

STUDY

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Transnational repression of human rights defenders: The impacts on civic space and the responsibility of host states



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Transnational repression of human rights defenders: The impacts on civic space and the responsibility of host states

ABSTRACT

Transnational repression arises when foreign governments reach across national borders to coerce, control and silence individuals in other countries using a broad range of methods, ranging from digital surveillance to extraterritorial killings. Amongst the primary targets of transnational repression are human rights defenders, whose advocacy is perceived by repressive regimes as a threat to their interests and power. As a result, human rights defenders fleeing persecution or other forms of repression at home are now facing increasing danger even though they have moved abroad. The practice of transnational repression negatively impacts every level of society, from individual rights to national security and democratic institutions. This paper presents global trends in transnational repression against human rights defenders, focusing on human rights impacts and curtailment of civic space. It examines the human rights obligations of European Union (EU) Member States as host countries to address transnational repression and outlines some of the emerging policy responses by governments worldwide. The paper also examines how current EU legal and policy frameworks and instruments could be applied to counter transnational repression and provides recommendations for improving protection for the human rights defenders.

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List of abbreviations

AI	Artificial Intelligence
AIMC	Arab Interior Ministers' Council
APHRD	Action Plan on Human Rights and Democracy
CISA	US Cybersecurity and Infrastructure Security Agency
CoE	Council of Europe
CSO	Civil Society Organisation
DIGI	Digital Industry Group Inc
DSA	Digital Services Act
ECHR	European Convention on Human Rights
EEAS	European External Action Service
EFI	Espionage and Foreign Interference
EU	European Union
EUGHRSR	EU Global Human Rights Sanctions Regime
FBI	Federal Bureau of Investigation
FH	Freedom House
G7	Group of Seven
HCHR	United Nations High Commissioner for Human Rights
HRW	Human Rights Watch
ICCPR	International Covenant on Civil and Political Rights
IPHR	International Partnership for Human Rights
IRPT	Islamic Renaissance Party of Tajikistan
NCSC	National Cybersecurity Centre
NGO	Non-Governmental Organisation
PEGA	European Parliament's Committee of Inquiry to Investigate the Use of Pegasus and Equivalent Surveillance Spyware
PRC	People's Republic of China
RRM	Rapid Response Mechanism
TEU	Treaty on European Union
TRAP	Transnational Repression Accountability and Prevention

UK	United Kingdom
UN	United Nations
USA	United States of America
V-Dem	Varieties of Democracy

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Executive summary

This paper defines and discusses the practice of transnational repression, which arises when a foreign government seeks to defend and advance its interests by reaching across national borders to coerce, control and silence individuals in other countries using a broad range of methods. Transnational repression leads to numerous human rights violations, such as the right to privacy, the right to freedom of expression, the right to peaceful assembly and, crucially, the right to life.

Amongst the primary targets of transnational repression are human rights defenders, whose advocacy is considered by repressive regimes as a threat to their interests and power. From unofficial Chinese police stations in countries across the globe to the attempted poisonings of exiled Russian journalists and the killing of Iranian regime opponents on European soil, these regimes do not hesitate to expand domestic political controls and repression across borders. Based on data from Freedom House, at least 43 governments have engaged in physical threats against political activists and journalists living in exile or in the diaspora between 2014 and 2024 – and this is probably just the tip of the iceberg, as transnational repression is often undertaken in a covert manner.

By employing tactics such as physical assaults, Interpol notices and digital surveillance, these governments are actively silencing their critics abroad, including human rights defenders located in European Union (EU) Member States. In some instances, governments resort to organised crime groups and other proxies to coerce, assault or punish members of exile and diaspora communities deemed to represent a threat to their interests. States may also leverage the capabilities of private sector actors, such as mercenary spyware companies, to enable tactics of digital transnational repression.

Transnational repression negatively impacts every level of society, from individual rights to national security and democratic institutions. For targeted human rights defenders, their communities and networks, transnational repression has broad and far-reaching impacts, ranging from damage to their mental health and well-being, risks to physical safety and the deterioration of social relations to restrictions on their mobility and professional development, self-censorship and even withdrawal from activism. These practices clearly limit the ability of human rights defenders in exile and the diaspora to communicate, organise and assemble freely, thus curtailing their human rights and, more broadly, civic space.

This paper examines global trends of transnational repression against human rights defenders with a particular focus on human rights impacts and the curtailment of civic space. To this end, a working definition of transnational repression is provided, with key methods and perpetrators identified. The impacts of this practice are discussed, and with a view to its mitigation, some of the human rights obligations incumbent on EU Member States as host countries are described. Certain emerging policies are presented, addressing transnational repression adopted by Australia, the United Kingdom and the United States of America. The paper then examines how current EU legal and policy frameworks and instruments could be applied to counter transnational repression against human rights defenders.

This paper is based on an open-source analysis and draws on recent research and documentation dealing with transnational repression (including work undertaken by the authors), as well as a

variety of policy documents broadly dealing with transnational repression and the protection of human rights defenders. The authors also use data drawn from Freedom House's Transnational Repression Database and five original semi-structured interviews conducted online with policy experts based in Europe.

The paper concludes that there is a need to adopt a comprehensive approach within the EU to protect human rights defenders at risk of transnational repression, current understandings of which are often embedded within a foreign interference framework, mainly considering it as a national security issue. Such an approach overlooks how incidents of transnational repression impair the fundamental rights of human rights defenders and undermine their advocacy work.

It is argued here that EU Member States are falling short in upholding their obligations to protect human rights defenders at risk of transnational repression, about which there remains a general lack of awareness among Member States. Consequently, such host countries are often ill-equipped to understand and support human rights defenders. This is also reflected in current EU policy formulations and guidance notes on human rights defenders. At present, none of the EU policy initiatives on human rights defenders, including [ProtectDefenders.eu](https://protectdefenders.eu), have adequate guidance or resources to protect and support human rights defenders in exile. The distinct and urgent protection needs of exiled human rights defenders demand a tailored, human rights-focused response. This paper, therefore, urges the EU and its Member States to formulate more specific policies and measures to give greater attention to the unique concerns of human rights defenders targeted with acts of transnational repression.

In order to address these gaps in response, this paper outlines a number of recommendations, which span EU policy reforms, specific actions for EU institutions and suggestions to EU Member States and their national law enforcement agencies. The proposed recommendations advocate for a comprehensive and unified approach at both EU and national levels, involving: greater cooperation among institutional actors, awareness raising and policy reforms. There is also an urgent need for increased funding and support not only for human rights defenders at risk of transnational repression but also for civil society organisations supporting them. These measures aim to raise the cost of engaging in transnational repression for perpetrators, enhance their accountability and ensure greater protection for human rights defenders globally.

To this end, the following recommendations are proposed:

1. EU policy frameworks

- Update the EU Human Rights Defenders Guidelines to include transnational repression.
- Revise the EU Action Plan on Human Rights and Democracy to include transnational repression and financial support mechanisms for at-risk human rights defenders.
- Extend ProtectDefenders.eu's mandate to include human rights defenders at risk of transnational repression within the EU.
- Amend the EU Visa Code to introduce provisions allowing further visa extensions for human rights defenders facing transnational repression and consider other immigration mechanisms that will allow human rights defenders at risk to have a secure legal status in the EU.

2. EU institutional actions

- Formulate an inclusive human rights-centred definition of transnational repression in collaboration with regional and international human rights experts and bodies.
- Establish a mechanism to collect and document transnational repression incidents across EU Member States, coordinate policy responses among EU institutions and facilitate information exchange on transnational repression among EU institutions, Member States and civil society.
- Extend EU financial support to human rights defenders at risk of transnational repression within existing programmes in EU Member States.
- Extend the European Police Office's mandate to conduct a targeted threat assessment on transnational repression; facilitate cooperation and information sharing among Member States' law enforcement agencies on this issue.
- Establish transparency and accountability in the spyware market, including enforcing export control rules and implementing strict standards for the authorisation, execution and oversight of spyware operations by EU Member States.
- Enforce the Digital Services Act to ensure social media platforms comply with human rights obligations and address digital transnational repression against human rights defenders.
- Fund an independent research laboratory for investigations into digital threats against human rights defenders.

3. EU foreign policy tools

- Expand the current EU Global Human Rights Sanctions Regime to include transnational repression and impose targeted sanctions against individuals or entities involved in serious cases of transnational repression.
- Restrict financial assistance and suspend aid to states involved in transnational repression.
- Raise transnational repression in all appropriate forums via diplomatic channels and public statements with a view to resolution.
- Strengthen language on transnational repression in the conclusions of the Foreign Affairs Council on EU priorities in United Nations Human Rights fora.
- Include information on transnational repression in European External Action Service guidance to EU delegations.

4. EU Member States

- Following the adoption of a definition of transnational repression at the EU level, adopt and codify this definition in domestic legislation. Introduce a comprehensive legal framework to respond to transnational repression.
- Implement a 'whole-of-government' approach to addressing transnational repression, involving all relevant government agencies in a coordinated response.

- Systematically record cases of transnational repression that occur domestically within a centralised EU mechanism, which can be used to track transnational repression patterns and tactics; formulate adequate policy responses to tackle transnational repression.
- Support human rights defenders and provide dedicated services, including psychological, legal and immigration support for those at risk of transnational repression.
- Provide training on transnational repression to law enforcement agencies to ensure that they recognise this as a distinct threat to the human rights of exile and diaspora human rights defenders.
- Educate immigration officers to recognise transnational repression in assessing and processing visa applications and asylum claims from human rights defenders at risk. Create or expand temporary protection schemes or other mechanisms to ensure secure legal status for those at risk (e.g., facilitate visas and extensions, prioritise fast-tracking asylum for human rights defenders and ensure family reunification).
- Apply rigorous scrutiny to Interpol Notices issued by the origin country against designated individuals in EU Member States.
- Critically assess how domestic state institutions may be unwittingly facilitating or cooperating in acts of transnational repression (for example, by undertaking extraditions or deportations of human rights defenders targeted with transnational repression) and take steps to prevent such participation.
- Enhance cybersecurity agencies' efforts to track and mitigate digital forms of transnational repression, share information and offer guidance to at-risk communities.
- Implement the recommendations of the European Parliament's Committee of Inquiry to Investigate the Use of Pegasus and Equivalent Surveillance Spyware (PEGA Committee) to address the threat of spyware proliferation and abuse.
- Enforce the due diligence obligations outlined in the Directive on Corporate Sustainability Due Diligence to ensure that technology companies captured by the directive identify and address potential human rights risks associated with their products.

1 Introduction

This paper examines global trends of transnational repression against human rights defenders, focusing on human rights impacts and the curtailment of civic space.

Transnational repression arises when foreign governments reach beyond borders to intimidate, silence and coerce members of their diaspora and exiles with methods ranging from digital surveillance to killings. Governments increasingly rely on transnational repression to extend domestic political controls beyond their territory to silence criticism and dissent in other countries. Human rights defenders are primary targets as these repressive regimes perceive advocacy and information sharing on human rights as a threat to their reputation, legitimacy and, ultimately, their power. As a result, human rights defenders fleeing persecution at home face an increasing number of risks when they continue to raise awareness of rights violations, corruption and power abuse from abroad – even when residing in democracies. Direct physical attacks and pressure resulting from more subtle methods such as digital surveillance and online harassment send a chill through diaspora and exile communities. The practices of transnational repression further limit the ability of human rights defenders in exile and the diaspora to communicate, organise and assemble freely, thus curtailing their human rights and, more broadly, civic space.

Relying on the United Nations (UN) Declaration on Human Rights Defenders, this paper defines human rights defenders as ‘people who, individually or with others, act to promote or protect human rights in a peaceful manner’¹. Anyone who carries out peaceful activities in the promotion and protection of fundamental and human rights can be a human rights defender, either working in large international organisations or individually at a local level. Since the adoption of the Declaration, there has been growing recognition of human rights defenders’ significance as agents of change². The European Union (EU) considers human rights defenders as ‘natural and indispensable allies’ in promoting human rights and democracy. Hence, support for human rights defenders is one of the EU’s major priorities within its external human rights policy³.

The European Parliament highlighted the increase in transnational threats against human rights defenders in its 2023 Resolution on the EU Guidelines on Human Rights Defenders⁴. In its Conclusions on EU Priorities in UN Human Rights Fora in 2025, the Foreign Affairs Council committed to considering measures to prevent and tackle transnational repression⁵. At a broader European level, the Parliamentary Assembly of the Council of Europe (CoE) recognised in Resolution 2509 (2023) that transnational repression is a growing concern which undermines the rule of law and human rights in Europe⁶. Similar echoes resonated in a 2022 Group of Seven (G7) Statement where members of the group, including the EU, committed to ‘building resilience against

¹ United Nations Office of the High Commissioner for Human Rights, [About Human Rights Defenders](#), webpage, nd.

² A. M. Nah, et al., ‘[A Research Agenda for the Protection of Human Rights Defenders](#)’, *Journal of Human Rights Practice*, Vol 5, No 3, 2013, pp. 401-420.

³ EEAS, [EU Guidelines on Human Rights Defenders](#), 21 June 2016.

⁴ European Parliament, [Resolution on the EU Guidelines on Human Rights Defenders](#), P9_TA(2023)0086, 16 March 2023.

⁵ Council, [Council Conclusions on Human Rights Defenders](#), ST 5638/25, 2025, 27 January 2025.

⁶ Parliamentary Assembly of the CoE, [Resolution 2509 \(2023\): Transnational repression as a growing threat to the rule of law and human rights](#), 23 June 2023.

malign foreign interference and acts of transnational repression that seek to undermine trust in government, society and media, reduce civic space and silence critical voices⁷.

Democratic governments, including those in the EU, are beginning to pay attention to the issue of transnational repression. However, the lack of a shared problem definition, systematic monitoring and data collection on incidents, as well as coordination across agencies and government levels, has hindered the development of evidence-based and comprehensive policy responses to transnational repression in the EU. As a result, protection measures for human rights defenders at risk are still incomplete or missing. Moreover, in the United States of America (USA), policy shifts under President Donald Trump risk setting back the promising steps taken by the previous administration. Drastic budget cuts and the reorientation of foreign policy pose an existential threat to many organisations whose work has been essential for understanding and mitigating the risks of transnational repression⁸. Harsh immigration controls and the threat of being deported will prevent many human rights defenders from coming to the USA for refuge in the first place.⁹ It is now up to the EU to step up and fill the gap left by the dismantlement of American civil society infrastructure and expertise in human rights and democracy. Together with other like-minded countries, such as Canada and the United Kingdom (UK), the EU needs to assume responsibility for coordinating policy responses to transnational repression and strengthen global protections for human rights defenders at risk¹⁰.

This paper examines some of the key methods and perpetrators of transnational repression against human rights defenders, highlighting the impacts of these repressive practices on their activities, personal lives and human rights. The paper further outlines EU Member States' human rights obligations to address transnational repression and mitigate its impacts on human rights defenders. Turning to emerging responses, the paper presents certain policies adopted in the USA, Australia and the UK to counter transnational repression. Finally, the authors assess some tools in the EU's policy and legal framework that could be employed or further developed to curtail transnational repression practices and improve the protection of human rights defenders both in exile and as part of the diaspora against the long arms of their repressive home countries.

1.1 Defining transnational repression

As highlighted throughout this paper and in the recommendations, the EU and its Member States still need to establish a working definition of transnational repression. A clear definition will allow policymakers and other stakeholders to: delineate the scope and boundaries of the issue; raise awareness within EU institutions and among Member States; coordinate and harmonise policy responses across jurisdictions; and cooperate on this issue with other governments, for instance, within the G7 framework.

⁷ Government of Canada, [2022 Resilient Democracies Statement](#), G7 Statement on Human Rights Defenders, 27 June 2022.

⁸ See for example: Freedom House, [The Effects of the US Foreign Aid Freeze on Freedom House](#), Webpage, nd.

⁹ A. ElGendy, ['Why I Had to Flee the United States: I was a political prisoner in Egypt. I didn't want to become one again in America'](#), *The Nation*, 02 May 2025.

¹⁰ D. Fu, E. Dirks, [How Can Canada Tackle Foreign Interference Without a U.S. Ally?](#), Asia Pacific Foundation of Canada, 2025.

In line with existing definitions put forward in academia, civil society and emerging legislation, this paper suggests that a definition of transnational repression should contain the following elements:

- 1) Transnational repression is **undertaken or organised by state actors** either directly or through the use of proxies. Non-state actors may also be involved (such as companies, different types of organised groups and private individuals), acting on *behalf* of the perpetrating state as enablers or agents of repression.
- 2) Transnational repression **reaches across national borders**; it means that a foreign government aims to repress people on the territory of another state, either directly or indirectly, who are perceived as challenging its interests.
- 3) Transnational repression is typically **directed against people with ties (by nationality or descent) to the perpetrating state**, which aims to extend domestic political controls and repression over members of exile or diaspora communities. Some experts point out that transnational repression can also target individuals without any transnational connection to the perpetrating state (e.g., lawyers, journalists, academics, or parliamentarians from one country criticising the government of another country). However, the authors stress that exiles and diaspora members are particularly vulnerable to the risks and impacts of rights violations resulting from transnational repression, for instance, because of familial bonds, the need to obtain official documents from their country of origin and their potentially precarious legal status in the host state (e.g., asylum seekers).
- 4) Transnational repression **involves a broad range of tactics**, which are constantly evolving. These include: killings, physical assaults, detention, rendition, abductions, in-person surveillance and intimidation, denial of consular services and other blackmail through embassies, Interpol abuse, digital threats, as well as threats against family and associates who remain in the country of origin.
- 5) Transnational repression has a variety of negative impacts that constitute **violations of the targets' human rights**. Accordingly, focusing on this issue is essential for highlighting the obligations of host states to prevent and protect against such violations. It allows a distinction to be drawn between transnational repression and other forms of foreign interference (e.g., election manipulation, disinformation campaigns directed against broader audiences in the target country, or military or industrial espionage), which primarily affect the national security interests of the target country.

Based on these considerations, the authors define transnational repression as: **actions of a foreign government that aims to defend and advance its interests by reaching across national borders to coerce, control or silence individuals in other countries through a broad range of methods. These actions have a negative impact on the human rights of the targets.**

Although this paper focuses on human rights defenders as a specific target category, transnational repression can be directed against a variety of other groups and individuals, such as former government members, businesspeople, political opposition members, as well as ethnic and religious minorities. It is important to understand that acts of transnational repression against one type of target can have negative effects on all individuals at risk, as well as broader communities. For example, the abduction or (attempted) killing of a former regime insider will demonstrate how far a repressive regime is willing to go to silence a perceived challenger abroad and, therefore, have

chilling effects also on exiled journalists or human rights defenders in the diaspora. While there are specific instruments to increase the protection of human rights defenders against transnational repression (some of which are pointed out in this paper), it is imperative to address transnational repression in its entirety, mitigating the risks for all types of potential targets.

1.2 Methodology

This paper is based on desk-based research, supplemented by five background interviews with selected EU officials and non-governmental organisations (NGOs) representatives. In addition, the authors have used valuable feedback contained in earlier versions of the paper along with recommendations from experts in NGOs working on transnational repression and human rights. Together with EU policy documents and reports, these interviews and comments helped to assess the EU's current human rights toolbox and its potential for improvements to counter transnational repression. Finally, with a focus on select methods of transnational repression, the paper analyses the responsibility of host states under international human rights law in addressing transnational repression targeting human rights defenders with a focus on the International Covenant on Civil and Political Rights (ICCPR) and the European Convention on Human Rights (ECHR).

Exact figures on incidents of transnational repression against human rights defenders are hard to come by as, by their very nature, authoritarian rulers shun transparency and accountability. Nevertheless, in addition to recent research literature (including work by all three co-authors of this paper), analysis of global transnational repression trends here has been able to draw on descriptive statistics taken from the most recent Transnational Repression Database compiled by Freedom House (FH), namely the 2024 edition (Version 6). Alongside other existing datasets on transnational repression (e.g., the Central Asian Political Exiles database¹¹ and the Authoritarian Actions Abroad database¹²), the FH Database is the most comprehensive and appropriate for the purpose of this paper. It relies on publicly available data from various sources, including reports produced by NGOs and international organisations, legal documents and journalistic accounts. The FH Database documents incidents of physical transnational repression (excluding digital attacks and threats against family members) from 2014-2024, categorising them according to the type of incident, the target person's home and host country, together with different target categories. The latest version of the database includes a total of 1219 incidents perpetrated by 48 governments in 103 countries around the world¹³. The profiles of individuals targeted in an incident of transnational repression are organised in the following categories: journalist, political activist, former regime insider, refugee, asylum seeker, human rights defender and persons targeted based on their identity or belonging. These categories are not mutually exclusive; hence, a target person may fall into more than one profile category.

It is important to note that the FH Database is incident-based so that one person can be listed on a number of occasions in the event of numerous attacks against the same individual. The authors noticed that, compared to the overall number of cases in the FH Database, only 61 incidents of 1219 were categorised as targeting human rights defenders. At the same time, all individuals coded as human rights defenders were also categorised as either journalists and/or political activists. Hence,

¹¹ Central Asian Political Exiles, [Political Exiles \(2014-2020\)](#), database, nd.

¹² A. Dukalskis, [Making the World Safe for Dictatorship](#), Oxford University Press, New York, 2021.

¹³ G. Vaughan, [Ten Findings from Ten Years of Data on Transnational Repression](#), FH, 06 February 2025.

for our analysis, the authors decided to disaggregate the human rights defenders' category, counting all incidents involving journalists and political activists, which gave us a more meaningful total number of 655 cases: 531 incidents directed against 'political activists' and 124 against 'journalists'. In this sense, the authors use journalists and political activists as proxy categories to understand broader indicative trends in transnational repression threats against human rights defenders in the absence of any other, more precise quantitative documentation, for instance, exists, on domestic threats against human rights defenders¹⁴.

In addition to the descriptive analysis of quantitative data, our analysis relies on publicly available research reports of NGOs and media outputs to provide details on specific cases and perpetrators of transnational repression. While open-source data provides an important examination tool, it does have various limitations¹⁵. The perpetrators of transnational repression have strategic incentives to act in secrecy to foreclose criticism or any other repercussions from domestic and international actors. Restrictions for the media and investigative reporting in authoritarian contexts further limit the documentation of transnational repression incidents. As a consequence, transnational repression incidents in authoritarian host countries, as well as the many subtle forms of harassment and pressure on human rights defenders, probably stay under the radar and thus go unreported.

1.3 Outline

Following this introduction, the paper will be organised as follows:

Section 2 presents global trends of transnational repression targeting human rights defenders on the basis of the FH Database, including key methods and perpetrators. It also discusses digital transnational repression and the role of non-state actors as enablers of repression. This section also presents four case studies on Russia, Tajikistan, India and Egypt, all significant perpetrators of transnational repression.

Section 3 addresses the chilling impacts of transnational repression and its effects on human rights and civic space, discussing how acts constitute violations of human rights protected under the ICCPR and the ECHR (e.g., freedom of expression, freedom of assembly, the right to privacy and the right to life).

Section 4 examines the human rights obligations of host states to protect human rights defenders under international law with regard to certain methods of transnational repression. In particular, it outlines how international human rights law obliges EU Member States to take specific protective action.

Section 5 outlines emerging policy responses addressing transnational repression in third countries (USA, UK and Australia) and some EU Member States.

¹⁴ See for example: Front Line Defenders, [Global Analysis 2023/24](#), 2023.

¹⁵ A. Dukalskis, et al., '[Transnational repression: data advances, comparisons, and challenges](#)', *Political Research Exchange*, Vol 4, No 1, 2022.

Section 6 presents key instruments in the EU's policy and legal framework that could allow for improved protection and resilience against transnational repression, including measures under the EU Guidelines on Human Rights Defenders¹⁶, the EU Global Human Rights Sanctions Regime (EUGHRSR), the EU Guidelines on Human Rights Dialogues With Partner/Third Countries¹⁷. It also explores the potential role of other regulations and institutions such as Europol.

Section 7 concludes the paper and highlights the gaps in existing protection mechanisms. The section provides a series of recommendations to strengthen the EU's current toolbox in protecting human rights defenders against transnational repression and curtailing current practices.

2 Transnational repression against human rights defenders: Global trends

Globally, human rights defenders are subject to various threats and attacks from state and non-state actors, including physical threats, judicial harassment, digital attacks and psychological harm. Human rights defenders have been criminalised, dismissed from their jobs, subjected to travel bans and, in extreme cases, killed. In 2023 alone, at least 300 human rights defenders were killed in an attempt to silence them and stop their work¹⁸.

