity in Sudan, because they are perceived as being different by the surrounding society. Persecution of individuals under this profile may also be for reasons of **religion**, since in matters that are not governed by any legislative text, the courts apply the *Sharia*.

CJEU, Minister voor Immigratie en Asiel v X and Y and Z, joined cases C-199/12 to C-201/12 judgment of 7 November 2013, X and Y and Z, paras. 70-76, https://curia.europa.eu/juris/document/document.jsf?text=&docid=144215&pageIndex=0&doclang=en&mode=Ist&dir=&occ=first&part=1&cid=7670158



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4. Subsidiary protection

Article 15 QD/QR

This chapter addresses the EU-regulated status of subsidiary protection. Where the applicant has not been found to qualify as a refugee, they may be eligible for subsidiary protection in accordance with Article 15 QD/QR.



The contents of this chapter include:

Under the section <u>4.1. Article 15(a) QD/QR: death penalty or execution</u>, the analysis focuses on the applicable EU legal framework and the factual circumstances surrounding the 'death penalty or execution' in Sudan.

The section <u>4.2. Article 15(b) QD/QR: torture or inhuman or degrading treatment or punishment</u> looks into the risk of 'torture or inhuman or degrading treatment or punishment' in relation to particular circumstances in Sudan.

Under the section 4.3. Article 15(c) QD/QR: indiscriminate violence in situations of armed conflict, the analysis covers the different elements of the provision, looking into: 'armed conflict', 'qualification of a person as a 'civilian', 'indiscriminate violence', 'serious and individual threat' (where further individualisation elements are discussed), 'qualification of the harm as 'threat to life or person', and the interpretation of the nexus 'by reasons of'. The sub-section on 'indiscriminate violence' includes an assessment of the situation in Sudan by region.



Please note that where refugee status is not granted, established **personal circumstances** (e.g. age, gender, professional and economic background, home area, potential vulnerabilities) are still to be taken into account in the assessment of subsidiary protection according to Article 15 QD/QR.

4.1. Article 15(a) QD/QR: death penalty or execution

Last update: Month year

Article 15(a) QD/QR





The analysis below is based on the following EUAA COI report: <u>Country Focus 2025</u>, 1.4.. Country Guidance should not be referred to as a source of COI.

As noted in the chapter on <u>3. Refugee status</u>, some profiles of applicants from Sudan may be at risk of death penalty or execution. In such cases, there could be a nexus to a reason for persecution falling under the definition of a refugee (see for example <u>3.2. Individuals fearing forced recruitment by the RSF</u>, <u>3.3. Members of the Resistance committees (RCs) and Emergency Response Rooms (ERRs)</u>, <u>3.8. Civilians from areas associated with the opposing warring party</u>, <u>3.10.1. Child recruitment</u>, <u>3.11. Persons with diverse SOGIESC</u>), and those individuals would qualify for refugee status. In cases where there is no nexus to a Convention ground, the need for subsidiary protection under Article 15(a) QD/QR should be examined.

Sudan maintains the death penalty in law and in practice. It is legal under article 27 of the Sudanese Criminal Act 1991 and can be imposed for a variety of offences based on the Muslim Law as well as offences against the state. Recent amendments abolished the death penalty for apostasy and discretionary offences (*ta'zir*), but it is retained for serious offences (*hudud* and *qisas*). Article 27 provides that the death sentence cannot be imposed for offences committed by persons under the age of 18 years or persons aged 70 or above, except in the case of *hudud* and *qisas*.

In the context of the ongoing conflict, hundreds of death sentences have been issued in 2024 by courts in SAF-controlled areas against civilians accused of supporting RSF militia or opposing the war under Articles 50 ('undermining the constitutional system') and 51 ('waging war against the state') of the Criminal Act.

Houses holding execution rooms were found in RSF-controlled areas.

Finally, sources report extrajudicial killings and executions of prisoners of war from opposing forces by both warring parties. According to sources, so-called 'death sentences' have been executed in Khartoum following incitement against civilians accused of spying for the RSF.



It is to be noted also that, in Sudan and in the context of the ongoing war, most of the death penalties or executions may be inflicted for reasons of (imputed) political opinion (see for example 3.2. Individuals fearing forced recruitment by the RSF, 3.3. Members of the Resistance committees (RCs) and Emergency Response Rooms (ERRs), 3.8. Civilians from areas associated with the opposing warring party, 3.10.1. Child recruitment) and those individuals would therefore qualify for refugee status.

If there is a reasonable degree of likelihood of death penalty or execution, and no nexus to a reason for persecution can be substantiated, subsidiary protection under Article 15(a) QD/QR shall be granted, unless the applicant is to be excluded in accordance with Article 17 QD/QR.

In some cases, the death penalty would have been imposed for a serious crime committed by the applicant, or for other acts falling within the exclusion grounds







(Article 17 QD/QR). Therefore, although the criteria of Article 15(a) QD/QR would be met, exclusion considerations should be examined (see <u>7. Exclusion</u>).

4.2. Article 15(b) QD/QR: torture or inhuman or degrading treatment or punishment

Last update: Month year

Article 15(b) QD/QR

As noted in the chapter on <u>3. Refugee status</u>, some profiles of applicants from Sudan may be at risk of torture or inhuman or degrading treatment or punishment (see for example <u>3.2. Individuals fearing forced recruitment by the RSF</u>, <u>3.3. Members of the Resistance committees</u> (RCs) and Emergency Response Rooms (ERRs), <u>3.4. Members of political parties, unions and civil society organisations</u>, <u>3.6. Journalists and other media workers</u>, <u>3.9. Women and girls</u>, <u>3.10. Children</u>, <u>3.11. Persons with diverse SOGIESC</u>). In such cases, there would often be a nexus to a reason for persecution falling under the definition of a refugee, and those individuals would qualify for refugee status. However, with reference to cases where there is no nexus to a Convention ground, the need for subsidiary protection under Article 15(b) QD/QR should be examined.



The contents of this section include:

- 4.2.1. Healthcare, humanitarian assistance and socio-economic conditions
- 4.2.2. Arbitrary arrests, illegal detention and prison conditions
- 4.2.3. Criminal violence
- 4.2.4. Violence in relation to land expropriation

4.2.1. Healthcare, humanitarian assistance and socio-economic conditions

The analysis below is based on the following EUAA COI reports and query: <u>Country Focus</u> 2024, 1.1.5; <u>Country Focus</u> 2025, 3.1.3., 3.1.4., 3.1.6.; <u>Security 2025</u>, 1.3.1.; <u>COI Update 2025</u>, 3.. Country Guidance should not be referred to as a source of COI.

Sudan faces one of the worst humanitarian crises globally, with 30.4 million people, over half the total population, in need of assistance in 2025. Reports indicate that the state healthcare system is in ruins while the economic collapse and the disruption of water and food chains has led to an unprecedented number of people facing starvation and famine.





Several attacks on health facilities have occurred since the outbreak of the conflict, with many of these attacks being deliberately carried out by warring parties, notably the RSF. Beyond healthcare facilities, humanitarian and healthcare workers, medical supplies and ambulances have been targeted by both warring parties, aggravating the lack of access to basic health services and aid delivery for the population. Civilians, including women and girls, were increasingly denied healthcare, including maternal and post-GBV health services. For more information, please see 3.7. Humanitarian and healthcare workers.

Reportedly, the RSF and its allied militias have been involved in a consistent pattern of destroying vital resources essential for the survival of the civilian population and limiting their economic, social, and cultural rights. Schools continued to be targeted by armed groups. Barriers to access local markets have also been reported.

Finally, sources reported thousands of deaths due to starvation, lack of access to health services and humanitarian assistance caused by the blocking of roads or transit by the warring parties. Reports indicate that deprivation of humanitarian aid has been used by the warring parties as a weapon of war by both parties to the conflict (See also Presence, methods and tactics under 4.3.4. Indiscriminate violence). Both the RSF and the SAF (particularly through its military intelligence branch) and their respective allied militias prevented access of humanitarian aid to areas controlled by the opposing camp (e.g. the SAF not allowing people to buy goods in SAF-controlled areas to bring into RSF-controlled areas, or the RSF preventing the transit of humanitarian aid through El Fasher alleging that it would benefit the SAF. See also 3.8. Civilians from areas associated with the opposing warring party). The situation was particularly severe in North Darfur where Zamzam IDP camp was classified as experiencing famine while still facing limited access to humanitarian aid. Government officials rejected claims of famine in Zamzam and other camps, presumably owing to military concerns about the subsequent risks of supplying RSF-controlled areas.



Serious harm must take the form of conduct of an actor (Article 6 QD/QR). In themselves, the general unavailability of healthcare, humanitarian assistance, education or other socio-economic elements (e.g. difficulties in finding livelihood opportunities, housing) are not considered serious harm meeting the requirements of inhuman or degrading treatment under Article 15(b) QD/QR in relation to Article 6 QD/QR, unless there is intentional conduct of actor, such as the intentional deprivation of the applicant's access to humanitarian assistance or appropriate healthcare.

However, as information suggests, in the context of the ongoing war in Sudan the healthcare, humanitarian and socio-economic conditions are in some cases, as the above-mentioned ones, the result of an intentional conduct of an actor, and therefore they may amount to torture, inhuman or degrading treatment or punishment under Article 15(b) QD/QR.

It is to be noted also that, in some cases, the denial of healthcare and/or humanitarian aid and/or other socio-economic conditions, may be linked to belonging to a minority (see 3.1. Ethnic) or to (imputed) political opinion (see for example 3.3. Members of the Resistance committees (RCs) and Emergency Response Rooms (ERRs), 3.4. Members of political parties, unions and civil society organisations, 3.5. Community leaders, human rights activists and lawyers, 3.8. Civilians form areas associated with the opposing warring party), and those





individuals would qualify for refugee status. If nexus to a reason for persecution is not substantiated, Article 15(b) QD/QR would apply.

4.2.2. Arbitrary arrests, illegal detention and prison conditions

Special attention should be paid to the phenomena of arbitrary arrests and illegal detention, as well as to prison conditions. When assessing the conditions of detention, the following elements may, for example, be taken into consideration (cumulatively): number of detained persons in a limited space, adequacy of sanitation facilities, heating, lighting, sleeping arrangements, food, recreation or contact with the outside world.

The analysis below is based on the following EUAA COI reports and query: <u>Country Focus</u> <u>2024</u>, 2.3.1.; <u>Country Focus</u> <u>2025</u>, 1.4., 2.6., 2.7.; <u>COI Update</u> <u>2025</u>, 4.. Country Guidance should not be referred to as a source of COI.

Despite Sudan's ratification of international conventions against torture and enforced disappearance and the inclusion of the right to due process and the prohibition of ill-treatment in the interim constitution, such human rights violations continue to be reported in the country.

Both the RSF and the SAF have engaged in arbitrary arrests and detentions of civilians. Although coverage of such acts has been reduced with the degradation of security conditions on the ground, reports indicate that kidnapping and enforced disappearances have increased since the beginning of the current conflict. It was also reported that RSF regularly abduct women and girls, hold them in detention houses and subject them to violence and abuse, including sexual violence, forced domestic beatings, torture and denied access to food.

Prisoners, including children, in both RSF and SAF formal or informal detention centres face severe conditions, including overcrowding, food shortages, lack of medical care, ventilation or heating and denied access to legal assistance or judicial oversight. Reportedly, boys under the age of 18 were imprisoned with adult male detainees in Khartoum and Darfur by both the SAF and the RSF. Individuals are also subjected to ill-treatments, humiliating and degrading behaviours and cruelty which have led to deaths in custody. Examples reported starvation, physical abuse (e.g. beatings, electric shocks and burns), sexual violence against men and boys (including rape and gang-rape, sexual assaults, forced nudity, beatings on genitals and rape threats). Finally, acts of torture used by both warring parties to obtain information or intimidate individuals, including physical violence as well as psychological and sexual violence (e.g. prior and during interrogations) have been reported.



In cases where the prosecution or punishment is grossly unfair or disproportionate, or where a person is subjected to prison conditions which are not compatible with respect for human dignity, a situation amounting to serious harm under Article 15(b) QD/QR may occur.

It should be highlighted that in some cases, there would be a nexus to a reason for persecution falling under the definition of a refugee, and those individuals would





qualify for refugee status. If nexus to a reason for persecution is not substantiated, Article 15(b) QD/QR would apply.



