ADMINISTRATIVE PUBLICATIONS AND INSTRUCTIONS: WHAT IMPACT DO THEY HAVE ON THE LEGAL STATUS OF INDIVIDUALS?

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Abstract:

It is well known that the administrative duties assigned to the hierarchical head of the administration include the power to determine and, in general, the conduct to be followed by his subordinates in the performance of a public service. These measures are known as circulars, directives or administrative instructions. These latter documents are merely guidelines and administrative instructions issued by the hierarchical administrative authority, such as a minister, governor or director of a public institution of an administrative nature, in order to clarify the application of existing legal texts and to standardise their implementation.

Based on this definition, administrative publications and instructions are considered as administrative acts that do not reach the level of regulation; therefore, they have no legal value and do not occupy a position in the hierarchy of legal rules. Consequently, they have no effect on legal status.

Sometimes, however, the administrative authority oversteps the legally permissible boundaries when issuing circulars and issues a circular that functions as a regulation and affects the legal status of individuals, contrary to what the law stipulates.

Keywords: *Regulatory Circular, Interpretative Circular, Mandatory, Non-Mandatory, Directive, Administrative Judge.*

INTRODUCTION:

In legal terms, a circular is defined as a means of transmitting instructions from a hierarchical superior who represents the highest administrative authority - such as a minister, governor, mayor, director of a public administration institution or head of an administrative department - to subordinates who represent the lower administrative level. The purpose of this communication is to guide and coordinate working methods within the administration by interpreting and simplifying the provisions of the legal texts they are required to implement.

In legal doctrine and jurisprudence, therefore, a circular is considered to be an internal administrative document that does not have a regulatory character within the administrative hierarchy, since its provisions are purely interpretative and explanatory, framed within the application of existing laws. Legal scholars have even considered these texts to be a form of hidden or secret law, since they are not justiciable, cannot be challenged and are not subject to judicial review, since they do not meet the criteria of an administrative decision[1]. Consequently, they do not affect legal status, provided that the administrative authority does not exceed the limits of interpretation and clarification.

However, what happens when the administrative authority issues a circular or instruction that goes beyond the limits of interpretation, clarification and instruction? How should the circular be classified in such cases, especially when it creates obligations and rights for individuals? In other words, to what extent is the circular legitimate when it affects the legal status of individuals?

First: The legal nature of administrative circulars and instructions

[1]- Nouha El-Chawashi, "The Circulars Restricting Rights and Freedoms: Their Concept and Legal Value," in a collective work titled "Circulars Limiting Freedom – A Hidden Law Governing the Rule of Law," Tunisian Association for the Defense of Individual Liberties, Tunisia 2018, p. 21.

A circular is considered to be an instrument at the disposal of the higher authority, which is recognised as having legal powers that allow it to organise the institution under its jurisdiction. The pressing question is whether the circular is merely an internal administrative document addressed to the staff of the institution, who are obliged to comply with it by virtue of their subordination to the higher authority, without any legal effect on other individuals. Or is it an executive administrative decision that creates obligations and rights for individuals?

This question is crucial for determining the legal nature of administrative circulars and instructions and for assessing their impact on the legal status of individuals. French administrative jurisprudence was the first to address this issue by introducing the concept of distinguishing between interpretative and regulatory circulars. According to the French Council of State, a circular issued for the sole purpose of interpreting a legal text cannot be annulled because it cannot be the subject of an annulment procedure, since it is not an administrative decision and does not affect the legal status of individuals.

If the interpretation involves the addition of a new legal rule or the repeal of an existing legal rule within the provisions of the text to be interpreted, the interpretative circular is transformed into a regulatory circular. This regulatory circular falls under the jurisdiction of the administrative judge and may be subject to annulment proceedings.

Consequently, the regulatory circular is considered an executive administrative decision that can be challenged for annulment, whereas the interpretative circular is not considered an executive administrative decision and therefore cannot be challenged for annulment. The difference between the two does not lie in their form or title, but in their content; a circular is considered to be regulatory if it introduces new rules concerning the applicable legal text. When the administrative authority issues a regulatory circular, individuals can rely on it in their favour, whereas this is not the case with interpretative circulars.

Regulatory circulars are often annulled for two reasons:

1. Lack of competence: This occurs, for example, when a minister intervenes in areas outside his or her competence by issuing regulations on matters outside his or her jurisdiction, as he or she does not have executive power.

