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CCF SYSTEMIC LIMITATIONS

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Purpose of the document:

This report is prepared to identify and systematize the structural limitations of the Commission for the Control of INTERPOL's Files (CCF) as a key mechanism of legal protection within the INTERPOL system. Its practical function is not to discredit the CCF as an institution, but to define the real limits of its mandate, procedural effectiveness, transparency, access to material, temporal usefulness and capacity to provide effective protection in conditions of growing caseload, confidential decision-making and dependence on the broader architecture of INTERPOL itself. For ARGA, this analysis is of fundamental importance because overestimating the CCF is as dangerous as underestimating it: in the first case, defense arrives too late by relying on one mechanism; in the second, a useful instrument is wasted because its actual operational value is not properly understood. The systemic limitations of the CCF must therefore be treated as part of strategy, not as a pretext for abstract institutional skepticism. ([Interpol](#))

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1. Executive Summary

The CCF formally presents itself as an independent and impartial body responsible for ensuring that the processing of personal data by INTERPOL complies with the applicable rules. That is an important and genuine institutional safeguard. The post-2024 institutional record, however, shows that the effectiveness of this safeguard is limited by at least five structural factors: confidentiality of full reasoning, delays and backlog, narrowness of mandate compared to the real needs of persecuted persons, dependence on cooperation of NCBs and other INTERPOL stakeholders, and the fact that review is largely post hoc rather than preventive. The CCF therefore remains significant, but not self-sufficient, as a protection mechanism. ([Interpol](#))

INTERPOL's public materials expressly acknowledge delays. The CCF sessions and decisions page states that the CCF has been experiencing delays in meeting its deadlines due to increases in workload of the CCF and other INTERPOL stakeholders, and that from 2026 a pilot has been introduced involving remote online case review, expanded delegation for non-complex cases, longer sessions and a possible fourth session in December. At the same time, the 2024 Annual Activity Report and the 2025 Chairperson's speech show record caseload, including 2,586 new admissible requests in 2024 and 2,717 requests closed overall. For the applicant, this means something simple: even high-quality legal protection through the CCF may arrive too slowly for a world in which arrest, extradition or mobility damage happen first and paperwork catches up later. ([Interpol](#))

The systemic limits of the CCF are not reducible to speed. They are built into the very structure of review. Full decisions remain confidential, while only anonymized excerpts are published; the CCF reviews compliance of INTERPOL data rather than the entirety of domestic injustice; applicants often do not know the full scope of data circulating about them; and the institution depends in part on responses from source NCBs and INTERPOL channels which it does not control in the way a court controls its own evidentiary process. The central conclusion is therefore this: the CCF is indispensable as a compliance forum, but structurally incapable of functioning as a complete transnational remedy. Any defense that relies on it alone too often mistakes institutional design for practical sufficiency. ([Interpol](#))

2. Context & Problem Statement / Why This Topic Has Legal and International Significance

In international practice, the CCF is often treated as the last rational mechanism available within the INTERPOL system itself. That is understandable. It is through the CCF that one may seek access, correction and deletion of data, challenge notices and diffusions, and invoke the language of Articles 2 and 3, due process, refugee policy, quality of data and misuse of channels. That is precisely why the question of its systemic limitations matters so much: when an institution becomes the central pillar of defense, its limits begin to determine not only legal technique but the fate of the case itself. ([Interpol](#))

The problem is aggravated by the fact that consequences of INTERPOL-related circulation arise outside the CCF and often faster than it. Arrests, extradition measures, border restrictions, visa disruption, compliance screening and reputational damage materialize in real time, whereas the CCF operates through sessions, case review cycles and confidential procedures. The CCF sessions page itself shows calendar-based workflow, fixed sessions and acknowledged delays. This produces a fundamental temporal mismatch between the speed of harm and the speed of remedy. For transnational defense, that gap is not a technical detail. It is the central structural problem. ([Interpol](#))