In some cases, the arrest, detention and imprisonment would have been imposed for a serious crime committed by the applicant, or for other acts falling within the exclusion grounds (Article 17 QD/QR). Therefore, although the criteria of Article 15(b) QD/QR would be met, exclusion considerations should be examined (see <u>7.</u> Exclusion).

4.2.3. Criminal violence

The analysis below is based on the following EUAA COI reports: <u>Country Focus 2024</u>, 1.1.3; <u>Country Focus 2025</u>, 1.3, 1.4.. Country Guidance should not be referred to as a source of COI.

Sudan faced a surge of criminality and the collapse of the rule of law, resulting in the disruption of police functions, destruction and looting of law enforcement facilities, including police stations, and the inability to protect civilians from armed groups and criminals. Reportedly, the RSF attacked national and state prisons across multiple states leading to the release of thousands of prisoners, some of whom joined military operations, while others engaged in criminal activities.

All parties to the conflict, including the SAF, the RSF and their allies, as well as other armed or criminal groups, have reportedly been involved in murders, rapes, kidnappings, enforced disappearances, extortion and trafficking. IDPs and civilians fleeing the country have been particularly vulnerable to this type of criminal activities.

For violence linked to trafficking in human beings, please also refer to <u>3.9.4. Trafficking in women and girls</u> Women and girls and <u>3.10.2 Child labour and child trafficking</u>.



A real risk of violent crime, such as abduction, murder or violence in relation to trafficking in human beings would meet the requirements under Article 15(b) QD/QR.

Where there is no nexus to a reason for persecution under the refugee definition, and there is a reasonable degree of likelihood for the individual to face violent crime, this risk would qualify under Article 15(b) QD/QR.

Exclusion considerations may be relevant to this profile, as some criminals may have been involved in excludable acts (see <u>7. Exclusion</u>).

4.2.4. Violence in relation to land expropriation

The analysis below is based on the following EUAA COI reports: <u>Country Focus 2024</u>, 2.4.1.; <u>Country Focus 2025</u>, 1.3, 2.5.; <u>Security 2025</u>, 2.4.5, 2.6.1, 2.6.2.. Country Guidance should not be referred to as a source of COI.





Disputes over land and resources have historically been a major source of conflict in Sudan, particularly in Darfur where the opposition between communities with traditional land rights and those without has been a major driving force behind the crises in the region since 2003.

This is also the case in the country's breadbasket areas, notably Al Jazirah, Sennar, and Gedaref states, where the irrigation of the region fertile lands plays a critical role in the country's food production. Clashes were also reported in eastern Sudan where tensions between the SAF and a local armed group composed of members of the Beja community were apparently based on concerns about land ownership.

Land expropriation and the use of violence to dispossess farmers and communities of their land were exacerbated by the current conflict. While representing a goal in itself, land grabbing has also been used by the RSF as a lever to mobilise the communities composing its troops in various regions such as Darfur, South Kordofan or Al Jazirah, calling on racial tropes and economic interests. Burning of land registries has also been reported.

See also 3.1. Ethnic.



In cases of violence in relation to land expropriation, a situation amounting to serious harm under Article 15(b) QD/QR may occur.

It should be highlighted that in some cases, there would be a nexus to a reason for persecution falling under the definition of a refugee, and those individuals would qualify for refugee status. If the nexus to a reason for persecution is not substantiated, Article 15(b) QD/QR would apply.

4.3. Article 15(c) QD/QR: indiscriminate violence in situations of armed conflict

Last update: June 2025

Article 15(c) QD/QR

This section focuses on the application of the provision of Article 15(c) QD/QR. Under Article 2(f) QD/QR in conjunction with Article 15(c) QD/QR, subsidiary protection is granted where substantial grounds have been shown for believing that the person would face a real risk of suffering serious harm defined as **serious and individual threat to a civilian's life or person by reason of indiscriminate violence in situations of international or internal armed conflict.** The individual assessment of real risk of serious harm in the context of Article 15(c) QD/QR takes also into account any 'mere presence' situation in the areas the applicant would need to travel through in order to reach their home area.

Each element of the provision is addressed in a separate subsection. As mentioned in <u>Country Guidance</u>: <u>explained</u>, all of these elements have to be fulfilled in order to grant subsidiary protection under Article 15(c) QD/QR.







The contents of this section include:

- 4.3.1. Preliminary remarks
- 4.3.2. Armed conflict (international or internal)
- 4.3.3. Qualification of a person as a 'civilian'
- 4.3.4. Indiscriminate violence
- 4.3.5. Serious and individual threat
- 4.3.6. Qualification of the harm as a 'threat to (a civilian's) life or person'
- 4.3.7. Nexus/'by reason of'

4.3.1. Preliminary remarks

Last update: June 2025

In armed conflicts, the targeting of civilians may have a nexus to one of the reasons for persecution according to the refugee definition. Therefore, refugee status may be granted. Such targeted violence, furthermore, would not be considered 'indiscriminate'.

In Sudan, mass killings of civilians and other large-scale attacks may have a targeted nature due to the perceived ethnic and/or political affiliation of the individuals or community affected. In such cases a nexus to refugee status may be substantiated. See in particular 3.1. Ethnic, 3.2. Individuals fearing forced recruitment by the RSF and 3.88. Civilians from areas associated with the opposing warring party. In other circumstances, mass killings of civilians and other large-scale attacks are conducted in the context of the fighting for the territorial control in areas held by the opposing warring party. In such cases, the existence of a serious and individual threat to a civilian's life or person by reason of indiscriminate violence in situations of international or internal armed conflict should be assessed.

a) Reference period

The following assessment is based on the EUAA COI reports, namely: Country Focus 2024 (April 2024), Country Focus 2025 (February 2025), and Security 2025 (February 2025) covering the reference period 15 April 2023 – 30 November 2024. Limited information has been added during the finalisation of the document based on the COI Update 2025, concerning the reference period 1 December 2024 - 21 March 2025, unless differently specified. Background information prior to April 2023, particularly regarding the origins of the SAF-RSF conflict, previous security trends, and structural vulnerabilities, is also taken into account in order to provide a comprehensive analysis of the situation.







This guidance should be considered valid as long as current events and developments fall within the trends and patterns of violence observed within the reference period of the mentioned COI report. New events and developments that cause substantial changes, new trends or geographical shifts in the violence, may lead to a different assessment. The security situation in a given territory should always be assessed in light of the most up-to-date COI available.

b) Legal framework

All of the elements under Article 15(c) QD/QR (Figure 1) have to be fulfilled in order to grant subsidiary protection in accordance with this provision.

Figure 1: Article 15(c) QD/QR: elements of the assessment.



Source: 'Country Guidance: explained' (February 2025).

Common analysis of the factual preconditions and guidance for the possible application of Article 15(c) QD/QD with regard to the situation in Sudan are provided below.



For general guidance on the country guidance approach to the assessment of subsidiary protection needs under Article 15(c) QD/QR, see <u>Country Guidance:</u> <u>explained</u>.





4.3.2. Armed conflict (international or internal)

Last update: (Month) year

Since April 2023, Sudan has been engulfed in separate non-international armed conflicts (NIAC), primarily between the SAF and the RSF, as well as among armed groups. According to the analysis by the Assessment Capacities Projects (ACAPS), the severity level of the conflict is very high.

The conflict has seen the involvement from multiple domestic and international actors, notably the SAF, under General Abdel Fattah al-Burhan, controlling conventional military forces, and the RSF, led by Mohamed Hamdan Dagalo ('Hemedti'), operating as a paramilitary force with heavy reliance on tribal militias. Reports indicate various forms of foreign involvement, including political and military support from Iran, Egypt, Eritrea and Saudi Arabia to the SAF, and from the UAE, although denied by the UAE, Russia's former Wagner Group, now renamed 'Africa Corps', and Libya to the RSF. During the reference period, the Russian government gradually backed away from supporting the RSF and shifted towards supporting the SAF.

The SAF is still involved in separate non-international armed conflicts against other non-state armed groups, including the SLM-AW in Darfur and of the SPLM-N Al Hilu in the Kordofans and in the Blue Nile state, adding an additional layer of complexity to the conflict.

[COI reference: Country Focus 2024, 1.1.1, 1.1.3.; Security 2025, 1.1.; COI Update, 1.]



Sudan is currently affected by multiple internal conflicts, which fall within the scope of Article 15(c) QD/QR, notably between the SAF and the RSF. Also, the SAF is involved in separate non-international armed conflicts against other non-state armed groups.

These conflicts affect different areas in Sudan at different degrees. At the moment of writing, the situation remains volatile with some actors shifting positions and/or side of the conflict. For further information, see <u>2. Actors of persecution or serious</u> harm and a) Security situation in Sudan: recent events.

With regard to the regions and/or states where confrontations and incidents take place, it has to be further examined whether the remaining criteria under Article 15(c) QD/QR are also cumulatively met.

4.3.3. Qualification of a person as a 'civilian'

Last update: (Month) year

Being recognised as a civilian is a prerequisite to benefiting from protection under Article 15(c) QD/QR. The purpose of this provision is to protect only those who are not taking part in the conflict. This includes the potential application of Article 15(c) QD/QR to former combatants who have genuinely and permanently renounced armed activity. In the context of Sudan, these may also include the thousands of civilians who have temporarily either armed themselves and formed self-defence groups or have been armed by the SAF to protect their area of residence and then renounced armed activity.





Applications by Sudanese nationals falling under the following profiles should be examined carefully. Based on an individual assessment, such applicants may be found not to qualify as civilians under Article 15(c) QD/QR. For example:

- The SAF and affiliated armed groups, including paramilitary and auxiliary units as well as security and intelligence agencies, and civilian volunteers.
- The RSF and associated militias, including local armed factions in Darfur and the Kordofans, paramilitary and auxiliary units as well as security and intelligence agencies.
- Other armed groups opposing the SAF or the RSF, such as the JEM and factions of the SPLM-N and the SLM.

See also the chapter 2. Actors of persecution or serious harm.

It should be noted that actively taking part in hostilities is not limited to openly carrying arms but could also include substantial logistical and/or administrative support to combatants.



Exclusion considerations may also apply (see the chapter 7. Exclusion).

[COI reference: Country Focus 2024, 1.1.3.; Security 2025, 1.2.]

4.3.4. Indiscriminate violence

Last update: June 2025



The common analysis regarding the degree of indiscriminate violence taking place in different regions in the respective country of origin combines quantitative and qualitative elements in a **comprehensive holistic assessment**.

For more information on the methodology and indicators used to assess the level of indiscriminate violence in country guidance documents, see Country Guidance: explained.

a) Security situation in Sudan: recent events

- Security situation in Sudan
- Presence, methods and tactics of actors
- Security incidents

- Fatalities
- Conflict-related displacement
- Further impact on civilians



It should, furthermore, be noted that the COI used as a basis for this assessment cannot be considered a complete representation of the extent of indiscriminate violence and its impact on the life of civilians.





In view of the ongoing conflict, the situation remains fluid and changes in trends may be observed in the future. It should be highlighted that in Sudan the widespread crackdown on media outlets, along with the recurring communication blackouts significantly impacted the reporting and the conflict media coverage throughout the country.

Therefore, concerns with regard to underreporting, especially pertinent to the quantitative indicators, should be taken into account.

Security situation in Sudan

In mid-April 2023, hostilities broke out between the SAF, and the RSF. This conflict follows several years of rivalry between these two components of the Sudan's security apparatus, whose respective leaders took the helm of the state as president and vice-president of the Transitional Sovereignty Council following the fall of the 30-year-long dictator Omar Hassan al-Bashir in 2019. After working together to overthrow the civilian-led government in October 2021, growing tensions between the two leaders crystallised over the timeline for the integration of the RSF into the military and led to the outbreak of an open and nationwide conflict that quickly spread from Khartoum to large parts of the country, notably Darfur, the Kordofans and Al Jazirah.

Fuelled by an inflow of weapons and military equipment from foreign actors despite an existing UN arms embargo on Darfur, the conflict has led to what is often described as the world's largest current humanitarian crisis and one of the most severe on record. As of March 2025, 8.5 million people have been internally displaced as a result of the conflict, while a further 3.9 million have fled to neighbouring countries. More than half of the total population, or 25 million people, were facing acute food insecurity at that time.

Several initiatives, including a UN Security Council resolution calling for an immediate end of hostilities in March 2024, have been launched to end the conflict but the few commitments made have remained largely unimplemented as both the SAF and the RSF continue to pursue their war aims.

