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Submitted via www.regulations.gov

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Office of Information and Regulatory Affairs
Office of Management and Budget
725 17th Street NW, Washington, DC 20503
Attention: Desk Officer, U.S. Citizenship and Immigration Services, DHS

RE: RIN 1125-AA94 or EOIR Docket No. 18-0002, Public Comment Opposing Proposed Rule on Asylum, and Collection of Information, OMB Control Number 1615-0067

I am writing on behalf of the NGO Committee on Migration (CoM), a member of the Conference of Non-Governmental Organizations (CoNGO) in consultative relationship with the United Nations. We are a committee of over 50 NGOs who seek to realize justice for migrants, refugees, stateless persons, internally displaced persons, and trafficked persons. We collaborate on our shared mission: to encourage the promotion and protection of migrants and their human rights, in accordance with the United Nations Charter.

It is based on this experience that CoM expresses our strong opposition to the Proposed Rule, DHS/EOIR; RIN 1125-AA94; EOIR Docket No. 18-0002. If put into effect, this would make it difficult, if not impossible, for people fleeing violence and persecution to seek asylum in the U.S. This would fly in the face of both international refugee law and human rights norms.

Asylum seekers make the incredibly difficult decision to uproot themselves and their families to seek safety and stability. If this rule were to take effect, the U.S. would no longer be a place of hope and welcome for people seeking freedom from fear. In fact, the Proposed Rule would dramatically exacerbate the dissonance between U.S. policies and international law.

The U.S. is obliged by its commitments under international law to respect human rights, particularly the human rights to freedom of movement and to seek asylum from persecution as enshrined in Articles 13 and 14 of the Universal Declaration on Human Rights. The Proposed Rule would have a detrimental effect beyond the U.S., undermining asylum protections and human rights commitments in other countries by signaling that the U.S. – once seen as a global

leader in welcoming those who have survived persecution – is now turning its back on asylum seekers.

CoM is particularly concerned about the safety and well-being of children who are seeking asylum, including children fleeing with their parents or guardians, as well as unaccompanied minors. The Proposed Rule would exacerbate barriers that children and accompanied minors face in applying for asylum, particularly children who do not have lawyers assisting them to complete already-complex application forms and to pursue their asylum claims in court

The Proposed Rule would also shut the door to safety for women and girls fleeing rape, domestic violence and sexual abuse. Our member organizations work directly with women in girls in humanitarian emergencies and know firsthand that a large proportion of female asylum seekers have escaped these kinds of gender-based persecution.

We call on the U.S. government to reverse its course of dismantling the asylum system, and instead to rededicate efforts toward ensuring that individuals fleeing persecution and violence are granted full and fair access to asylum protections. This would not only save the lives of those men, women, girls and boys who are looking to the U.S. for safety, it would encourage other countries to bolster their own commitments to providing the same for asylum seekers within their borders.

Thank you for the opportunity to submit comments on the Proposed Rule. Please do not hesitate to contact me in my capacity as CoM Chair, at chanway@riisettlement.org, for any additional information as needed.

Sincerely,

Christopher Hanway

Christopher Hanway
Chair, NGO Committee on Migration