Article 1F(c) of the 1951 Convention excludes from refugee status an individual for whom there are 'serious reasons for considering...has been guilty of acts contrary to the purposes and principles of the United Nations'. Several resolutions of the United Nations Relief and Rehabilitation Administration (UNRRA) might be considered forerunners of Article 1F(c). For example, UNRRA Resolution 71 excluded from the organisation’s assistance:

displaced persons who may be detained in the custody of the military or civilian authorities of any of the United Nations on charges of having collaborated with the enemy or having committed other crimes against the interests or nationals of the United Nations.1

The Constitution of the International Refugee Organisation (IRO Constitution) also excluded from its mandate those who had assisted enemy forces in the persecution of civilian populations or operations against the United Nations, and those who had, since the end of hostilities, participated in any organisation hostile to the government of a member of the United Nations, or had participated in any terrorist organisation.2

Despite reference to terrorist organisations in the IRO Constitution, terrorism did not feature in early formulations of Article 1F(c), nor the debates surrounding the drafting of the provision. The drafting debates rather focused on the imprecise nature of the phrase ‘acts contrary to the purposes and principles of the United Nations’, and the type of acts that might fall within the scope of the provision.3 The debates surrounding the drafting of the provision

1 UNRRA, Resolution 71, para 2(a).
2 IRO Constitution, Annex I Part II.
3 The Canadian delegate proposed deleting these words, stating the formulation was so vague as to be open to abuse by governments wishing to exclude refugees from the protection of the Convention. ECOSOC Social Committee ‘160th Meeting’ (1950) UN Doc E/AC.7/SR.160, 16. The UK delegate stated that he had ‘doubts as to the exact meaning of the words “acts contrary to the purposes and principles of the United Nations,” and felt that the adoption of such a text might make it possible for governments to exclude refugees who should not be so treated’. UN Conference of Plenipotentiaries on the Status of Refugees and Stateless Persons ‘Conference
suggest that Article 1F(c) was understood as applying to violations of human rights that fell short of crimes against humanity, war crimes, genocide and the subversion or overthrow of democratic regimes, committed by persons occupying government posts, such as heads of State, ministers and high officials.\(^4\)

Terrorism is also not mentioned in the exclusion provisions of the \textit{OAU} Refugee Convention, which replicate the wording of Article 1F(c) and includes an additional reference to a person who has been ‘guilty of acts contrary to the purposes and principles of the Organization of African Unity’.\(^5\) Terrorism is, however, explicitly cited in the \textit{EU} Qualification Directives. The Directives exclude those ‘guilty of acts contrary to the purposes and principles of the United Nations \textit{as set out in the Preamble and Articles 1 and 2 of the Charter of the United Nations}’.\(^6\) Furthermore, the Preambles to the Directives provide:

\begin{quote}
Acts contrary to the purposes and principles of the United Nations are set out in the Preamble and Articles 1 and 2 of the Charter of the United Nations and are, amongst others, embodied in the United Nations Resolutions relating to measures combating terrorism, which declare that ‘acts, methods and practices of terrorism are contrary to the purposes and principles of the United Nations’ and that ‘knowingly financing, planning and inciting terrorist acts are also contrary to the purposes and principles of the United Nations’.\(^7\)
\end{quote}

The \textit{EU} Directives thus refer directly to the Charter of the United Nations and \textit{UN} resolutions relating to measures combating terrorism when interpreting the phrase ‘acts contrary to the purposes and principles of the United Nations’.

The purposes and principles of the \textit{UN}, as set out in the Preamble and Articles 1 and 2 of the Charter of the United Nations (\textit{UN} Charter), include such purposes as maintaining international peace and security, developing friendly relations among nations and promoting and encouraging respect for human rights, and principles such as the sovereign equality of all states, fulfilling

\^4\ E\textit{COSOC} Social Committee ‘166th Meeting’ (1950) \textit{UN} Doc E/AC.7/SR.166, 6–7;
\textit{UN} Conference of Plenipotentiaries on the Status of Refugees and Stateless Persons ‘Summary Record of the Twenty-fourth Meeting’ (n 198) (Mr. Hoare [United Kingdom]).
\^5\ This should be read today as a reference to the purposes and principles of the African Union. \textit{OAU} Refugee Convention, art 1(5). Zimmermann and Wennholz (n 68) 592. No provision equivalent to Article 1F(c) is included in the Arab Refugee Convention.
\^6\ \textit{Qualification Directive}, art 12(2)(c) (emphasis added).