The conflict has become more and more complex and volatile with the use of new military equipment, such as armed drones whose long range has disrupted the frontlines, rendering previously safe areas vulnerable to devastating attacks. Also, both warring parties have massively recruited civilians, often along ethnic lines. Both sides have been accused of human rights abuses, indiscriminate attacks against civilians, as well as war crimes and crimes against humanity, with the RSF more often identified as the perpetrator.

[COI reference: <u>Country Focus 2024</u>, 1.1.1., 1.3.2.; <u>Country Focus 2025</u>, 2.5.; <u>Security 2025</u>, 1.1.1., 1.1.2.; <u>COI Update 2025</u>, 3.]

Presence, methods and tactics of actors

For a general overview of the main actors of serious harms and their areas of control in Sudan involved in the current conflict, please see <u>2. Actors of persecution or serious harm</u>.

During the reference period, the country has been fragmented into different areas of control with most territories being held by either the SAF or the RSF, who remain the primary parties





to the conflict, alongside local armed groups controlling regional territories such as the SPLM-N-al-Hilu in the Kordofans and Blue Nile as well as factions of SLM in Darfur.

The SAF retained control over the country's north, east and southeast, including Port Sudan on the Red Sea Coast. Meanwhile, the RSF has been controlling most of the city of Khartoum from April 2023 until March 2025, when the SAF regained control of the capital city Khartoum and key strategic locations. Between January and March 2025, the SAF retook from the RSF Wad Madani and most of the Al Jazirah state's territory as well as most of Sennar state. Also, the RSF controls large parts of West and North Kordofan as well as the Darfur region except for El Fasher state capital, and some parts of North Darfur. Meanwhile, the SLM-AW which declared itself neutral in the current conflict, has continuously controlled parts of the Jebel Marra in Darfur, and SPLM-N-Al-Hilu controlled parts of Blue Nile and South Kordofan states.

As the only belligerent to own combat aircrafts, the SAF carried out all the airstrikes since the eruption of the conflict and relied on its air superiority combined with artillery strikes and the deployment of tanks to defend fixed positions and break the siege of its garrisons despite its lack of troops on the ground to pursue RSF troops in urban terrain. As the conflict progressed, the SAF deployed new combat drones acquired from Türkiye and Iran and used them to conduct mass drone attacks supporting its ground-based offensives. SAF has also reportedly used chemical weapons on at least two occasions, alongside 'indiscriminate bombing' of civilian infrastructure, attacks on schools, markets and hospitals and extrajudicial executions.

In contrast, relying on the mobility and agility of its troops, the RSF has adopted hit-and-run tactics to target SAF positions and loot their resources and gain access to additional heavy weapons such as artillery and long-range missiles. With the logistical support and weapons supply from regional powers such as Russia's Wagner Group or the UAE, although the UAE government denies it, the RSF also gained sophisticated intelligence capabilities and access to combat drones. They used these abilities to spy on army's movements and take further advantage of their lack of hierarchical chain of command that allow the RSF to regroup and redeploy their troops following the necessities on the ground. In addition, the drones were used to strike areas far away from the frontlines with the aim of creating a sense of constant threat throughout the country and stretching the SAF's defensive positions. These tactics enabled the RSF and allied militias to force the SAF's retreat of some positions and take control of vast territories during the first year of the conflict, particularly in Greater Khartoum, Darfur and Al-Jazirah. Reportedly, the RSF continued to employ tactics known from the *Janjaweed* era, including pillaging and looting, as well as deliberate killings to intimidate residents.

Sources have highlighted the use of sexual violence as a weapon of war, defined as a characteristic of the ongoing conflict, with widespread instances of rape and gang-rape, primarily targeting women and girls. These acts have been particularly prevalent during city invasions, attacks on IDPs and their camps, and when armed groups occupied urban areas, especially at the hands of the RSF. Additionally, UN special rapporteurs noted in June 2024 that both the SAF and the RSF are using food as a weapon of war, blocking aid deliveries, starving the civilian population and disrupting farming activities, increasing significantly the risk of a looming famine. See 3.3. Members of the Resistance committees (RCs) and Emergency Response Rooms (ERRs, 3.7. Humanitarian and healthcare workers, and 3.9. Women and girls.

[COI reference: Country Focus 2024, 1.1.3; Security 2025, 1.2.1; COI Update 2025, 2.1.]





Security incidents



Data concerning this indicator are primarily based on ACLED reporting from 15 April 2023 to 21 March 2025.

Also, as reported by sources, including ACLED, these figures are likely to be underestimates, as incidents and fatalities might not be officially recorded by local and health authorities due to the ongoing conflict. For more information on the methodologies of data collection, please see Country Focus 2024, Security 2025 and COI Update 2025.

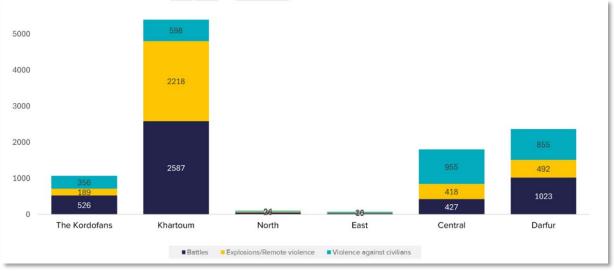
In Sudan, 10 567 security incidents were reported of which 4 597 were recorded as battles, 3 299 as explosions/remote violence and 2 671 as incidents of violence against civilians.

Security incidents were recorded in all regions, with Khartoum (5 330), Darfur (2 294), the Central (1774) and the Kordofans (992) registering the highest numbers during the reference period. In 3 587 instances civilians were the primary or only target.

Based on ACLED data, further calculations on security incidents per week in each region for the period are also provided in the section b).

April 2023 and 21 March 2025. 5000

Figure 2: Breakdown by region of number of incidents recorded by ACLED between 15



Source: EUAA elaboration based on ACLED data as of 21 March 2025.

[COI reference: Country Focus 2024, 1.1.3.; Security 2025, 1.1.4.; COI Update, 2.2.]





Fatalities



Data concerning this indicator are primarily based on ACLED reporting from 15 April 2023 to 21 March 2025.

The number of civilian casualties is considered a key indicator when assessing the level of indiscriminate violence and the associated risk for civilians in the context of Article 15(c) QD/QR.

As no comprehensive data with regard to civilian deaths and injuries at the level of the regions in Sudan has been identified, this analysis refers to ACLED records regarding the overall number of fatalities. The data used for this indicator reflects the number of fatalities in relation to reported 'battles', 'violence against civilians' and 'explosions/remote violence' with reference to the ACLED Codebook. Importantly, it does not differentiate between civilians and combatants and does not additionally capture the number of those injured in relation to such incidents. While this does not directly meet the information needs under the indicator 'civilian casualties', it can nevertheless be seen as a relevant indication of the level of confrontations and degree of violence taking place.

It should further be mentioned that ACLED data are regarded as merely estimates, especially with regard to the number of fatalities. As reported by sources, including ACLED, these figures are likely to be underestimates, as incidents and fatalities might not be officially recorded by local and health authorities due to the ongoing conflict. Please note that the reported number of fatalities is further weighted by the available estimations of population of the respective region provided by different sources. This data is presented as the approximate number of fatalities per 100 000 inhabitants.

See clarifications in Country Focus 2024, Security 2025 and COI Update 2025.

In total 28 608 fatalities were reported in Sudan. Other sources suggest that as of May 2024, up to 150 000 people have been killed since the beginning of the ongoing conflict. However, besides telecommunication blackouts and insecurity reportedly hampering the recording of fatalities, many indirect cases of death resulting from war-exacerbated factors – such as lack of emergency care, essential food, medicine and vaccination programmes – were not recorded. Fatalities were reported in all regions, with Darfur (13 354), Khartoum (9 709), the Kordofans (4 010), and the Central (5 765) registering the highest numbers during the reference period. Urban residential areas have been the most impacted locations (e.g. attacks on markets being the most injurious for civilians).

As of January 2024, according to Action on Armed Violence (AOAV) civilians accounted for 99 % of the recorded casualties, with 57 % of the incidents occurring in urban residential areas, and 80 % of incidents attributed to airstrikes. According to this estimate, the London School of Hygiene & Tropical Medicine (LSHTM) suggested that the death toll in other parts of the country must have also been considerably higher than the respective recorded figures.

Based on ACLED data, further calculations on fatalities per 100 000 inhabitants in each region for the period are also provided in the <u>section b</u>).



Central

Darfur

16000
14000
12000
10000
8000
6000
4000
2000
4240

167

North

Figure 3: Breakdown by region of number of casualties recorded by ACLED between 15 April 2023 and 21 March 2025.

Source: EUAA elaboration based on ACLED data as of 21 March 2025.

Khartoum

[COI reference: Country Focus 2024, 1.1.3.; Security 2025, 1.1.4.; COI Update, 2.2.]

East

Conflict-related displacement

The Kordofans



0

Data concerning this indicator is mostly based on IOM and UNHCR reporting.

For more information on the methodologies of data collection please see <u>Country</u> <u>Focus 2024</u>, <u>Security 2025</u> and <u>COI Update 2025</u>.

According to IOM and UNHCR, as of the start of March 2025, about 11.3 million people have been forcibly displaced as a result of the ongoing conflict, of whom more than 8.5 million were internally displaced while 3.9 million have fled Sudan to neighbouring countries. According to UNICEF, the number of displaced children (internally and abroad) amounted to 5 million as of September 2024.

An estimated 3.8 million persons were already internally displaced (IDPs) in Sudan prior to the 15 April 2023, of whom more than 1 million had experienced secondary displacement as a result of the ongoing conflict at the beginning of December 2024. At this date, Sudan was hosting a total estimated IDP population of 11.5 million people. More than half of them (53 %) were children under the age of 18 years and 55 % were female.

According to IOM's Displacement Tracking Matrix (DTM) Data, as of December 2024, IDPs had been displaced to 9 653 locations across all 18 states of the country, with the majority of the IDPs being sheltered by hosting families and communities.





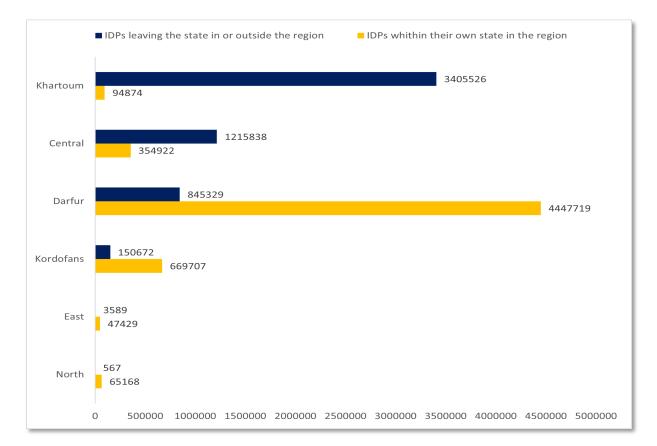


Figure 4: Breakdown by region of number of IDPs recorded by IOM as of 12 March 2025.

Source: EUAA elaboration based on IOM data.

[COI reference: Country Focus 2024, 1.1.1., 1.1.5.; Security 2025, 1.3.1.; COI Update, 3.2.1.]

Further impact on civilians

Beyond the elements described above, the ongoing conflict has a global impact on the life of civilians living in Sudan as it has led to one of the most severe humanitarian crises in records with almost two thirds of the population in 'desperate need' of humanitarian and protection assistance. Attacks on civilian areas and infrastructure have seriously impacted healthcare system, agriculture activities, food chain, water and sanitation systems. It resulted in telecommunication blackouts, food stock looting, and school closures. According to UNICEF, as of September 2024 more than 17 million children were not attending school, and more than 3 200 school buildings were being used as shelters for IDPs.

A large proportion of the health facilities have been destroyed or rendered inoperable, while health workers have been targeted by both warring parties. As a result, the civilian population is experiencing serious difficulties in accessing health care and medical supplies, with two-thirds of the population no longer able to access essential health services.

The conflict has also led to the collapse of the economy and the disruption of the food and water supply chains, placing an unprecedented number of people in situation of starvation and famine. As of December 2024, more than half of the total population, or over 25 million people, were facing acute food insecurity and famine was confirmed in at least five areas.