Advocating for human rights is a dangerous vocation, and as a result, many human rights defenders are forced to flee their countries¹⁹. Yet, even abroad, human rights defenders are subject to threats and attacks when they continue to raise awareness of human rights violations, corruption and power abuse as repressive governments increasingly reach across borders to silence and punish human rights advocacy. Vidadi Isgandarli, for example, an Azerbaijani human rights defender and outspoken critic of the country's President Ilham Aliyev, was violently attacked at his apartment in Mulhouse, France, in September 2024²⁰. He died of his injuries two days later. Isgandarli had sought international protection in France in 2015 after facing persecution in Azerbaijan. According to the FH Database, there have been 92 registered incidents against human rights defenders in EU Member States, 22 against journalists and 70 against political activists.

¹⁶ EEAS, [Ensuring Protection – European Union Guidelines on Human Rights Defenders](#), 2016.

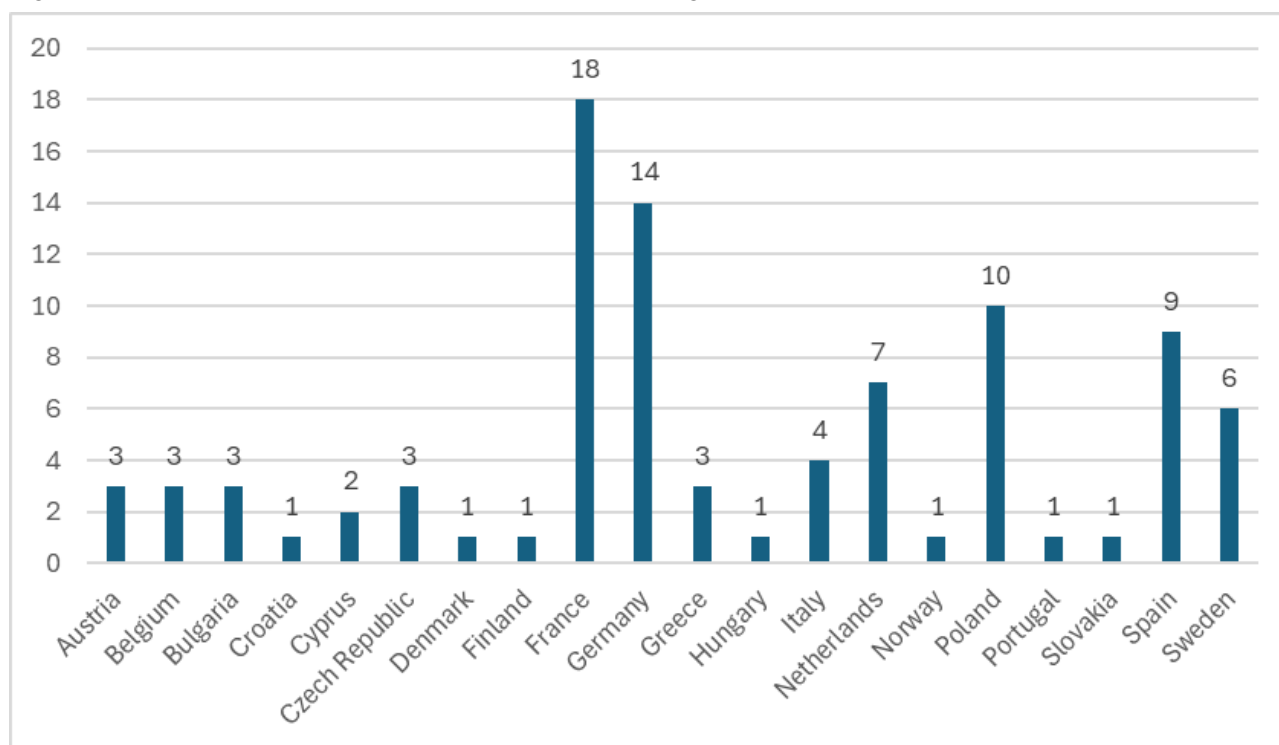
¹⁷ EEAS, [Revised EU Guidelines on Human Rights Dialogues with Partner/Third Countries](#), 6279/21 Annex, 2021.

¹⁸ Front Line Defenders, [Global Analysis 2023/24](#), 2023.

¹⁹ FRA, [Protecting Human Rights Defenders at Risk: EU Entry, Stay and Support](#), Report, 2023.

²⁰ M. Sharipzhan, ['Azerbaijani Opposition Figure Dies After Brutal Attack In France'](#), *RFE/RL's Azerbaijani Service*, 1 October 2024.

Figure 1: Transnational repression incidents on human rights defenders in the EU 2014-2024



Source: Authors' own compilation based on the FH database.

Transnational repression is not a new phenomenon, as states have long engaged in hostile activities to persecute their citizens abroad (see, for example, Operation Condor in South America)²¹. However, activities continue to expand as a result of migration flows, digital technologies and the globally entangled security interests of states²². Moreover, authoritarian rulers worldwide have grown increasingly assertive, challenging established democratic norms and liberal values. For over a decade, democracy metrics such as the FH Index and the Varieties of Democracy Institute (V-Dem Institute) have documented an enduring trend of democratic decline and autocratisation. According to the V-Dem report, in 2022, 72 % of the world's population (5.7 billion people) lived in autocracies²³.

The repressive, rights-curtailing practices of authoritarian rulers do not stop at territorial borders as they export domestic political controls abroad, targeting critics and opponents living in other countries. Research shows that the likelihood of transnational repression increases with escalating domestic repression 'because crackdowns at home drive dissent abroad and incentivise the state to extend its repressive gaze beyond its borders'²⁴. Exiled human rights defenders or human rights

²¹ F. Lessa, '[Operation Condor on Trial: Justice for Transnational Human Rights Crimes in South America](#)', *Journal of Latin American Studies*, Vol 51, No 2, 2019, pp. 409-439.

²² F. B. Adamson and K. M. Greenhill, '[Globality and Entangled Security: Rethinking the Post-1945 Order](#)', *New Global Studies*, Vol 15, No 2-3, 2021, pp. 165-180; E. Dalmasso, et al., '[Intervention: Extraterritorial Authoritarian Power](#)', *Political Geography*, Vol 64, 2018, pp. 95-104; G. Tsourapas, '[Global Autocracies: Strategies of Transnational Repression, Legitimation, and Co-Optation in World Politics](#)', *International Studies Review*, Vol 23, No 3, 2021.

²³ Varieties of Democracy Institute, '[Democracy Report 2022: Autocratization Changing Nature?](#)', 2022.

²⁴ A. Dukalskis, et al., '[The Long Arm and the Iron Fist: Authoritarian Crackdowns and Transnational Repression](#)', *Journal of Conflict Resolution*, Vol 68, No 6, 2024, pp. 1051-1079.

defenders living in the diaspora may become targets of transnational repression when they use their positions to mobilise dissent and opposition inside their countries of origin from afar or shape global public opinion contrary to the interests of their home countries by drawing attention to human rights abuses²⁵.

The opportunities, cost-benefit calculations and strategic decisions of transnational repression perpetrators are shaped by the regime type of the host country, geographic proximity and regional ties, as well as economic relations and power dynamics between the home and the host country. A recent study shows that autocracies can better elicit cooperation on human rights violations from states with shared economic interests and a weak rule of law²⁶. In fact, authoritarian governments are increasingly working together to detain, extradite or deport critics across borders²⁷. A shared disregard for human rights, weak rule of law and ties between security agencies mean that authorities collaborate more readily in cases of politically motivated extradition requests or forced repatriation. These regimes also have limited interest in hosting human rights defenders from other countries that not only criticise their own rulers but also transmit challenging ideas and capacities to local civil society. Tacit understandings and back-door deals between two authoritarian governments cooperating on transnational repression also mean that incidents remain under the radar of media and civil society, causing less international attention and reputational costs for the perpetrating state²⁸.

Neighbourhoods of two or more authoritarian countries are particularly risky zones for human rights defenders in exile. Governments in Southeast Asia, for instance, have long been suspected of agreeing to and facilitating the persecution of human rights defenders by their country of origin. Authorities in Thailand have not only facilitated assaults, abductions, enforced disappearances and other abuses against individuals on their territory but also forcibly returned others to neighbouring countries, violating the principle of non-refoulement²⁹. Regional organisations provide additional opportunities for cooperation on transnational repression among authoritarian governments. For instance, security arrangements between members of the Gulf Cooperation Council include broadly formulated extradition agreements that prevent the protection of human rights defenders from one member country fleeing to another³⁰. The Arab Interior Ministers' Council (AIMC), an Arab League body tasked with enhancing cooperation among Arab states in the fields of internal security and crime prevention, has facilitated arbitrary extraditions of dissidents and human rights defenders across Arab League countries³¹.

²⁵ A. Dukalskis, [Making the World Safe for Dictatorship](#), Oxford University Press, New York, 2021.

²⁶ R. Cordell and K. Medhi, '[Transnational Repression: International Cooperation in Silencing Dissent](#)', *International Studies Quarterly*, Vol 68, No 3, 2024.

²⁷ Y. Gorokhovskaia and I. Linzer, '[The Long Arm of Authoritarianism](#)', *Foreign Affairs*, 24 June 2022.

²⁸ M. Michaelsen and K. Ruijgrok, '[Autocracy's Long Reach: Explaining Host Country Influences on Transnational Repression](#)', *Democratization*, Vol 31, No 2, 2023, pp. 290–314.

²⁹ C. Quinley, '["We Thought We Were Safe" Repression and Forced Return of Refugees in Thailand](#)', *HRW*, 2024.

³⁰ N. Schenkan and I. Linzer, '[Out of Sight, Not Out of Reach: The Global Scale and Scope of Transnational Repression](#)', *FH*, 2021, p. 33.

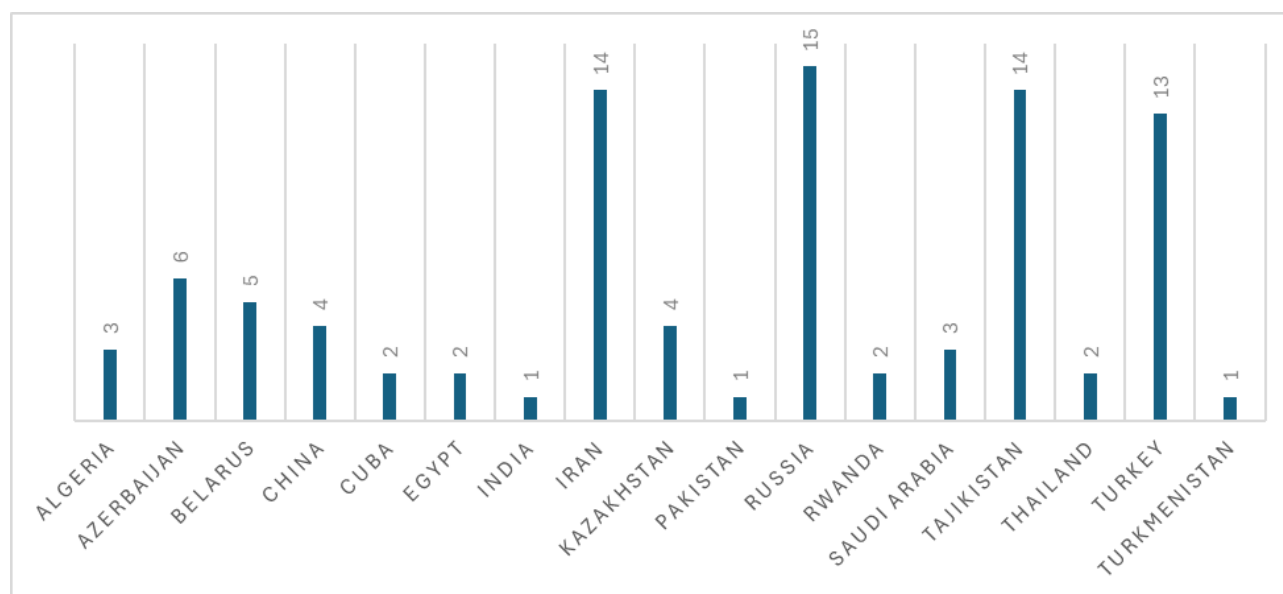
³¹ Recent cases include the Turkish-Egyptian poet Abdulrahman al-Qaradawi, who was extradited from Lebanon to the United Arab Emirates in January 2025 and Kuwaiti activist and government critic Salman al-Khaldy, who was extradited in the same month from Iraq to Kuwait following an AIMC warrant. See MENA Rights Group, '[The AIMC Must End Its Role in Transnational Repression, Say NGOs](#)', 17 February 2025.

In democratic host states, the rule of law, the guarantee of fundamental rights and asylum procedures establish a layer of protection for exiled human rights defenders so that governments engaging in transnational repression find it more difficult to persuade authorities to cooperate. However, as we show below, there are still a number of detentions and deportations linked to cases of transnational repression against human rights defenders in which the perpetrators successfully manipulated government bodies in democratic host countries for their purposes.

Another consequence is that regimes resort to other, more subtle methods, such as digital attacks and threats against the families of human rights defenders still in their countries of origin (see sections 2.1.2). They also rely on criminal organisations and other non-state proxies to circumvent law enforcement and counterintelligence agencies in the host country of their targets (see section 2.2.2). In some cases, though, the perpetrating governments seem to perceive exiled human rights defenders residing in democratic host states in the EU and North America as threatening enough to justify the costs and potential repercussions of a direct physical attack. Outspoken dissidents and human rights defenders who use the opportunities offered by liberal host states to voice their demands build ties to media and policy circles, thereby leveraging public opinion against their rights-violating countries of origin and consequently becoming targets of violent assaults and other attacks.

Governments that have engaged in direct physical attacks (physical assaults, killings and killing attempts) against human rights defenders in EU Member States include those from Russia, Iran, China, Azerbaijan and Türkiye, countries which are among the top perpetrators of transnational repression. To counter such threats, the EU and Member States should not only improve protection measures for human rights defenders at risk but also increase the costs for perpetrators through sanctions and other policies.

Figure 2: Transnational repression incidents on human rights defenders carried out by perpetrator states in the EU 2014–2024



Source: Authors' own compilation based on the FH database.

2.1 Key methods of transnational repression

The methods of transnational repression deployed by a perpetrating state will depend on the opportunities and constraints that the government encounters when reaching across borders into the territory and jurisdiction of another state³². That said, FH categorises the various methods of transnational repression into four main categories (the FH database counts and verifies data on incidents in the first two categories)³³.

- **Direct attacks** are incidents in which ‘an origin state carries out a targeted physical attack against an individual abroad’³⁴. This category includes killings (and attempted killings) (also known as assassinations or assassination attempts), assaults, disappearances and violent forced renditions.
- **Co-opting other countries:** this refers to attacks that manipulate or co-opt authorities and institutions in other countries ‘to act against a target through detention, unlawful deportation, and other types of forced renditions’³⁵. This also includes abuse of the Interpol notification system to bring host country authorities to detain and deport targeted human rights defenders.
- **Mobility controls:** this describes tactics such as ‘passport cancellation and denial of consular services, preventing the target from travelling or causing them to be detained’³⁶. These steps may lead to the deportation or forced rendition of the targeted human rights defender.³⁷
- **Threats from a distance:** this category covers all types of threats which ‘the origin state can carry out without physically acting beyond its own jurisdiction’³⁸. This includes the different methods of digital transnational repression, such as digital surveillance and online harassment (see below), as well as the widespread tactic of threatening family members in the country of origin (‘coercion-by-proxy’).

2.1.1 Physical threats

The FH Database describes the following acts as falling within the category of physical threats:

- Killings or attempted killings (also known as assassinations or assassination attempts);
- Assaults (a physical attack that is less likely to result in death);
- Credible threats (a threat considered sufficiently serious by law enforcement in the host country that they act to prevent it through the deployment of protective actions for a target, like moving to a hidden location);

³² J. H. R. DeMeritt, [The Strategic Use of State Repression and Political Violence](#), Oxford Research Encyclopedia of Politics, 2016, p. 6.

³³ N. Schenkkan and I. Linzer, [Out of Sight, Not Out of Reach: The Global Scale and Scope of Transnational Repression](#), FH, 2021, p. 9.

³⁴ N. Schenkkan and I. Linzer, [Out of Sight, Not Out of Reach](#), 2021, p. 9.

³⁵ N. Schenkkan and I. Linzer, [Out of Sight, Not Out of Reach](#), 2021, p. 9..

³⁶ N. Schenkkan and I. Linzer, [Out of Sight, Not Out of Reach](#), 2021, p. 9.

³⁷ See also: A. Slipowitz, J. White and Y. Gorokhovskaia, [No Way In or Out: Authoritarian Controls on the Freedom of Movement](#), FH, 2024.

³⁸ N. Schenkkan and I. Linzer, [Out of Sight, Not Out of Reach](#), 2021, p. 9.

- Detention (a person is held in their host state for at least 12 hours at the request of the country of origin);
- Rendition (forcible return to the country of origin without or with minimal pretension of a legal process)³⁹;
- Unlawful deportation (forcible return with some violations of due process to a country of origin where the person is liable to be subjected to persecution);
- Unexplained disappearance (a person has disappeared, and the country of origin is presumed to be responsible, but there is no confirmation as to where the person physically is)⁴⁰.

Table 1: Transnational repression methods used against political activists and journalists 2014–2024

Target Category	Assassination/ assassination attempt	Assault	Credible threat	Detention	Rendition	Unlawful deportation	Unexplained disappearance	Total
Journalists	11	15	13	42	31	7	5	124
Political activists	35	48	27	238	111	65	7	531

Source: Authors' own compilation based on the FH database.

The FH Database documents 35 incidents of killing or killing attempts (assassinations or assassination attempts) against political activists and 11 cases against journalists. Iran is a leading perpetrator of this transnational repression method, with seven documented cases of killings or attempted killings. Cases tied to Iran include:

- The 2017 killing of Ahmad Mola Nissi, a political activist of the Arab minority in Iran, in the Netherlands;
- The 2019 killing of Masoud Molavi, a scientist and former member of Iranian intelligence turned exiled critic, in Türkiye in 2019;
- The 2017 killing of Saeed Karimian, a British citizen and founder of the exiled Gem TV Group, in Türkiye⁴¹;
- The 2024 attempted killing of Iranian dissident Siamak Tadayon Tahmasebi in the Netherlands⁴².

³⁹ While some renditions can take the form of kidnappings or abductions of the target person from another territory without involvement of host country authorities, in many cases they involve 'working closely with host country authorities to illegally transfer people to the origin country'. See N. Schenkkan and I. Linzer, [Out of Sight, Not Out of Reach: The Global Scale and Scope of Transnational Repression](#), FH, 2021.

⁴⁰ Definitions taken from the Methodology section of the FH database. The authors are grateful to the FH team working on transnational repression for sharing these data.

⁴¹ Committee to Protect Journalists, '[Saeed Karimian](#)', webpage, nd.

⁴² Iran International, '[Iranian Dissident Escapes Assassination Attempt in Netherlands](#)', 26 June 2024.

Further, there have been a number of 'credible threats' attributed to Iran in the FH Database. In 2022, American law enforcement officers arrested a man with a loaded assault rifle outside the house of prominent women's rights activist Masih Alinejad in New York. Furthermore, after the worldwide 'Women, Life, Freedom' Protests in 2022, British law enforcement agencies reported more than a dozen credible threats linked to the Iranian regime to kill or kidnap individuals on UK territory. Due to increased threats against its staff members, the television channel Iran International even decided to move its headquarters temporarily from London to Washington, DC⁴³.

Other aggressive perpetrators of transnational repression engaging in killings and attempted killings against regime critics and opponents abroad include Russia, India (see case studies below) and Rwanda. Nicaragua is also suspected of seven killings and attempted killings, including that of Joao Maldonado and his partner Nadia Robleto, both activists for the exiled opposition who survived a shooting in Costa Rica in 2024⁴⁴.

The most widely used tactic of physical transnational repression is detention, with 238 incidents documented against political activists and 42 against journalists. Detentions involve the manipulation of, or cooperation with, host state authorities and reflecting an increase in this regard, most detention incidents were documented for cases involving targeted individuals residing in another authoritarian country. However, there are still incidents of authorities in democratic host countries detaining political exiles who are at risk of persecution by their home countries' governments. Between 2014 and 2024, the FH database records 12 incidents of unlawful deportations and 35 detentions linked to incidents of transnational repression against political activists in the EU. Journalists were targeted in five incidents of detention. For example, Bulgarian authorities detained and issued a deportation order against Abulrahman Al-Khalidi, a Saudi human rights defender who fled Saudi Arabia in 2013 and claimed asylum in Bulgaria in 2022. Al-Khalidi worked with murdered journalist Jamal Khashoggi, and a return to Saudi Arabia risks exposing him to torture and other abuses⁴⁵.

Despite growing awareness among states that certain governments abuse Interpol Red Notices, it is still a key player in facilitating transnational repression. The FH database shows that in the EU, there have been 26 confirmed Interpol notices against human rights defenders; 21 of them were directed against political activists and 5 against journalists. A Red Notice is an official request issued by Interpol to law enforcement agencies worldwide to locate and provisionally arrest a person pending extradition or other legal action. For example, in January 2020, Azerbaijani opposition activist and political emigrant Dashgyn Agalarli was briefly detained in Poland on the basis of an Interpol Red Notice filed by Azerbaijan for alleged tax evasion⁴⁶. The Azerbaijani government has also issued various other Interpol Red Notices against critics in exile in the EU⁴⁷. In 2016, Iranian activist Mehdi Khosravi, a political refugee living in the UK since 2010, was arrested in Italy on a Red

⁴³ UN, '[Violence and threats against journalists reporting on Iran from abroad must stop, warn UN Experts](#)', Press Release, 30 May 2024.

⁴⁴ K. Estrada Téllez, '[Gun Attack on Nicaraguan Exile Joao Maldonado in Costa Rica](#)', *Confidencial*, 11 January 2024.

⁴⁵ HRW, '[Bulgaria: Saudi Activist at Risk of Deportation](#)', News Release, 10 March 2025.

⁴⁶ Jam News, '[Azerbaijani political emigrant detained in Poland on charges of tax evasion released on bail](#)', 9 January 2020.

⁴⁷ Open Caucasus Media, '[Azerbaijan seeks arrest of critics abroad](#)', 10 September 2020.

Notice issued by the Iranian government for alleged corruption⁴⁸. Türkiye has also abused the Interpol system to detain critics abroad, including the writer Doğan Akhanlı, a German citizen who was arrested in Spain in 2017 and whose extradition to Türkiye was prevented only by the German foreign ministry's intervention⁴⁹.

Although Interpol has taken important steps to limit the abuse of Red Notices, governments continue to call on the organisation to detain, locate and restrict the movement of exiled human rights defenders. Some countries, such as Türkiye and Belarus, are working with Interpol's database of lost and stolen passports to harass dissidents and trap them while travelling abroad⁵⁰. The Chinese government has used the Interpol system to search and find individuals abroad, subsequently pressuring them to return home by threatening their family members in acts of coercion-by-proxy⁵¹.

In light of this abuse, the European Parliament has considered Interpol reforms. A 2019 study commissioned by the European Parliament's Subcommittee on Human Rights and a 2022 study commissioned by the European Parliament's Committee on Civil Liberties, Justice and Home Affairs put forward certain recommendations to address the problem of politically motivated Interpol notices. Elsewhere, America has passed the Transnational Repression Accountability and Prevention Act (also known as the TRAP Act) to address the abuse of Interpol for political motives⁵². However, due to the sheer number of submissions being entered into the system each year, Interpol is experiencing persistent problems stemming from: a lack of control over updates; deletion of notices; diffusion orders in national databases; and authoritarian regimes' interference within the organisation⁵³.

2.1.2 Coercion-by-proxy

A widespread and particularly insidious method of transnational repression concerns threats against exiled human rights defenders' relatives and other associates who remain in their home countries⁵⁴. Rather than reaching across borders to target an individual abroad directly, 'proxy punishment' uses threats and violence within a regime's territory. By directing repression towards diaspora family members, which does not involve incursions by the perpetrating state into the territory of another state and thus is likely to be less politically problematic, regimes indirectly punish those who remain outside the country. Tactics include physical harm, arrests, detentions, interrogations, verbal threats and harassment, forced participation in regime propaganda and slander, asset seizures, travel bans and employment terminations. These tactics are far easier to

⁴⁸ Reuters, ['Italy frees Iranian activist after son of late shah appeals'](#), 12 August 2016.

⁴⁹ Deutsche Welle, ['German-Turkish author Dogan Akhanli freed'](#), 20 August 2017.

⁵⁰ New York Times, ['Interpol Tightens Oversight on Databases Misused by Autocrats'](#), 07 November 2024.