For ARGAs, the topic matters particularly because clients and even practitioners often oscillate between two unhelpful myths. The first myth is that the CCF can supposedly "fix everything" if the filing is strong enough. The second myth is that the CCF is supposedly useless because the system is too closed. Both myths are false. The published materials show a more difficult reality: the CCF is active, evolving and at times effective, but structurally bounded by mandate, confidentiality,

workload and post hoc logic. The task is therefore not to romanticize or dismiss the institution, but to place its real capabilities inside a broader multilevel defense. ([Interpol](#))

3. Legal Framework / Normative and Institutional Framework

The normative framework of the CCF is defined by the Constitution of INTERPOL, the Rules on the Processing of Data, the Statute of the Commission for the Control of INTERPOL's Files and related operating materials published by INTERPOL. INTERPOL's legal documents page describes the CCF as an independent, impartial body officially responsible for ensuring that the processing of personal data by the General Secretariat conforms to the applicable rules, while the Statute defines its competence, powers, structure, functioning and procedures. Formally, this creates a strong compliance architecture. Yet already at this level one sees the limit: the object is control of data processing, not full review of domestic criminal cases or broad adjudication of injustice. ([Interpol](#))

The updated Statute of the CCF, reflecting amendments approved by the 93rd General Assembly in 2025, strengthens certain procedural tools, including provisions relating to abusive or bad-faith conduct and procedural management. This shows institutional development. But the underlying logic of the Statute remains the same: the CCF is a specialized body with delimited powers, not a fully open international tribunal with adversarial public hearings, full precedential publication and direct coercive enforcement powers over states. Normative evolution improves tools within the model, but does not change the nature of the model itself. ([Interpol](#))

The Rules on the Processing of Data also matter for understanding the CCF's limitations. They construct the overall legal ecology of INTERPOL processing and even authorize the General Secretariat to compile repositories of practice on Articles 2 and 3. This means that the CCF works inside a broader organizational system where legal interpretation, operational review and data circulation are distributed across the General Secretariat, the NDTF, NCBs and the CCF itself. Accordingly, even the independence of the CCF does not amount to full institutional autonomy from the system whose legality it reviews. That is not a scandal. It is simply the structural condition of review within an international police organization rather than outside it. ([Interpol](#))

4. Mechanisms of Practice / Abuse / Key Mechanisms of Practice, Abuse, or Conflict

The first systemic limit concerns confidentiality architecture. INTERPOL expressly notes that all decisions are confidential and not meant for public dissemination, although certain anonymized decisions are published. In practical terms, this means that applicants and counsel do not have access to a full body of jurisprudence comparable to what is normal in mature judicial systems. They receive guidance by excerpts, tags and institutional summaries, but not by full reasoning across comparable fact patterns. As a result, predictability through precedent remains limited. The defense works by fragments of light rather than by a complete map. ([Interpol](#))

The second limit lies in the post hoc design of review. The CCF generally acts after data have already been processed and after consequences may already have begun. Even where it later finds data non-compliant, that finding does not retroactively erase detention stress, mobility disruption, asylum complications or reputational harm already suffered. The 2024 Annual Activity Report itself shows the scale of requests handled after data exist and circulate. A legal victory before the CCF may therefore be real, but temporally incomplete. This is a systemic limitation of remedies by timing, not merely by doctrine. ([Interpol](#))

The third limit concerns dependence on institutional cooperation beyond the CCF itself. The 2024 Annual Activity Report states that in 50 requests data were found non-compliant because of total lack of cooperation from the source NCB. For the applicant, that may look favorable. As a structural indicator, however, it is troubling: it shows that review outcomes can be materially shaped by whether

external actors cooperate. A body whose work is partly constrained by the responsiveness of the very system around the data cannot be treated as equivalent to a court commanding full evidentiary disclosure on pain of contempt. International organizations usually call this cooperation. Defense teams usually call it risk. ([Interpol](#))

The fourth limit lies in backlog and workload pressure. The CCF recorded the highest number of new admissible requests ever in 2024, according to the Chairperson's speech, and INTERPOL's sessions page openly acknowledges deadline delays. In response, 2026 measures include more delegation to the Rapporteur and Chairperson for appropriate non-complex cases and remote case review. This is a pragmatic response, but it itself reveals the systemic problem: when workload management becomes a central institutional question, triage logic inevitably grows in importance. For the defense, that means that complexity framing, urgency framing and procedural precision become part of the outcome architecture, because the institution is managing scarcity as well as legality. ([Interpol](#))