This situation is further exacerbated by road blockages of certain localities and the obstructions and restrictions imposed on humanitarian aid deliveries by the belligerents, who have also been targeting aid workers. For more information, please see 3.7. Humanitarian and healthcare workers. Lack of food, income and access to basic services led IDPs to accept risky jobs to cover their needs. IOM identified multiple specific protection risks including trafficking of persons, child marriage, forced recruitment, child labour and sexual violence. For more information, please see 3.2. Individuals fearing forced recruitment by the RSF, 3.9 Women and girls, and 3.10. Children.

Many roads are under the threat of attacks and simply inaccessible while insecurity, administrative obstacles and/or poor road conditions is generally reported. Both the SAF and the RSF and their allies have set up many checkpoints in their respective areas of control, which are used to control the population but also as a mean of looting. Multiple checkpoints are usually along a same road, restraining movements and extending journey times. Reports indicate that people passing through checkpoints face extorsion, mistreatments, sexual violence and specific targeting, notably on the basis of ethnicity, age or profession.

Explosive remnants of war have been reported in some areas of the country because of the widespread use of conventional weapons including field artillery, mortars, air-dropped weapons and anti-aircraft guns during the clashes, notably in urban areas of El Obeid, in North Kordofan, in Omdurman and rural areas North of Bahri. The RSF has also been accused of planting mines, especially in northern Bahri.

[COI reference: Country Focus 2024, 1.1.5., 1.2.4.; Country Focus 2025, 3.2.4.; Security 2025, 1.3.1., 2.1.5.]

b) Assessment of indiscriminate violence per region

Last update: June 2025

For the purposes of this document, the assessment of the level of indiscriminate violence in Sudan is made by (non-administrative) regions, denoted as follow:

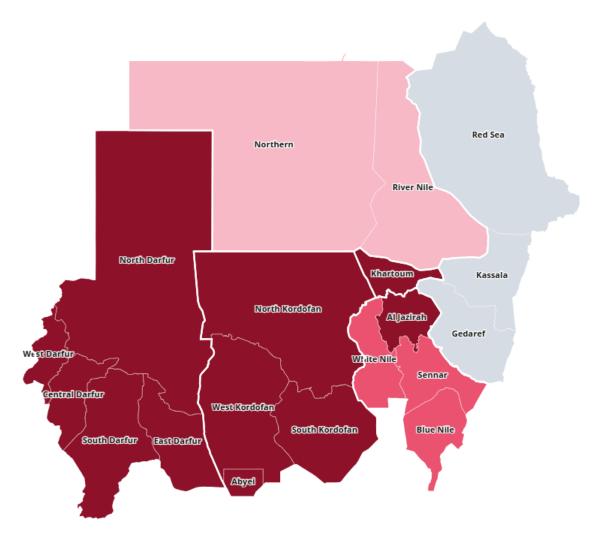
- **Khartoum region** which comprises Khartoum state;
- Darfur region which comprises North Darfur, South Darfur, West Darfur, East Darfur and Central Darfur states:
- Kordofan region which comprises North Kordofan, South Kordofan and West Kordofan states, including Abyei¹⁴;
- Central region which comprises Al Jazirah, Sennar, Blue Nile and White Nile states;
- North region which comprises Northern and River Nile states; and,
- **East region** which comprises Gedaref, Kassala and Red Sea states.

The map below summarises and illustrates the assessment of the level of indiscriminate violence per region.



¹⁴ Abyei: disputed territories





Map 2. Level of indiscriminate violence in Sudan (based on information up to 21 March 2025).

- **Mere presence** would be considered sufficient in order to establish a real risk of serious harm under Article 15(c) QD/QR.
- Indiscriminate violence reaches a **high level** and a lower level of individual elements is required to establish a real risk of serious harm under Article 15(c) QD/QR.
- Indiscriminate violence is taking place, however **not at a high level**, and a higher level of individual elements is required to establish a real risk of serious harm under Article 15(c) QD/QR.
- In general, there is **no real risk** for a civilian to be personally affected within the meaning of Article 15(c) QD/QR.

Mere presence

Areas where the degree of indiscriminate violence reaches such an exceptionally high level that substantial grounds are shown for believing that a civilian, returned to the relevant area, would, **solely on account of their presence there**, face a real risk of being subject to the





serious threat referred to in Article 15(c) QD/QR. Accordingly, additional individual elements are not required in order to substantiate subsidiary protection needs under Article 15(c) QD/QR. The areas assessed as belonging to this category as well as the main elements leading to this assessment are highlighted below.

Khartoum state

- Actors and territorial control: in Khartoum, the most densely inhabited state in Sudan with a population of 9.4 million, the SAF and the RSF and their allies are the primary warring parties actively confronting to gain control of the areas. Also, international actors are active, notably the Egyptian air force supporting the SAF. Following the offensives, the SAF regained control over most of the three cities, while the RSF remained in control of western and southern parts of Omdurman. See 2. Actors of persecution or serious harm.
- Methods and tactics: explosive weapons and drone attacks have been used by both warring parties, but while the SAF is reported to conduct also air strikes and artillery shelling, the RSF uses asymmetric tactic relying on heavy artillery attacks, acting on the ground through its infantry. Reportedly, civilians continued to be injured and killed in heavy artillery crossfire and due to the use of drone-dropped munitions against persons wearing civilian clothes, airstrikes and shelling during the 2024 SAF's offensive. The RSF targeted civilian infrastructures (such as markets, medical facilities, and other services) killing and injuring dozens of people in Omdurman. Reportedly, in April 2023, the RSF used the presence of detained civilians in streets and open areas close to buildings as 'human shields' to deter SAF airstrikes in Khartoum and Bahri. Additionally, sexual violence is used as a weapon of war, particularly by the RSF and allied militias. See 3.9. Women and girls.
- **Incidents and fatalities**: in the reference period, 52.8 security incidents per week and 103 fatalities per 100 000 inhabitants were reported in Khartoum state. In 1 075 instances civilians were the primary or only target.
- **Displacement**: with around 3 500 400 IDPs, Khartoum represents the second most common area of origin for IDPs in Sudan accounting for 31 % of all IDPs in the country. It is reported that despite the 'mass exodus' triggered by the conflict, there was still a large number of persons who either could not afford to flee or were unable to do so due to vulnerabilities or insecurity.
- Further impact on civilians: the use of explosive weapons by both the SAF and the RSF with wide area effects in densely populated Khartoum has resulted in large-scale destruction of homes, schools, hospitals, and other vital infrastructure. Reportedly, many indirect cases of deaths resulting from war-factors are not recorded. The healthcare system has been 'decimated' due to the conflict with Khartoum being reported as the most affected by attacks to healthcare facilities. Severe food insecurity due to the conflict resulted in deaths for starvation, including among children. See the use of food as a weapon of war in Presence, methods and tactics of actors under section a) Security situation in Sudan: recent events. Finally, explosive remnants of war were reported in Omdurman and northern Bahri, in the latter the RSF was also accused of planting mines. See also 3.77. Humanitarian and healthcare workers under RS and 4.2.1. Healthcare, humanitarian assistance and socioeconomic conditions under SP.

Khartoum state experiences exceptionally high level of indiscriminate violence, characterised by intense urban warfare, shifting territorial control, heavy aerial bombardments, and widespread civilian targeting. Both the SAF and the RSF engage in large-scale military





operations, including airstrikes, artillery shelling, and drone attacks, leading to severe civilian casualties, mass displacement, destruction of infrastructure, and humanitarian collapse. Given the scale and intensity of the conflict, civilians in Khartoum face a real and immediate risk of serious harm solely due to their **mere presence** in the area. Accordingly, additional individual elements are not required in order to substantiate subsidiary protection needs under Article 15(c) QD/QR.

[COI reference: Country Focus 2024,1.2.2.; Security 2025, 2.1.; COI Update, 2.2., 3.2.1.]

Darfur region [North Darfur, South Darfur, West Darfur, East Darfur and Central Darfur states]

- Actors and territorial control: the Darfur region is mostly controlled by the RSF except for El Fasher state capital, some parts of North Darfur, and Jebel Marra. Nevertheless, territorial control in Darfur remains contested, with various armed actors exerting influence over different areas. The shifting alliances, defections and internal divisions among these actors contribute to the volatile security situation. The RSF, originating from Darfuri Arab groups, hold control over four of the five state capitals, with El Fasher in North Darfur remaining a key battleground where the SAF and allied factions retain a presence. The SLM maintains influence in different areas, with the SLM-AW controlling parts of Jebel Marra and claiming to protect civilians there, while the SLM-MM and the JEM have actively engaged in hostilities against the RSF in North Darfur where SLM-MM exert control over some areas. Some smaller groups composing the Joined Forces or JFASM, together with SLM-MM and JEM also abandoned their neutrality in April 2024.
- Methods and tactics: the ongoing conflict in Darfur is characterized by the use of protracted sieges, indiscriminate attacks on civilian areas and infrastructures (including healthcare facilities), the use of heavy artillery and airstrikes and targeted ethnic violence. Violations of international humanitarian law (IHL) and international human rights law (IHRL) have been documented, particularly concerning the protection of civilians and vulnerable populations. Despite an existing UN arms embargo prohibiting weapons supplies to Darfur, weaponry was transferred into the region and the active participation of other armed groups has heightened risks of serious harm for civilians caught in the crossfire. See 3.1.1. Non-Arabs/Africans from Darfur. Additionally, sexual violence is used as a weapon of war, particularly by the RSF and allied militias. See 3.9 Women and girls.

Reportedly, the **SAF** primarily relied on air superiority, employing indiscriminate airstrikes in urban and rural areas, resulting in civilian casualties, damage to infrastructures, and forced displacement. However, shelling against civilians and bombardments of civilian areas and infrastructures (including schools, healthcare facilities markets, IDPs camps) resulting in fatalities and casualties among the civilian population were also reported.

The **RSF** employed siege warfare, notably in El Fasher where it trapped over 900 000 civilians under dire conditions, subjecting them to daily artillery shelling targeting markets and other locations. Also, the RSF engaged in indiscriminate artillery shelling that targeted civilian infrastructures such as markets, hospitals and IDP camps, (notably Abou Shouk, Ardamata and Zamzam) causing the loss of civilian life and damage to infrastructures. The use of suicide drones has been reported as part of the RSF's military strategy. The abovementioned tactics have contributed to widespread human rights violations and a deterioration of the security situation.





- **Incidents and fatalities**: in the reference period, 22.7 security incidents per week and 223 fatalities per 100 000 inhabitants were reported in Darfur region. In 1 017 07 instances civilians were the primary or only target.
- **Displacement**: most of the 5 293 048 internally displaced persons originated from Darfur region moved within the respective state. In October 2024, it was reported that about 2.8 million people in and around El Fasher had no option to escape or to access humanitarian assistance.
- Further impact on civilians: attacks against civilian infrastructures caused significant damages, including on health facilities, schools, markets, hospitals, houses and routes. Widespread destruction was reported in the region, where many villages were targeted by fires. The general situation is exacerbated by both the RSF and the SAF limiting the access of humanitarian aid. Children malnutrition and people dying from starvation and diseases were also reported. For example, in Zamzam IDP camp the severely limited humanitarian access is reported to be one of the primary causes of famine. See the use of food as a weapon of war in Presence, methods and tactics of actors under section a) Security situation in Sudan: recent events.

The Darfur region experiences an exceptionally high level of indiscriminate violence characterised by ongoing fighting for territorial control with the use of indiscriminate attacks against civilian areas and infrastructures resulting in the highest number of fatalities and IDPs overall. Looking at the indicators, it can be concluded that in the **Darfur region**, indiscriminate violence reaches such a high level that substantial grounds are shown for believing that a civilian, returned to the region, would, solely on account of their **mere presence** on its territory, face a real risk of being subject to the serious threat referred to in Article 15(c) QD/QR. Accordingly, additional individual elements are not required in order to substantiate subsidiary protection needs under Article 15(c) QD/QR.

[COI reference: Country Focus 2024, 1.2.2.; Security 2025, 1.3., 2.2.; COI Update, 2.2., 3.2.1.]

