



The Vanishing Preemptive Request: Uncertainty at the CCF's New INTERPOL Portal

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The launch of the Commission for the Control of INTERPOL's Files' ("CCF") new online [portal](#) has created significant uncertainty regarding the status and handling of preemptive requests before INTERPOL. Historically, practitioners relied on guidance published by the CCF indicating that preemptive requests – submissions made before the publication of a Red Notice or diffusion – could be forwarded by the CCF to the INTERPOL General Secretariat for consideration. That guidance has now disappeared from the CCF's public-facing materials, leaving attorneys and their clients without clarity as to whether preemptive filings remain available, how they should be submitted, or how they will be processed.

The new portal, which became mandatory for submissions in March 2026, expressly references requests for access, deletion, and revision applications. However, it makes no mention of preemptive requests. On the one hand, the omission is understandable, given that preemptive requests are not handled by the CCF, which only reviews requests by individuals for existing Red Notices. With a preemptive request however, the whole point is to avoid the issuance of a persecutory or illegitimate Red Notice. That said, the CCF's website used to contain important guidance about preemptive requests.

This omission is notable because as noted in a previous blog, preemptive requests have long served as an important procedural safeguard for individuals at risk of abusive INTERPOL actions, particularly dissidents, refugees, political opponents, and businesspersons targeted by authoritarian regimes. Abusive Red Notices and diffusions continue to be used as tools of transnational repression, despite INTERPOL's constitutional prohibitions.

The absence of public guidance represents a step backwards. INTERPOL and the CCF [announced](#) broader procedural changes and reforms, including changes to the INTERPOL's Rules on the Processing of Data and the Statute of the CCF. These reforms are rightly intended to improve efficiency and accountability. Yet transparency is undermined when practitioners cannot even determine whether a critical procedural mechanism still exists.

Clear guidance is urgently needed. If it's not the CCF that will issue this guidance, then INTERPOL's General Secretariat (GS) should do so. The GS should publicly clarify whether preemptive requests remain permissible, identify the proper procedural avenue for filing them, explain whether and how such requests are reviewed by the CCF, and ideally provide estimated processing procedures and timelines. Additionally, guidance is sorely needed on whether preemptive requests will remain confidential, protecting individuals from further abuse by member states. Without such direction, applicants face uncertainty

at precisely the stage where proactive intervention may prevent wrongful detention, reputational harm, immigration consequences, or abusive extradition efforts.

If INTERPOL genuinely seeks to strengthen confidence in its oversight mechanisms and reinforce its stated commitment to transparency, it should restore and expand public guidance regarding preemptive requests, often the only mechanism which allow the would-be victims of abusive Red Notices to avoid the worst consequences of bogus allegations against them. Transparency about preventive remedies is essential to ensuring meaningful protection against misuse of INTERPOL's powerful global policing systems.