

Please cite as: EUAA, '[Subsidiary protection: real risk of serious harm](#)' in *EASO Practical Guide: Qualification for international protection*, janvier 2022.

Subsidiary protection: real risk of serious harm

Legal references	Jurisprudence
Article 2(f) QD	<ul style="list-style-type: none">• CJEU, Meki Elgafaji and Noor Elgafaji v Staatssecretaris van Justitie, Case C-465/07, judgment of 17 February 2009, EU:C:2009:94, para. 40 (past serious harm)• ECtHR, F.G. v Sweden, Application No 43611/11, judgment of 23 March 2016, para. 115 (assessment of real risk)• ECtHR, Auad v. Bulgaria, Application No 46390/10, judgment of 11 October 2011, para. 99(c) (assessment of real risk)• ECtHR, Saadi v. Italy, Application No 37201/06, judgment of 28 February 2008, para. 130 (assessment of real risk); para. 140 (standard of proof)• ECtHR, Vilvarajah and Others v. The United Kingdom, 45/1990/236/302-306, judgment of 26 September 1991, para. 111 (standard of proof)