Kordofan region [North Kordofan, South Kordofan and West Kordofan states, including Abyei]

• Actors and territorial control: territorial control in the region is contested and subjected to rapid developments. As of October 2024, the RSF controlled most areas of the Kordofan region while the SAF remained in control of it military garrisons and strategic cities. Although besieged by the RSF, El Obeid and Kadugli, the capitals of North and South Kordofan states, remained under the control of the SAF during the reference period while heavy fighting took place in and around the cities. The SPLM-N-al-Hilu controlled some territories mainly in the Nuba Mountains of South Kordofan. The SPLM-N-al-Hilu remained officially neutral until February 2025 when, together with RSF and 22 other smaller rebel movements, and political and civil society groups, they signed an alliance aiming to establish a parallel government in RSF-controlled areas. Before the alliance the SPLM-N-al-Hilu had occasional fights with both sides of the conflict while seeking to gain control of territories.





Between July and October 2024, the RSF bolstered its hold in West Kordofan with the capture of the state's capital Al-Fula as well as the towns of Al-Meiram and Wad Banda whereas the disputed cities of Al Nuhud, Babanusa and Lagawa remained under SAF control. In South Kordofan, the SAF benefited from the support of the SPLM-N-al-Hilu to repel RSF attacks on the populous town of Dilling, amid inter-ethnic violence targeting Nuba.

In the Kordofans, the shifting alliances and internal divisions among the main actors contributed to the volatile security situation, including clashes erupting between the SAF or the RSF and their local allied forces.

- Methods and tactics: clashes and fighting were conducted by the three main actors in the state, each trying to expand their territorial control in the region. The SAF made large use Dof airstrikes, bombings and artilleries, including against civil areas and civilian infrastructures, such as a crowded markets and resulting in civilian casualties and fatalities. The RSF imposed sieges on entire cities, attacked villages, looting and burning down houses and entire villages, and reportedly perpetrated mass killings of civilians. Kidnapping, forced disappearance and sexual violence against civilians by RSF troops have also been reported, targeting especially Nuba localities and inhabitants in South Kordofan. Sexual violence is used as a weapon of war, particularly by the RSF and allied militias. See 3.1.2. Nuba from the Kordofans and 3.4. Members of political parties, unions and civil society organisations and 3.9 Women and girls.
- **Incidents and fatalities**: in the reference period, 9.8 security incidents per week and 67 fatalities per 100 000 inhabitants were reported across all states of the Kordofan region. In 364 instances, civilians were the primary or only target.
- **Displacement**: 820 379 IDPs were displaced from the Kordofan region as of the March 2025, mainly inside the region itself.
- Further impact on civilians: SAF airstrikes and bombings have damaged or destroyed public infrastructures such as schools, markets, state legislature and civil registries. RSF attacks damaged or destroyed houses and villages. Deaths have been reported as a result of starvation and lack of access to health services, particularly in the Nuba Mountains. See the use of food as a weapon of war in Presence, methods and tactics of actors under section a) Security situation in Sudan: recent events.

In the disputed region of Abyei, the situation remained tense as intercommunal clashes continued and accounted for most of the security incidents reported in the region.

In addition, the local security situation continued to be affected by the conflict in Sudan with an ongoing flow of weapons into the region, the arrival of persons displaced by the fighting and clashes between the SAF and the RSF in border areas. There were also reports of RSF incursions into Abyei territory, mainly in connection with looting incidents.

With regard to the high intensity of the conflict in the three states composing the region, illustrated by the methods employed by the actors, the numbers of security incidents and casualties reported as well as the general impact on civilians, it can be concluded that indiscriminate violence in the **Kordofan region** reaches such an exceptionally high level that **mere presence** on the territory would be considered sufficient in order to establish a real risk of serious harm under Article 15(c) QD/QR. Accordingly, additional individual elements are not required in order to substantiate subsidiary protection needs under Article 15(c) QD/QR.





[COI reference: Country Focus 2024, 1.2.4.; Security 2025, 1.3.1., 2.3.; COI Update, 2.2., 3.2.1.]

Central region [Al Jazirah]



For the different conclusion on the assessment of the level of indiscriminate violence in the other states of the central region, namely Sennar, Blue Nile and White Nile, assessed under the 'high level category' see <u>below</u>.

• Actors and territorial control: the conflict expanded to the Central region in July 2023 with a large-scale offensive by the RSF. Since March 2024, the SAF received the support of the SLM-MM, the JEM, the SPLM-N-Agar. They also relied increasingly on Islamist militia. The recent SAF offensive to recapture Al Jazirah state where the RSF controlled 90 % of the state since December 2023 has notably increased the volatility of the security situation of the state. In retaliation to the defection of an RSF commander in October 2024, the RSF troops carried major attacks against more than 30 localities across Al Jazirah, committing mass killings, sexual violence, and looting of markets and homes.

The RSF seized parts of northern **White Nile** state while the SAF pulled back into defensive positions further south. Although the frontlines have remained static, the RSF raids on villages have been reported in the state, with the use of hit-and-run tactics, the looting of localities and killing of civilians. Beyond some clashes between the SAF and the SPLM-N in July 2023, **Blue Nile** beneficiated of relative calm until August 2024, when the RSF began expanding its military attacks. As of November 2024, the RSF reported to have made some advances again in Blue Nile state. In 2024, **Sennar** state was affected by the offensive of both the RSF that took control of the area in July 2024, and then by the SAF and its allies that between October and December 2024, managed to retake control of most cities in Sennar state, including Sinja.

- Methods and tactics: SAF airstrikes reportedly targeted crowded spaces such as markets in RSF-controlled areas with the aim of disrupting commercial activities and targeting RSF members, as stationary targets are easier to hit than moving forces in the field. However, these attacks led to civilian casualties. The RSF is reported to attack areas and use hit-and-run tactics to raid and loot towns and villages. In addition, sieges by the RSF are also reported. Violence against civilians, including (mass) killings, food supplies poisoning, shootings, tortures, sexual violence and lootings, and shelling of civilian facilities (e.g. markets) were reported during RSF's offensives and in areas under its control. Reportedly, a reason behind the attack might have been retaliation for some village members having taken up arms against the RSF. Sexual violence is used as a weapon of war, particularly by the RSF and allied militias. See 3.4. Members of political parties, unions and civil society organisations and 3.9. Women and girls.
- **Incidents and fatalities**: in the reference period, 17.6 security incidents per week and 50 fatalities per 100 000 inhabitants were reported in the Central region. In 1 070 instances civilians were the primary or only target.
- **Displacement**: furthermore, 1 570 760 of IDPs were displaced from the Central region, as of the start of March 2025, mainly outside the region.





- **Geographical Scope:** If security incidents and fatalities were recorded across all states composing the Central region, they have not been equally impacted. Al Jazirah was the most affected state in the region, with about 71 % recorded security incidents, while Sennar accounted for 14 %, White Nile for 11 % and Blue Nile for 3 %. Similarly, 77 % of the IDPs displaced from the region within the reference period originated from Al Jazirah state.
- Further impact on civilians: SAF airstrikes targeting crowded places, such as markets, destroyed public infrastructures. The RSF reportedly engaged in land grabbing and looted and/or damaged and/or attacked essential infrastructures, such as health, water and food facilities as well as irrigation and electrical systems. The damages caused to food production capacities in the region, including through attacks targeting farming infrastructures, is likely to exacerbate food insecurity in other parts of the country. Theft of humanitarian assets, including the looting of essential food supplies from the WFP warehouse were also reported. See the use of food as a weapon of war in Presence, methods and tactics of actors under section a) Security situation in Sudan: recent events.

Al Jazirah state experiences an exceptionally high level of indiscriminate violence due to an ongoing offensive by the SAF. The volatile situation there resulted in the concentration of most of the security incidents, fatalities and IDPs overall recorded in the Central region. Looking at the indicators, it can be concluded that indiscriminate violence in Al Jazirah state reaches such an exceptionally high level that the **mere presence** on the territory would be considered sufficient in order to establish a real risk of serious harm under Article 15(c) QD/QR. Accordingly, additional individual elements are not required in order to substantiate subsidiary protection needs under Article 15(c) QD/QR.

[COI reference: Country Focus 2024, 1.2.4.; Security 2025, 1.3.1., 2.3.; COI Update, 2.2., 3.2.1.]

High level of indiscriminate violence

Areas where 'mere presence' would not be sufficient to establish a real risk of serious harm under Article 15(c) QD/QR, but where, **indiscriminate violence reaches a high level**.

Accordingly, a **lower level of individual elements** is required to show substantial grounds for believing that a civilian, returned to the area, would face a real risk of serious harm in the meaning of Article 15(c) QD/QR.

The areas assessed as belonging to this category as well as the main elements leading to this assessment are highlighted below.

Central region [Sennar, Blue Nile and White Nile states except Al Jazirah]



For the assessment of the indicators related to the central region and the conclusion on Al Jazirah state see above under the 'mere presence' category.

The security situation in **Blue Nile, Sennar and White Nile** remains volatile and intrinsically linked to developments in neighbouring states, as the offensives of the warring parties have often spread from one to the other. Therefore, in light of the current security situation in Al Jazirah, assessed <u>above</u> in the 'mere presence' category, and based on the respective number of incidents in each state, the overall number of casualties in the Central region and





the general impact on civilians, it can be concluded that indiscriminate violence in Blue Nile, Sennar and White Nile states reaches a **high level**. Accordingly, <u>a lower level of individual</u> <u>elements</u> is required in order to show substantial grounds for believing that a civilian, returned to the area, would face a real risk of serious harm in the meaning of Article 15(c) QD/QR.

[COI reference: Country Focus 2024, 1.2.3; Security 2025, 1.3.1, 2.4., COI Update, 2.2., 3.2.1.]

Indiscriminate violence not at a high level

Areas where indiscriminate violence is taking place, however **not at a high level**. Accordingly, **a higher level of individual elements** is required in order to show substantial grounds for believing that a civilian, returned to the area, would face a real risk of serious harm in the meaning of Article 15(c) QD/QR. The areas assessed as belonging to this category as well as the main elements leading to this assessment are highlighted below.

North region [Northern and River Nile states]

- Actors and territorial control: the SAF maintains predominant control over the region, particularly in key cities like Dongola (Northern) and Atbara (River Nile). In April 2023, the Northern state was described as the 'heartland of Sudan's military'. Although the RSF has attempted incursions into the area, it has not established a lasting foothold. In 2024, the RSF presence was reported in the Hajar al-Asal areas of River Nile state, close to the border with Khartoum, and in all the checkpoints on the unpaved routes through the desert connecting Mellit district in North Darfur with Al Dabbah city in Northern State. Key confrontations have occurred around Merowe, Shendi and the bordering region between Khartoum and River Nile states where the RSF engaged SAF positions before being repelled.
- Methods and tactics: the violence in the North region is localised and strategic rather than widespread and indiscriminate. The SAF conducted aerial operations against RSF positions in the region, while the RSF used drone strikes and limited ground incursions, primarily in Merowe and Shendi. However, in 2024 an increased use of remote violence by both sides was observed, including the deployment of airstrikes, drones and artillery fire. Reportedly, while most drones attacking civilian areas were shot down, some have hit civilians, particularly in Atbara and Merowe regions. Civilian fatalities and injuries were also reported in the fighting around the Hajar al-Asal area of River Nile state close to the border with Khartoum state.
- **Incidents and fatalities**: in the reference period, 1 security incidents per week and 6 fatalities per 100 000 inhabitants were reported in the North region, many of them were reported to be combatants. In 33 instances civilians were the primary or only target.
- Geographical Scope: the violence is concentrated around Merowe (Northern), Shendi, and Atbara (River Nile). Other areas remain relatively stable, with limited direct impact from active hostilities.
- **Displacement**: furthermore, 65 735 IDPs were displaced from the North region as of the start of March 2025, mainly inside the region itself. Furthermore, approximately 1.5 million





displaced persons have sought refuge in the region rather than fleeing from it, notably persons from Khartoum.

Further impact on civilians: landmine-related incidents occurred, such as the explosion on a
bus in Shendi that killed 10 civilians in January 2024. In October 2024, due to the RSF
activities, telecommunication services were shut down, hindering access to essential
services in River Nile state. Finally, essential services were reported to be affected by the
high number of IDPs hosted in the region, such as overcrowded hospitals, shortages of food
and other essential supplies.

The security situation in **North region** is characterised by a general stable territorial control by the SAF, with exceptions in certain areas, including the bordering region with Khartoum state where sporadic incidents of remote violence by both sides were observed, including the deployment of airstrikes, drones and artillery fire. Therefore, in light of the current security situation in North region, where the conflict between the SAF and the RSF seems to be more targeted as also reflected in the relatively low number of civilian fatalities and incidents reported, it can be concluded that in Northern and River Niles states indiscriminate violence is taking place, however **not at a high level**. Accordingly, a higher level of individual elements (such as the area of origin) is required in order to show substantial grounds for believing that a civilian, returned to the area, would face a real risk of serious harm in the meaning of Article 15(c) QD/QR.