5. Case Patterns / Typical Scenarios, Patterns of Development, or Practice Models

The first typical scenario is the case in which the defense expects more from the CCF than its mandate permits. Applicants seek, in substance, cancellation of national proceedings, recognition of innocence, condemnation of a requesting state's entire justice system or broad political vindication. The 2024 Annual Activity Report specifically mentions "other requests" falling outside the CCF's mandate, including requests for cancellation of national proceedings. In such cases, the systemic limitation manifests as mandate collision: the body is asked to do what it was not constituted to do. The result is often perceived as institutional failure, when in fact it is failure of strategic calibration. ([Interpol](#))

The second scenario is the formally strong but temporally weak remedy. The applicant may eventually obtain a favorable compliance outcome, but only after months of exposure to arrest risk, detention or mobility restrictions. Because the CCF sessions page expressly acknowledges delays and because the body works through scheduled sessions and procedural cycles, this pattern is structurally foreseeable rather than exceptional. From the standpoint of lived reality, the remedy may arrive legally sound and practically late. That does not erase its value, but it does limit its protective sufficiency. ([Interpol](#))

The third scenario involves partial visibility and partial pleading. Because applicants often do not know the full scope of notices, diffusions or other data concerning them, the request is necessarily built under uncertainty. The CCF can process access requests, but the asymmetry remains real. The 2024 Annual Activity Report shows substantial numbers of admissible requests involving notices and diffusions, which itself confirms that hidden or partially known data are part of the normal caseload rather than an anomaly. Where the applicant cannot fully see the data architecture, the institution's corrective function remains structurally reactive. ([Interpol](#))

The fourth scenario is overreliance by external forums. Lawyers, courts or clients may assume that because a CCF process is pending, broader risk is under control. Yet extradition bodies, asylum systems, border agencies and banks operate on different timelines and legal thresholds. Since the CCF is specialized and confidential, its process does not automatically shield the person across systems. The limitation here is not a defect in formal jurisdiction, but the practical impossibility of one review body stabilizing a fragmented transnational environment. ([Interpol](#))

6. Risk Assessment / Main Risks, Legal Vulnerabilities, and Problem Areas

The first risk is strategic mono-dependence. If the defense places everything on the CCF, it becomes vulnerable to every structural limit of that forum: delay, confidentiality, narrow mandate and post hoc review. This risk is especially severe in extradition-sensitive or asylum-related files where time

matters more than later doctrinal vindication. The CCF remains vital, but as a sole line of defense it is too often structurally overburdened by expectations. ([Interpol](#))

The second risk is confusion between independence and adequacy. INTERPOL's materials emphasize that the CCF is independent and impartial. That matters. But independence of the reviewing body does not by itself guarantee full remedial adequacy, speed, transparency or systemic reach. Defense teams that collapse these ideas into one often overestimate what a favorable filing can achieve. In institutional life, it is a common trap to hear "independent" and silently supply "sufficient." The documents do not make that promise. ([Interpol](#))

The third risk is underestimation of evidentiary scarcity. Because full decisions are confidential and because applicants may lack full visibility into the data processed, case construction often occurs under information deficit. This does not make defense impossible, but it makes bad templates more dangerous. Where predictability is partial, precision becomes more important, not less. Otherwise counsel is effectively litigating blind while pretending to see the whole room. ([Interpol](#))

The fourth risk is procedural harm through waiting. The longer a person waits for relief from a specialized body experiencing delays, the more likely it is that linked systems will harden around the data: extradition proceedings advance, asylum windows narrow, compliance flags spread and travel plans collapse. The limitation of the CCF thus radiates outward through time into other legal systems. Temporal risk is therefore not mere administrative inconvenience, but a substantive defense issue. ([Interpol](#))