2. Breach of law: This occurs when a minister violates a legislative or regulatory text by issuing a circular within his jurisdiction that contains a rule contrary to another legal rule of higher authority in the hierarchy of legal norms.

In this case, the ministerial circular not only interpreted the texts in force, but also established new rules concerning the preparation of the application file for financial aid. It thus created new legal rules that conferred rights and obligations on individuals. This transformation allowed the circular to move from an interpretative to a regulatory nature, which enabled the administrative judge to treat it as an administrative decision affecting legal relations and to make it the subject of an action for exceeding authority.

1. The traditional position of the French Council of State on the classification of circulars

The French administrative judiciary first established the basis for distinguishing between interpretative circulars and regulatory circulars in the context of a judicial precedent: the decision of the Council of State of 29 January 1954 in the case of *Notre-Dame du Kreisker*[2].

The case concerned a director of an educational establishment who applied to the administration for financial assistance, as was permitted by the law in force at the time. The Deputy Prefect of Labour (at the time, the Deputy Head of the District) replied that the director should submit an application for a subsidy in accordance with the rules and conditions laid down in the circular of the Minister of National Education of 11 January 1950 concerning the implementation of the law of 15 March 1850. On the basis of this reply, the Director brought an action for annulment before the Administrative Tribunal against

[2]- Conseil d'Etat, decision Notre-Dame du Kreisker, Assembly, January 29, 1954, n°07134. (https://www.legifrance.gouv.fr/ceta/id/CETATEXT000007637421/) consulted on 01/01/2024.

1. The letter from the Deputy Prefect of Labour containing the reply to the request for subsidy.
2. The ministerial circular of 11 January 1950 issued in application of the law of 15 March 1850.

The French Council of State considered that the ministerial circular was of a regulatory nature and could therefore be challenged by way of an action for ultra vires. It declared the circular unlawful on two grounds: firstly, because it made applications subject to the prior opinion of the High Council of National Education, whereas the applicable legal texts did not contain this requirement and the power to take the final decision in this matter lay with the general and municipal councils; secondly, because the ministerial circular required the applicant institution to undertake to accept administrative and pedagogical supervision of the institution in the event that support was granted, whereas such supervision was not provided for by law[3].

It is noteworthy that the letter in this case did not raise a legal issue and the judge did not consider it to be an administrative decision, since it did not affect the legal status of the grant applicant; rather, it was an administrative document that merely reiterated the procedures to be followed. The ministerial circular, on the other hand, raised a new legal issue concerning the legal nature of circulars and administrative instructions.

In this case, the ministerial circular not only interpreted the texts in force, but also established new rules concerning the preparation of the application file for financial aid. It thus created new legal rules that conferred rights and obligations on individuals. This transformation allowed the circular to move from an interpretative to a regulatory nature, which enabled the administrative judge to treat it as an administrative decision affecting legal relations and to make it the subject of an action for exceeding authority.

02. Judicial revision of the classification of administrative circulars and instructions

The French Council of State has revised its previous position on the distinction between administrative circulars and instructions and has widened the distinction in the light of the Duvignères judgment of 18 December 2002[4].

An examination of the content of this ruling shows that the French Council of State has moved from distinguishing between regulatory and interpretative circulars to distinguishing between mandatory and non-mandatory circulars. A circular is considered mandatory in two cases: it can be either a regulatory circular or a mandatory interpretative circular, while non-mandatory circulars are merely interpretative.

Consequently, it can be said that the Duvignères judgment has extended the category of administrative circulars that can be subject to judicial review for abuse of power. In the previous Notre-Dame du Kreisker ruling, only administrative circulars were accepted by the court for abuse of power claims. However, the Duvignères judgment added the category of binding interpretative circulars. These are circulars that ignore the meaning and scope of the legislative or regulatory provisions they are intended to clarify.

Mandatory circulars, whether regulatory or mandatory interpretative, are those that establish a legal rule and, on the basis of this rule, the administration is obliged to comply with certain behaviours described in them. Non-mandatory circulars, on the other hand, are interpretative; they are simply instructions or internal documents of the administration that provide interpretations or reminders in order to facilitate and harmonise the application of the legal texts that the administration must implement. However, their provisions do not have the force of law and are addressed by department heads to other employees and agents under their authority.