[COI reference: <u>Security 2025</u>, 2.5.1 - 2.5.6.; <u>COI Update</u>, 2.2., 3.2.1.]

No real risk

Areas where, **in general, there is no real risk** for a civilian to be personally affected within the meaning of Article 15(c) QD/QR. This may be because the criteria for an armed conflict within the meaning of this provision are not met, because no indiscriminate violence is taking place, or because the level of indiscriminate violence is so low, that in general there would be no real risk for a civilian to be affected by it. The areas assessed as belonging to this category as well as the main elements leading to this assessment are highlighted below.

East region [Gedaref, Kassala and Red Sea states]

• Actors and territorial control: during the reference period, the SAF maintained control over the eastern states of Sudan, including the strategically significant Red Sea coast and Port Sudan, where the SAF ministries had relocated since 2023. While the RSF attempted to expand their presence there, they failed to establish significant control in Gedaref state. Fighting escalated in 2024, with RSF forces advancing near El Fau and along Gedaref's western border with Sennar state, and the disputed Fashaga region near Ethiopia prompting authorities to activate popular resistance. The SAF also held key supply routes, including the last remaining connection between Sennar city and Gedaref state. Additionally, various SAF-aligned armed groups, such as SLM-MM, SLM-Tambour, JEM, and the JFASM, were active in the region, with thousands of new recruits undergoing training in Gedaref and Kassala. Pro-SAF militias, including the Eritrea-backed National Movement for Justice and Development (NMJD) and the Eastern Corps, were also deployed in rural and some urban areas of Kassala state. Popular resistance forces, composed of civilians acting in self-defence, were present across SAF-controlled areas, while the SAF reportedly armed and paid the Popular Defence Forces (PDF) to counter the RSF. The region also saw tensions with an armed tribal group





from the Beja community, which considers itself the rightful possessor of eastern Sudanese lands and was headquartered in Port Sudan where clash erupted between the SAF and Beja community in mid-September 2024.

- Methods and tactics: the SAF's tactics include airstrikes, clashes, declaring states of emergency, deploying joint security forces to enforce control. The expansion of the conflict into agricultural regions like Gedaref is also being used as a strategic pressure point, worsening food insecurity and exacerbating humanitarian conditions. The RSF, in turn, has increasingly relied on drone warfare, conducting strikes deep into SAF-controlled areas, including Gedaref and El Fau, and even attempting to assassinate SAF commander Al-Burhan. Additionally, the RSF engages in territorial incursions, particularly along the borders of Gedaref, Al Jazirah, and Sennar states, prompting local authorities to mobilise popular resistance forces. The group also employs sporadic drone-strikes and shelling to destabilise enemy-controlled regions.
- **Incidents and fatalities**: in the reference period, 0.7 security incidents per week and 1 fatality per 100 000 inhabitants were reported across all states of the East region. In 28 instances civilians were the primary or only target.
- **Displacement**: furthermore, 51 018 IDPs were displaced from the East region including within the region.
- Further impact on civilians: the conflict's expansion into eastern Sudan, particularly Gedaref state, threatens to worsen an already critical food security situation. The RSF's forced shutdown of Zain Sudan's telecommunications services in Port Sudan in February 2024 disrupted online payments, making it difficult for civilians to access essential goods.
 Additionally, RSF offensives in Sennar state in July 2024 further damaged food production, exacerbating food shortages across Sudan.

In light of the relative stability of the area, as well as the low number of security incidents, civilian fatalities and IDPs, it can be concluded that in the **East region**, there is, in general, **no real risk** for a civilian to be personally affected within the meaning of Article 15(c) QD/QR.

Additionally, due consideration should be given to the volatile situation in Port Sudan where multiple attacks at the beginning of May 2025 have been reported. In particular, drone attacks caused explosions and huge fires near the international airport, and fuel depots in the port area were targeted and a major power station was hit causing a complete blackout in the city¹⁵.

[COI reference: <u>Security 2025</u>, 2.6.; <u>COI Update</u>, 2.2., 3.2.1.]

4.3.5. Serious and individual threat

Last update: June 2025

As mentioned above, even if refugee status is not granted, established personal circumstances are yet to be taken into account in the examination of subsidiary protection.

BBC (British Broadcasting Corporation), *Drone attacks raise stakes in new phase of Sudan's civil war*, 15 May 2025, https://www.bbc.com/news/articles/cq4vz0qy77no.





In the context of the 'sliding scale', each case should be assessed individually, taking into account the nature and intensity of the violence in the area, along with the combination of personal circumstances present in the applicant's case. It is not feasible to provide exhaustive guidance what the relevant personal circumstances could be and how those should be assessed.

The text below provides some indications concerning the relevant considerations and the nature of the assessment.

- Age: when assessing the risk of indiscriminate violence, age would be of particular importance in relation to the ability of the person to assess the risks. For example, children may not be able to assess the risk associated with contamination by unexploded remnants of war. Children may also not be in a position to quickly assess a changing situation and avoid the risks it entails. In some cases, elderly age may also impact the person's ability to assess and avoid risks associated with an armed conflict.
- Gender: when assessing the applicability of Article 15(c) QD/QR, it is difficult to ascertain whether and in what circumstances men or women would be at a higher risk in general. It would also depend on other factors, such as the nature of the violence in the area. For example, men may be at higher risk of violence targeting local markets, banks, governmental institutions, as they are the ones more frequently being outside the home and visiting such locations. On the other hand, general gender norms in Sudan suggest that women may have limited access to information regarding the current security situation and the associated risks. Gender-based restrictions, societal norms, and systemic discrimination can contribute to women having reduced access to timely and accurate security-related information. Additionally, the use of sexual violence as a weapon of war, trafficking, and forced marriages may further limit their ability to engage with broader social networks that could provide critical updates on security threats. Moreover, if violence moves closer to civilian residences, such as in the case of airstrikes or ground engagements, women may face greater difficulty in avoiding it. Movement restrictions, both culturally imposed (such as expectations around modesty and family honour) and conflict-related (such as checkpoints, the threat of sexual violence, or forced marriages to armed actors), can severely limit women's ability to flee danger. Additionally, women caring for children, the elderly, or family members with disabilities may find it even harder to escape quickly, increasing their exposure to conflict-related harm.
- Health condition and disabilities, including mental health issues: serious illnesses and disabilities may result in restricted mobility for a person, making it difficult for them to avoid immediate risks and, in the case of mental illnesses, it can make them less capable of assessing risks. In other cases, such conditions may require frequent visits to a healthcare facility. The latter may have different implications related to the assessment of the risk under Article 15(c) QD/QR. Considering road security, individuals required to travel may face increased risks, particularly if travel is necessary to access healthcare services. It may also increase the risk when health facilities themselves are reported to be targeted. Moreover, if healthcare facilities are damaged and closed because of fighting, such an applicant may be at a higher risk due to the indirect effects of the indiscriminate violence as they would not be able to access the health care they need.





- **Economic situation:** applicants in a particularly dire economic situation may be less able to avoid the risks associated with indiscriminate violence. They may be forced to expose themselves to risks such as working in areas which are affected by violence in order to meet their basic needs. They may also have less resources to avoid an imminent threat by relocating to a different area.
- Area of origin/Knowledge of the area: the relevant knowledge of the area concerns the patterns of violence it is affected by, the existence of areas contaminated by landmines, etc. Different elements may contribute to a person's knowledge of the area. It can relate to their own experience in the area or in areas similarly affected by indiscriminate violence. For example, being born or having lived for many years outside the country or originating from a different area can impact the applicant's ability to assess the risks.
- Profession and/or place of residence: the profession and/or place of residence the person is likely to have if they return to their home area may also be relevant to assess the risk under Article 15(c) QD/QR. It may, for example, be linked to the need for the applicant to travel through areas where road incidents are often reported, or to frequent locations known to be particularly affected by the conflict.
- Family members or support network: the lack of family members or support network in particular for single women or women at the head of a household, without a male relative or social network, could affect the applicant's economic situation and place of residence/occupation and may also prevent them from being informed on risks relevant to the indiscriminate violence in a situation of an armed conflict.

Individual elements related to the above can exist in combination. Other factors may also be relevant.

4.3.6. Qualification of the harm as a 'threat to (a civilian's) life or person'

Last update: June 2025

Some of the commonly reported types of harm to civilian's life or person in Sudan include (mass) killings, injuries, sexual violence used as a weapon of war, abductions, retaliatory violence by the armed forces, forced displacements as well as many indirect cases of death resulting from war-exacerbated factors – such as lack of emergency care, essential food, medicine and vaccination programmes deaths from accidents, etc. Death by inflicted starvation, explosions of remnants of war, and the use of civilians as 'human shields' was also reported in Sudan. A real risk of such serious harm would qualify as a threat to a (civilian's) life or person in accordance with the provision of Article 15(c) QD/QR.

4.3.7. Nexus/'by reason of'

Last update: June 2025

The interpretation of the causation 'by reason of' may not be limited to harm which is directly caused by the indiscriminate violence or by acts that emanate from the actors in the conflict. To a certain extent, it may also include the indirect effect of indiscriminate violence in situations of armed conflict. As long as there is a demonstrable link to the indiscriminate





violence, such elements may be taken into account in the assessments, for example: destruction of the necessary means to survive, destruction of infrastructure, criminality.



Please note that in areas where it would be generally considered that a civilian would not be affected by indiscriminate violence within the meaning of Article 15(c) QD/QR, this does not imply that these areas are considered safe areas for any applicant. All circumstances specific to the applicant's individual case have to be thoroughly assessed.





5. Actors of protection

Article 7 QD/QR



The contents of this chapter include:

<u>The State</u>: outlining and analysing the capacity of the Sudanese authorities, the Sudanese Armed Forces (SAF), law enforcement, and judiciary to provide protection in accordance with Article 7 QD/QR.

Parties or organisations, including international organisations: analysing whether Rapid Support Forces (RSF), humanitarian organisations, or international actors in Sudan could qualify as actors of protection under Article 7 QD/QR.

5.1. The State

The analysis below is based on the following EUAA COI reports and query: <u>Country Focus</u> 2024, 1.1.1. – 1.1.6.; <u>Country Focus</u> 2025, 1.1. – 1.4.; <u>Security 2025</u>, 1.2.; <u>COI Update</u>, 1.. Country Guidance should not be referred to as a source of COI.

5.1.1. The Sudanese authorities

Last update: June 2025

As of October 2024, due to the ongoing conflict, the **rule of law** was reported to have collapsed in Sudan and both warring parties have been urged to restore law and order. The police force has been disrupted, and police offices have been attacked by the RSF which damaged buildings, devices and equipment. Reportedly, government institutions and law enforcement have faced significant operational constraints due to the ongoing conflict, with most IDP camps having no functioning police force. Prisons across multiple states were seized by the RSF, leading to the release of numerous prisoners, some of whom joined military operations, while others engaged in criminal activities.

Despite its institutional independence, the **judiciary** is largely controlled by the executive. Lawyers are targeted and face restrictions in the exercise of the profession (see 3.5. Community leaders, human rights activists, and lawyers). The ongoing conflict has significantly affected the judicial infrastructure, including through systematic attacks on institutional buildings by the RSF. There have been reports of extrajudicial killings, arbitrary detentions, enforced disappearances, and torture committed by both warring parties. Despite efforts in the past, Sudan's **legal system** continued to lack the necessary monitoring mechanisms and to provide access to justice for victims of human rights violations. Domestic law did not explicitly criminalise enforced disappearances as offences. It was reported that authorities have often failed to investigate torture allegations or provided effective remedies and reparations to





victims. Furthermore, the 2007 Armed Forces Act, 2008 Police Act, and 2010 National Security Act granted immunities to state actors, limiting accountability for such practices.

Sudan lacks effective provisions for prosecuting sexual and gender-based violence. Reportedly, perpetrators of widespread crimes against women and girls, including during armed conflicts, have generally enjoyed impunity. Furthermore, victims of rape and sexual violence face obstacles in reporting crimes due to fear of stigma and of prosecution for adultery, the reported police reluctance to investigate and lack of trust in the ability and willingness of the domestic system to deliver justice. In additions, concerns over the legal procedures required to prove rape, in particular the mandatory use of a medical report form which has become unavailable in many health facilities or police stations, were also reported (see 3.9.1. Violence against women and girls).

