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2.4. Humanitarian and health personnel

2.4.1. Regulatory framework

Both warring parties established administrative bodies to regulate humanitarian access in areas under their respective control. UN OHCHR noted that the Humanitarian Aid Commission (HAC) in areas controlled by the SAF, and the Sudanese Agency for Relief and Humanitarian Operations (SARHO), in areas controlled by the RSF, imposed measures affecting the work of humanitarian organisations as well as civil society organisations, human rights defenders, and journalists.^{[378](#)} In May 2025, the Khartoum state government announced that all voluntary entities were required to register with the HAC – by paying a fee of around 800 USD [about EUR 700] and submitting a list of staff members or volunteers – in order to continue operating.^{[379](#)} Groups providing aid without registration ‘may be considered as operating illegally’. In the same state, HAC officials reportedly encouraged NGOs to channel funding through local merchants rather than ERR volunteers, which resulted in ‘bureaucratic delays’. The measure also led to the suspension of a major NNGO for its partnership with ERRs, raising concerns about the sustainability of ERR operations. ^{[380](#)}

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UN OHCHR, Human Rights Situation in the Sudan, 1 January to 30 June 2025, 19 September 2026, [url](#), para. 63

- ^{[379](#)}

Al Jazeera, Sudan’s aid workers fear crackdown under strict new army rules, 28 May 2025, [url](#)

- ^{[380](#)}

ACAPS, Challenges and opportunities for Khartoum state emergency response rooms, 16 October 2025, [url](#), pp. 3, 4