With regard to the new criterion established by the Duvignères judgment for assessing the potential abuse of power by circulars, the judge defined interpretative circulars as those that "lack the mandatory character", whereas a mandatory circular is defined as one that contains "mandatory

[3]- Ibid.

[4]- Conseil d'Etat, decision Duvignères, December 18, 2002, n°233618.(https://www.legifrance.gouv.fr/ceta/id/CETATEXT000008124026/) consulted on 04/01/2024.

provisions ... which must be considered unlawful". It is therefore essential to examine the content of the circular in order to determine whether the administrative authority is seeking to establish rights and obligations or to impose its interpretation, in order to understand the intention of the issuing authority and how it will be received by the persons to whom the circular is addressed[5].

The distinction between binding and non-binding publications has the following consequences:
- A non-binding publication does not confer any binding power on its issuer; it cannot therefore be regarded as a decision or act causing harm. The issuer cannot take advantage of it to demand its implementation or challenge it by claiming abuse of power or illegality.
- A binding publication, on the other hand, contains rules characterised by their mandatory nature, which may be either regulatory or interpretative. However, if the provisions of the publication create a new rule in the absence of an explicit legal text, it will be unlawful either because the issuing authority lacks the legal power to make regulations - as ministers, governors or heads of department often do not have general regulatory powers - or for other reasons, such as legal error[6]. This occurs when a subordinate rule conflicts with a higher legal rule in the hierarchy.
The French Council of State maintained the same position in the case of the National Federation of Food Industries against the Minister of the Economy, decided on 21 May 2007. In this case, the Minister of the Economy issued an administrative publication giving binding instructions to his subordinate bodies on how to determine the origin of perishable food products when indicating a price reduction or promotional price. The French Council of State found that these ministerial publications and instructions constituted acts that could be challenged on the grounds of abuse of power, allowing the National Federation of Food Industries to seek their annulment[7].
In this case, the Minister did not merely interpret the provisions of Article 441/02 of the French Commercial Code, but established new rules that he imposed on all perishable food products manufactured or derived from raw materials, without having the legal authority to take such measures.
From the present case, we conclude that the interpretation given by the administrative authority, through publications or instructions, to the laws and regulations which it is responsible for implementing, cannot be referred to the administrative judge if it is not binding. Consequently, under no circumstances can it be the subject of an action for annulment. On the other hand, the administrative judge is obliged to accept appeals against publications or instructions if, in the absence of a legal text, they introduce a new rule not contained in the legal text intended to be implemented, or if they introduce a rule that is contrary to a rule that is superior in the hierarchy of legal norms, or if the administrative authority, in its interpretation, has misunderstood the meaning of the legal text intended to be interpreted.

Second - Unjustified effects on the legal status of individuals in Algeria
Administrative publications and instructions are considered a legal means by which the administrative authority communicates with its subordinates in order to disseminate methods for applying existing legal texts and to unify their implementation. However, these publications and instructions can sometimes go beyond their legal framework and extend their effects to other individuals using public facilities, directly affecting their legal status through restrictions or negatively. In this case, the publication acts as a regulatory text, regulating legal issues on which the regulation is silent, thus violating constitutionally protected freedoms and rights.
This constitutes a deviation from the legal powers granted to the administrative authorities, which significantly violates legal rights and freedoms, contrary to what is established in the Constitution.

[5]- CE February 2, 2005, Spiritual Association of the Church of Scientology of Île-de-France, Rec. 201; March 8, 2006, Federation of Parents' Councils of Public Schools, Rec. 112: imperative nature of a circular regulating internal order measures.
[6]- CE July 7, 1978, Union of Lawyers of France, RDP 1979. 263, conclusions by Théry.
[7]- CE, May 21, 2007, decision ASSOCIATION NATIONALE DES INDUSTRIES ALIMENTAIRES, n°286764, (https://www.legifrance.gouv.fr/ceta/id/CETATEXT000018006277) consulted on 02/01/2024.

Article 34 of the Constitution states that restrictions on freedoms may only be imposed by law and that such restrictions may not, under any circumstances, affect the essence of rights and freedoms. Moreover, this is a violation of the applicable laws, including Article 04 of Decree No. 88-131, which governs the relationship between the administration and the Algerian citizen, which states "The actions of the administrative authority must be within the framework of the laws and regulations in force. Consequently, instructions, publications, memoranda and opinions must be issued in accordance with the required texts"[8].