5.1.2. The Sudanese armed forces

Last update: June 2025

The SAF controls certain areas and it is actively engaged in the conflict, representing one of the main actors of persecution in Sudan. After the outbreak of the conflict, Lieutenant General Al-Burhan and the local authorities imposed or expanded the state of emergency declared in 2021 to most states, granting security forces extensive powers and immunity in the course of their duties. In February 2025, amendments to the 2019 Constitutional document were announced, extending the transition period and replacing the Sovereignty Council with a military council controlled by the SAF. Reports indicate that SAF committed a series of violations including indiscriminate aerial bombardments on civilian areas, contributing to mass displacement and casualties, and the targeting of aid convoys and restrictions on humanitarian access.

In 2024, the General Intelligence Service (GIS) Law reinstated legal powers to intelligence personnel, including interrogation, search, detention and asset seizure, while also granting them immunity from criminal or civil prosecution. Also, this law authorised the GIS director to establish a special court for cases involving capital punishment.

See <u>2.2. The Sudanese authorities</u>, the <u>Sudanese Armed Forces [SAF] and main allies</u> under *2. Actors of persecution*.



The Sudanese State does not meet the criteria of an actor of protection under Article 7 QD/QR and protection is in general not considered available. There are areas that are not under the control of SAF and the Sudanese authorities. In areas under the control of SAF, the ongoing conflict and institutional collapse has significantly affected the state's capacity to provide protection. In some cases, the Sudanese state is also the actor of persecution or serious harm and/or is unwilling to provide protection.

5.2. Parties or organisations, including international





organisations

The analysis below is based on the following EUAA COI reports and query: <u>Country Focus</u> 2024, 1.1.1. – 1.1.6; <u>Country Focus</u> 2025, 1.1. – 1.4.; <u>Security 2025</u>, 1.2.; <u>COI Update</u>, 1.. Country Guidance should not be referred to as a source of COI.

5.2.1. The Rapid Support forces and its allies

Last update: June 2025

Originally a paramilitary force of the state, the RSF is one of the main warring parties in the conflict and is controlling parts of the state. The RSF is responsible for widespread human rights violations, including extrajudicial and mass killings, sexual violence, looting and forced displacements. The RSF has reportedly targeted civilians, humanitarian convoys, and medical facilities, making protection impossible in areas under its control. Since the beginning of the conflict the RSF made efforts to build a civilian governance structure to stabilise and reinforce its control over newly seized areas. In February 2025, the RSF, alongside SPLM-N Al-Hilu and other allied groups, signed the Sudan Founding Alliance Charter in Nairobi, aiming to establish a parallel government in RSF-held areas and promote a secular, democratic, and decentralised state. Although the RSF attempted to establish a justice system and field courts in areas under its control, these institutions have reportedly been used infrequently. Furthermore, RSF internal mechanisms, specifically the RSF Committee for Addressing Violations and field courts, are reported to not be active in enforcing accountability. In RSF-controlled areas people have reportedly been forcibly disappeared, with their families coerced into paying ransoms for their release.

See 2.3. The Rapid Support Forces [RSF] and allies under 2. Actors of persecution.



The RSF, which is also one of the main actors of persecution, lacks the capacity, willingness, and appropriate functional institutions necessary to provide protection against persecution or serious harm. Further taking into account their active role in the ongoing conflict against the SAF and allies, and their record of human rights violations, it can be concluded that the RSF does not qualify as an actor of protection able to provide effective, non-temporary and accessible protection within the meaning of Article 7 QD/QR.



No other actors are currently found to be in control of a significant part of the territory and able to provide protection within the meaning of Article 7 QD/QR.





6. Internal protection alternative

Last update: June 2025

Article 8 QD/QR



The contents of this chapter include:

Preliminary remarks

6.1. Part of the country

6.2. Safety

6.33. Travel and admittance

6.4. Reasonableness to settle

6.5. General conclusion on the applicability of IPA

Preliminary remarks

Last update: June 2025

This chapter is focussed on the topic of internal protection alternative. It analyses the situation in Port Sudan in relation to the requirements of Article 8 QD/QR.

In order to determine that internal protection alternative is available in a particular part of the applicant's country of origin, three cumulative criteria have to be met, namely: 'safety', 'travel and admittance' and 'reasonableness to settle'.

In relation to these elements, when assessing the applicability of IPA, the decision-maker should consider the general situation in Port Sudan, as well as the individual circumstances of the applicant.

6.1. Part of the country

Last update: June 2025

The first step in the analysis of IPA is to identify a particular part of the country with regard to which the criteria of Article 8 QD/QR would be examined in the individual case.





The example of Port Sudan has been selected as a potential IPA location due to its relative stability compared to other conflict-affected areas. This is without prejudice to the possibility to apply IPA to other places in Sudan, provided that all criteria described hereunder are met.

6.2. Safety

Last update: June 2025

6.2.1. Absence of persecution or serious harm

Last update: June 2025

When examining whether the applicant would have no fear of persecution or serious harm, the decision-maker should refer to chapters 1 to 4 of this document.

When assessing the requirement of safety with regard to the applicability of IPA in individual cases of applicants from Sudan, the following elements should be taken into account:

• General security situation in relation to indiscriminate violence

The general security situation in the particular part of the country that is being examined as an alternative for internal protection in the individual case should be assessed in accordance with the analysis under the section on Article 15(c) QD/QR.

The conclusion with regard to Port Sudan, Red Sea State, is as follows:

In Port-Sudan, there is, in general, no real risk for a civilian to be personally affected within the meaning of Article 15(c) QD/QR. See b) Assessment of indiscriminate violence per region — No real risk. However, due consideration should be given to the volatile situation in Port Sudan where multiple attacks at the beginning of May 2025 have been reported.

Actor of persecution or serious harm and their reach

In cases where the person fears persecution or serious harm by State actors (e.g. <u>3.1.2. Nuba from the Kordofans</u>, <u>3.1.3. Arabs from Darfur and the Kordofans</u>, <u>3.3. Members of the Resistance committees (RCs) and Emergency Response Rooms (ERRs)</u>, <u>3.4. Members of political parties, unions and civil society organisations</u>, <u>3.6. Journalists and other media workers</u>, <u>3.7. Humanitarian and healthcare workers</u>), there is a presumption that IPA would not be available (Recital 27 QD/QR).

In case of persecution or serious harm by the RSF or other armed groups, it is important to assess their operational capacity in Port Sudan. Given that the RSF or other groups do not have significant presence or operational capacity in Port Sudan, the criterion of safety may be satisfied. However, particular consideration should be given to the individual circumstances of the applicant and whether they are perceived by the actor as a priority target.





In some cases, where the applicant faces persecution or serious harm for reasons related to the prevalent social norms in Sudan, and the actor of persecution or serious harm is the Sudanese society at large (e.g. women and girls facing gender-based violence, FGM, forced and child marriage and persons with diverse SOGIESC), taking into account the reach of the actor of persecution or serious harm, the general lack of State protection for such applicants, and their vulnerability to potential new forms of persecution or serious harm, the safety criterion would in general not be met.

Whether the profile of the applicant is considered a priority target and/or a threat by the actor of persecution or serious harm

The profile of the applicant could make him or her a priority target, increasing the likelihood that the actor of persecution or serious harm would attempt to trace the applicant in the potential IPA location.

Behaviour of the applicant

It is recalled that an applicant cannot be reasonably expected to abstain from practices fundamental to his or her identity, such as those related to religion or sexual orientation, in order to avoid the risk of persecution or serious harm.¹⁶

Other risk-enhancing circumstances

The information under 3. Refugee status should be used to assist in this assessment.

6.2.2. Availability of protection against persecution or serious harm

Alternatively, it may be determined that the requirement of safety is satisfied if the applicant would have access to protection against persecution or serious harm, as defined in Article 7 QD/QR, in the area where IPA is considered. In Sudan no actor of protection is considered available. See also 5. Actors of protection.

For those who have a well-founded fear of persecution or serious harm by the Sudanese authorities and/or by the society at large, the criterion of safety would generally not be met in Port Sudan.

For others, the requirement of safety may be satisfied in Port Sudan, depending on the profile and the individual circumstances of the applicant and particularly taking into account the reach of the specific actor of persecution or serious harm. Nevertheless, due consideration should be given to any possible deterioration of the security situation in Port Sudan (Red Sea state). See East region [Gedaref, Kassala and Red Sea states].

CJEU, Minister voor Immigratie en Asiel v X and Y and Z v Minister voor Immigratie en Asiel, joined cases C-199/12 to C-201/12 judgment of 7 November 2013, X and Y and Z, paras. 70-76, <a href="https://curia.europa.eu/juris/document/document.jsf?text=&docid=144215&pageIndex=0&doclang=en&mode=1%20st&dir=&occ=first&part=1&cid=7670158
CJEU, Bundesrepublik Deutschland v Y and Z, joined cases C-71/11 and C-99/11, judgment of 5 September 2012, para. 80, https://curia.europa.eu/juris/document/document.jsf?docid=126364&doclang=en





6.3. Travel and admittance

Last update: June 2025

The analysis below is based on the following EUAA COI report: <u>Country Focus 2025</u>, 3.2.. Country Guidance should not be referred to as a source of COI.

If the criterion of 'safety' is satisfied, as a next step, it has to be established whether an applicant can **safely** and **legally travel** and **gain admittance** in the suggested IPA location. It should be noted that, in the context of Sudan, the three requirements cannot be clearly differentiated.

- Safely travel: Port Sudan has an international airport in its proximity, and it has been reported that international flights from Arab countries to Port Sudan are available. Port Sudan, including the airport area, both under the control of SAF, are characterised by relative stability compared to other conflict affected areas. However, still some security concerns persist. Even though one source indicated that social profiling 'played less of a role at Port Sudan airport', individuals seeking to pass through checkpoints were subject to ethnic profiling. Specific information on the checkpoints in Port Sudan were not available, however it has been reported that in Sudan, in some cases, people were harassed, robbed, threatened, arrested or subjected to enforced disappearance when passing through checkpoints. In particular, Arabs from Darfur and the Kordofans were at risk of being suspected by the authorities of supporting the RSF and being treated as such at checkpoints.
- Legally travel: some legal and administrative obstacles may prevent the applicant from travelling to Port Sudan. While civil documentation services, including passport issuance, have been relocated to Port Sudan, obtaining new identity documents remains challenging. Although passports can still be applied for in SAF-controlled states and at Sudanese embassies abroad, the process takes over two months, creating delays and barriers for individuals without valid travel documents. Despite the 11:00 p.m. curfew and heavy security presence in Port Sudan, there are no formal travel restrictions for Sudanese nationals with proper documentation. However, IDs are required to move around the city.
- Gain admittance: as mentioned above, Port Sudan is controlled by the SAF and ID documentation is needed to enter and move around the city. Ethnic profiling at checkpoints controlled by the SAF has also been reported. Reports further indicate that Sudanese returnees, particularly those suspected of RSF affiliations or originating from RSF-controlled areas face risks of interrogation and detention upon arrival.

The profile and individual circumstances of the applicant should be taken into account in this regard. The existence and/or possibility to issue relevant identification documents, the ethnic origin and perceived links with the RSF should be given due consideration. For individuals who would return to Sudan without identity documents or without security clearance or status settlement in place prior to travelling, these requirements would not be satisfied.





6.4. Reasonableness to settle

Last update: June 2025

If the criteria of safety and travel and admittance are met, the next step in assessing the existence of an IPA in Port Sudan is to consider the reasonableness to settle in light of the general situation in the area and the individual circumstances of the applicant. According to Article 8(1) QD/QR, IPA can only apply if the applicant 'can reasonably be expected to settle' in the area of internal protection under consideration.

It is important to note that, due to the limited availability of information on socio-economic conditions specific to Port Sudan, the assessment in the following section also relies on information regarding the general situation in the country.

6.4.1. General situation

Last update: June 2025

The analysis below is based on the following EUAA COI reports: Country Focus 2024, 1.1.5. (c), Country Focus 2025, 3.1.1., 3.1.2., 3.1.3., 3.1.4., 3.1.5., Security situation 2025, 1.3.1., 2.6.6.. Country Guidance should not be referred to as a source of COI.