7. Institutional Gaps / Institutional Limitations, Gaps, Deficits of Safeguards, or Systemic Weaknesses

The first systemic weakness is partial transparency. The Repository of Practice and published decision excerpts have improved visibility, and INTERPOL's 2024 human-rights communication presented the updated Repository as providing greater insight into constitutional commitments. Even so, that greater insight remains curated rather than complete. The institution publishes categories and selected reasoning, not a full open body of adjudication. Transparency has therefore improved without becoming fully jurisprudential. ([Interpol](#))

The second weakness is the structural lag between harm and remedy. The CCF can review legality, but it cannot redesign the timing of all downstream consequences triggered by INTERPOL data. Its own public acknowledgment of delays demonstrates that this lag is recognized internally. A remedy that arrives after months of exposure may still be valuable, but it cannot be mistaken for preventive protection. In high-risk files, this gap is not accidental. It is structural. ([Interpol](#))

The third weakness is specialization at the cost of completeness. The strength of the CCF lies in focused compliance review. Its weakness lies in the same place. Because it is not a general human-rights court, not an extradition tribunal and not a supranational appellate body over domestic prosecutions, many dimensions of harm remain outside its direct remedial reach. The applicant lives one integrated experience of transnational pressure; the institution addresses one important slice of it. This makes the CCF indispensable, but necessarily incomplete. ([Interpol](#))

The fourth weakness is review inside the ecosystem being reviewed. The CCF is independent, but it still functions within the institutional universe of INTERPOL, whose legal documents, processing systems, NCB cooperation and procedural channels shape the cases before it. This does not negate its value. It does mean, however, that the model is one of internal compliance review within an international organization, not external constitutional adjudication over it. That distinction is analytically decisive when assessing systemic limitations. ([Interpol](#))

8. Practical Guidance / Practical Recommendations and Model of Legal Action

The first step is to treat the CCF as a core forum, not a total forum. In practical terms, every INTERPOL-related defense should evaluate CCF action early, but no serious case should rely on the CCF alone where detention, extradition, asylum, mobility or banking consequences are in play. Parallel tracks must be built from the start. This is not pessimism. It is simply respect for the institution's public design and acknowledged limits. ([Interpol](#))

The second step is calibration of the ask to the mandate. Requests should be framed in terms of access, correction, deletion, restriction and non-compliance of data processing, not as broad pleas for the CCF to terminate domestic prosecutions or adjudicate guilt and innocence. The 2024 Annual Activity Report confirms that mandate-confused requests exist and fall outside the body's function. Correct calibration does not weaken a filing. It protects it from structural mismatch. ([Interpol](#))

The third step is designing for delay. Because delays are openly acknowledged, counsel should plan around them. That means early protective filings elsewhere, careful travel-risk advice, document sequencing, asylum or non-refoulement triggers where relevant, and active management of any extradition exposure. A client should never discover the temporal limitations of the CCF only after the border officer does. ([Interpol](#))

The fourth step is building under partial visibility. Because full decisions are confidential and the full data picture may be unclear, submissions should be structured around clearly mapped hypotheses: what data likely exist, through what channel, serving what purpose, and with which compliance defect. This disciplined inferential method is far stronger than either blind accusation or passive waiting for perfect visibility that may never arrive in time. ([Interpol](#))

9. Policy Recommendations / Recommendations on Legal and Institutional Approach

First, greater publication of structured reasoning would materially improve foreseeability. INTERPOL has already expanded transparency through the updated Repository of Practice and published decision excerpts, which is a meaningful advance. The next step should be more consistent publication of reasoning patterns concerning admissibility, mandate boundaries, purpose, lawfulness, due process, and the way the CCF handles uncertainty, delay and non-cooperation. This would reduce preventable weak filings and strengthen the quality of advocacy across the system. ([Interpol](#))

Second, time-to-protection should become a central metric of institutional performance. The 2026 pilot arrangements and the increased workload-management measures are important, but their value should be assessed by whether they shorten the interval between filing and effective protection in real-world high-risk cases. Counting closed requests matters. Measuring protective timeliness matters more. ([Interpol](#))

Third, legal practice should adopt a doctrine of calibrated reliance on the CCF. Such a doctrine would reject both cynicism and overbelief. It would treat the CCF as a specialized, evolving, partially transparent, delay-exposed but still strategically essential compliance body. For ARGAs, that is the only mature way to position the institution inside a broader architecture of transnational defense. ([Interpol](#))