One of the most notable cases of blatant violation of the legal status of individuals and their freedoms granted by the Constitution occurred when a ministerial instruction intervened in the freedom of dress and imposed a particular form. The Ministry of National Education issued a ministerial instruction with a mandatory character, numbered 65, dated 12 July 2018[9], which stipulates the obligation for students within educational institutions to wear clean and appropriate clothing that allows them to be identified. In addition, staff within educational institutions are required to maintain an appearance appropriate to the professional context of educators that allows for their identification. This has led directors of educational institutions to prohibit individuals wearing the niqab from entering or using educational facilities.

In light of the social turmoil caused by this ministerial instruction, with the emergence of supporters and opponents, especially in the absence of any legislative or regulatory text prohibiting individuals wearing the niqab from accessing public services, and in light of numerous inquiries, the General Directorate of Public Service and Administrative Reform issued Instruction No. 13 on 4 October 2018, entitled "Duties of public employees and officials regarding dress". This instruction requires them to comply with security and identification rules in their offices, which require the clear and permanent identification of individuals. Consequently, they are obliged to avoid any action or behaviour, including dress codes, that contradict their professional duties, and specifically prohibit the wearing of the niqab in the workplace[10].

In addition, the then Prime Minister ordered strict compliance with this instruction by ministers and governors. Subsequently, on 29 October 2018, the Minister of Higher Education and Scientific Research also issued a binding instruction to all university directors, ordering them to implement the instructions of the General Directorate of Public Service and Administrative Reform[11].

Another example of administrative instructions that clearly and significantly restricted individual freedoms and affected their legal status is Ministerial Instruction No. 02, issued by the Minister of the Interior on 11 February 1980. This instruction, addressed to the governors and the Director-General of National Security, regulated the issuing of mixed marriage licences under Article 31 of the Algerian Family Code. It stipulated that the conclusion of a marriage contract involving a foreign party required an administrative authorisation issued by the competent governor. It also stipulated that the competent civil status officer would not register a mixed marriage unless it was confirmed that this licence had been obtained, on the understanding that failure to obtain the prior administrative marriage licence would result in the marriage not being registered. The governor would grant this licence only after an investigation by the security services into the background and

[8]- Decree No. 88-131, dated July 4, 1988, regulating relations between the administration and the citizen, Official Gazette No. 27, dated July 6, 1988.

[9]- Decision No. 65, dated July 12, 2014, defining the organization and operation of the educational community, Official Bulletin of National Education, No. 599, dated July/August 2018.

[10]- Instruction No. 13, issued by the General Directorate of Public Service and Administrative Reform, dated October 4, 2018. Published (https://www.youm7.com/story/2018/10/19/رسميا-الجزائر-تمنع-ارتداء-النقاب-فى-الأماكن-العامة-مديرية-الوظائف/3995838) consulted on 03/01/2024.

- (https://www.echoroukonline.com/حجار-يأمر-بمنع-الموظفين-من-ارتداء-النق) consulted on 03/01/2024.

[11]- Instruction No. 13, issued by the General Directorate of Public Service and Administrative Reform, dated October 4, 2018. Published (https://www.youm7.com/story/2018/10/19/رسميا-الجزائر-تمنع-ارتداء-النقاب-فى-الأماكن-العامة-مديرية-الوظائف/3995838) consulted on 03/01/2024.

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conduct of the foreign party wishing to marry the Algerian citizen, and after several administrative conditions had been met in the application file[12].

Since this Ministerial Instruction is the only legal source for the granting of licences for mixed marriages, in accordance with Article 31 of the Family Code - which stipulates that its implementation is subject to regulatory provisions - the content of Instruction No. 02 issued by the Minister of the Interior not only provided an interpretation, but also exceeded its interpretative scope by introducing new regulatory provisions not provided for in Article 31 of the Personal Status Code. As a result, this instruction was transformed into a mandatory regulatory instruction, which should remain under the control of the administrative judge for its legality.

However, the Supreme Court, when ruling on cases related to mixed marriages, took a different stance on the legal nature of the administrative instruction - whether it was merely an administrative legal act that did not rise to the level of a legal text, or whether it constituted an organisation on which its decision was based.