Means of basic subsistence and employment

The ongoing conflict in Sudan has led to a severe economic downturn, with a projected Gross Domestic product (GDP) contraction of -20.3% in 2024 and an inflation rate exceeding 240%. State revenue has fallen by over 80%, and the national currency has depreciated by more than 300%. Port Sudan, serving as a temporary administrative centre, has experienced an influx of displaced people, further straining an already fragile economy. The banking sector faces a liquidity crisis, with most operations suspended due to insecurity, power outages, and looting. While mobile banking remains an option in Port Sudan, it is heavily dependent on internet access and remittances from the diaspora. However, disruptions in communication infrastructure and surveillance by armed groups create risks for those relying on external financial support.

The conflict has caused a dramatic rise in unemployment, with projections reaching 58% in 2024. Many people have turned to informal and self-employment opportunities due to the collapse of formal labour markets. Women-headed households, which constitute a significant portion of urban populations, are disproportionately affected, with over one-third reporting no income. The destruction of critical infrastructure and lack of economic alternatives have also driven civilians toward armed groups as a means of survival.

Even before the conflict, two-thirds of Sudan's population lived in extreme poverty, and the situation has worsened since. Armed groups have deliberately targeted essential infrastructure, further limiting access to food, water, and basic services.

Food security





The food security situation in Sudan remains precarious due to the combined effects of conflict, economic instability, market disruptions, and climate-related disasters. Restrictions on humanitarian aid, rising food prices, and limited access to agricultural resources have created a dire situation for both residents and displaced populations.

Housing and shelter

The ongoing conflict in Sudan has severely impacted housing and shelter conditions, exacerbating an already fragile humanitarian situation. As displacement increases due to the ongoing hostilities, the availability of adequate housing has become increasingly strained. Deteriorating living conditions for displaced persons, marked by overcrowded shelters and insufficient health services, increase the risk of disease outbreaks such as cholera, typhoid, and dysentery.

Water and sanitation

Access to clean water and adequate sanitation has deteriorated significantly following the escalation of conflict in Sudan. Access to drinking water in urban areas has worsened since April 2023, forcing residents to rely increasingly on alternative and often less reliable sources. The shift from piped water systems to tanker trucks, carts, and animals as primary means of water supply has created inconsistencies in availability and raised concerns about water quality, affordability and hygiene.

Basic healthcare

Sudan's healthcare system has collapsed due to ongoing conflict, with 65-80% of hospitals in affected areas non-functional and a severe shortage of medical supplies and personnel. Attacks on healthcare facilities, workers, and medical supplies have further compounded the crisis. Diseases such as cholera, malaria, dengue, and measles have resurfaced, and vaccination rates have dropped significantly. Voluntary emergency healthcare initiatives have emerged but are overwhelmed and underresourced.

By October 2024, many regions reported highly dysfunctional health services, with two-thirds of the population unable to access essential care. Maternal and reproductive health services are in critical shortage, and chronic conditions like malaria go untreated. The lack of necessary medical resources, such as dialysis supplies, and the environmental damage caused by the conflict have left the population increasingly vulnerable to further health risks.

For further information see also 1. Humanitarian situation.

6.4.2. Conclusion on reasonableness to settle

Last update: June 2025

considered under the requirement of reasonableness to settle in a different part of



The dire humanitarian situation in the country has a significant impact on all elements





the country, including means of basic subsistence and employment, food security, housing and shelter, water and sanitation, and basic healthcare. **Therefore, based on the general situation in Sudan, including Port Sudan, the reasonableness to settle criterion under Article 8 QD/QR would, generally, not be met.**

6.5. General conclusion on the applicability of IPA

Taking into account the assessment with regard to the three criteria under Article 8 QD/QR, it is found that IPA would in general not be applicable to any part of Sudan.





7. Exclusion

Last update: June 2025

Article 12(2) QD/QR

Article 17 QD/QR



The contents of this chapter include:

- 7.1. Exclusion based on the commission of international crimes
- 7.2. Exclusion based on the commission of a serious crime
- 7.3. Exclusion based on acts contrary to the purposes and principles of the United Nations
- 7.4. Exclusion based on constituting a danger to the community or to the security of the Member State



For general guidance on Exclusion, see <u>EUAA Practical Guide: Exclusion</u> and <u>EUAA</u> Practical Guide on Exclusion for Serious (Non-Political) Crimes.



Given the serious consequences that exclusion may have for the individual, the exclusion grounds should be interpreted restrictively and applied with caution.

The examples mentioned in this chapter are non-exhaustive and non-conclusive. Each case should be examined on its own merits.

In the context of Sudan, various circumstances may require consideration of the potential applicability of exclusion grounds. The QD/QR does not set a time limit for the application of the grounds for exclusion. Applicants may be excluded in relation to events regardless of when they took place.

More specifically, the need to examine possible exclusion issues in the context of Sudan may arise, for example, in cases of applicants being former or current members of the groups cited below. This list is non-exhaustive:





- (Former) members of the state forces and affiliated para-state groups, such as the SAF, the Military intelligence, the General Intelligence Service (GIS) and the former National Intelligence and Security Service (NISS), the Border Guards, the Central Reserve Police (CRP), Popular Defence Forces (PDF), Islamist militias linked to the former regime and the National Congress Party, police forces.
- (Former) members of the RSF and affiliated groups, including Arab militias and Janjaweed militias.
- (Former) members of the Sudanese government institutions, such as government
 officials and members of political or administrative institutions of a certain rank or level,
 judicial officials, prosecution authorities, prison officials and detention personnel.
- (Former) members of armed groups in Darfur, such as the SLM-MM, SLM-AW, the JEM, the JSAMF and other smaller splinter factions.
- (Former) members of armed groups in the Kordofans and Blue Nile, such as SPLM-N, the SPLM-N-al-Hilu, SPLM-N-Agar and other smaller splinter factions.
- (Former) members of others armed groups located along the Eritrean and Ethiopian borders (e.g. the National Movement for Justice and Development (NMJD) and the Eastern Corps).
- (Former) mercenaries fighting abroad (e.g. in civil wars in Libya and Yemen).
- Individuals who committed serious crimes in or outside Sudan, such as trafficking in human beings or violence against women and children.

7.1. Exclusion based on the commission of international crimes

Last update: June 2025

Article 12(2)(a) QD/QR

Article 17(1)(a) QD/QR

It can be noted that the ground 'crime against peace' is not likely to be of relevance in the cases of applicants from Sudan.

Violations of international humanitarian law by different parties in the current and in past conflicts in Sudan could amount to 'war crimes', such as deliberate and systematic attacks and airstrikes on non-strategic civil areas and civilian infrastructures such as schools and health facilities, the use of prohibited means and methods of warfare, the use of sexual violence as a weapon of war, deliberate and indiscriminate attacks on civilians, illegal executions, murder or ill treatment of war prisoners, forced displacements of the population, etc.

Reported crimes such as murder, enforced disappearance, illegal detention, torture, sexual violence, persecution against any identifiable group on ethnic ground by the different actors could amount to crimes against humanity when committed as part of a widespread or





systematic attack directed against any civilian population, with knowledge of the attack. Crimes in the context of past conflicts, such as during the conflict in Darfur or in South Kordofan, could also trigger the consideration of exclusion in relation to 'crimes against humanity'.

Some acts in the ongoing conflict, such as extrajudicial killings, torture, child recruitment, forced disappearance, could amount to both war crimes and crimes against humanity.

According to COI, especially (former) members of the SAF, the RSF and affiliated para-military groups and militias, as well as members of former insurgent armed groups in Darfur and the Kordofans have been implicated in acts that would qualify as war crimes and/or crimes against humanity.

Acts reported to be committed in the context of the following past and current confrontations in Sudan could be also relevant for Article 12(2)(a) QD/QR and Article 17(1)(a) QD/QR, as they may, depending on the circumstances, amount to 'war crimes' and/or 'crimes against humanity', if the legal requirements in this regard are fulfilled:

- first Sudanese Civil War between August 1955 and March 1972;
- second Sudanese Civil War between May 1983 and January 2005;
- conflict in Darfur since April 2003;
- conflict in South Kordofan and Blue Nile since June 2011; and,
- the ongoing armed conflict in Sudan, since April 2023.

For more information on human rights violations committed by different actors, please see 2. Actors of persecution or serious harm.

[Country Focus 2024, 1.1.3.; Country Focus 2025, 1.1, 1.4.; Security 2025, 1.2.1.]

7.2. Exclusion based on the commission of a serious crime

Last update: June 2025

Article 12(2)(b) QD/QR

Article 17(1)(b) QD/QR

Criminal activity in Sudan is reported to be widespread and is aggravated by the current conflict which completely undermined the rule of law. Criminal acts reported include kidnappings, enforced disappearances, extortion, sexual violence, arbitrary executions and trafficking in human beings.

Such serious (non-political) crimes would trigger consideration of the application of Article 12(2)(b)/Article 17(1)(b) QD/QR.





Violence against women and children (for example, in relation to domestic violence, honour-based violence, forced and child marriage, FGM) could also potentially amount to a serious (non-political) crime.

Some serious (non-political) crimes could also be considered war crimes (e.g. if committed in order to finance the activities of armed groups) if they could be linked to an armed conflict or could amount to crimes against humanity committed as a part of a widespread or systematic attack directed against any civilian population, with knowledge of the attack, in which case they should instead be examined under Article 12(2)(a)/Article 17(1)(a) QD/QR.

[Country Focus 2024, 1.1.3.; Country Focus 2025, 1.3, 1.4.]

7.3. Exclusion based on acts contrary to the purposes and principles of the United Nations

Last update: June 2025

Article 12(2)(c) QD/QR

Article 17(1)(c) QD/QR

(Former) membership in group such as the RSF could trigger relevant considerations and require an examination of the applicant's activities under Article 12(2)(c)/Article 17(1)(c) QD/QR, in addition to the considerations under Article 12(2)(b)/Article 17(1)(b) QD/QR. However, membership alone is not enough to substantiate exclusion. The application of exclusion should be based on an individual assessment of the specific facts in the context of the applicant's activities within that organisation. The position of the applicant within the organisation would constitute a relevant consideration and a high-ranking position could justify a (rebuttable) presumption of individual responsibility. Other engagement with a group, such as the aforementioned, could also trigger exclusion considerations. Nevertheless, it remains necessary to examine all relevant circumstances before an exclusion decision can be made.

Where the available information indicates possible involvement in crimes against peace, war crimes or crimes against humanity, the assessment would need to be made in light of the exclusion grounds under Article 12(2)(a)/Article 17(1)(a) QD/QR.

[Country Focus 2024, 1.1.3.; Security 2025, 1.2.1.]

7.4. Exclusion based on constituting a danger to the





community or to the security of the Member State

Last update: June 2025

Article 17(1)d) QD/QR

In the examination of the application for international protection, the exclusion ground under Article 17(1)(d) QD/QR (danger to the community or the security of the Member State) is only applicable to persons otherwise eligible for subsidiary protection.

Unlike the other exclusion grounds, the application of this provision is based on a forward-looking assessment of risk. Nevertheless, the examination should take into account the past and/or current activities of the applicant, such as association with certain groups considered to represent a danger to the security of the Member State or criminal activities of the applicant.



Annex: Country of origin information references

| The main COI sources used in the common analysis are the following (listed alphabetically by reference used in the text) | |
|--|--|
| Country Focus | EUAA Country of Origin Information Report: Sudan: Country Focus |
| 2025 | (February 2025) |
| | Available at: https://coi.euaa.europa.eu/administration/easo/PLib/2025_02_EUAA_C OI_Report_Sudan_Country_Focus.pdf |
| Country Focus | EUAA Country of Origin Information Report: Sudan - Country Focus |
| 2024 | (April 2024) |
| | Available at: |
| | https://coi.euaa.europa.eu/administration/easo/PLib/2024_04_COI_Report_Sudan_Country_Focus_EN.pdf |
| Security 2025 | EUAA Country of Origin Information Report: Sudan – Security Situation |
| | (February 2025) |
| | Available at: https://euaa.europa.eu/sites/default/files/publications/2025-02/2025_02_EUAA_COI_Report_Sudan_Security_Situation.pdf |
| COI update 2025 | EUAA Country of Origin Information Query: — Sudan: Major political, security, humanitarian and human rights developments |
| | (April 2025) |
| | Available at: https://coi.euaa.europa.eu/administration/easo/PLib/2025_04_EUAA_C Ol_Query_Response_Q5_Sudan_major_political_security_humanitaria n_developments_and_human_rights.pdf |