⁵¹ The Economist, ['Interpol is no longer fit for purpose, say Rhys Davies and Ben Keith'](#), 09 May 2025.

⁵² US Department of State, [Transnational Repression Accountability and Prevention \(Trap\) Act Reports](#), 02 June 2023.

⁵³ R. H. Wandall, [Ensuring the rights of EU citizens against politically motivated Red Notices](#), Directorate-General for Internal Policies, PE 708.135, European Parliament, 2022; T. R. Bromund et al., ['As Interpol Gets New Secretary General, What are the Risks of Abuses Over Reforms?'](#), *Just Security*, 01 November 2024.

⁵⁴ F. B. Adamson and G. Tsourapas, [At Home and Abroad: Coercion-by-Proxy as a Tool of Transnational Repression](#), FH, 2020.

deploy than attempting to reach human rights defenders in other countries while also avoiding media attention and international condemnation⁵⁵.

Coercion-by-proxy is often used to constrain and retaliate against public activity, such as the work of journalists in influential news organisations or human rights defenders who are able to garner international attention. In a survey conducted among Iranian journalists working in the UK, 60 % indicated that their families had experienced threats or intimidation related to their work⁵⁶. The Iranian regime also pressured the husband of human rights lawyer and Nobel laureate Shirin Ebadi to 'confess' on national television about his wife's alleged involvement in an anti-Iranian Western conspiracy⁵⁷. The father of Mohamed Ali, an exiled businessman from Egypt who stirred protests with YouTube videos criticising government corruption, was forced to appear on TV programmes in Egypt denouncing his son⁵⁸. Many Uyghur human rights defenders and journalists report that they receive video calls from Chinese government agents who pressure them in the presence of family members to stop speaking out about human rights or to spy on other activists in the diaspora⁵⁹.

In her 2024 report on exiled journalists, the UN Special Rapporteur on freedom of expression and opinion, Irene Khan, spoke about promoting and protecting the right to freedom of opinion and expression. She stressed that attacks on family members 'take a heavy personal toll'. Exiled journalists face a difficult choice between cutting off ties with loved ones or with sources in their home countries, self-censoring, working anonymously, or even quitting their jobs⁶⁰. A study on exiles from Iran, Egypt, Syria and other Middle Eastern countries found that only human rights defenders with a strong political commitment who also benefited from support and solidarity within their work environment succeeded in raising public attention and condemning threats against their relatives and were able to 'fight back' and mitigate the pressures of proxy punishment⁶¹. Host country governments and civil society can also provide support by expanding psychological counselling, publicly condemning incidents and acknowledging and sanctioning coercion-by-proxy as a distinct practice of transnational repression⁶². Moreover, family reunification programmes for recognised refugees can mitigate the risks of coercion-by-proxy against the immediate relatives of human rights defenders targeted by their country of origin.

2.1.3 Digital transnational repression

Digital transnational repression is a specific form of transnational repression that employs digital technologies to control, intimidate and silence individuals living in exile or the diaspora. Digital

⁵⁵ D. M. Moss et al., ['Going after the family: Transnational repression and the proxy punishment of Middle Eastern diasporas'](#), *Global Networks*, Vol 22, No 4, 2022, pp. 735–751.

⁵⁶ Reporters Without Borders, ['Watch out because we're coming for you': An RSF report on unprecedented transnational repression of Iranian journalists in the UK'](#), 2024.

⁵⁷ S. Ebadi, [Until we are free: My fight for human rights in Iran](#), Random House, New York, 2016.

⁵⁸ HRW, [Egypt: Families Of Dissidents Targeted](#), 19 November 2019.

⁵⁹ Amnesty International, [Nowhere Feels Safe: Uyghur Tell of China-Led Intimidation Campaign Abroad](#), 2020.

⁶⁰ UN, [Journalists in exile: Report of the Special Rapporteur on the promotion of the right to freedom of opinion and expression, Irene Khan](#), *General Assembly, A/HRC/56/53*, 26 April 2024, p. 10.

⁶¹ D. M. Moss et al., ['Going after the family: Transnational repression and the proxy punishment of Middle Eastern diasporas'](#), *Global Networks*, Vol 22, No 4, 2022, pp. 735–751.

⁶² FH, ['TNR Watch: Coercion at Home, Pressure Abroad'](#), 05 September 2023.

technologies offer repressive governments a low-cost means of expanding the scope and scale of cross-border threats, reaching far into foreign territories – and into the personal lives of targeted individuals. Digital transnational repression has become a core element in all forms of transnational repression. Digital threats are often intertwined with other methods, setting the stage for an escalation into threats against family members (coercion-by-proxy), assaults and even attempted killings or killings⁶³.

The following methods of digital transnational repression enable perpetrator governments to instil fear and uncertainty, thereby undermining social relationships as well as trust within exile and diaspora human rights defenders, leading to self-censorship and withdrawal from activism:

- **Monitoring and surveillance:** State agents comb through social media feeds and online communications to gather and analyse information ('open-source intelligence') on the activities, daily habits, contacts and social networks of human rights defenders. This information can help them expose fellow activists and other contacts in the country of origin and prepare for further attacks. As human rights defenders continue to rely on social media platforms for advocacy and organisation, they leave traces that perpetrators of digital transnational repression can exploit. In interviews, human rights defenders at risk often report that they are constantly feeling monitored by authorities from their origin country and often, the presumed data collection already has a chilling effect in and of itself⁶⁴.
- **Interception and targeted surveillance:** Perpetrators hack into human rights defenders' electronic devices, email and social media accounts to access private information, communications and contacts. Such targeted, invasive surveillance often relies on phishing attacks, which use detailed information on the targeted person for scenarios of social engineering and tailored messages aiming to trick them into opening files or links compromised with malware⁶⁵. Increasingly, states use commercial spyware against human rights defenders, which they can purchase on a thriving but highly non-transparent market of surveillance technologies. The companies working in this field exploit vulnerabilities in widely used operating systems and applications to provide their customers with access to phone calls, personal files, emails, chats and geolocation data of targets, regardless of their location⁶⁶. The governments of *inter alia* Saudi Arabia, the United Arab Emirates and Rwanda have used the notorious Pegasus spyware, sold by Israel-based NSO Group, to infiltrate the smartphones of critics abroad⁶⁷. The gruesome murder of exiled journalist Jamal Khashoggi in

⁶³ M. Michaelsen, [The Digital Transnational Repression Toolkit, and Its Silencing Effects](#), Special Report, FH, 2020.

⁶⁴ M. Michaelsen, [Silencing Across Borders: Transnational Repression and Digital Threats against Exiled Activists from Egypt, Syria, and Iran](#), Humanist Organization for Social Change, 2020.

⁶⁵ W. Marczak and V. Paxson, '[Social engineering attacks on government opponents: Target perspectives](#)', *Proceedings on Privacy Enhancing Technologies*, Vol 2, 2017, pp. 172–185.

⁶⁶ R. J. Deibert, '[The autocrat in your iPhone: How Mercenary Spyware Threatens Democracy](#)', *Foreign Affairs*, 12 December 2022.

⁶⁷ B. Marczak, et al., [Hide and Seek: Tracking NSO Group's Pegasus Spyware to Operations in 45 Countries](#), Citizen Lab Research Report 113, University of Toronto, 2018.

the Saudi consulate in Istanbul was likely to have been prepared by Pegasus infiltrations in his close circle⁶⁸.

- **Online harassment:** On social media, human rights defenders are exposed to threats and attacks that aim to intimidate and silence them. Women human rights defenders, in particular, face a massive amount of sexualised and gender-based abuse, general insults, direct messages with detailed fantasies of sexual assault, rape threats, pictures of male genitalia, or photoshopped fake nude pictures being circulated online⁶⁹. Such harassment can be government-coordinated, relying on paid trolls and regime-affiliated social media influencers. Often, it is also amplified by social media users loyal to the government and other groups who attack publicly outspoken women human rights defenders based on shared misogynist views⁷⁰.
- **Defamation and disinformation campaigns:** Governments use private, false and distorted information to discredit human rights defenders and smear their reputation. These campaigns take interviews, statements or other activities of human rights defenders out of context to misrepresent them, isolate them from home country audiences, or exacerbate fissures within diaspora communities. Iranian journalist and news anchor of the BBC's Persian service Rana Rahimpour, for instance, had her wiretapped phone conversations with family members in Iran edited, skewed and broadcast on state media in November 2022, portraying her as supporting the government⁷¹. The government of Azerbaijan has repeatedly exploited private information, probably obtained in surveillance operations, to shame women human rights defenders publicly or the women relatives of male human rights defenders⁷². In February 2021, the Azerbaijani opposition activist and blogger Mahammad Mirzali who lived in France at the time, was blackmailed with a 'video of intimate footage taken in his sister's bedroom'⁷³.
- **Censorship and disruption:** Governments use different techniques to curtail expression on blogs, news websites and social media profiles. Online publications of human rights and news organisations operating from exile are typically blocked for audiences inside the country. In addition, distributed denial-of-service attacks can flood a target publication with many requests to overwhelm its services and make it temporarily unavailable to legitimate users. Perpetrators exploit the technical capabilities of social media platforms to manipulate crowd- and algorithm-driven news feeds, drown out criticism and manipulate online discussions. Automated bots and fake accounts amplify posts and hashtags that promote regime

⁶⁸ United Nations Office of the High Commissioner for Human Rights, '[Khashoggi killing: UN Human Rights expert says Saudi Arabia is responsible for 'premeditated execution'](#)', Press Release, 19 June 2019.

⁶⁹ N. Aljizawi, et al., '[No Escape: The Weaponization of Gender for the Purposes of Digital Transnational Repression](#)', Citizen Lab Report 180, University of Toronto, 2024.

⁷⁰ M. Michaelsen and S. Anstis, '[Gender-based digital transnational repression and the authoritarian targeting of women in the diaspora](#)', *Democratization*, 2025.

⁷¹ K. Adam, '[How London Became a 'Hot Spot' for Threats Against Iranian Journalists](#)', *The New York Times*, 17 April 2024.

⁷² K. Bloss, '[How revenge porn is used to silence dissidents in Azerbaijan](#)', *Organized Crime and Corruption Reporting Project*, 04 April 2023.

⁷³ Amnesty International, '[Azerbaijan: Gender-based reprisals against women must stop](#)', Public Statement, 12 May 2021.

positions⁷⁴. The mechanisms of social media platforms are also abused so as to mass report the profiles of human rights defenders for allegedly spreading hate speech or pornography. Reported profiles are blocked or shut down by the platform and users often struggle to have them reinstated. In another example, the Instagram accounts of a group of Iranian feminists were disrupted by a massive and sudden increase in followers. An investigation revealed that a Pakistani company that sold artificial followers, likes and shares for marketing purposes had been hired for a coordinated harassment campaign, likely to have been organised by the Iranian government⁷⁵.

Because digital technologies play a central role in the professional activities and personal lives of human rights defenders, the different techniques of digital transnational repression significantly impact their safety, security and well-being⁷⁶. As such, digital transnational repression severely impedes civil society's continued ability to use digital tools to exchange, organise and mobilise freely across borders.

Moreover, artificial intelligence (AI) advancements may enhance authoritarian actors' capabilities in digital transnational repression, particularly with respect to surveillance and online information manipulation⁷⁷. AI-powered surveillance systems process and analyse data on a large scale, automating the inference of social ties and political opinions, which are then used to map out and prepare attacks against human rights defenders and their networks. AI-enhanced biometric technology may also facilitate the identification and detention of exiles when travelling through countries cooperating with authorities in their country of origin⁷⁸. AI tools further scale up disinformation production by automating the generation of increasingly hard-to-detect false and misleading images, audio and text. Governments already use automated accounts and deceitful information to manipulate online debates, silence critical voices and amplify pro-government views. The proliferation of these tactics due to accessible AI capabilities and information-manipulation-for-hire services catering to the needs of repressive governments risks further enhancing the scope and impact of digital transnational repression, leading to greater harm for human rights defenders targeted with digital repression. The impacts can be particularly severe for vulnerable groups such as women who are already disproportionately targeted by gendered digital violence and hostility, for example, in the form of sexualised deepfake videos aimed at shaming them and pushing them out of public spaces⁷⁹.

⁷⁴ S. Bradshaw et al., [Industrialized Disinformation 2020: Global Inventory of Organized Social Media Manipulation](#), Working Paper No 1, Project on Computational Propaganda, 2021.

⁷⁵ A. Deck, '[A million-strong troll army is targeting Iran's #MeToo activists on Instagram](#)', *Rest of World*, 29 June 2022; Qurium, '[Weaponizing Instagram against the Iranian #MeToo movement](#)', 16 June 2022.

⁷⁶ N., Aljizawi et al., [Psychological and Emotional War Digital Transnational Repression in Canada](#), Citizen Lab Research Report No. 151, University of Toronto, 2022.

⁷⁷ A. Ünver, '[Artificial intelligence \(AI\) and human rights: Using AI as a weapon of repression and its impact on human rights](#)', European Parliament's Directorate-General for External Policies of the Union, PE 754.450, 2024.

⁷⁸ K. Schaer, '[AI-enhanced identification: A danger in the Middle East?](#)', *Deutsche Welle*, 23 August 2023.

⁷⁹ A. Funk et al., [Freedom on the Net 2023: The Repressive Power of Artificial Intelligence](#), FH, 2023; B. Saab, [Manufacturing Deceit: How Generative AI Supercharges Information Manipulation](#), *National Endowment for Democracy and International Forum for Democratic Studies*, 2024.

2.2 The perpetrators of transnational repression

The FH Database documents a total of 1209 incidents of physical transnational repression committed between 2014 and 2024 by 48 governments. Of these, 43 governments have engaged in attacks on political activists (531 incidents) and journalists (124 incidents), which the authors use as proxy categories to understand threats against human rights defenders. The table below presents the top perpetrators of physical transnational repression against journalists and political activists. In the following section, the authors briefly present some of these countries (see also case studies on Tajikistan, Russia and Egypt, section 2.3).

Table 2: Top perpetrators of physical incidents of transnational repression against journalists and political activists 2014–2024

Origin State	Incidents (Journalists)	Origin State	Incidents (Political Activists)
Iran	16	Tajikistan	65
Thailand	13	China	50
Azerbaijan	12	Turkmenistan	42
Türkiye	12	Uganda ⁸⁰	39
Russia	9	Cambodia	37
China	8	Iran	28
Belarus	6	Belarus	27
Egypt	6	Türkiye	25
Sudan	6	Russia	24
Tajikistan/ Uzbekistan	4	Egypt	23

Source: Authors' own compilation based on the FH database.

⁸⁰ Uganda's inclusion in the list of top perpetrators results from a mass incident in 2024 that involved the detention of 36 political activists in Kenya in coordination with Ugandan authorities. See: I. Katusiime, '[Arrest of FDC activists in Kenya](#)', *The Independent*, 05 August 2024.

2.2.1 Key perpetrators of transnational repression

China 'conducts the most sophisticated, global, and comprehensive campaign of transnational repression in the world'⁸¹. The Chinese government goes after a variety of targets, including ethnic minorities, former members of the political elite, political dissidents and human rights defenders. Among 272 cases of physical transnational repression documented in the FH Database linked to China, almost every fifth incident concerns a political activist or journalist. Moreover, as noted by FH, these incidents represent 'only the tip of the iceberg of a much broader system of surveillance, harassment, and intimidation', which has repercussions in communities of overseas Chinese and exiled ethnic minorities worldwide⁸².

Chinese authorities also use a range of digital techniques to threaten their targets across borders, including hacking attacks, surveillance of online communications, disinformation and defamation campaigns. Members of the Tibetan, Uyghur and, more recently, Hong Kong diaspora face a high risk of transnational repression, in particular when they publicly speak out about human rights violations perpetrated in their respective homelands⁸³. The Chinese government also uses its economic and political clout to exert leverage on host states harbouring targeted individuals and to shield itself against accountability demands or countermeasures. In addition, China's transnational repression efforts are supported by a broader network of party and state agencies that reach beyond borders to promote the Chinese Communist Party's agenda, also turning against non-diasporic targets such as foreign parliamentarians, journalists and NGOs who criticise the human rights record of the People's Republic of China (PRC)'s government⁸⁴.

Iran, as already outlined above, conducts one of the most pervasive and pertinent campaigns of transnational repression worldwide. The Iranian regime has a long history of targeting opponents abroad, with its trans-border repression typically intensifying at times of political tension and protest. The Iranian government stepped up its global transnational repression campaign when the 2022 anti-regime protests mobilised its diaspora communities across the world⁸⁵. In addition to activists engaged in mobilising protests and international support, journalists working for prominent Persian-language media stations, such as BBC Persian, Iran International, Deutsche Welle Persian and Radio Zamaneh, came under intense pressure⁸⁶.

⁸¹ N. Schenkkan and I. Linzer, [Out of Sight, Not Out of Reach: The Global Scale and Scope of Transnational Repression](#), FH, 2021, p. 15.

⁸² N. Schenkkan, and I. Linzer, 2021, p. 17.

⁸³ See for example B. Jardine, et al., [No Space Left to Run: China's Transnational Repression of Uyghurs](#), Uyghur Human Rights Project and Oxus Society for Central Asian Affairs, 2021; Tibetan Centre for Human Rights and Democracy, [Chinese Transnational Repression of Tibetan Diaspora Communities](#), 2024; C. Engelbrecht, 'Fleeing Hong Kong Wasn't Enough. China's war on dissidents comes to the United Kingdom', *The Atlantic*, 25 March 2025.

⁸⁴ Australian Strategic Policy Institute, [The Party Speaks for You: Foreign Interference and the Chinese Communist Party's United Front System](#), 09 June 2020.

⁸⁵ S. Harris, et al., 'Rise in Iranian assassination, kidnapping plots alarms Western officials', *The Washington Post*, 1 December 2022; M. Ganguly, 'Iranian activists across Europe are targets of threats and harassment', *The Guardian*, 22 September 2023.

⁸⁶ United Nations Office of the High Commissioner for Human Rights, [Violence and threats against journalists reporting on Iran from abroad must stop, warn UN experts](#), Press Release, 30 May 2024.

Under the long-standing leadership of former Prime Minister Hun Sen and his son Hun Manet, who succeeded him in 2023, **Cambodia** has engaged in various forms of transnational repression targeting dissidents, opposition members and critics within its immediate neighbourhood. Following crackdowns on domestic dissent after the leadership transition, Cambodian authorities went after activists and human rights defenders in exile. The government's tactics build on close collaboration with other governments in the region, as law enforcement and migration agencies are increasingly helping one another to arrest and extradite critics⁸⁷. In a February 2024 meeting, for instance, the prime ministers of Cambodia and Thailand vowed to curb the 'interference' of Cambodian activists based in Thailand⁸⁸.

Türkiye's reliance on transnational repression increased drastically after the 2016 failed coup attempt, which the government of President Recep Tayyip Erdoğan attributed to the Gülen movement. Since then, Turkish authorities have engaged in a global and systematic campaign to persecute movement members and other perceived enemies⁸⁹. As mentioned above, to a significant extent, Türkiye's practice of transnational repression relies on extradition and rendition. Other tactics include Interpol abuse, assault and coercion by proxy. Exiled journalists and Erdoğan critics in Germany and the Netherlands have been placed under police protection after receiving death threats or being physically attacked⁹⁰.

2.2.2 Non-state enablers of transnational repression

When governments engage in transnational repression, they typically rely on different 'configurations' or 'assemblages' of actors which coordinate acts of repression and enable the perpetrating state to transcend geographic and territorial boundaries to reach exiles and diaspora members.⁹¹ In addition to security and intelligence agencies, these actor configurations can include embassies serving as outposts for spying and stalking operations, state media perpetuating smear campaigns or government-affiliated diaspora and youth organisations amplifying social media abuse and offline harassment. Moreover, perpetrators of transnational repression increasingly build on the help of non-state enforcers and enablers, such as criminals, loyalist diasporas and spyware companies, which the authors present in what follows.

Criminal groups

Governments engaging in transnational repression have relied on members of organised criminal groups to reach targets abroad. In January 2024, the USA's Department of Justice indicted Naji Zarifi Zindashti, leader of a narcotics trafficking network, for plotting assassinations and

⁸⁷ S. Mahtani, '[The countries of Southeast Asia work together to quash dissent](#)', *The Washington Post*, 3 January 2025.

⁸⁸ M. Firn and T. Kang, '[Crackdown on political activists tops Thai-Cambodian summit agenda](#)', *Radio Free Asia*, 7 February 2024.

⁸⁹ A. Erdi Öztürk and H. Taş, '[The Repertoire of Extraterritorial Repression: Diasporas and Home States](#)', *Migration letters*, Vol 17, No 1, 2020, pp. 59-69; I. Yılmaz, et al., '[Transnational Securitization and Violence: The Discursive Mechanism Behind the Pro-AKP Diaspora's Repression of the Dissident Diaspora Groups in the West](#)', *Democratization*, Vol 30, No 3, 2023, pp. 521-539.

⁹⁰ FH, '[Türkiye: Transnational Repression Origin Country Case Study](#)', Report, 2021.

⁹¹ S. Furstenberg, et al., '[Spatialising State Practices Through Transnational Repression](#)', *European Journal of International Security*, Vol 6, No 3, 2021, pp. 358-378; G. Marlies, 'Extraterritorial Authoritarian Practices: People of Turkish and Iranian Descent in the Netherlands', in G. Marlies (ed), [Authoritarian Practices in a Global Age](#), Oxford: Oxford University Press, 2023.

kidnappings against Iranian dissidents in the USA⁹². Zindashti, who lives in Iran, allegedly tried to hire a member of the Hells Angels biker gang to help with the planned killing. His network is presumably involved in several other acts of transnational repression carried out on behalf of the Iranian regime in other countries, particularly Türkiye. Turkish officials believe Zindashti's network was behind the abduction of Habib Chaab, a Swedish–Iranian activist who was kidnapped during a visit to Türkiye in 2020 and later executed in Iran. In conjunction with the Department of Justice's indictment, the USA's Department of the Treasury's Office of Foreign Assets Control sanctioned Zindashti and key associates, blocking all property, property interests and associated business transactions⁹³. The Iranian government also hired criminals from Eastern Europe to attack Pouria Zeraati, a journalist and presenter for *Iran International*, who was stabbed outside his London home in March 2024. Assailants involved in a plot to kill women's human rights defender Masih Alinejad in New York belonged to a criminal mob with roots in Russia⁹⁴. Iran's use of criminal networks for acts of transnational repression against human rights defenders also overlaps with threats against other targets, such as Jewish businesspeople and synagogues or American and Israeli officials⁹⁵.

Other governments, such as those of Russia and India, have also relied on criminals to target exiled opponents and critics. The use of criminal proxies helps perpetrators of transnational repression to circumvent scrutiny by Western intelligence agencies and reach their targets in the EU as well as North America. The involvement of criminals embedded within host state societies is more difficult to detect, compounding the difficulty of protecting dissidents who have sought refuge from their repressive home country. For a relatively low cost, outsourcing transnational repression to criminals provides perpetrator states with greater operational flexibility and a degree of plausible deniability, which complicates attribution to the state⁹⁶.

Diaspora loyalists

Authoritarian governments mobilise loyalists in diaspora communities to 'perform as proxy, non-state agents of transnational repression'⁹⁷. For example, the governments of China, Eritrea and Türkiye rely on groups of government supporters among overseas populations who function as levers of control and punishment against critical voices within diaspora and exile communities⁹⁸. These groups can also work to shape public opinion within a host country in favour of the home

⁹² United States Department of Justice, '[One Iranian and Two Canadian Nationals Indicted in Murder-for-Hire Scheme](#)', Press Release, 29 January 2024.

⁹³ US Department of the Treasury, '[The United States and United Kingdom Target Iranian Transnational Assassinations Network](#)', Press Release, 29 January 2024.

⁹⁴ G. Miller, et al., '[Iran turns to Hells Angels and other criminal gangs to target critics](#)', *The Washington Post*, 12 September 2024.

⁹⁵ M. Levitt and S. Boches, '[Iranian External Operations in Europe: The Criminal Connection](#)', *The Washington Institute*, 21 October 2024.

⁹⁶ FH, '[TNR Watch: Transnational Repression for Hire](#)', 6 May 2024.

⁹⁷ K. Chi-Pan Wong, '[Sowing Hate, Cultivating Loyalists: Mobilizing Repressive Nationalist Diasporas for Transnational Repression by the People's Republic of China Regime](#)', *American Behavioral Scientist*, Vol 68, No 12, 2024, pp. 1655–1678, p. 1660.