For example, in Case No. 0942668, issued on 3 February 2016, the Supreme Court ruled that the validation of customary marriages between parties of different nationalities without complying with the regulatory provisions established constitutes a violation of the law[13]. Here, the regulatory provisions refer to the aforementioned Instruction No. 02 issued by the Minister of the Interior. The Court found that the Minister had relied on this instruction in the processing of the case file and had classified it as a regulatory text, thereby elevating the instruction from a mere administrative act intended to interpret a legal text for the employees of the sector to a regulatory text that organises a specific matter and creates new legal rules. Consequently, the Court refused to validate the customary marriage on the sole basis of this instruction.

The Supreme Court maintained the same position in Case No. 1005800, dated 13 July 2016, stating that the regulatory provisions on mixed marriages require the obtaining of an administrative license, whether to register or validate the marriage[14]. Similarly, in Case No. 1028971 dated 7 December 2016, the Court ruled that a mixed customary marriage cannot be validated without the presentation of an administrative licence[15].

As is well known, ministerial instructions do not have the binding, general and abstract nature of legislation; they are not issued by a body empowered to legislate under the Constitution, nor are they published in the Official Gazette. These instructions are primarily addressed to administrative bodies in order to explain and organise working procedures. Therefore, a decision of the Supreme Court based on a ministerial instruction is considered an improper application of the law[16].

Although instruction number 02, issued by the Minister of the Interior on 11 February 1980, has been revoked, it has been replaced by another ministerial instruction, number 09, issued by the Minister of the Interior, Local Communities and Urban Planning on 25 November 2018, entitled “Regulation of the Issuance of Marriage Licences”[17].

However, we believe that it would have been more appropriate for the legislator to intervene to regulate the issue of administrative licensing of mixed marriages and the resulting disputes, especially those related to informal mixed marriages and the establishment of children’s lineage,

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[12]- Sabti Boukarb, "Administrative Authorization as a Prerequisite for Mixed Marriage," Study Day titled "Mixed Marriage and Its Effects Between Sharia and Law," Prince Abd Al-Qadir University for Islamic Sciences in collaboration with the Court of Constantine, Algeria March 9, 2021, published on the website of the Court of Constantine, pp. 03-07. (https://courdeconstantine.mjustice.dz/boukarb.pdf) consulted on 29/01/2024.

[13]- Supreme Court, Case No. 0942668, dated February 3, 2016, Supreme Court Journal, No. 01, 2016, p. 130.

[14]- Supreme Court, Case No. 1005800, dated July 13, 2016, Supreme Court Journal, No. 02, 2016, p. 207.

[15]- Supreme Court, Case No. 1028971, dated December 7, 2016, Supreme Court Journal, No. 02, 2016, pp. 211-212.

[16]- Issa Maiza, "Administrative Authorization in the Marriage of Algerians to Foreigners in Light of the Judicial Precedents of the Supreme Court," Journal of Law and Society, Vol. 07, No. 02, 2019, p. 371.

[17]- Sabti Boukarb, op. cit., p. 15.

rather than leaving such an important matter to a ministerial instruction, which effectively functions as a regulation in the absence of legal provisions. This is particularly critical when the objective of obtaining an administrative licence restricting the freedom to marry is contrary to the provisions of the Constitution, in particular Article 34, which states that the restriction of rights, freedoms and guarantees can only be done by law. Consequently, it is legally inadmissible to restrict freedoms by means of regulations or lesser forms such as administrative orders.

With regard to the Algerian administrative judiciary, we question its stance on the classification of administrative publications, particularly with regard to mandatory administrative instructions banning the niqab in public places, as these have an obligatory character that moves them from the realm of administrative instructions to that of regulations. We wonder whether the judiciary will be bold enough to accept annulment claims against such instructions, in line with comparative judicial developments that recognise that mandatory instructions and publications can be subject to annulment claims.

Third: The Algerian administrative judiciary and the legal nature of circulars

A review of the various cases dealt with by the Algerian administrative judiciary shows that it has in principle followed the French administrative judiciary in its classification of administrative circulars, distinguishing between interpretative circulars, which cannot be challenged in court, and regulatory circulars, which can be challenged in court. It did not, however, follow the judicial shift in the French judiciary, which, starting with the Duvignères case in 2002, extended the scope of circulars subject to judicial review and went beyond the traditional distinction to distinguish between mandatory circulars, whether regulatory or interpretative, and non-mandatory circulars.