10. Conclusion

The systemic limitations of the CCF are real, identifiable and strategically consequential. They arise not because the institution is fictitious or useless, but because it is specialized, confidential, workload-exposed, partly dependent on broader INTERPOL cooperation, and structurally oriented toward

review of data rather than total remediation of transnational harm. Its strengths and weaknesses derive from the same institutional design. ([Interpol](#))

For ARGA, the principal conclusion is the following. The CCF should neither be romanticized nor dismissed. It should be used precisely where its mandate, logic and published practice make it effective, and supplemented wherever its design makes it incomplete. In transnational defense, maturity usually begins the moment a lawyer stops expecting one institution to save a person from the whole system. With the CCF, that rule is unusually visible. ([Interpol](#))

11. Appendix A. Terminology

CCF. The Commission for the Control of INTERPOL’s Files, an independent and impartial body responsible for ensuring that INTERPOL personal data processing conforms to applicable rules. ([Interpol](#))

Post hoc review. Review occurring after data have already been processed and potentially after downstream consequences have already begun. This is a defining structural feature of much CCF protection. ([Interpol](#))

Mandate limitation. The boundary according to which the CCF reviews compliance of INTERPOL data processing rather than serving as a general court over domestic criminal proceedings. ([Interpol](#))

Confidentiality architecture. The procedural design under which full CCF decisions remain confidential while only selected anonymized excerpts are published. ([Interpol](#))

Time-to-protection. A practical measure of how quickly a legal mechanism can reduce real-world exposure after filing. It is particularly important in assessing the adequacy of CCF remedies under acknowledged delay conditions. ([Interpol](#))

12. Appendix B. Risk / Powers / Legal Consequences Matrix

| Task | Legal risk | Legal limit | Possible consequence | Practical comment |
|---|--|--|---|---|
| File with the CCF as the main step | Overestimation of remedial sufficiency | The CCF reviews data, not the whole transnational harm | Incomplete protection | Always build parallel tracks |
| Ask the CCF to terminate the domestic case | Exceeding the mandate | The body is not a general appellate tribunal | Structurally weak or out-of-mandate outcome | Calibrate the ask precisely |
| Wait for the decision without other action | Temporal harm | Delays are publicly acknowledged | Arrest, extradition progress, mobility damage | Design for delay from day one |
| Build strategy as if full precedent were public | Information deficit | Full decisions remain confidential | Template-based errors and weak foreseeability | Work with reasoning patterns, not fantasy certainty |
| Rely on full institutional cooperation | Dependence on NCB responses | External cooperation can affect review dynamics | Uncertain timing and evidentiary exposure | Build arguments that stand even if cooperation occurs |
| Treat independence as full adequacy | Conceptual overreach | Independence does not equal complete remedy | Strategic mono-dependence | Separate legitimacy from sufficiency |

This matrix reflects not defects of one case, but recurring structural pressures visible in the public materials on how the CCF functions. ([Interpol](#))

13. Official Sources

- INTERPOL, Statute of the Commission for the Control of INTERPOL's Files, amended in 2025. The core source on competence, powers, structure and procedural design of the CCF, including amendments approved by the 93rd General Assembly. ([Interpol](#))
- INTERPOL, About the CCF. Official description of the CCF's status as an independent and impartial body and gateway to related legal documents and operating materials. ([Interpol](#))
- INTERPOL, CCF sessions and decisions. The main current source on session structure, acknowledged delays and the 2026 pilot measures introduced to address workload and backlog. ([Interpol](#))
- INTERPOL, Annual Activity Report of the CCF for 2024. The key source on caseload, admissible requests, closed requests, non-cooperation from NCBs and broader institutional workload. ([Interpol](#))
- INTERPOL, Repository of Practice on Articles 2 and 3, updated in 2024. Important as a source of increased transparency and operational interpretation, while also illustrating the limits of excerpt-based visibility. ([Interpol](#))
- INTERPOL, Rules on the Processing of Data. The main systemic source showing that the CCF operates inside a broader INTERPOL processing architecture rather than outside it. ([Interpol](#))