⁹⁸ B. Baser and A. E. Ozturk, '[Positive and Negative Diaspora Governance in Context: From Public Diplomacy to Transnational Authoritarianism](#)', *Middle East Critique*, Vol 29, No 3, 2020, pp. 319–334; N. Hirt and A. Saleh Mohammad, '[By Way of Patriotism, Coercion, or Instrumentalization: how the Eritrean regime makes use of the diaspora to stabilize its rule](#)', *Globalization*, Vol 15, No 2, 2017, pp. 232–247.

country. In China, the United Front Work Department is officially tasked with shoring up support for the Chinese Communist Party among the diaspora. The Chinese government has mobilised overseas citizens and international students to participate in pro-government demonstrations and counter rallies of Hongkongers, Tibetans, Uyghurs and others who criticise the PRC government. Research has documented the intimidation of exiled opposition members and protesters in the form of harassment, surveillance, assaults and reporting to home country authorities in Australia, Canada, Germany, the UK, the USA and other countries⁹⁹. The Chinese government also relies on students at international universities to spy on and report any critical activity, fostering an atmosphere of fear and mistrust among Chinese students abroad¹⁰⁰.

The Turkish government also relies on certain organisations to cultivate diaspora support and mobilise loyalist groups for its political agenda¹⁰¹. Imams affiliated with the Turkish-Islamic Union for Religious Affairs, for instance, an umbrella organisation linked to the government that oversees mosques in several European countries, have spied on the opposition¹⁰². Nationalist right-wing groups in the diaspora often intimidate and threaten critics, online and offline, acting sometimes on their own and sometimes in coordination with Turkish officials¹⁰³. On social media, pro-government groups spread propaganda and disinformation, their messages often instigated or amplified by influencers close to the ruling AKP party¹⁰⁴. In 2016, Turkish authorities even introduced an application to facilitate the reporting of anti-regime behaviour to domestic security agencies. The app allowed users to upload photos and contact details of alleged dissidents. Anyone who was reported became at risk of arrest and interrogation upon their return to Türkiye¹⁰⁵.

Similarly, the Eritrean government exercises control over the diaspora through loyalist networks and embassy-coordinated organisations¹⁰⁶. Monitoring and infiltrations by government informants have fostered a culture of mistrust and suspicion¹⁰⁷. With the diaspora's increasing polarisation, aggressive online trolling and bullying have become a permanent feature of Eritrean diaspora online networks and social media¹⁰⁸. In recent years, events organised by embassies and pro-government associations have turned into sites of violent clashes between government supporters and detractors in countries such as the UK, Germany, Sweden, Israel, Canada and the USA¹⁰⁹.

⁹⁹ K. Chi-Pan Wong, '[Sowing Hate, Cultivating Loyalists: Mobilizing Repressive Nationalist Diasporas for Transnational Repression by the People's Republic of China Regime](#)', *American Behavioral Scientist*, Vol 68, No 12, 2024, p. 1670.

¹⁰⁰ Amnesty International, '[On my campus, I am afraid](#)': China's targeting of overseas students stifles rights, Report, 2024.

¹⁰¹ B. Baser and A. E. Ozturk, '[Positive and Negative Diaspora Governance in Context: From Public Diplomacy to Transnational Authoritarianism](#)', *Middle East Critique*, Vol 29, No 3, 2020, pp. 319-334.

¹⁰² C. Winter, '[Turkish Imam Spy Affair in Germany Extends Across Europe](#)', *Deutsche Welle*, 16 February 2017.

¹⁰³ I. Yilmaz, et al., '[Transnational Securitization and Violence: The Discursive Mechanism Behind the Pro-AKP Diaspora's Repression of the Dissident Diaspora Groups in the West](#)', *Democratization*, Vol 30, No 3, 2023, pp. 521-539.

¹⁰⁴ N. Kohlenberg, '[The Tweet is Coming from Inside the House](#)', *Alliance for Securing Democracy*, 11 May 2023; I. Yilmaz and B. Kenes, '[Digital Authoritarianism in Turkish Cyberspace: A Study of Deception and Disinformation by the AKP Regime's AKtrolls and AKbots](#)', *Populism and Politics*, European Center for Populism Studies, 13 November 2023.

¹⁰⁵ J. Fitsanakis, '[Turkish Spy Agency Develops Phone App to Help Expats Inform on Dissidents](#)', *Intelnews*, 10 June 2019.

¹⁰⁶ Amnesty International, '[Eritrea: Repression Without Borders](#)', Report, 2023.

¹⁰⁷ D. Bozzini, '[The Fines and the Spies: Fears of State Surveillance in Eritrea and in the Diaspora](#)', *Social Analysis*, Vol 59, No 4, 2015, pp. 32-49.

¹⁰⁸ V. Bernal, '[Crazy, Stupid, Lying, Traitors: Eritrean Politics and Extreme Speech Online](#)', *Anthropological Quarterly*, Vol 96, No 4, 2023, pp. 651-682.

¹⁰⁹ Tigrinya Service, '[Why Eritreans are at War with Each Other Around the World](#)', *BBC News*, 24 May 2024.

Private sector enablers

Acts of transnational repression can be facilitated by private sector actors who either act deliberately or are oblivious to the consequences of their actions. For example, Iran and China have drawn on private investigators to track and collect intelligence on potential targets in the USA¹¹⁰. A London-based private intelligence firm conducted an extensive surveillance operation on Bota Jardemalie, a Kazakh lawyer and refugee living in Belgium, on behalf of Kazakhstan's BTA Bank, which is intertwined with the Kazakh regime¹¹¹.

On a more systemic level, the commercial spyware industry is a key factor in enabling the practices of digital transnational repression. Invasive surveillance tools such as the NSO Group's Pegasus spyware have allowed authoritarian state actors to infiltrate the devices of targeted human rights defenders, independent of their location, gaining access to their most intimate data and communications¹¹². These companies provide government clients with packages that exploit rare and highly coveted vulnerabilities in popular applications and devices, such as WhatsApp Messenger and Apple's iPhone. Investigations into NSO Group's abuse of a security flaw in WhatsApp identified over 100 cases of targeted human rights defenders in at least 20 countries across the globe, including those in the Middle East, Africa and Asia¹¹³. In response, spyware companies constantly aim to improve and obfuscate the functionality of their products. This also highlights the substantial resources these companies devote to marketing their lucrative products to government clients who are often known human rights abusers. In addition to surveillance technology, other private companies offer services of 'hack for hire' and information manipulation to repressive governments, which are also used against human rights defenders in exile and in the diaspora¹¹⁴.

Finally, social media platforms are primary sites for digital transnational repression as human rights defenders worldwide continue to rely on such platforms for information sharing, advocacy and activism. However, companies such as Meta and X have directed limited attention to addressing practices of digital transnational repression and protecting vulnerable communities. In a study on gender-based digital transnational repression by The Citizen Lab, many of the interviewed women human rights defenders said that social media platforms remained unreachable and mechanisms for redress proved unresponsive whenever their posts came under attack from regime-affiliated mobs. Furthermore, their accounts were taken over, or their accounts were muted by false mass

¹¹⁰ B. Weiser and W. K. Rashbaum, '[Iran and China Use Private Detectives to Spy on Dissidents in America](#)', *The New York Times*, 13 November 2022.

¹¹¹ A. Rettman, '[Rear Window: How a UK firm spied on target in the EU capital](#)', *Euobserver*, 21 January 2025.

¹¹² R. J. Deibert, '[The Autocrat in Your iPhone](#)', *Foreign Affairs*, 22 December 2022.

¹¹³ Citizen Lab, '[NSO Group/Q Cyber Technologies. Over one hundred new abuses](#)'. University of Toronto, 29 October 2019.

¹¹⁴ R. J. Deibert, '[Subversion Inc: The Age of Private Espionage](#)', *Journal of Democracy*, Vol 33, No 2, 2022, pp. 28-44; R. Grohmann and J. Corpus Ong, '[Disinformation-for-hire as everyday digital labor: Introduction to the special issue](#)', *Social Media + Society*, Vol 10, No 1, 2024.

reports. As a result, activists often experienced uncertainty and anxiety over how to protect their accounts and safeguard content¹¹⁵.

The community guidelines of social media platforms can, in theory, capture some – but not all – of the activity that constitutes digital transnational repression by addressing issues such as bullying and harassment, inciting violence, hate speech, coordinated inauthentic behaviour, or doxing (publication of private information with malicious intent) and other use of material containing personally identifiable information that could lead to physical harm. Yet, platforms lack functions that would enable targets of online harassment to report to the platform itself or external authorities easily¹¹⁶. Inadequate reporting mechanisms typically place responsibility for documenting and responding to abuse on the shoulders of the victims, who have to cope not only with the risk of re-traumatisation but also with insufficient support from platforms and the legal system¹¹⁷. Moreover, existing policies come hand-in-hand with a broadly acknowledged failure to enforce such policies by social media platforms. Platforms' content moderation mechanisms do not detect abuse and hostility or actively oversee content in languages other than English. This results in inconsistent enforcement of guidelines, over-removal of non-harmful content and only partial removal of speech with language which is coded requires cultural context to interpret¹¹⁸. Exacerbating these problems, both X and Meta have, in recent years, continually downsized with regard to staff working on trust and safety issues, human rights and misinformation¹¹⁹. Echoing changes at X under Elon Musk, Meta has also realigned with the Trump administration's 'free speech' approach, ending fact-checking programmes and relying on its users to correct inaccurate and false posts¹²⁰.

2.3 Case studies

The following section presents four case studies on perpetrators of transnational repression against human rights defenders, featuring Russia, Tajikistan and Egypt, all significant examples. In addition, with the geopolitical conflict between Europe and Russia intensifying, transnational repression from Russia against human rights defenders exiled in EU Member States is likely to intensify. India is included as an emerging perpetrator, indicating that a growing level of authoritarianism within a country can lead to a more pronounced practice of transnational repression against nationals abroad.

¹¹⁵ N. Aljizawi, et al., [No Escape: The Weaponization of Gender for the Purposes of Digital Transnational Repression](#), Citizen Lab Report #180, University of Toronto, 2024.

¹¹⁶ V. Vilc and K. Lo, ['Shouting into the Void: Why Reporting Abuse to Social Media Platforms is so Hard and How to Fix It'](#), *Pen America*, 29 June 2023.

¹¹⁷ C. Gosse, ['Don't Take on the Responsibility of Somebody Else's Fu**ed Up Behavior': Responding to Online Abuse in the Context of Barriers to Support'](#), *Canadian Journal of Law and Technology*, Vol 19, No 1, 2021, pp. 249-275.

¹¹⁸ R. A. Wilson, ['The Anti-Human Rights Machine: Digital Authoritarianism and the Global Assault on Human Rights'](#), *Faculty Articles And Papers*, 2022, pp. 02-41.

¹¹⁹ H. Field and J. Vanian, ['Tech Layoffs Ravage the Teams That Fight Online Misinformation and Hate Speech'](#), *CNBC*, 26 May 2023.

¹²⁰ M. Isaac and T. Schleifer, ['Meta to End Fact-Checking Program in Shift Ahead of Trump Term'](#), *The New York Times*, 07 January 2025.

2.3.1 Russia

Russia is regarded as being among the most aggressive perpetrators of transnational repression. For years, its practices of extraterritorial violence have stood out for the high number of killings and attempted killings of former regime and elite insiders. Other prominent targets have included members of the Chechen diaspora, often members of armed groups previously involved in the conflict with Russia, who faced threats from both the Russian government and the current head of the Chechen Republic, Ramzan Kadyrov¹²¹. After the full-scale invasion of Ukraine in February 2022, the focus of transnational repression from Russia has expanded to include recent exiles and critics of President Putin's aggression.

Opposition to the war against Ukraine, partial military mobilisation and economic problems resulting from sanctions have triggered up to a million new Russian emigrants. In addition to Georgia, Armenia, Serbia and Türkiye (visa-free for Russian citizens), significant receiving countries include former Soviet republics in Central Asia, as well as countries in the EU and North America¹²². With tightening restrictions inside Russia, civil society organisations (CSOs) and activist groups have relocated abroad to continue their work¹²³. By November 2023, an estimated 93 independent Russian media outlets have been operating in exile¹²⁴. Repression by the Russian state has followed them.

The FH Database documents five killings or attempted killings against political activists or journalists by Russia. Three of these incidents happened before 2022 and were linked to Chechnya. In March 2020, for instance, Swedish police arrested two Russian nationals suspected of attempting to murder Tumso Abdurahmanov, a prominent blogger and critic of the Chechen government¹²⁵. In October 2022, Elena Kostyuchenko and Irina Babloyan, two Russian journalists living in Germany and Georgia, respectively, were targeted in poisoning attacks – Russian state agents' method of choice¹²⁶. Other exiled journalists received threatening messages indicating a high level of surveillance on planned travels and activities, as well as threats against family members in Russia¹²⁷. Other methods of transnational repression used by the Russian state against exiled critics and anti-war activists abroad include legal prosecutions in Russia, denial of consular services and physical assaults through criminal proxies¹²⁸.

¹²¹ N. Schenkkan and I. Linzer, [Out of Sight, Not Out of Reach: The Global Scale and Scope of Transnational Repression](#), FH, 2021.

¹²² A. Prashizky, ['We Are Exactly Like the White Émigrés 100 Years Ago': The cultural repertoire of exiled public intellectuals fleeing Russia after its invasion of Ukraine](#), *Revolutionary Russia*, Vol 37, No 2, 2024, pp. 220–238.

¹²³ K. Shamiev and K. Luchenko, ['Life in Exile: A New Approach to Russian Democrats in Europe'](#), Policy Brief, European Council on Foreign Relations, 14 March 2024; A. Soldatova and I. Borogan, [In From the Cold: The Struggle for Russia's Exiles](#), Report, Center for European Policy Analysis, 2023.

¹²⁴ JX Fund, [Sustaining Independence: Current State of Russian Media in Exile](#), Report, 2023.

¹²⁵ RFE/RL, ['Sweden Detains Two Russian Nationals In Connection With 'Attempted Murder' Of Chechen Blogger'](#), 7 March 2020.

¹²⁶ Meduza, ['The most likely explanation': At least three Russian journalists and activists appear to have been poisoned abroad since fall 2022](#), 15 August 2023.

¹²⁷ CPJ, ['Two Prague-based Russian journalists threatened, fear surveillance'](#), 21 September 2023.

¹²⁸ Meduza, ['How Russia targets its critics abroad in wartime'](#), 05 February 2024.

As Russian activists and journalists operating in exile rely heavily on digital communication tools, they are also exposed to various digital threats. The independent news media *Meduza*, headquartered in Latvia, reported a surge of attacks against its website, staff members and audience¹²⁹. In August 2024, the Citizen Lab, together with Access Now and other organisations, uncovered a sophisticated phishing campaign against Russian opposition-in-exile, media organisations and staff members at NGOs in the USA and the EU. The campaign relied on social engineering and phishing tactics that revealed extensive preparations by the perpetrators. The subsequent investigation attributed attacks to two different groups of threat actors working in alignment with the Russian state, and at least one of them was linked to the Russian Federal Security Service¹³⁰.

2.3.2 Tajikistan

Based on data from FH, Tajikistan is ranked as the top perpetrator of physical transnational repression against political activists and journalists, which is notable given the country's comparatively small size. However, the use of such tactics is consistent with the country having been listed among the twenty most oppressive regimes in the world¹³¹. The government has engaged particularly in a campaign of harassment against members of the Islamic Renaissance Party of Tajikistan (IRPT), a banned political group, and Group 24, a political opposition movement. The government's banning of the IRPT and subsequent self-imposed exile of party leader Muhiddin Kabiri has been accompanied by a more general crackdown on civil and political rights groups. The authorities have not only imprisoned opposition activists and journalists but also extradited and kidnapped government critics from abroad.

Transnational repression used by the Tajik government's transnational repression strategy closely mirrors that used by other authoritarian states mentioned in this paper. Harassment of relatives and associates, mobility restrictions, both physical and digital surveillance, as well as physical attacks such as assassination, assault or unexplained disappearances, have all been deployed to silence exiled activists and journalists overseas. The Tajik government's engagement in transnational repression also construes exiles and opposition groups as 'traitors' and 'terrorists'. The country's state media regularly defame the opposition members, linking them to incidents of violence in the country. Both Group 24 and IRPT are banned and labelled as 'terrorist' organisations. Such discourses, as pointed out by Saipira Furstenberg et al. (2021), constitute an attempt to delegitimise the political opposition in exile, portraying them as a threat to national security and legitimating measures against them¹³². In July 2023, a number of UN experts expressed concerns over the apparent use of anti-terrorism legislation to silence critical voices¹³³.

¹²⁹ Meduza, '[Meduza is facing the most intense cyberattack campaign in its history](#)', 11 March 2024.

¹³⁰ J. Scott-Railton, et al., '[Rivers of Phish: Sophisticated Phishing Targets Russia's Perceived Enemies Around the Globe](#)', The Citizen Lab, University of Toronto, 2024.

¹³¹ FH, '[Freedom in the world 2023: Tajikistan](#)', webpage, nd.

¹³² S. Furstenberg, et al., '[Spatialising State practices through transnational repression](#)', *European Journal of International Security*, Vol 6, No 3, 2021, pp. 358–378.

¹³³ United Nations Office of the High Commissioner for Human Rights, '[Tajikistan: UN experts deplore criminal proceedings against human rights defenders](#)', Press Release, 04 July 2023.

The use of bilateral and multilateral cooperation agreements such as the 1993 *Minsk Convention on Legal Assistance and Legal Relations* and the *Shanghai Cooperation Treaty* has further facilitated the practice of transnational repression by Tajikistan¹³⁴. The government also uses Interpol Red Notices to target political opposition abroad, including the alleged issuance of Red Notices against 2 528 citizens, most of whom have allegedly been involved in crimes of terrorism¹³⁵. For example, Red Notices taken out by the Tajik authorities against Group 24 and IRPT have frequently been criticised as politically motivated by international human rights experts¹³⁶.

There have been various notable cases of transnational repression by the Tajik government. In March 2015, the leader of Group 24, Umarali Kuvvatov, was shot dead in Istanbul in circumstances that pointed to involvement or acquiescence by the Tajik government¹³⁷. That same year, Shabnam Khudoydodova, a human rights defender from Tajikistan, was targeted by Tajik authorities in retaliation for her political activism online. She moved to Russia in 2008 for better job opportunities and became a member of Group 24. After some of Shabnam's fellow activists from Group 24 went missing, including Ehson Odinaev, she decided to move to Belarus with plans to seek political asylum in Poland. Upon her arrival at the Belarusian border, she was denied entry and detained for nine months under a Tajik extradition request and an Interpol warrant¹³⁸. Following an international human rights campaign on her behalf, she was released and granted political asylum in Poland¹³⁹. However, despite being in Poland, Shabnam's political activities have been restrained because of ongoing harassment threats to family members back home¹⁴⁰. In 2016, after she participated in the annual Organization for Security and Co-operation in Europe Human Dimension Implementation Meeting, the Tajik authorities directed an angry mob to attack her daughter, Fatima Davlyatova, at her school in Tajikistan and then attack her relatives in the family's home in the city of Kulob, Tajikistan¹⁴¹.

Additional cases of transnational repression include the 2017 arrest of Mirzorahim Kuzov, a senior IRPT member, at Athens International Airport by Greek border guards while he was in transit after attending a human rights conference. He was the subject of an Interpol Red Notice despite the political nature of the criminal proceedings against him and the fact that he was previously recognised as a refugee in an EU country. In March 2023, Germany deported the son of a Tajik opposition politician, Shamsiddin Saidov, who was a member of the banned IRPT¹⁴². Upon his return

¹³⁴ D. Lewis, '[Illiberal Spaces: Uzbekistan's extraterritorial security practices and the spatial politics of contemporary authoritarianism](#)', *Nationalities Papers*, Vol 43, No 1, 2018, pp. 140-159; S. Furstenberg, et al., '[Spatialising State Practices Through Transnational Repression](#)', *European Journal of International Security*, Vol 6, No 3, 2021, pp. 358-378.

¹³⁵ S. Furstenberg, et al., '[Spatialising State Practices Through Transnational Repression](#)', *European Journal of International Security*, Vol 6, No 3, 2021, pp. 358-378.

¹³⁶ HRW, [World Report 2025: Tajikistan](#), Country Chapter, 2025.

¹³⁷ BBC News, '[Tajik opposition leader Kuvvatov shot dead in Türkiye](#)', 06 March 2015.

¹³⁸ Civil Rights Defenders, '[From Tajikistan to Poland: Relocation Through the Emergency Fund](#)', 05 October 2018.

¹³⁹ HRW, '[Tajikistan: Allow 10-Year-Old to Reunite With Mother](#)', 07 August 2018.

¹⁴⁰ HRW, '[Tajikistan: Allow 10-Year-Old to Reunite With Mother](#)', 07 August 2018.

¹⁴¹ HRW, '[Tajikistan: Violent Retaliation Against Activists](#)', 28 September 2016.

¹⁴² Tajik Service, '[Tajik Opposition Politician's Son Extradited From Germany, Jailed In Dushanbe](#)', *Radio Free Europe*, 07 March 2023.

to Tajikistan, the 32-year-old Abdullo Shamsiddin was sentenced to seven years in prison. According to Human Rights Watch (HRW), his trial did not adhere to fair trial standards¹⁴³.

In 2024, the government further reinforced its crackdown on political activists and journalists¹⁴⁴. HRW has also documented various other cases of transnational repression of Group 24 members in 2024¹⁴⁵. Furthermore, in November 2024, German authorities deported Dilmurod Ergashev, an opposition activist who participated in various peaceful protests against the Tajikistani government and has been seeking asylum in Germany since 2011¹⁴⁶. He was taken into custody upon landing in Dushanbe and remains in prison. In similar cases, people have been sentenced to decades in prison after being returned to Tajikistan¹⁴⁷.

2.3.3 Egypt

The Egyptian government has been a persistent perpetrator of transnational repression for more than a decade. Following the toppling of long-term dictator Hosni Mubarak, a democratic experiment was curtailed by a military coup, following which the current president, Abdel Fattah Al-Sisi, who took power in 2013, swiftly re-established authoritarian rule. With zero tolerance for political dissent, Al-Sisi's government has engaged in systematic and widespread human rights violations¹⁴⁸. Draconian legislation severely curtailed civic space, exposing independent media and civil society to judicial persecution and harassment from security agencies¹⁴⁹. These conditions forced many political activists, journalists and human rights defenders into exile, in a wave of political emigration unprecedented in recent Egyptian history¹⁵⁰.

The FH Database documents 29 incidents of transnational repression by Egypt against political activists and journalists abroad in the period from 2014 to 2024. However, these acts of physical transnational repression are only a small part of a much broader systematic campaign of harassment, threats and surveillance against Egyptian human rights defenders in exile and in the diaspora¹⁵¹. These tactics are illustrated by the case of exiled journalist Basma Mostafa, as highlighted in a letter to the Egyptian authorities signed by five UN Special Rapporteurs¹⁵². While

¹⁴³ Tajik Service, '[Tajik Opposition Politician's Son Extradited From Germany](#)', 07 March 2023.

¹⁴⁴ HRW, [World Report 2025: Tajikistan](#), Country Chapter, 2025.

¹⁴⁵ HRW, [World Report 2025: Tajikistan](#), 2025.

¹⁴⁶ M. Kholiqzod, '[Germany Deports Tajik Activist, Sending Chill Among Other Dissidents Abroad](#)', *Radio Free Europe*, 08 November 2024.

¹⁴⁷ M. Kholiqzod, '[Germany Deports Tajik Activist, Sending Chill Among Other Dissidents Abroad](#)', 2024.

¹⁴⁸ Amnesty International, [Egypt: Gross human rights violations under President Al-Sisi: Amnesty International submission for the UN Universal Periodic Review, 34th session of the UPR working group, November 2019](#), MDE 12/0253/2019, 18 June 2019.

¹⁴⁹ HRW, [Egypt: Constitutional Amendments Entrench Repression: Referendum Set in Grossly Unfree, Rights-Abusive Environment](#), 2019.

¹⁵⁰ M. Dunne and A. Hamzawy, [Egypt's Political Exiles: Going Anywhere but Home](#), Carnegie Endowment for International Peace, 2019.

¹⁵¹ The Egyptian Human Rights Forum and Egyptian Front for Human Rights, [Transnational Repression: Targeting Egyptian Human Rights Defenders in the Diaspora](#), 2024.