The position adopted by the Algerian administrative judiciary may mean that a significant number of interpretative administrative circulars with mandatory characteristics are not subject to judicial review by the Algerian administrative judge, as the latter has not yet adopted the classification of interpretative mandatory circulars as administrative acts that can be challenged on the grounds of abuse of power.

Examples of cases in which the Algerian administrative judiciary has relied on the traditional distinction between regulatory and interpretative circulars include

1. Decision of the Administrative Chamber of the Supreme Council in the case of S.E.M.P.A.C., dated 8 March 1980, in which it was ruled that the General Director of the national company S.A.M.P.A.C. had decided, by means of a circular dated 3 February 1976, to implement the objectives set by the revolutionary authority in the context of the production struggle, in particular to liberalise the percentage of fertilisers and food flour, i.e. to increase the extraction rate of flour from cereals for production purposes. The circular not only interpreted existing texts, but also introduced new rules through this decision, thus making the circular regulatory in nature and therefore subject to challenge before the Administrative Chamber of the Supreme Council[18].

2. Decision of the Administrative Chamber of the Supreme Court of 14 May 1995 in the case of the National Association of Cinema Managers against the Minister of the Interior, based on a circular issued by the latter concerning the resale of cinema halls to the Algerian Centre for Art and Cinematographic Industry. The Supreme Court ruled that the circular aimed to transfer the rights and obligations of individuals and was detrimental to them, giving it the characteristics of a decision and making it liable to annulment[19].

This means that as long as the circular of the Minister of the Interior affects the legal position of individuals, it acquires the character of a regulation, which makes it subject to annulment. Thus, the Algerian administrative judiciary recognises that a regulatory circular affects the legal status of individuals because it assumes the role of law in regulating rights and freedoms, which goes beyond the legitimacy of administrative acts.

[18]- Rachid Kheloufi, "Administrative Disputes Law: Organization and Jurisdiction of Administrative Courts," Volume 1, University Publication Office, Algeria 2012, p. 291.

[19]- Rabhi Ahmed, op. cit., p. 154.

Given the seriousness of these acts and the extent of their impact on the legal status of individuals, as well as the administrative authority's habitual issuance of such circulars, especially in the exercise of discretionary power, the exclusion of many circulars containing mandatory rules from judicial review inevitably affects the constitutional freedoms and rights of individuals, as well as their legal status in the context of the rule of law.

CONCLUSION

"The judiciary protects society and the freedoms and rights of citizens in accordance with the Constitution," as stated in Article 164 of the Algerian Constitution. It is therefore the legally authorised body responsible for safeguarding the rights and freedoms of individuals, with the power to protect them from administrative abuse of power by monitoring the legality of administrative acts. Consequently, it is the responsibility of the judiciary to monitor the legality of administrative circulars and instructions, ensuring that they do not exceed the limits of interpretation and clarification set by the law, in order to prevent their unlawful effects from affecting the legal status of individuals.

However, one criticism of the Algerian administrative judiciary is that, in defining its jurisdiction, it has limited itself to administrative circulars, recognising only this category as appropriate for claims of abuse of power. This approach overlooks the need for an updated classification of circulars, which may also be the subject of such claims, especially given the significant increase in the way administrative authorities intervene in regulatory matters by creating new legal rules or establishing lower legal standards that contradict higher-ranking texts. Furthermore, when these authorities interpret legal texts using mandatory language, such circulars should be classified as mandatory interpretative circulars, which may also give rise to claims of abuse of power. Unfortunately, the Algerian administrative judiciary has maintained the traditional classification, which distinguishes only between regulatory and interpretative circulars.

In contrast, the modern distinction introduced by comparative administrative jurisprudence distinguishes between mandatory and non-mandatory circulars.

We therefore urge the Algerian administrative judiciary to adapt to this contemporary classification by accepting challenges to mandatory interpretative circulars. This would broaden the framework of judicial protection and ensure greater protection for individuals against the increasing interference and restrictions imposed by administrative authorities under the guise of interpretation, particularly when such circulars contain mandatory provisions that affect the legal status of individuals. This type of circular clearly falls outside the scope of judicial control exercised by the Algerian administrative judiciary.

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