¹⁵² I. Khan, G. Citroni, G. Romero, M. Lawlor and L. Nyirinkindi, [Mandates of the Special Rapporteur on the promotion and protection of the right to freedom of opinion and expression; the Working Group on Enforced or Involuntary Disappearances; the Special Rapporteur on the rights to freedom of peaceful assembly and of association; the Special Rapporteur on the situation of human rights defenders and the Working Group on discrimination against women and girls](#), Letter by five Special Rapporteurs to the Egyptian authorities, Ref.: AL EGY 6/2024, 23 December 2024.

still in Egypt, Mostafa was arrested three times for her work as a journalist. After leaving the country in 2020, she faced harassment, intimidation and threats in Kenya and Germany (where she eventually obtained asylum), reportedly by or at the instigation of the Egyptian government. While undertaking UN advocacy in Geneva, she was also harassed and threatened. In addition, she reported attacks on her social media accounts and gendered online abuse, as well as threats against her children¹⁵³.

The Egyptian government is also putting pressure on human rights defenders abroad by denying them access to consular services for the renewal of their passports or obtaining other civil documents such as birth or marriage certificates. According to a 2023 HRW report, Egyptian authorities have systematically refused to issue or renew documents for dozens of dissidents, journalists and human rights defenders living abroad – apparently in an attempt to force them back to Egypt, where they would more than likely face prosecution¹⁵⁴. The denial of consular services for political motives is a transnational repression tactic that threatens the ability of targeted individuals to travel, live and work legally. It hampers access to fundamental services such as health care and education, thereby increasing the risk of deportation back to the home country¹⁵⁵.

In addition, the Egyptian authorities systematically rely on coercion-by-proxy, targeting the relatives of exiled human rights defenders¹⁵⁶. In retaliation for the activities of exiled human rights defenders, family members have been detained, interrogated, criminally charged, banned from travel and forced to publicly denounce their children¹⁵⁷. For example, in August 2023, security forces arrested the father of Belgium-based journalist Ahmed Gamal Ziada, questioning him about his son and charging him with three counts for misusing social media, spreading false news and belonging to a banned group¹⁵⁸.

Finally, Egypt is also a frequent perpetrator of digital transnational repression. Enjoying largely unrestricted access to the market for surveillance technology, the Egyptian government has acquired equipment for mass and targeted surveillance from German, Italian, French and American manufacturers¹⁵⁹. Egypt is also among numerous other governments which have purchased the highly invasive Pegasus spyware from the Israel-based NSO Group¹⁶⁰. In 2021, the smartphone of

¹⁵³ European Centre for Press and Media Freedom, [ECPMF Urges Immediate End to Transnational Repression Targeting Basma Mostafa, Statement](#), 2025.

¹⁵⁴ HRW, [Egypt: Dissidents Abroad Denied Identity Documents: Undermines Victims' Access to Basic Rights](#), 2023.

¹⁵⁵ A. Slipowitz, J. White and Y. Gorokhovskaia, [No Way In or Out: Authoritarian Controls on the Freedom of Movement](#), FH, 2024; G. Vaughan, [How Diplomats Enable Transnational Repression: British authorities must prioritize human rights when reviewing Beijing's plans for a new "super embassy" in London](#), FH, 2025.

¹⁵⁶ HRW, [Egypt: Families Of Dissidents Targeted](#), 19 November 2019.

¹⁵⁷ D. Walsh, [Outside Egypt, Critics Speak Freely. Inside, Families Pay the Price: Egyptian officials have jailed the relatives of President Abdel Fattah el-Sisi's loudest critics in exile. It is his latest effort to silence all opposition](#), *The New York Times*, 14 May 2020.

¹⁵⁸ Committee to Protect Journalists, [Egyptian authorities arrest father of freelance journalist Ahmed Gamal Ziada](#), 23 August 2023.

¹⁵⁹ International Federation for Human Rights, [Egypt: A repression made in France](#), 2018; Privacy International, [State of Privacy in Egypt: A study of privacy and surveillance issues in Egypt](#), 2019.

¹⁶⁰ B. Marczak, et al., [Hide and Seek: Tracking NSO Group's Pegasus Spyware to Operations in 45 Countries](#), Citizen Lab Research Report 113, University of Toronto, 18 September 2018.

Egyptian opposition politician Ayman Nour, exiled in Türkiye, was simultaneously hacked with two different types of sophisticated spyware, Pegasus and Predator, probably initiated by Egypt and the United Arab Emirates¹⁶¹. Egypt has also relied on large-scale phishing attacks against civil society, *inter alia*, to infiltrate the phones of a number of well-known activists and journalists with malware, including Egyptians living in Canada, the UK and the USA¹⁶². The government also employs comprehensive internet censorship of, for instance, exiled media publications¹⁶³.

2.3.4 India

In 2023, India came under the spotlight as a perpetrator of transnational repression with the killing of Hardeep Singh Nijjar. The Sikh activist was shot outside a temple in Surrey, Canada. Canadian Prime Minister Justin Trudeau subsequently announced that his government was investigating credible allegations of a link between Indian government agents and the killing of Nijjar, a Canadian citizen¹⁶⁴. Relations between India and Canada swiftly deteriorated, with both countries expelling diplomatic staff and accusing each other of interference in internal affairs¹⁶⁵.

This was not an isolated incident. In the same year, law enforcement thwarted a plot to kill Gurpatwant Singh Pannun, another Sikh activist, in New York. Just as in Nijjar's case, American agencies alleged links to the Indian intelligence agency, including potential knowledge of the plan to kill both activists by people within Indian Prime Minister Modi's inner circle. In recent years, at least five Sikh activists in the US and five in Canada were warned by law enforcement about credible threats to their physical security, indicating an increasingly global and aggressive campaign of transnational repression by the Indian government¹⁶⁶. Moreover, two killings and various killing attempts attributed to Indian intelligence services were directed against exiled Sikh and Kashmiri activists living in Pakistan, who are labelled as terrorists by the Modi government¹⁶⁷.

In the FH Database, India is the only country classified as 'Free', according to the organisation's Freedom in the World Index, that has engaged in an act of transnational repression. In 2015, Indian intelligence officers in Dhaka, working with Bangladeshi plain clothes police, arrested two alleged members of the United National Liberation Front, a separatist group in Northeast India, and returned them to India. In the same year, a Sikh activist who had previously received asylum in the UK was arrested on holiday in Portugal based on an Interpol Red Notice concerning murder and

¹⁶¹ B. Marczak, et al., [Pegasus vs. Predator: Dissident's Doubly-Infected iPhone Reveals Cytox Mercenary Spyware](#), Citizen Lab, 2021.

¹⁶² J. Scott-Railton, et al., [Nile Phish: Large-Scale Phishing Campaign Targeting Egyptian Civil Society](#), Citizen Lab Research Report 88, University of Toronto, 2017; R. Bergman and D. Walsh, ['Egypt is Using Apps to Track and Target Its Citizens, Report Says'](#), *The New York Times*, 03 October 2019.

¹⁶³ Committee to Protect Journalists, ['Egypt blocks independent media outlet Zawia3 over investigative reporting'](#), 21 February 2025; J. Shea, [Global tech and domestic tactics: Egypt's multifaceted regime of information controls](#), The Tahrir Institute for Middle East Policy, 31 January 2020.

¹⁶⁴ S. Hogan, ['Canadian Sikh activist's killing has put a spotlight on India's little-known intelligence agency'](#), *CBC*, 28 September 2023.

¹⁶⁵ K. Pathi and R. Gillies, ['India expels Canadian diplomat, escalating tensions after Trudeau accuses India in Sikh's killing'](#), *Associated Press*, 20 September 2023.

¹⁶⁶ G. Miller, et al., ['An assassination plot on American soil reveals a darker side of Modi's India'](#), *The Washington Post*, 29 April 2024.

¹⁶⁷ M. Hussain and R. Grim, ['Secret intelligence documents show global reach of India's death squads'](#), *The Intercept*, 21 November 2023.

terrorism offences¹⁶⁸. Furthermore, in 2019, a German court convicted an Indian couple for spying on Kashmiri and Sikh groups in Germany on behalf of India's foreign intelligence service¹⁶⁹.

Since then, India's democracy score has been downgraded to the Partly Free category as the government under Prime Minister Modi and the Hindu nationalist Bharatiya Janata Party (BJP) targeted political opponents and encouraged discriminatory policies against Muslims and other marginalised groups¹⁷⁰.

Despite this authoritarian turn, India remains an important economic and increasingly geostrategic partner for Western democracies, including EU Member States, particularly in the context of intensifying systemic competition with China and Russia. This seems to complicate responses to acts of transnational repression emanating from India. Contrary to Canada, the American government under President Biden showed restraint *vis-à-vis* the Indian government, even after murder plots were uncovered. Reportedly, the USA's administration issued a warning to the Indian government but refrained from taking punitive measures such as expulsions of diplomats or economic sanctions¹⁷¹.

However, the USA's State Department 2023 human rights report sheds further light on India's alleged transnational repression practices, listing 'extraterritorial killing, kidnapping, forced returns or other violence', as well as 'threats, harassment, arbitrary surveillance and coercion' of CSOs, diaspora members, journalists and others advocating for human rights from overseas. The report also mentions accounts of harassment and pressure against families, friends, or associates of human rights defenders from authorities in India because of their human rights activities. An example of digital transnational repression is the removal within India of the X accounts of the non-profit Hindus for Human Rights and another diaspora organisation¹⁷². To maintain their access to India's vast market, social media platforms have repeatedly responded to takedown requests from the Indian government or ignored disinformation coming from government figures. The BJP conducts highly aggressive disinformation, smear and trolling campaigns, pushing a Hindu nationalist agenda that seeks to marginalise religious minorities and suppress criticism inside the country and amongst the diaspora¹⁷³.

Finally, Indian authorities have also used the revocation of visa privileges to punish overseas critics of Indian origin who have spoken out against the government of Prime Minister Modi and the BJP party. Here, a number of journalists, academics and activists have lost their Overseas Citizenship of India status, which grants visa-free entry and work authorisation to foreign nationals of Indian origin. In February 2024, Nitasha Kaul, a British-Indian professor who is a vocal critic of the BJP and had previously testified on human rights violations in Jammu and Kashmir before the US House

¹⁶⁸ Y. Gorokhovskaia and I. Linzer, '[Defending Democracy in Exile. Understanding and Responding to Transnational Repression](#)', FH, Report, 2022.

¹⁶⁹ Deutsche Welle, '[Germany: Indian couple convicted of spying](#)', 12 December 2019.

¹⁷⁰ FH, '[Freedom in the World 2024: India](#)', webpage, nd.

¹⁷¹ G. Miller, et al., '[An assassination plot on American soil reveals a darker side of Modi's India](#)', *The Washington Post*, 29 April 2024.

¹⁷² US Department of State, '[2023 Country Reports on Human Rights Practices: India](#)', 2023.

¹⁷³ G. Shih, '[Inside the vast digital campaign by Hindu nationalists to inflame India](#)', *The Washington Post*, 26 September 2023.

Committee on Foreign Affairs, was barred from entering the country after landing at Bangalore airport¹⁷⁴.

3 The impacts of transnational repression against human rights defenders

Transnational repression has profound and far-reaching impacts on human rights defenders, their communities, networks and broader society. This section outlines some of the more significant consequences, highlighting cases of harm to the safety and well-being of targeted human rights defenders as well as the curtailment of civic space, with the second half describing how these practices violate the human rights of targeted individuals.

3.1 Silencing effects and shrinking civic space

While more work needs to be done on the effects of transnational repression, existing studies concur that impacts range from direct personal harm and professional limitations to community-wide repercussions and long-term consequences:

- **Harms to mental health and wellbeing:** human rights defenders interviewed for different studies related to transnational repression mention experiencing feelings of exhaustion, stress, anxiety, burnout, sleeplessness and depression as a result of different threats. Constant fear and hypervigilance can foster paranoia and psychological trauma¹⁷⁵.
- **Risks to physical safety:** Digital threats are often a stepping stone for other types of offline threats, such as surveillance, stalking, the disruption of public events, in-person confrontations and verbal harassment. These threats can escalate into more severe coercive tactics, causing physical harm to the target person or their surroundings, including the targeting of family members in the host state or abroad, together with physical threats such as assault, kidnapping and even killing.
- **Deterioration of social relations:** Relationships with family and colleagues fracture under the stress and uncertainty caused by online harassment, digital attacks and surveillance. Individuals at risk reduce or avoid contact with home country family members and colleagues to protect them against government reprisals. Disinformation, surveillance and infiltration of diaspora communities and online networks can breed mistrust, pushing individuals into social isolation and withdrawal. Individuals at risk are also being ostracised online or offline as other diaspora members avoid being associated with them for fear of government retaliation.
- **Financial and professional risks:** The blocking or loss of home country assets can lead to financial insecurity for those being targeted and their families. Politically motivated criminal charges in the country of origin can complicate banking and other administrative procedures, as well as increase risks associated with travel, limiting professional and educational opportunities for targeted individuals. Mental harm caused by online harassment and other

¹⁷⁴ HRW, [India: Authorities Revoke Visa Privileges of Diaspora Critics: Government Targets Overseas Indians Opposing Ruling Party Policies](#), 2024; A. Slipowitz, J. White and Y. Gorokhovskaia, [No Way In or Out: Authoritarian Controls on the Freedom of Movement](#), FH, 2024.

¹⁷⁵ N., Aljizawi, et al., [Psychological and Emotional war: Digital Transnational Repression in Canada](#), Citizen Lab Research Report No. 151, University of Toronto, 2022.

forms of intimidation negatively affects productivity, work and study routines, forcing some to give up or change their profession. Smear campaigns, defamation and disinformation, can negatively impact targets' professional careers and opportunities, with risk-averse employers distancing themselves, while smaller, under-funded organisations cannot guarantee protection.

- **Restrictions on mobility, immigration and citizenship status:** Threats such as passport cancellations, extradition requests and international arrest warrants impede the mobility of human rights defenders as they cannot leave their current country of residence or must avoid those countries whose authorities risk cooperating with the home regime¹⁷⁶. Perpetrator states also seek to influence or delay decisions on asylum, residency, or citizenship in other countries through allegations of terrorism, corruption and other targeted defamation.
- **Chilling effects and self-censorship:** Human rights defenders at risk of transnational repression engage in self-censorship and opt for a low profile. They may, *inter alia*, stop participating in public events and protests, shun media interviews, or cease promoting their work online and in public spaces. Some entirely withdraw from activism to protect themselves and their families. The targeting of selected activists also has broader dampening effects on entire diaspora communities, as others witness the consequences of publicly speaking out against the home regime.
- **Resource diversion:** Targeted individuals and organisations need to spend significant resources on protecting their security rather than continuing activism and advocacy efforts. This can include training and equipment for digital security. Reporting and blocking social media accounts involved in constant online harassment and smear campaigns can sap the time and energy needed for human rights defence work.
- **Unique negative impacts on women:** A recent study by The Citizen Lab on gender-based digital transnational repression shows that women human rights defenders face unique threats that weaponise their gender identity to intimidate, shame and discredit them. Gender-specific forms of online harassment, abuse and defamation lead to disproportionate harms that range from professional setbacks, stigmatisation and social isolation to the erosion of intimate relationships, profound emotional distress and psychological trauma. This kind of repression also frequently involves the amplification and exploitation of entrenched patriarchal norms around women's bodies, sexuality, behaviour and notions of family honour, potentially leading to further forms of violence and discrimination¹⁷⁷.

With these impacts at individual, community and societal levels, transnational repression contributes to curtailing civic space. Intimidation, mistrust and weakened social relations, together with the heightened costs associated with transnational human rights activism, restrict the ability

¹⁷⁶ The Belarusian government has amended the citizenship law to allow for stripping Belarusians abroad of their citizenship if convicted of crimes such as 'participation in mass riots' and similar politically motivated charges. The government further denied all citizens abroad the ability to renew their passports from abroad, affecting hundreds of thousands of Belarusians living in exile. See HRW, ['We Will Find You': A Global Look at How Governments Repress Nationals Abroad](#), 2024.

¹⁷⁷ N. Aljizawi, et al., [No Escape: The Weaponization of Gender for the Purposes of Digital Transnational Repression](#), Citizen Lab Report #180, University of Toronto, 2024.

of citizens to meet and share their interests and concerns, individually or collectively, working for social and political change. By threatening diaspora members and exiles living in other countries, authoritarian governments interfere in public deliberation and opinion-building processes, which are key foundations of democracy. For example, the extensive campaign of the Chinese government against Uyghur human rights defenders who speak out about the ongoing crimes against humanity in their homeland, the Xinjiang region in northwestern China, clearly aims to shape international opinion and foreign policy decisions of other governments. Transnational repression thus constitutes a systematic attempt by authoritarian states to silence dissent and curtail human rights across borders. With such practices, these regimes consolidate and expand autocratic rule globally.

3.2 Human rights impacts

The negative impacts experienced by human rights defenders subjected to transnational repression can also be articulated as a series of human rights infringements and, thus, a breach of regional and international human rights law, including the ICCPR and the ECHR¹⁷⁸. Section 4 discusses how host states, such as EU Member States, are obliged to protect individuals within their territory or jurisdiction against such rights violations. An EU Member State that fails to take action in the face of transnational repression may also be held responsible for a violation of regional or international human rights law. While transnational repression may be framed as a violation of state sovereignty or a national security concern, focus on the human rights violations at the core of transnational repression facilitates a response that focuses on the protection of human rights defenders versus the host state's interests.

3.2.1 Extraterritorial killings

As summarised in section 2.1, a variety of methods are used by perpetrating states to effect transnational repression. Each of these may give rise to a variety of human rights violations. For example, extraterritorial killings as a method of transnational repression arise when perpetrating states kill members of the diaspora or exiled communities with the aim of silencing them (or, more generally, intimidating and silencing the wider diaspora or exiled community). Extraterritorial killings give rise to obvious violations of the right to life (protected under Article 6 of the ICCPR and Article 2 of the ECHR). While not an absolute right, killings that arise as part of a practice of transnational repression are clearly arbitrary violations of the right to life. Such intentional killings do not meet the requirements of being 'strictly necessary to protect life from an imminent threat'¹⁷⁹. Article 2(1) of the ECHR also protects against such intentional killings¹⁸⁰.

3.2.2 Spyware or other digital threats and attacks

While extraterritorial killing is a gruesome and rather obvious example of an adverse human rights impact flowing from the practice of transnational repression, other methods, in particular those using digital means, are more subtle and also lead to significant human rights violations. As the CoE

¹⁷⁸ CoE, [Transnational repression as a growing threat to the rule of law and human rights](#), Parliamentary Assembly, Doc. 15787, 5 June 2023, p.4.

¹⁷⁹ ICCPR, [General comment No. 36 on article 6: right to life](#), CCPR/C/GC/36, 2019, p. 3.

¹⁸⁰ See for example: European Court of Human Rights, [Case of Carter v. Russia](#), Application No 20914/07, 2022, p. 41.

Committee on Legal Affairs and Human Rights noted in their report, '...other forms of non-physical transnational repression, such as online intimidation and surveillance, may violate rights such as the right to respect for private life guaranteed by Article 8 of the Convention'¹⁸¹.

For example, perpetrating states use different digital technologies to engage in transnational repression. Sophisticated forms of spyware (such as NSO Group's Pegasus spyware) that provide full access to mobile phones of targeted human rights defenders give rise to violations of the right to privacy (protected under Article 17 of the ICCPR and Article 8 of the ECHR), the right to freedom of expression (protected under Article 19 of the ICCPR and Article 10 of the ECHR) and the right to peaceful assembly or freedom of assembly and freedom of association (protected under Articles 21 and 22 of the ICCPR and Article 11 of the ECHR)¹⁸².

The ability to use digital devices without fear of intrusion by foreign states is critical for human rights defenders living in exile or the diaspora who continue to engage in transnational human rights advocacy work¹⁸³. In particular, deploying spyware against human rights defenders not only impairs freedom of expression because human rights defenders can no longer communicate safely using applications such as Signal or WhatsApp but also violates their right to privacy because such technology allows the perpetrating state to steal and exploit private information on the targeted devices. Such infringements of the right to privacy and freedom of expression are not prescribed by law, legitimate, or necessary and thus are not permitted under regional or international human rights law¹⁸⁴.

3.2.3 Extraditions

Transnational repression may also be undertaken by perpetrating states through the exploitation of bilateral extradition agreements that specifically provide for the transfer of persons through a legal process to the perpetrating state. Such an approach is also characterised by the involvement of the host state, which necessarily facilitates the extradition of the sought individual and has hence been described as a form of host state co-optation or cooperation in repressive practice. Extradition of a human rights defender as part of a transnational repression scheme – in other words, the perpetrating state seeks extradition to silence or intimidate the human rights defender sought for extradition – can lead to violations of the principle of non-refoulement. For example, extradition or deportation of a human rights defender by the host state to a perpetrating state where substantial grounds have been shown for believing that the sought human rights defender would face a real risk of being subjected to the death penalty, torture, inhuman/degrading treatment or punishment would give rise to a violation of the right to life and/or the prohibition of

¹⁸¹ CoE, [Transnational repression as a growing threat to the rule of law and human rights](#), Parliamentary Assembly, Doc. 15787, 05 June 2023, p. 4.

¹⁸² See for example: T. Kaldani and Z. Prokopets, [Pegasus spyware and its impact on human rights](#), CoE, 2022; European Data Protection Supervisor, [Preliminary Remarks on Modern Spyware](#), 2022; D. Mijatović, [Highly intrusive spyware threatens the essence of human rights](#), CoE Commissioner for Human Rights, 2023.

¹⁸³ T. Kaldani and Z. Prokopets, [Pegasus spyware and its impact on human rights](#), CoE, 2022, pp. 18–20.

¹⁸⁴ T. Kaldani and Z. Prokopets, [Pegasus spyware](#), 2022, pp. 9–18.

torture or inhuman or degrading treatment or punishment¹⁸⁵. Similar restrictions exist under international human rights law; for example, the ICCPR restricts extradition (or deportation and transfer of persons more generally) to 'countries in which there are substantial grounds for believing that a real risk exists that their right to life' would be violated¹⁸⁶. While extradition follows a legal procedure outlined in bilateral agreements between states, human rights impacts also arise as part of a repressive practice where host states engage in the transfer of human rights defenders to perpetrating states outside a formal legal procedure. The obligations of host states not to cooperate with perpetrating states will be discussed more fully in section 4.

3.2.4 Enforced disappearances

Enforced disappearances and abductions form another method of transnational repression, which may be undertaken solely by the perpetrating state or may also involve the host state (for example, where the host state assists by detaining an individual within the host state who is then forcibly disappeared by the perpetrating state). Enforced disappearances also give rise to a series of human rights violations, including violations of the right to security and dignity, the right not to be subjected to torture or other cruel, inhuman, degrading treatment or punishment and the right to a fair trial.

4 Host state obligations

In the current context, transnational repression is mostly considered a national security issue and delegated to EU Member States. Any incident is largely treated as isolated and regarded as a confidential matter to be addressed by the respective EU Member State. Nevertheless, such acts have wider implications beyond individual EU Member States. Accordingly, the importance of framing and understanding transnational repression as giving rise to a series of human rights violations is critical when it comes to defining appropriate responses by host states. While such repressive acts may also give rise to violations of state sovereignty or represent a threat to national security, focusing only on the protection of host state interests (for example, its territorial integrity) fails to capture the spectrum of harms that flow from transnational repression and the profound negative impact that such behaviour has on the human rights of targeted communities along with their ability to engage in transnational political and social advocacy work supporting human rights protection, democracy and the rule of law.

By characterising transnational repression as a series of human rights violations, host states are required to recognise their obligations under international and regional human rights law. In particular, this includes the obligation not to facilitate or take part in repressive acts across borders as well as the requirement to take positive measures to protect against human rights violations within their territory or jurisdiction. Furthermore, states must uphold and safeguard the rights articulated in, for example, the ICCPR and the ECHR. As summarised by the CoE Committee on Legal Affairs and Human Rights:

¹⁸⁵ European Court of Human Rights, [Guide on the case-law of the European Convention on Human Rights: Immigration](#), 2025, p. 36; European Court of Human Rights, [Guide on Article 2 of the European Convention on Human Rights: Right to life](#), 2024.

¹⁸⁶ ICCPR, [General comment No. 36 on article 6: right to life](#), CCPR/C/GC/36, 2019, p. 7.

'The Assembly recalls that host States have a positive obligation to protect individuals within their jurisdiction from acts of transnational repression by providing specific protection to identified targets in case of real and immediate risks, not by conniving in violations committed by foreign agents on their territory. Host States also have the obligation, in accordance with the principles of non-refoulement and legality, not to render, transfer, deport or extradite persons vulnerable to transnational repression, including through the use of extra-legal channels, particularly if there is a real risk of violating a core Convention right by the requesting State.'¹⁸⁷

By framing transnational repression through the lens of international human rights law, host states – such as EU Member States – must recognise that acting to prevent this practice is not a voluntary act that can be addressed with discretion through, for example, diplomatic back-channels. Rather, a series of actions is imposed on them under international and regional human rights law. In Section 5, the authors review some of the emergency policy responses to transnational repression to date and argue that these responses need to be streamlined across all EU Member States for them to be considered as acting diligently to protect against rights violations. Moreover, this should be considered a minimum requirement under international human rights law.

4.1 Extraterritorial killings and the obligations to investigate and warn

Extraterritorial killings significantly illustrate the importance of responses to transnational repression under international human rights law, in accordance with which states carry obligations to prevent violations of the right to life. In particular, 'where they know or should have known of potentially unlawful deprivations of life, [states are required] to investigate and, where appropriate, prosecute the perpetrators of such incidents'¹⁸⁸. Such investigations need to be undertaken in compliance with international standards. In particular, they need to be 'independent, impartial, prompt, thorough, effective, credible and transparent', and states must ensure 'full reparation' in the event that a rights violation is found. States must also 'take steps to prevent the occurrence of similar violations in the future'¹⁸⁹. Thus, the extraterritorial killing of a human rights defender in exile cannot be dealt with through a political response (for example, the host state simply admonishing the perpetrating state in private) but must give rise to a complete investigation that meets the minimum standards required under international human rights law and that, by necessity, investigates and documents the role of a foreign state actor in such a killing.

Another obligation incumbent on host states in the face of violations of the right to life through extraterritorial killings includes a duty to warn potential victims. Under international human rights law, host states are required to take 'special measures of protection towards persons in vulnerable situations whose lives have been placed at particular risk because of specific threats or pre-existing patterns of violence'¹⁹⁰. Such persons include human rights defenders, and protection measures

¹⁸⁷ CoE, [Transnational repression as a growing threat to the rule of law and human rights](#), Parliamentary Assembly, Doc. 15787, 5 June 2023, p. 4.

¹⁸⁸ ICCPR, [General comment No. 36 on article 6: right to life](#), CCPR/C/GC/36, 2019, p. 6.

¹⁸⁹ ICCPR, [General comment No. 36](#), 2019, pp. 6–7.

¹⁹⁰ ICCPR, [General comment No. 36](#), 2019, p. 5.

could include ‘the assignment of around-the-clock police protection, the issuance of protection and restraining orders against potential aggressors and, in exceptional cases, and only with the free and informed consent of the threatened individual, protective custody’¹⁹¹. Under the ECHR, as discussed in *Osman v. the United Kingdom*, EU Member States have a duty to warn victims of threats to their safety, thus meeting their obligations to protect against violations of the right to life¹⁹².

These positive human rights obligations on host states in the context of transnational repression have been discussed by the UN Special Rapporteur on extrajudicial, summary or arbitrary executions in her review of the extraterritorial killing of Saudi journalist Jamal Khashoggi. In this report, the Special Rapporteur examined the obligations of Türkiye as a host state and the USA as a third state in the context of an extraterritorial killing that amounted to an act of transnational repression¹⁹³. As the UN Special Rapporteur noted, the obligations to protect against violations of the right to life apply not only to the actions of private parties but also to the actions of foreign states within the host state’s territory¹⁹⁴.

4.2 The obligation to take measures to prevent enforced disappearances and forcible transfers and to investigate such situations

As noted in section 3.2.4, transnational repression may also arise through enforced disappearances and/or forcible transfers that take place on the soil of the host state (and, in some cases, may take place with assistance from the host state). It is clear that a host state violates international human rights law when it facilitates or participates in the enforced disappearance of a human rights defender. As well as the obligation not to participate in such human rights violations, there is also an obligation on the host state to prevent such situations and to investigate after the fact in a manner that complies with standards set under international human rights law.

This is helpfully illustrated in *Dzhurayev v. Russia*, where the applicant, who had applied for asylum in Russia, argued that Russia violated its human rights obligations when the applicant was secretly transferred from Russia to Tajikistan after a failed extradition attempt by the latter state. As explained by the European Court of Human Rights, EU Member States may be under an obligation to take preventative operational measures to prevent enforced disappearances or forcible transfers of persons and to conduct an effective investigation into any such incident¹⁹⁵. In other words, host states are required to take specific measures which prevent the enforced disappearance and/or forcible transfer of persons targeted through transnational repression acts.

¹⁹¹ ICCPR, [General comment No. 36](#), 2019, p. 5.

¹⁹² Human Rights Council, [Investigation of, accountability for and prevention of intentional State killings of human rights defenders, journalists and prominent dissidents: Report of the Special Rapporteur on extrajudicial, summary or arbitrary executions](#), UN General Assembly, A/HRC/41/36, 2019, pp. 11-12.

¹⁹³ Human Rights Council, [Report of the Special Rapporteur on extrajudicial, summary or arbitrary executions](#), 2019, pp. 11-12.

¹⁹⁴ Human Rights Council, [Report of the Special Rapporteur on extrajudicial, summary or arbitrary executions](#), 2019, p. 7.

¹⁹⁵ Paragraph 139. European Court of Human Rights, [Case of Nizomhon Dzhurayev v. Russia](#), Application No 31890/11, 2014.

4.3 Digital transnational repression and the requirement to take positive steps to ensure the right to privacy

States' positive obligations to protect against violations of the right to life are better established in decision-making by treaty bodies and regional courts, as articulated in *General Comment No 36*. However, host states are also required to take steps to protect against violations of other rights, such as the right to privacy.

States' obligation to protect against violations of the right to privacy has been discussed by the UN High Commissioner for Human Rights (HCHR) in his 2018 report on the right to privacy in the digital age. The HCHR noted that Article 2(1) of the ICCPR imposes an obligation to 'respect and ensure' rights for individuals within the territory or jurisdiction of the state, which gives rise to an obligation not only to refrain from rights violations but also 'in the context of the right to privacy...adopt legislative and other measures to give effect to the prohibition of and protection against unlawful or arbitrary interference and attacks, whether they emanate from State authorities or from natural or legal persons'¹⁹⁶. As the HCHR further discussed, '[e]njoyment of the right to privacy depends largely on a legal, regulatory and institutional framework that provides for adequate safeguards, including effective oversight mechanisms'¹⁹⁷. The fact that international human rights law gives rise to positive obligations has also been discussed by legal scholars, in particular: (1) an obligation to 'regulate private companies operating in areas under control that collect, store, process, or have access to personal data'; and (2) the need to 'undertake all effective measures reasonably available to them to prevent interferences with privacy by third parties'¹⁹⁸.

In short, host states are required to work within a legal framework to prevent violations of the right to privacy. For example, where a foreign state actor installs spyware on the phone of a human rights defender located within the territory or jurisdiction of the host state, the host state would contravene its positive obligation to protect against violations of the right to privacy if it failed to have in place a legislative framework that rendered such cross-border, targeted surveillance by a foreign state illegal or where it failed to implement such an already existing legislative framework.

5 International policy responses to transnational repression

Over the past few years, transnational repression has been a growing concern in international and regional fora such as the UN and the G7. This issue has been noted in different UN reports or contexts¹⁹⁹. G7 States have also condemned these practices. The G7 Rapid Response Mechanism

¹⁹⁶ Human Rights Council, [The right to privacy in the digital age: Report of the United Nations High Commissioner for Human Rights](#), UN General Assembly, A/HRC/39/29, 2018, pp. 7-8.

¹⁹⁷ Human Rights Council, [The right to privacy in the digital age](#), 2018, p. 8.

¹⁹⁸ M. Milanovic, '[Human Rights Treaties and Foreign Surveillance: Privacy in the Digital Age](#)', *Harvard International Law Journal*, Vol 56, No 1, 2015, p. 123.

¹⁹⁹ See for example: Human Rights Council, [Report of the Group of Human Rights Experts on Nicaragua](#), Advanced unedited version, A/HRC/58/26, 2025; United Nations Office of the High Commissioner for Human Rights United Nations Office of the High Commissioner for Human Rights, ["Turbulence and unpredictability" amid growing conflict and in divided societies, Türk tells Human Rights Council](#)', Speech delivered by UN High Commissioner for Human Rights Volker

(RRM), initiated in 2018 to strengthen coordination among G7 members to identify and respond to foreign threats to democracies, highlighted both online and offline transnational repression as a continuing concern for the G7 RRM community in its 2023 Annual Report²⁰⁰. In February 2025, the Canadian Government, holding the G7 Presidency, hosted a dialogue on transnational repression, which included representatives of G7 member states and civil society, with the aim of producing a shared definition of transnational repression and recommendations for addressing and countering repressive acts. In addition to these international responses, some governments have begun enacting various domestic laws and policies. Some of these policy responses are summarised below, focusing on the USA, Australia and the UK²⁰¹. This review shows that transnational repression is increasingly of concern to other states and, as such, indicates what responses could be implemented by EU Member States. Most of these measures are recent, and to date, no academic research or policy evaluation is assessing their effectiveness in combating transnational repression.

5.1 United States of America

Under the Biden-Harris administration, the USA emerged as a leader in efforts to combat transnational repression, with the government adopting and actively using the term in policy and law-making. A 'whole-of-government' approach, coordinated by the National Security Council, involved the USA's Departments of Homeland Security, Justice and State, as well as the Federal Bureau of Investigation (FBI). Mitigation and prevention measures have centred around: monitoring incidents of transnational repression; awareness raising among populations at risk; sanctions against perpetrators; and legal prosecution holding foreign actors to account for involvement in acts of transnational repression²⁰².

In terms of legislative steps, the USA introduced the 'Khashoggi Ban' in 2021 (under section 212(a)(3)(C) of the Immigration and Nationality Act), which sanctioned the imposition of visa restrictions on individuals 'engaged in serious, extraterritorial counter-dissident activities'²⁰³. The State Department has used this tool to issue visa restrictions *inter alia* against Saudi citizens implicated in the killing of Jamal Khashoggi as well as Belarusian nationals for their involvement in the repression of dissidents across borders, most notably the attempt to return Belarusian Olympian Krystsina Tsimanouskaya forcibly to Belarus during the Tokyo Summer Olympic Games in 2021²⁰⁴. Congress has also passed the TRAP Act to help address Interpol's abuse²⁰⁵. Further

Türk, 03 March, 2025; United Nations Office of the High Commissioner for Human Rights, '[Transnational repression of journalists threatens democracy: Special Rapporteur](#)', Press release, 26 June 2024.

²⁰⁰ Government of Canada, '[G7 Rapid Response Mechanism Annual Report 2023](#)', webpage, nd.

²⁰¹ The Canadian government has recently also begun to develop a more comprehensive approach to combatting transnational repression. See, Y. Gorokhovskaia and G. Vaughan, '[Engaging the Community: Combating Transnational Repression in Canada](#)', FH, Special Report, May 2025.

²⁰² Y. Gorokhovskaia, and I. Linzer, '[Unsafe in America: Transnational Repression in the United States](#)', FH, 2022.

²⁰³ N. Schenkkan, et al., '[The 'Khashoggi Ban': What It Does and Doesn't Mean](#)', *Just Security*, 2021.

²⁰⁴ P. Stewart, '[U.S. imposes sanctions, visa bans on Saudis for journalist Khashoggi's killing](#)', *Reuters*, 26 February 2021; US Embassy in Belarus, '[Promoting Accountability for Transnational Repression of Belarusian Athletes Abroad](#)', Press Statement by Antony J. Blinken, Secretary of State, 03 February 2022.

²⁰⁵ US Congress, '[Transnational Repression Accountability and Prevention Act of 2021](#)', S.1591, Introduced in Senate, 12 May 2021.

pending legislation aims to criminalise transnational repression and propose a series of policy responses for the government²⁰⁶.

In the area of law enforcement, the Department of Justice has investigated and prosecuted cases of transnational repression, resulting in indictments against foreign actors in, for instance, China, Iran and Egypt for targeting dissidents and political opponents on US territory. As an example, in April 2023, a New York federal court attorney charged 40 officers of China's Ministry of Public Security for creating and using thousands of fake social media accounts to harass and intimidate Chinese dissidents abroad, spreading propaganda and disrupting online meetings²⁰⁷. While prosecutors describe the acts under investigation as transnational repression, this does not as yet constitute a specific criminal offence and hence they must rely on existing legislation, such as violations of the Foreign Agents Registration Act and other criminal charges. Such indictments hold perpetrators publicly accountable, even if defendants ultimately remain beyond the reach of American authorities.

The FBI, responsible for domestic intelligence and security, provides training for staff to identify repressive incidents and has published a dedicated website that defines transnational repression, explains common tactics and advises on how to report threats²⁰⁸. The FBI classifies threats that are reported through its hotline as transnational repression and treats them as such internally. FBI agents have repeatedly tracked and foiled repressive attempts in the USA, notably an assassination attempt against prominent Iranian women's rights defender Masih Alinejad in New York.

The State Department documents incidents of transnational repression in its annual country reports on human rights violations (although it is unclear whether that practice will continue after the sunset of the TRAP Act). The Department has also provided some training for diplomats. Internationally, the State Department has engaged with other like-minded democracies on the topic, including the G7 RRM Working Group.

With a focus on addressing digital transnational repression, the USA's Cybersecurity and Infrastructure Security Agency (CISA) initiated a High-Risk Community Protection Initiative dedicated to strengthening the cybersecurity of high-risk communities in the USA. CISA also announced the creation of a Strategic Dialogue on Cybersecurity of Civil Society Under Threat of Transnational Repression, along with Australia, Canada, Denmark, Estonia, France, Japan, New Zealand and the UK, with the goal of information-sharing regarding actions and best practices in response to transnational repression²⁰⁹. A significant step taken by the Biden-Harris administration in curtailing the proliferation of surveillance technology was an Executive Order prohibiting the use of spyware by the USA where it poses risks to national security or has been misused by foreign actors to enable human rights abuses worldwide. The USA also added certain spyware companies

²⁰⁶ US Congress, [Stop Transnational Repression Act](#), H.R.9460, Introduced in House, 7 December 2022; US Congress, [Transnational Repression Policy Act](#), S.831, Introduced in Senate, 16 March 2023.

²⁰⁷ US Department of Justice Archives, [40 Officers of China's National Police Charged in Transnational Repression Schemes Targeting U.S. Residents](#), Press Release, 17 April 2023.

²⁰⁸ FBI, ['Transnational Repression'](#), webpage, nd.

²⁰⁹ CISA, ['Joint Statement on the Strategic Dialogue on Cybersecurity of Civil Society Under Threat of Transnational Repression'](#), Press Release, 30 March 2023.

to the Commerce Department's Bureau of Industry and Security Entity Control List, revised export controls and imposed visa restrictions on people working in the commercial surveillance industry²¹⁰.

Ongoing shifts in American domestic and foreign policy under the Trump-Vance Administration risk halting, if not upending, progress made in the USA's policy-making in response to transnational repression. Some policies have continued, as reflected in the March 2025 sanctions imposed by the American government on Chinese and Hong Kong officials for intimidating and harassing Hong Kong activists abroad. Additional sanctions were imposed on Thai officials for complying with Beijing's request to deport 40 Uyghur men to China²¹¹. However, the current Administration's focus on curbing migration could result in a dismantling of protection measures for exiles and diaspora members in the USA, or worse, the criminalisation of migrants from communities exposed to transnational repression, thereby providing a justification for deportation or resulting in their further exposure to threats from their home countries. In March 2025, for instance, American Immigration authorities detained Russian scientist Kseniia Petrova, based at Harvard Medical School, for allegedly filing an improper customs declaration, revoking her visa and telling her that she would be deported to Russia. She was later charged with violating American customs law and transferred into criminal custody²¹². Petrova had left Russia after publicly protesting about the invasion of Ukraine and being briefly arrested by Russian authorities²¹³. Moreover, in its efforts to deport migrants to countries other than their own, the Administration is also in talks with the government of Rwanda, itself a prolific perpetrator of transnational repression²¹⁴.

In addition, the drastic budget cuts in American foreign aid and other policy areas pose an existential threat to many organisations working on human rights protections and support for diasporas, as well as political exiles whose expertise has been essential for understanding and mitigating the tactics of governments engaging in transnational repression²¹⁵. Staffing changes at the FBI, the Department of Justice and the Department of Homeland Security may affect the government's capacity to deal with transnational repression effectively. Closing the Department of Homeland Security's Office for Civil Rights and Civil Liberties, for instance, has disrupted important work at the level of migrant communities to build resilience against transnational repression²¹⁶. Finally, the Administration's transactional approach to foreign policy risks undermining international cooperation in containing the extraterritorial reach of authoritarian governments. Isolationist policies will weaken intelligence information sharing, undermining the prevention and prosecution of acts of transnational repression.

²¹⁰ The White House, [Fact Sheet: Advancing Technology for Democracy](#), webpage, 29 March 2023.

²¹¹ FH, [TNR Watch: Answering Chinese Bounties with US Sanctions](#), 24 April 2025.

²¹² J. Lee, ['Harvard scientist facing deportation is charged with smuggling: Federal prosecutors allege Kseniia Petrova violated customs law by failing to declare preserved frog embryos in her luggage, in a case that's raised questions over her detention'](#), *NBC News*, 14 May 2025.

²¹³ E. Barry, ['President Trump's immigration crackdown ensnared Kseniia Petrova, a scientist who fled Russia after protesting its invasion of Ukraine. She fears arrest if she is deported there'](#) *The New York Times*, 11 April 2025.

²¹⁴ C. Anna, ['What to know about Rwanda's talks with the U.S. about taking in third-country deportees'](#), *PBS News*, 07 May 2025.

²¹⁵ K. Mehrotra, ['For exiled Tibetans, U.S. funding was always about more than just aid'](#), *The Washington Post*, 28 March 2025.

²¹⁶ R. Santana, ['Homeland Security makes cuts to offices overseeing civil rights protections'](#), *Associated Press*, 22 March 2025.

5.2 Australia

In his 2025 annual threat assessment, the director-general of security in charge of the Australian Security Intelligence Organisation, Mike Burgess, said that foreign interference and espionage were key security concerns as many countries attempted to threaten and intimidate diaspora communities in Australia²¹⁷. In 2025, the Australian government launched the 'Countering Foreign Interference in Australia: Working Together Towards a More Secure Australia' Strategy²¹⁸. This Strategy reflects on the risks of foreign interference and how Australian society can mitigate them. It also identifies a number of sectors (communities, universities, industry, democratic institutions and media) at-risk of foreign interference and outlines measures to identify, moderate and prevent foreign interference. The current understanding of transnational repression in Australia is embedded within the concept of foreign interference²¹⁹. More specifically, the Australian government uses the term 'community interference' to describe the broad range of foreign interference activities, including transnational repression, targeting multicultural communities²²⁰. Since 2018, following a series of media exposés on PRC political influence, Australia enacted a rapid legislative response centred on countering 'foreign interference'²²¹. In June 2018, the Australian Government introduced the National Security Amendment (Espionage and Foreign Interference) Act 2018²²² (EFI Act) to combat the growing challenge of foreign interference. The EFI Act amended existing offences in the Criminal Code Act 1995 and introduced espionage-related offences. Some of the criminalised actions include covert and deceptive or threatening activities by persons not only intending to interfere with Australia's democratic systems and processes but also supporting a foreign government's intelligence activities. That same year, the Australian government appointed the National Counter Foreign Interference Coordinator and created the Counter Foreign Interference Coordination Centre²²³. Vital work by the Centre includes detecting and disrupting foreign interference activities as well as offering support and advice to at-risk sectors. It also engages in outreach activities with multicultural communities²²⁴.

In 2020, the Australian government introduced the Counter Foreign Interference Taskforce, based within and led by the Australian Security Intelligence Organisation, which brings together the

²¹⁷ Australian Government Office of National Intelligence, [ASIO Annual Threat Assessment 2025](#), Speech by Mike Burgess, Director-General of Security, 19 February 2025.

²¹⁸ Australian Government Department of Home Affairs, [Countering Foreign Interference in Australia: Working together towards a more secure Australia](#), Commonwealth of Australia, 2024.

²¹⁹ Australian Government, [Australian Government response to the Senate Select Committee on Foreign Interference through Social Media: First Interim and Final Reports](#), June 2024.

²²⁰ Australian Government, [Australian Government response to the Senate](#), June 2024.

²²¹ A. Chubb and K. Roberts Lyer, '[Transnational Human Rights Violations: Addressing the Evolution of Globalized Repression through National Human Rights Institutions](#)', *Journal of Human Rights Practice*, Vol 16, No 3, 2024, pp. 770–793.

²²² Australian Government, [National Security Legislation Amendment \(Espionage and Foreign Interference\) Act 2018](#), *Federal Register of Legislation*, C2018C00506 (01), 10 December 2018.

²²³ K. Mansted, [The Domestic Security Grey Zone: Navigating the Space Between Foreign Influence and Foreign Interference](#), *Australian National University*, 2021

²²⁴ Australian Government Department of Home Affairs, [Countering Foreign Interference in Australia: Working together towards a more secure Australia](#), Commonwealth of Australia, 2024.

capabilities of a range of partners, including the Australian Federal Police²²⁵. This Taskforce aims to stop attempts to monitor and harass members of Australia's diaspora communities. Individuals can raise their concerns, and instances of foreign interference in the community can be reported to the National Security Hotline, a central point of contact operating 24/7²²⁶. Additionally, the Department of Home Affairs established the Community Liaison Officer network to create outreach engagement with cultural, religious and ethnic community stakeholders around Australia, to support the communication of official information and provide a mechanism for community members to share information about their priorities, concerns as well as the impact of government policies and programmes on their communities²²⁷. Within this framework, it has further led programmes to help communities understand what foreign interference is, how it manifests itself and where victims can report instances and seek assistance²²⁸. On 11 July 2024, the Australian Federal Police, under the auspices of the Counter Foreign Interference Taskforce, charged two Russian-born Australian citizens with the first espionage charges since the introduction of the EFI Act²²⁹.

As seen above, the Australian approach to transnational repression spans different government sectors. In addition to the measures mentioned above, the government has formulated a targeted approach to counter foreign interference in the education sector through the University Foreign Interference Taskforce²³⁰, which aims to protect academic institutions from coercion and intellectual property theft. Similarly, the Electoral Integrity Assurance Taskforce²³¹ aims to ensure the integrity of federal electoral events against foreign threats. Additionally, the government has created an alternative reporting system called Notifiable Incidents, Threats or Reportable Observations for the education, business and defence sectors. This secure internet portal is created for non-security clearance holders to report concerns about potential espionage, foreign interference or insider threats²³².

Moreover, with the aim of addressing digital interference and cyber-attacks, the government has established the Australian Cyber Security Centre²³³. This Centre aims to help mitigate the impact of major cyber incidents and increase cyber resilience against foreign interference. The Government also established the Technology Foreign Interference Taskforce²³⁴, which aims to collaborate with the technology sector to address interference in critical technologies. In February 2021, the Digital Industry Group Inc. (DIGI) published the Australian Code of Practice on Disinformation and Misinformation (DIGI code) with Adobe, Apple, Google, Meta, Microsoft,

²²⁵ Parliament of Australia, '[Chapter 4 – Government: Current practice](#)', *Senate Select Committee on Foreign Interference through Social Media*, Commonwealth of Australia, 2023.

²²⁶ Australian Federal Police, '[Foreign Interference in the Community](#)', Factsheet, 2023.

²²⁷ Parliament of Australia, '[Chapter 4 – Government: Current practice](#)', *Senate Select Committee on Foreign Interference through Social Media*, Commonwealth of Australia, 2023.

²²⁸ Parliament of Australia, '[Chapter 4 – Government: Current practice](#)', 2023.

²²⁹ T. Turnbull, '[Australian soldier charged with spying for Russia](#)', *BBC*, 12 July 2024.

²³⁰ Australian Government Department of Education, '[University Foreign Interference Taskforce](#)', webpage, nd.

²³¹ Australian Electoral Commission, '[Electoral Integrity Assurance Taskforce](#)', webpage, nd.

²³² Australian Government Department of Home Affairs, '[Countering Foreign Interference in Australia: Working together towards a more secure Australia](#)', Commonwealth of Australia, 2024.

²³³ Australian Signals Directorate's Australian Cyber Security Centre, '[About us](#)', webpage, nd.

²³⁴ Australian Government Department of Home Affairs, '[Technology Foreign Interference Taskforce](#)', webpage, nd.

Redbubble, TikTok and Twitter (now X). The DIGI code aims to provide safeguards against harm from the spread of mis- and disinformation on digital platforms²³⁵.

Australia's action highlights national security-led approaches to transnational repression as embodied within the foreign interference framing. Yet, such an approach bears some limitations. According to Chubb and Roberts Lyer, the Australian approach to countering foreign interference at the community level has generated limited direct support to targeted community members, some of whom are fearful about contacting national security agencies, given the risk of foreign surveillance. Besides the National Security Hotline, there has been little guidance on contact points for individuals who have been subject to or at risk of rights violations through transnational repression²³⁶. Additionally, some would further argue that the EFI law passed in 2018 may have narrowed the scope of protection against such interference for many vulnerable individuals who might be viewed as potential threats acting as agents of foreign interference²³⁷.

5.3 United Kingdom

The UK government has, for the most part, taken a national security approach in its response to transnational repression. In November 2022, the Defending Democracy Taskforce body was established to review and bolster protection against foreign interference in electoral processes, political parties and universities. Its mandate includes transnational repression as one of the threats to be addressed, and in January 2025, the Defending Democracy Taskforce announced that it was reviewing the UK's existing response to transnational repression²³⁸. A report on the results of this review and a corresponding action plan to address transnational repression have not yet been published²³⁹.

The National Security Act passed in 2023, introduces the offence of foreign interference, including acts interfering with the exercise of rights protected under the ECHR, such as freedom of speech²⁴⁰. At the same time, a newly introduced Foreign Interference Registration Scheme requires the registration of arrangements for carrying out political influence activities in the UK at the direction of a foreign power²⁴¹.

While these provisions address some aspects of repressive action, civil society has criticised the UK government's continuing lack of any clear and comprehensive working definition of what constitutes transnational repression, capturing its varying forms and threat levels²⁴². Early in 2025,

²³⁵ Parliament of Australia, '[Chapter 4 – Government: Current practice](#)', *Senate Select Committee on Foreign Interference through Social Media*, Commonwealth of Australia, 2023.

²³⁶ A. Chubb and K. Roberts Lyer, '[Transnational Human Rights Violations: Addressing the Evolution of Globalized Repression through National Human Rights Institutions](#)', *Journal of Human Rights Practice*, Vol 16, No 3, 2024, p. 781.

²³⁷ A. Chubb, [PRC Overseas Political Activities: Risk, Reaction and the Case of Australia](#), Routledge, London, 2021.

²³⁸ United Kingdom Government, '[Ministerial Taskforce meets to tackle state threats to UK democracy](#)', Press release, 28 November 2022.

²³⁹ Y. Gorokhovskaia and G. Vaughan, '[From Awareness to Action: Combating Transnational Repression in the United Kingdom](#)', FH, Special Report, May 2025.

²⁴⁰ United Kingdom Government, '[National Security Act 2023: Foreign interference](#)', UK Public General Acts, 11 July 2023.

²⁴¹ United Kingdom Government, '[Foreign Influence Registration Scheme factsheet](#)', webpage, nd.

²⁴² Amnesty International, '[Roundtable on Transnational Repression in the UK: lived experience and recommendations from Hong Kong diaspora community groups: A Summary Report](#)', 2024.

the UK Parliament's Joint Committee on Human Rights launched a public inquiry and a series of hearings to gather evidence on incidents in the UK, examining the effectiveness of current legal and policy frameworks in relation to transnational repression as well as the assistance available to targets²⁴³. Part of these exchanges also focused on establishing a definition of transnational repression, with witnesses highlighting the lack of any accessible reporting mechanism, training for law enforcement and coordination across government agencies.

With regard to digital forms of transnational repression, the UK's National Cybersecurity Centre (NCSC) develops guidance and support for high-risk individuals – people with access to or influence over sensitive information that could be of interest to nation-state actors, including targets of digital transnational repression. The NCSC and its partners have issued public advisory notices on cyber operations against think tanks, journalists and human rights defenders, including, most recently, information on spyware targeting Uyghur, Taiwanese and Tibetan groups²⁴⁴. In 2025, the UK and Canada will launch the Common Good Cyber Fund to support cybersecurity non-profits to maintain critical cybersecurity infrastructure and deliver technical assistance, as well as capacity building to actors at a high risk of digital transnational repression. The UK is also participating in initiatives led by the US to strengthen the cybersecurity of targeted CSOs. For example, in September 2023, CISA and the UK National Cyber Security Centre (UK-NCSC) held the first Strategic Dialogue on Cybersecurity of Civil Society Under Threat of Transnational Repression²⁴⁵. Along with various other countries, the UK is also a signatory to a joint statement countering the proliferation and misuse of commercial spyware²⁴⁶. Together with France, in 2024, the UK government launched the Pall Mall Process, a multistakeholder initiative to address the proliferation and irresponsible use of commercial cyber intrusion capabilities, including commercial spyware²⁴⁷.

In terms of holding perpetrators to account, together with the USA, the UK government has issued sanctions against perpetrators of transnational repression, notably members of the Iranian Revolutionary Guard Corps and members of criminal networks who cooperated with the regime in the targeting of Iranian dissidents abroad²⁴⁸. Under the National Security Act, London's Metropolitan Police has charged three men with surveilling Hong Kong pro-democracy activists, accusing them of transnational repression²⁴⁹. Officials have also used existing criminal penalties to prosecute criminals from Chechnya, Bulgaria and Romania acting on behalf of the Russian and Iranian governments to spy on and threaten exiled journalists from both countries living in the UK²⁵⁰. There has also been some progress with respect to civil litigation brought by targets of

²⁴³ United Kingdom Parliament, '[Transitional repression in the UK](#)', webpage, nd.

²⁴⁴ NCSC, '[NCSC and partners share guidance for communities at high risk of digital surveillance](#)', 09 April 2025.

²⁴⁵ NCSC, '[UK and US host international dialogue to advance cyber support for groups that strengthen democracy](#)', 29 September 2023.

²⁴⁶ Foreign, Commonwealth and Development Office, '[Efforts to counter the proliferation and misuse of commercial spyware: joint statement](#)', 30 March 2023.

²⁴⁷ J. Brody, '[How the Pall Mall Process Can Help Combat Commercial Spyware Abuse](#)', FH, 08 May 2025.

²⁴⁸ REDRESS, '[UK Targeted Sanctions Quarterly Update](#)', Briefing, 31 May 2024.

²⁴⁹ R. Comerford, '[Three charged with aiding Hong Kong intelligence service](#)', *BBC News*, 13 May 2024.

²⁵⁰ Y. Gorokhovskaia and G. Vaughan, '[From Awareness to Action: Combating Transnational Repression in the United Kingdom](#)', FH, Special Report, May 2025.

transnational repression in the UK against their home countries, with various cases proceeding despite arguments of state immunity made by defendant states²⁵¹.

5.4 Emerging policies in EU Member States and the need for coordination

While some EU Member States have emerging policies on transnational repression, there remains insufficient knowledge about the issue. Furthermore, to date, state responses appear to be piecemeal and *ad hoc*²⁵². Here, some of the emerging responses among EU Member States are briefly noted together with the need for a more coordinated and comprehensive EU-wide framework in addressing transnational repression.

Some EU Member States have expressed awareness by signing the Declaration of Principles to Combat Transnational Repression²⁵³, which includes Germany, the Baltic states and Slovakia. In Sweden, Norway and Switzerland, refugee espionage – which amounts to an act of transnational repression as defined in this paper – is criminalised in national criminal legislation²⁵⁴. Sweden's criminal code includes a charge of refugee espionage, which refers to intelligence activities that are directed against opposition figures, regime critics and other minority groups in Sweden²⁵⁵. In 2019, Swedish prosecutors charged an Iraqi Swede with spying on the Ahwazi community in Sweden as well as elsewhere in Europe and passing information on to Iranian authorities²⁵⁶. In April 2025, Swedish authorities detained a Uyghur man on suspicion of spying on exiled members of the Uyghur community on behalf of the Chinese intelligence services²⁵⁷. In France, refugee espionage is criminalised under the country's general espionage provisions²⁵⁸. The Finnish Security and Intelligence Service is currently lobbying for refugee espionage to be made a criminal offence²⁵⁹.

Similarly, in March 2025, the Dutch Parliament passed a law criminalising digital espionage and diaspora espionage. The new law expands on existing legislation and criminalises actions such as leaking information or working for foreign governments that harm Dutch interests. Offenders can face up to 8 years in prison, with a maximum of 12 years for severe cases, such as espionage activities leading to someone's death²⁶⁰. In addition, the Dutch government announced the creation of a reporting point for foreign threats over which it also consulted with a coalition of diaspora

²⁵¹ For example see: Leighday, '[Court of Appeal strikes out Saudi Government case in Pegasus spyware claim brought by UK based dissident Ghanem Al-Masarir](#)', 29 January 2024.

²⁵² S. Furstenberg, '[The European Union's response to transnational repression: Are we moving towards securitisation?](#)', *European Journal of International Security*, 2021, pp. 1–25.

²⁵³ Australian Government Department of Foreign Affairs and Trade, '[Declaration on Principles to Combat Transnational Repression \(Freedom House\)](#)', 30 March 2023.

²⁵⁴ Unrepresented Nations and Peoples Organisation, '[The Recognition and Criminalisation of 'Refugee Espionage' in Europe](#)', Briefing Paper, 2022.

²⁵⁵ Swedish Ministry of Justice, '[Foreign espionage](#)', Legal advice, 01 October 2021.

²⁵⁶ Reuters, '[Sweden charges man with spying on Ahwazi community for Iran](#)', 06 November 2019.

²⁵⁷ Radio Free Asia Uyghur, '[Man accused of spying on Uyghurs in Sweden was exiled group's spokesman](#)', 10 April 2025.

²⁵⁸ La service public de la diffusion du droit, '[Chapitre Ier : De la trahison et de l'espionnage \(Articles 411-1 à 411-12\)](#)', nd.

²⁵⁹ Finnish Security and Intelligence Service, '[Refugee espionage seeks to silence and control](#)', webpage, nd.

²⁶⁰ Government of Netherlands, '[Legislation to be broadened to make more forms of espionage a criminal offence](#)', News item, 18 March 2025.

groups, the Alliance against Foreign Interference²⁶¹. In Germany, the domestic intelligence agency included a definition of transnational repression for the first time in its 2023 edition of the annual report on the protection of the Constitution, attesting to a growing awareness of the problem among authorities²⁶². German law enforcement agencies have repeatedly acted upon threats against exiles and diaspora members, notably providing protection to journalists and activists from Russia, Türkiye, Iran and Vietnam. In 2025, the French General Directorate for Internal Security established a helpline for those targeted by transnational repression to report incidents or threats²⁶³.

Despite these limited developments, a coherent EU-wide policy approach to counter transnational repression is still lacking. This leaves a gap in protection for human rights defenders at risk. Hence, there is a need for a common guidance document to facilitate a joint conceptual understanding of transnational repression, its impacts and what measures are necessary to prevent it. As articulated in this paper, transnational repression constitutes a serious threat to the exercise of human rights and fundamental freedoms such as the right to life, the right to liberty and security of the person, freedom of expression, freedom of association, the right to peaceful assembly and the right to privacy. These are essential human rights that allow individuals to participate in their host states' democratic processes and to advocate for such rights in their countries of origin. The next section examines how different EU policy frameworks could be strengthened to address transnational repression specifically.

6 Strengthening EU policy frameworks to counter transnational repression

Concern about spreading transnational repression practices and adequate protection for human rights defenders has risen at the EU level to some extent. In June 2023, for the first time, the Parliamentary Assembly of the CoE recognised transnational repression as a threat, undermining the rule of law and human rights in the EU²⁶⁴. Similarly, the European Parliament's 2023 resolution concerning the EU Guidelines on Human Rights Defenders makes frequent mention of transnational repression targeting human rights advocates. This document highlights the increasing 'phenomenon of transnational threats against human rights defenders by their national authorities or proxies', calling on the European Commission and EU Member States to 'to identify and tackle these threats within the EU as a priority' and provide foreign human rights defenders residing in the EU with 'appropriate financial aid, protection mechanisms, and training programmes on cybersecurity and cyber-harassment' to enable them to continue their human rights activism without fear of retaliation²⁶⁵. The following section outlines specific instruments in the EU's human

²⁶¹ L. van der Pol, M. Salomons and Y. Sharhani, [""We weten waar je woont""](#) ["We know where you live"], *D Groene Amsterdammer*, 11 December 2024.

²⁶² Bundesamt für Verfassungsschutz, ['Spionage, Cyberangriffe und sonstige sicherheitsgefährdende oder geheimdienstliche Aktivitäten für eine fremde Macht'](#), webpage, nd.

²⁶³ French Ministry of Internal Affairs, ['Fight against transnational repression'](#), News, 26 December 2024.

²⁶⁴ PACE, [Resolution 2509 \(2023\): Transnational repression as a growing threat to the rule of law and human rights](#), 23 June 2023.

²⁶⁵ European Parliament, [Resolution on the EU Guidelines on Human Rights Defenders](#), P9_TA(2023)0086, 16 March 2023, para 38-39.

rights policy toolbox and other policies that could be employed or further strengthened to counter transnational repression against human rights defenders.

6.1 EU External Action Service and the Human Rights Defenders Guidelines

The protection of human rights defenders is an objective of EU external relations, according to Article 21 Treaty on EU (TEU) and is incorporated into the EU's external policy through a range of mechanisms. The EU's European External Action Service (EEAS) regularly supports and promotes the work of human rights defenders through public diplomacy, political and human rights dialogues and funding through the European Instrument for Democracy and Human Rights. The European Council's Working Party on Human Rights deals with human rights aspects of the EU's external relations and supports the implementation of the EU Guidelines on Human Rights Defenders (the EU Guidelines).

These EU Guidelines give practical suggestions to EU bodies, institutions and missions for enhancing actions to support and assist human rights defenders, including those who are at risk. An important element of the Guidelines is support for the Special Procedures of the UN Human Rights Council, including the UN Special Rapporteur on human rights defenders and appropriate regional mechanisms to protect human rights defenders²⁶⁶. In 2012, the Guidelines were reinforced through the EU Strategic Framework and Action Plan on Human Rights and Democracy (APHRD), which the EEAS adopted in three successive iterations²⁶⁷. The most recent has been extended until 2027²⁶⁸.

Although EU Guidelines highlight the need for greater coherence between the EU's internal and external actions, emphasising the need to hold human rights abusers accountable, the EU Guidelines ultimately fail to address the topic of transnational repression against human rights defenders. In fact, most EU initiatives are designed to support and protect human rights defenders in non-EU countries and in relations with third countries as well as multilateral fora. Consequently, there is a lack of guidance to the EU and its Member States on how to recalibrate their support effectively to human rights defenders who reside in democracies or outside their home countries and are exposed to transnational repression. In this respect, the extended Action Plan as well as the EU Guidelines, fail to adequately reflect on challenges faced by human rights defenders in the present global context.

Currently, the limited awareness raising and training offered by EU entities (for instance, members of the EU external delegations) on transnational repression is conducted independently and internally through the EEAS. However, as pointed out by a number of interviewees, no public guidance is available on transnational repression. An appreciation of this problem and its negative impacts on the rights of human rights defenders (and civic space and democracy more broadly) would help stress how urgent it is to come up with adequate protection measures. Guidance on addressing transnational repression would have to provide a comprehensive definition, outline the responsibilities of host states to respond and suggest mechanisms for reporting and documenting

²⁶⁶ EEAS, [EU Guidelines on Human Rights Defenders](#), 21 June 2016.

²⁶⁷ Council, [EU Strategic Framework and Action Plan on Human Rights and Democracy](#), 11855/12, 25 June 2012.

²⁶⁸ EEAS, [EU Action Plan on Human Rights and Democracy 2020–2024](#), 2020.

incidents at national and local levels. The lack of designated and accessible points of contact to report threats and receive initial basic support often means that targeted human rights defenders have to fend for themselves and are hesitant to turn to host state authorities. As a result, only a few incidents are documented and recorded, thereby concealing the severity of this issue. The absence of procedural safeguards and support mechanisms at the national level leaves targeted human rights defenders and their communities vulnerable to transnational repression. Effective guidance from the EU to its Member States could change that. In section 7, the authors provide recommendations for points to be included in an EU guidance on transnational repression.

6.2 The EU human rights defenders mechanism: ProtectDefenders.eu

The EU mechanism ProtectDefenders.eu is specifically designed for responding to human rights defenders at risk. This is particularly so in countries with a hostile climate for human rights defenders or where evacuation to another neighbouring country is unsafe due to the risk of transnational repression resulting from collaboration between governments (risk of extradition or refoulement, say). In such cases, relocation to a country within the EU or a safer EU neighbouring country may be the most practical solution in enabling any defender to escape persecution and find protection. The mechanism provides a contact point for urgent assistance, help with temporary relocation, as well as monitoring and reporting. Furthermore, it can finance a wide range of measures, including legal representation, medical costs and protection measures.

Interviews with EU representatives showed the limits of this mechanism to protect human rights defenders at risk against transnational repression. Human rights defenders supported by the ProtectDefenders.eu have been increasingly targeted by repressive practices from their respective countries of origin²⁶⁹. Most have benefited from emergency visa relocation and have been offered shelter via Temporary International Relocation Initiatives. The mandate's core principle is to help individuals relocate to the EU through the Temporary Relocation Programme in response to an increased risk or difficult environment for a prolonged period of time²⁷⁰. Hence, the mandate assumes that once on EU territory, these human rights defenders are safe. However, as mentioned above, even in democracies, relocated human rights defenders have been exposed to risks and received threats from authoritarian home governments²⁷¹. Moreover, family members in the country of origin are regularly harassed and intimidated by local state authorities.

In such instances, through the ProtectDefenders.eu mandate, human rights defenders subject to transnational repression tactics have been offered: digital training against spyware and other forms of surveillance; medical and psychosocial assistance; support for filing complaints to law enforcement; and even police protection. Yet, as EU officials and human rights representatives pointed out in interviews, although the police take such incidents seriously, they often lack a

²⁶⁹ Interview 1, EU Policy Officer, 21 March 2025; Interview 2, EU Policy Officer, 24 March 2025.

²⁷⁰ Protectdefenders.eu, '[About us](#)', webpage, nd.

²⁷¹ Interview 1, EU Policy Officer, 21 March 2025; Interview 2, EU Policy Officer, 24 March 2025; Interview 3, UN Policy Officer, UN Office of the UN HCHR, 26 March 2025; Interview 4, UN Policy Officer, UN Office of the UN HCHR, 26 March 2025.

broader understanding of transnational repression and its systematic nature²⁷². In addition, while human rights defenders have welcomed such support, it is nevertheless subject to limitation as the mandate of ProtectDefenders.eu is bound by a time frame that generally spans from 6 to 12 months for individuals residing in the EU. Hence, the mandate does not make provision for additional support to human rights defenders outside the programme's timeframe. Once the human rights defenders' temporary relocation expires, they lose support. The programme does not facilitate permanent relocation and/or asylum procedures.

As has been noted in a recent report published by the International Partnership for Human Rights (IPHR)²⁷³, existing temporary relation programmes are struggling with escalating demand for relocation to protect human rights defenders²⁷⁴. At the same time, they often fail to provide adequate solutions for exiled human rights defenders for whom a return to their country of origin remains unsafe. Many Temporary International Relocation programmes have, therefore, been forced to engage the international refugee regime to protect human rights defenders at risk when international relocation has failed to mitigate sufficiently continuing risks within a certain period²⁷⁵. In such situations, human rights defenders have had no choice but to apply for asylum protection to be recognised as refugees. In our interviews, difficulty with obtaining a visa and securing legal status in the host state was noted as a significant burden for human rights defenders. Additionally, asylum procedures can take a long time, and during that time period, human rights defenders can also be at risk of transnational repression. In such cases, human rights defenders targeted by transnational repression have understandably been hesitant to seek help from local authorities for fear of being deported back home.

As mentioned in a report from the UN Special Rapporteur on the promotion and protection of the right to freedom of opinion and expression, people in distress and in urgent need of protection often have limited visa options or are faced with bureaucratic obstacles²⁷⁶. As a result, in the first instance, many human rights defenders apply for tourist visas or move to countries that do not require visas for a short-term visit and then deliberately overstay those visas when they cannot find a way to relocate elsewhere²⁷⁷. Yet, as discussed above, even in neighbouring countries, human rights defenders are at risk of arrest and deportation to their home countries. As documented by ProtectDefenders.eu²⁷⁸ and in the recent IPHR report, only a few countries offer humanitarian visas

²⁷² Interview 1, EU Policy Officer, 21 March 2025; Interview 2, EU Policy Officer, 24 March 2025; Interview 3, UN Policy Officer, UN Office of the UN HCHR, 26 March 2025; Interview 4, UN Policy Officer, UN Office of the UN HCHR, 26 March 2025.

²⁷³ T. Beria, et al., [Life in Exile: A comprehensive investigation of the challenges facing and support provided to human rights defenders in long-term relocation](#), IPHR, 2023.

²⁷⁴ T. Beria, et al., [Life in Exile: A comprehensive investigation of the challenges facing and support provided to human rights defenders in long-term relocation](#), 2023.

²⁷⁵ M. Jones, 'Protecting human rights defenders at risk: asylum and temporary international relocation' *The International Journal of Human Rights*, Vol 19 No 7, 2015, pp. 935-960.

²⁷⁶ United Nations Office of the High Commissioner for Human Rights, [Journalists in exile - Report of the Special Rapporteur on the promotion and protection of the right to freedom of opinion and expression](#), A/HRC/56/53, 26 April 2024.

²⁷⁷ United Nations Office of the High Commissioner for Human Rights, [Journalists in Exile](#), 2024.

²⁷⁸ Front Line Defenders, [Joint Statement: International civil society organisations call for an effective and enabling EU Visa framework for at-risk human rights defenders](#), 06 September 2022.

on urgent grounds. In the European context, according to the IPHR report, human rights defenders at risk are being accommodated to some extent in 18 EU Member States, including those with city-led, academia-led, or civil society-led initiatives. Some states have introduced flexible visa policies for human rights defenders. Relocation initiatives currently exist in Czechia, Estonia, Finland, France, Germany, Ireland, Latvia, Lithuania, the Netherlands, Poland, Spain and Sweden²⁷⁹. However, not all EU Member States offer flexible visa support policies for human rights defenders. As noted by ProtectDefenders.eu and CSOs, human rights defenders at risk around the world lack consistent procedures to access visas for the EU territory effectively and predictably²⁸⁰. As highlighted in the UN Special Rapporteur's report, the political will of governments plays an important role here. In 2022, for instance, Ireland provided hundreds of humanitarian visas to Afghan human rights defenders, including some journalists, while Czechia, Latvia and Lithuania have issued a similar number of visas to independent journalists, media workers and their family members from Belarus and Russia²⁸¹. Additionally, some countries such as Armenia, Czechia, Georgia, Latvia, Lithuania and Poland have introduced favourable visa regimes for human rights defenders or maintain a visa-free regime with home countries²⁸². Yet, as stressed in the IPHR report and confirmed during our interviews, these initiatives aim to offer only temporary protection for human rights defenders facing threats and persecution, but demand often exceeds available resources and space²⁸³. Some of the relocation programmes are also limited in scope or are designed for specific categories of human rights defenders, highlighting the urgent need for more comprehensive and robust support mechanisms for human rights defenders at risk of transnational repression in Europe.

6.3 The EU Global Human Rights Sanctions Regime

An important instrument for the EU to sanction human rights violations is the EUGHRSR. It provides a legal basis for EU sanctions targeting individuals, entities and bodies – including state and non-state actors – responsible for, involved in or associated with serious human rights violations and abuses worldwide²⁸⁴. The EUGHRSR also covers acts of serious concern in relation to the EU's Common Foreign and Security Policy goals, including violations or abuses of freedom of peaceful assembly and association, freedom of opinion and expression, as well as freedom of religion or beliefs²⁸⁵. Those targeted by restrictive measures under the EUGHRSR are subject to a travel ban to the EU as well as an asset freeze.

²⁷⁹ T. Beria, et al., [Life in Exile: A comprehensive investigation of the challenges facing and support provided to human rights defenders in long-term relocation](#), IPHR, 2023.

²⁸⁰ T. Beria, et al., [Life in Exile](#), IPHR, 2023.

²⁸¹ United Nations Office of the High Commissioner for Human Rights, [Journalists in exile – Report of the Special Rapporteur on the promotion and protection of the right to freedom of opinion and expression](#), A/HRC/56/53, 26 April 2024.

²⁸² T. Beria, et al., [Life in Exile: A comprehensive investigation of the challenges facing and support provided to human rights defenders in long-term relocation](#), IPHR, 2023.

²⁸³ Interview 5, EU Policy Officer, 04 April 2025.

²⁸⁴ Council, [Council Decision \(CFSP\) 2020/1999 of 7 December 2020 concerning restrictive measures against serious human rights violations and abuses](#), *Official Journal of the EU*, L 410 I/13, 7 December 2020.

²⁸⁵ Council, [Council Decision \(CFSP\) 2020/1999](#), 07 December 2020.

At the time of writing, the list of designated individuals under the EUGHRSR includes 115 natural persons and 33 legal persons, organisations and entities²⁸⁶. A recent study by the European Democracy Hub (2024) shows that, during the last three years, most EU sanctions were related to Russia, which accounts for two-thirds of all measures under the EUGHRSR²⁸⁷. As a result, many other human rights violators go unpunished, although the EUGHRSR represents an important tool to confront those who commit serious human rights violations worldwide. Indeed, as observed in the European Democracy Hub's 2024 report, the EU has seemed reluctant to impose sanctions on individuals or entities from strategic partners. For example, Egypt and Türkiye count among the top perpetrators of transnational repression against human rights defenders, yet are not subject to sanctions.

The EU's reluctance to target *all* governments that engage in transnational repression is probably related to the EU's perceived strategic interests, in particular with respect to migration control or energy security. Such unequal application of sanctioning mechanisms and other countermeasures are likely to encourage perpetrators to continue engaging in acts of transnational repression against human rights defenders and, more broadly, risks the politicisation of efforts to counter transnational repression (in particular, by opening up EU Member States to the argument that they undertake measures to counter transnational repression only with respect to regimes that counter their strategic and security interests).

Furthermore, while the EUGHRSR could be used as an assertive tool against actors, entities and governments engaged in transnational repression to increase the perceived costs for perpetrators, there are some additional issues to consider. The current sanction mechanisms apply to acts such as genocide, crimes against humanity and other serious human rights abuses like extrajudicial, summary or arbitrary executions and killings, enforced disappearances, as well as arbitrary arrests and detentions. Other human rights violations or abuses can also be covered by the sanctions regime where those violations or abuses are widespread, systematic or otherwise of serious concern in regard to the common foreign and security policy objectives set out in the Treaty (Article 21 TEU)²⁸⁸. The current sanction regime should be broadened specifically to include sanctions in response to acts of transnational repression.

Targeted sanctions such as visa bans and asset freezes can act as deterrents to state and non-state perpetrators of transnational repression, highlighting the consequences of engaging directly or indirectly in this practice. Applying the EUGHRSR regime to transnational repression cases would further allow for a more coordinated approach with other governments, such as that in the USA, where the so-called Khashoggi Ban makes possible the imposition of visa restrictions on individuals who engage in serious extraterritorial counter-dissident activities²⁸⁹. In March 2025, for instance,

²⁸⁶ Council, [Council Decision \(CFSP\) 2024/3004 of 2 December 2024 amending Decision \(CFSP\) 2020/1999 concerning restrictive measures against serious human rights violations and abuses](#), *Official Journal of the EU*, L series, 03 December 2024.

²⁸⁷ T. Tsertsvadze, '[Sharpening the EU's Global Human Rights Sanctions Regime](#)', Spotlight, *European Democracy Hub*, 12 March 2024.

²⁸⁸ EEAS, '[Sanctions defending human rights worldwide](#)', webpage, 09 January 2025.

²⁸⁹ US Department of State, '[Accountability for the Murder of Jamal Khashoggi](#)', Press Statement by Antony J. Blinken, Secretary of State, 26 February 2021.

the USA's Department of State imposed sanctions on Hong Kong Secretary of Justice Paul Lam as well as five other individuals from Hong Kong and mainland China who have played a role in carrying out acts of transnational repression as well as undermining and eroding Hong Kong's freedoms and human rights²⁹⁰.

Such joint condemnations through sanctions regimes would send a powerful signal to perpetrators committing human rights abuses across borders. To achieve this, the EU should deploy the EUGHRSR regime irrespective of strategic relationships or geopolitical interests within countries engaging in transnational repression.

6.4 EU Human Rights Dialogues and other bilateral dialogues

The EU Human Rights Dialogues (which aligns with the EU APHRD (2020–2026)) is another key instrument in EU external human rights policy²⁹¹. The principal aim of these Human Rights Dialogues is to improve the human rights situation within the country with which the dialogue is initiated and to maintain a channel of communication regarding human rights. The dialogues are designed to ensure consistency and coherence while allowing for flexibility and tailor-made approaches for each country concerned²⁹². Over the years, the EU has established such dialogues with an increasing number of non-EU countries. Currently, there are approximately 60 as well as consultations with partner countries and regional groupings²⁹³. Although topics are determined on a case-by-case basis, the EU is committed to including a list of priority issues in each dialogue. These include: implementation of international human rights instruments; combating the death penalty²⁹⁴; torture and other cruel treatment²⁹⁵; children's rights²⁹⁶; women's rights²⁹⁷; freedom of expression; the role of civil society and the protection of human rights defenders²⁹⁸; international cooperation in the field of international justice (especially with the International Criminal Court²⁹⁹); the promotion of democratisation and good governance; conflict prevention; and support for the rule of law³⁰⁰.

Human Rights Dialogues can be viewed as an important tool to approach the topic of transnational repression against human rights defenders with third countries engaged in these practices. In response to a written parliamentary question in April 2024, the High Representative of the Union for Foreign Affairs and Security Policy confirmed that cases of transnational repression were raised in the context of human rights dialogues, but there is, to date, no reference to such concerns in any post-dialogue statements. When governments use transnational repression to threaten human

²⁹⁰ US Department of State, [Sanctioning those undermining Hong Kong's autonomy](#), Press Statement by Marco Rubio, Secretary of State, 31 March 2025.

²⁹¹ Council, [Revised EU Guidelines on Human Rights Dialogues with Partner/Third Countries](#), Outcome of Proceedings, 6279/21, 22 February 2021.

²⁹² J. Wouters, et al., [EU human rights dialogues. Current situation, outstanding issues and resources](#), Policy Brief, *Centre for Global Governance Studies*, 2007.

²⁹³ R. Kaskina, [Human rights](#), Fact Sheets on the European Union, European Parliament, April 2024.

²⁹⁴ EUR-Lex, [EU guidelines on the death penalty](#), Summaries of EU Legislation, webpage, nd.

²⁹⁵ EUR-Lex, [EU guidelines on torture and other cruel treatment](#), Summaries of EU Legislation, webpage, nd.

²⁹⁶ EUR-Lex, [EU guidelines on the rights of the child](#), Summaries of EU Legislation, webpage, nd.

²⁹⁷ EUR-Lex, [Violence against women and girls: EU guidelines](#), Summaries of EU Legislation, webpage, nd.

²⁹⁸ EUR-Lex, [Human Rights Defenders – EU support](#), Summaries of EU Legislation, webpage, nd.

²⁹⁹ EUR-Lex, [Agreement between the EU and the International Criminal Court \(ICC\)](#), Summaries of EU Legislation, webpage, nd.

³⁰⁰ Council, [EU guidelines on human rights dialogues with third countries – Update](#), 16526/08, 22 December 2008.

rights defenders and other target categories, the option of different sanction mechanisms and other reprisals could be raised directly and referred to publicly in the context of a dialogue. The EU should remind those governments of their obligations under international law as well as regional and international human rights law. Moreover, the EEAS should strengthen these dialogues by consulting with civil society before each dialogue to ensure that civil society can not only share critical insights and expertise regarding ongoing practices of transnational repression but also document individual cases. When a government continues to commit acts of transnational repression and fails to meet its human rights obligations in the wake of such dialogues, the EU should consider the use of other tools, including sanctions or review of aspects of bilateral relations and/or suspend the dialogue until there are tangible changes in the behaviour of the perpetrating state. Transnational repression should also be raised in other bilateral forums, including partnership or association committees and councils, partnership dialogues under the Samoa Agreement and other relevant bilateral high-level dialogues.

6.5 The human rights clause in EU bilateral and regional free trade agreements with third countries

Article 21 in the TEU constitutionally obligates the EU to incorporate its core principles, including democracy, the rule of law and respect for human rights, into all aspects of its relations with third countries. Hence, bilateral trade agreements and other cooperation agreements between the EU and non-EU countries typically include a human rights clause defining respect for human rights as an 'essential element'³⁰¹. This approach has been repeatedly re-emphasised with the aim of promoting the EU's fundamental values and political principles³⁰². The inclusion of a human rights clause in treaties and agreements serves as an entry point for further engagement and dialogue on human rights. It also provides an important legal mechanism enabling the unilateral suspension of trade commitments if the signatory party fails to respect its human rights obligations³⁰³. Such measures can be used in conjunction with other mechanisms, such as sanctions.

For the EU, acting upon human rights clauses in bilateral agreements with third countries could serve as a tool to respond to human rights violations resulting from transnational repression. The EU could apply provisional trade restrictions or limit its financial assistance to states that perpetrate acts of transnational repression. This would signal that transnational repression represents a violation of a state's human rights obligations and is unacceptable under cooperation frameworks. Moreover, EU Member States could also consider the possibility of suspending the visa-free regime with a third country³⁰⁴ in case of a significant and abrupt deterioration in the EU's external relations with that country, particularly when it relates to systematic human rights violations, including acts of transnational repression. Currently, the EU has suspended visa-free regime agreements with

³⁰¹ R. Kaskina, 'Human rights', Factsheets on the European Union, European Parliament, April 2024.

³⁰² Council, [Common approach on the use of political clauses](#), 10491/1/09, 25 April 2013.

³⁰³ L. Bartels, '[Assessment of the implementation of the human rights clause in international and sectoral agreements](#)', European Parliament's Directorate-General for External Policies of the Union, PE 702.586, 2024; I. Zamfir, '[Human rights in EU trade agreements: The human rights clause and its application](#)', European Parliamentary Research Service, PE 637.975, 2019.

³⁰⁴ EP and Council, [Regulation \(EU\) 2018/1806 of the European Parliament and of the Council of 14 November 2018 listing the third countries whose nationals must be in possession of visas when crossing the external borders and those whose nationals are exempt from that requirement \(codification\)](#), *Official Journal of the EU*, L 303/39, 28 November 2018.

Russia, Belarus and Vanuatu; however, the list can be extended to perpetrator states of transnational repression, such as Venezuela.

6.6 Addressing transnational repression through Europol

The multifaceted nature of transnational repression demands coordinated actions among EU institutions and between its Member States. In particular, cross-border law enforcement and judicial cooperation are essential to address transnational repression within the EU. Although such incidents fall under the responsibility of individual Member States, the EU can provide support and assistance in fighting transnational repression. In this regard, the EU Agency for Law Enforcement Cooperation (hereafter 'Europol') could serve as an important platform to support law enforcement and judicial authorities in sharing knowledge and best practices on transnational repression. This would further encourage closer cooperation between Member States and foster the adoption of common legal, judicial and investigative frameworks to address transnational repression incidents.

At present, Europol is the only EU-wide platform for multilateral exchange and analysis on critical security threats. The current mandate of the organisation covers terrorism and other forms of crime that affect a common interest covered by Union policy. This agency is empowered to tackle more than 30 forms of serious crime and related criminal offences, including terrorism, drug trafficking, money laundering, human trafficking, sexual abuse and exploitation, as well as trafficking in arms and ammunition³⁰⁵. To fulfil its objectives, Europol carries out a series of tasks, including its core activities of acting as the EU's criminal information exchange hub, as well as providing operational support and expertise to EU Member States' criminal investigations. The main objectives of Europol are to improve the effectiveness of and cooperation among national police authorities in the EU Member States, primarily by facilitating the exchange of information.

Including transnational repression within Europol's mandate would complete the organisation's existing work on state-sponsored criminality, organised crime and cyber-attacks. Europol could assist EU Member States by carrying out a targeted evaluation of incidents, for example, through Europol's flagship report, such as the EU Serious and Organised Crime Threat Assessment. Such assessments could provide up-to-date information to EU Member States as well as their law enforcement agencies and decision-makers on transnational repression and the threats it poses to the EU. However, interviews conducted by the authors show that, for now, at least, Europol has not been consulted about transnational repression by EU Member States or EU institutions. A request to perform this type of work would have to be directly transferred through the Directorate-General for Migration and Home Affairs of the European Commission. As with Interpol, this is because Europol is not an executive police force with autonomous supranational authority to conduct its own investigations, undertake searches or arrest suspects.

In addition to analysing incidents of transnational repression, Europol could offer dedicated training to law enforcement agencies. Alternatively, such training could be carried out by the EU Agency for Criminal Justice Cooperation or the EU Agency for Law Enforcement Training.

The inclusion of transnational repression within Europol's mandate would not only facilitate information sharing among Member States but also improve exchanges with the FBI as well as

³⁰⁵ B. Immenkamp and E. Constantinou, [Europol: The EU law enforcement cooperation agency](#), European Parliamentary Research Service, PE 767.208, January 2025.

Interpol and police services in other non-EU countries. Through its mandate, Europol has the authority to progressively expand cooperation with third-party states. Such efforts could contribute to coordinating a unified response to transnational repression and align the EU's countering efforts with those of other like-minded countries.

6.7 Overlaps with EU policies addressing foreign interference

As our review of emerging policies in Australia and the UK has shown, addressing the issue of transnational repression is often embedded with a broader framework for countering foreign interference. Similarly, several EU policy documents merge transnational repression with other issues, such as disinformation campaigns and election manipulation by foreign powers³⁰⁶. The concept of foreign interference describes illegitimate interference (covert or overt) by foreign powers in the democratic and political processes of the EU and its Member States³⁰⁷. It includes malign activities such as using disinformation, economic coercion, corruption, espionage, cyber-attacks, election meddling for political influence, covert lobbying and cultivation of improper ties with politicians. Such tactics are often deliberately tailored to exploit vulnerabilities that govern democratic societies, such as freedom of speech, freedom of movement and open pluralism³⁰⁸.

The EU and its Member States have initiated various policies to counter foreign interference, including the 2016 Joint Framework on Countering Hybrid Threats³⁰⁹, the 2018 Joint Communication on Increasing Resilience and Bolstering Capabilities to Address Hybrid Threats³¹⁰ and the 2018 Communication on the Threat of Disinformation and Foreign Information Manipulation³¹¹. The new EU Security Internal Strategy, ProtectEU, further stresses the building of EU resilience against hybrid campaigns 'featuring acts of sabotage targeting critical infrastructure, arson, cyberattacks, election interference, foreign interference and manipulation of information, including disinformation and weaponisation of migration' from foreign states and non-state actors³¹².

Subsuming transnational repression under foreign interference affects how policy-makers understand and respond to transnational repression. Although there are overlaps, approaching this problem exclusively through the paradigm of foreign interference prioritises national security over human rights protection. A security approach fails to capture the more subtle tactics of surveillance and harassment that authoritarian regimes use to intimidate diaspora groups, infringing on their human rights and curtailing civic space. This approach also prioritises the role of security and intelligence agencies, whose largely non-public mission stands in contrast to the need for accessible support and trust-building measures directed towards communities at risk. Moreover,

³⁰⁶ S. Furstenberg, ['The European Union's response to transnational repression: Are we moving towards securitisation?'](#), *European Journal of International Security*, 2021, pp. 01-25.

³⁰⁷ K. Jones, ['Legal loopholes and the risk of foreign interference, Directorate General for External Policies of the Union'](#), Directorate General for External Policies of the Union, European Parliament, PE 702.575, 2023, p. 11.

³⁰⁸ M. Wigell, ['Democratic Deterrence: How to Dissuade Hybrid Interference'](#), *The Washington Quarterly*, Vol 44, No 1, 2021, pp. 49-67; S. Kalniete and T. Pildegovičs, ['Strengthening the EU's resilience to hybrid threats'](#), *European View*, Vol 20, No 1, 2021, pp. 23-33.

³⁰⁹ European Commission, [Countering hybrid threats: a European Union response](#), JOIN(2016) 18 final, 06 April 2016.

³¹⁰ European Commission, [Countering hybrid threats](#), 06 April 2016.

³¹¹ European Commission, [Action Plan against Disinformation](#), JOIN(2018) 36 final, 05 December 2018.

³¹² European Commission, [ProtectEU: a European Internal Security Strategy](#), COM(2025) 148 final, 01 April 2025, p. 11.

under a foreign interference approach, exiles and diasporas with ties to authoritarian countries risk being treated with suspicion as foreign spies or actors subject to external manipulation instead of being seen as individuals in need of protection against a state extending its practices of domestic repression across borders. It is, therefore, important to distinguish transnational repression from other forms of foreign interference, problematising it as a distinct threat to the individual security and human rights of targeted human rights defenders.

6.8 Addressing the risks of digital technologies

6.8.1 Spyware proliferation

Spyware is one of the various digital tools used to undertake transnational repression against targets located within the EU. The European Parliament's Committee of Inquiry to Investigate the Use of Pegasus and Equivalent Surveillance Spyware (PEGA Committee) examined the use of Pegasus and similar spyware within the EU. Their recommendations have been summarised in the Committee's final report issued in May 2023. While the Committee was particularly concerned with the use of Pegasus spyware by EU Member States, recommendations issued by the PEGA Committee should be implemented to counter the use of spyware as a tool of digital transnational repression³¹³.

Relevant recommendations include EU Member States' need to assess export licences thoroughly and repeal them where appropriate. The export of spyware by EU Member States to foreign states has a direct impact on the rights and freedoms of human rights defenders living in exile or in the diaspora within the Union. Thus, EU Member States need to improve control over the exporting of such software from their jurisdictions and, in particular, ensure that such technology is not exported to states that will use it to abuse human rights, domestically or transnationally. This will require a much more robust implementation and administration of the Dual-Use Regulation (2021/821), which obliges EU Member States to control exports of cyber-surveillance.

EU Member States also need to comply with recommendations to investigate and resolve cases of alleged domestic and extraterritorial spyware abuse. In particular, cases of transnational targeting with spyware must be fully investigated by the jurisdictions in which such targeting happens. Apart from such investigations, human rights defenders targeted with spyware by their countries of origin do not have the resources or information either to become aware that they are being targeted in such a manner or to take specific action in response.

Furthermore, following the state's positive obligation to prevent violations of the right to privacy, EU Member States must ensure that there is a legal framework to prevent violations of the right to privacy using spyware or other digital technologies. This would require a legal framework that sanctions and criminalises the use of spyware by foreign states within the host state and complies with additional recommendations made by the PEGA Committee. This legal framework must include provisions for pursuing criminal prosecutions against actors that facilitate or undertake transnational cyber surveillance of human rights defenders, ensuring that targeted human rights defenders can pursue civil litigation in domestic courts through legal reform in EU Member States

³¹³ European Parliament, [Investigation of the use of Pegasus and equivalent surveillance spyware: Recommendation](#), P9_TA(2023)0244, 15 June 2023.

if necessary and also have access to funding³¹⁴. The EU should also consider leading a process to develop specific international norms against the targeted transnational surveillance of human rights defenders³¹⁵.

Another important recommendation made by the PEGA Committee is in regard to the development of an EU Tech Lab that works on identifying and disclosing spyware threats, among other digital threats³¹⁶. Human rights defenders targeted in exile do not generally have the resources available to detect and mitigate sophisticated digital threats such as spyware attacks undertaken by state actors. States are better positioned to collect information regarding digital threats, investigate and proactively warn targets about such digital targeting.

6.8.2 Engaging with social media platforms

As this paper has outlined, social media platforms continue to provide a thriving environment for digital transnational repression practices, such as online harassment, smear campaigns and information manipulation targeting human rights defenders. However, the platforms' current practices in content moderation and user guidelines fail to protect human rights defenders at risk adequately. In the past, the USA and the EU have worked together to address the misuse of digital technologies to target human rights defenders online. For instance, collaboration under the USA-EU Trade and Technology Council framework led to the formulation of recommendations for platforms for improving online safety for human rights defenders³¹⁷. After recent shifts in American policy, though, it seems unlikely that such joint initiatives will continue, particularly since the Trump Administration, in close alliance with big technology companies, takes a lax approach to regulating online content. Hence, the EU must continue to work on creating a safer online environment and combating harmful activities exposing human rights defenders to risks of digital transnational repression on large social media platforms.

The EU's Digital Services Act (DSA), which entered into force in February 2024, provides an important instrument for making sure that social media platforms address the risks of disseminating harmful content and better protect users' fundamental rights. The implementation of enforcement measures under the DSA could potentially also lead to improved protection for human rights defenders against digital transnational repression. Among the regulation requirements for platforms are easier reporting mechanisms for illegal content, greater transparency in content moderation and more options to appeal against the removal of content or reduction of content visibility³¹⁸. These improvements would address some of the grievances that

³¹⁴ For example, in the UK there has been some progress on this issue with courts finding that human rights defenders or others targeted with spyware by foreign states can pursue litigation against the latter, see: S. Anstis, '[Regulating Transnational Dissident Cyber Espionage](#)', *International and Comparative Law Quarterly*, Vol 73, No 1, 2024.

³¹⁵ S. Anstis, '[Regulating Transnational Dissident Cyber Espionage](#)', 2024.

³¹⁶ European Parliament, '[Investigation of the use of Pegasus and equivalent surveillance spyware: Recommendation](#)', P9_TA(2023)0244, 15 June 2023, pp. 113-119.

³¹⁷ EEAS, '[EU-US recommended actions for online platforms on protecting Human Rights Defenders online](#)', Strategic Communications, 11 March 2024.

³¹⁸ European Commission, '[The impact of the Digital Services Act on digital platforms](#)', webpage, nd.

women human rights defenders targeted with gender-based digital transnational repression brought forward in a recent research study published by The Citizen Lab³¹⁹.

The European Commission has launched formal proceedings against X for potential breaches of the DSA in areas linked to *inter alia* the dissemination of illegal content and measures taken to combat online manipulation³²⁰. The outcome of this investigation and enforcement of the DSA against X in case of non-compliance are seen as comprising the regulation's first major test³²¹.

6.8.3 Using the Corporate Sustainability Due Diligence Directive

On 25 July 2024, the European Commission adopted the Directive on Corporate Sustainability Due Diligence (Directive 2024/1760)³²², which aims to foster more sustainable and responsible corporate behaviour in companies' operations and global value chains. This Directive also aims to establish a common mandatory human rights due diligence framework across the EU, thus ensuring that companies identify and address adverse human rights as well as environmental impacts of their operations along with much of their supply chain both inside and outside Europe. EU Member States are also required to transpose the Directive's provisions into their national law.

The Directive is a step change in protecting people from abuses, including individuals affected by transnational repression incidents. It would mean that victims of transnational repression targeted by the company's operations or its subsidiaries could have access to better judicial redress in Europe. If robustly implemented, it would further prevent or mitigate the risks associated with selling spyware technologies to governments that systematically commit human rights abuses. In such instances, the Directive would help companies conduct due diligence risk assessments and identify channels suggesting their technologies may be used for repressive purposes. Such procedures would allow companies to notify their platform users in a timely fashion if their information is being compromised. Businesses exporting technologies could further be asked to report annually on the human rights impact of their exports and list countries to which they have exported such technologies in compliance with their due diligence reporting obligations. Such reporting would help identify potential human rights concerns (which could also include risks for human rights defenders), mitigate potential harm and prevent future would-be abusers from using the company's products.

Accordingly, due diligence requirements must encourage meaningful engagement for companies to identify and take steps to avoid and address adverse human rights impacts. Paragraph (40) of the Directive specifically stresses that:

³¹⁹ N. Aljizawi, et al., [No Escape: The Weaponization of Gender for the Purposes of Digital Transnational Repression](#), Citizen Lab Report 180, University of Toronto, 2024.

³²⁰ European Commission, ['Commission opens formal proceedings against X under the Digital Services Act'](#), Press Release, 18 December 2023.

³²¹ R. Jahangir, ['Understanding the EU's Digital Services Act Enforcement against X'](#), *Tech Policy Press*, 05 April 2025; J. Ohmz et al., ['Will Europe Sacrifice the Digital Services Act in Negotiations with Trump?'](#), *Tech Policy Press*, 25 March 2025.

³²² European Parliament and Council, [Directive \(EU\) 2024/1760 of the European Parliament and of the Council of 13 June 2024 on corporate sustainability due diligence and amending Directive \(EU\) 2019/1937 and Regulation \(EU\) 2023/2859 \(Text with EEA relevance\)](#), *Official Journal of the EU*, L series, 05 July 2024.

‘to comply with due diligence obligations, companies need to take appropriate measures with respect to the identification, prevention, bringing to an end, minimisation and remediation of adverse impacts, and the carrying out of meaningful engagement with stakeholders throughout the due diligence process’.

In this sense, businesses that export surveillance technology need to consult with civil society and human rights defenders to understand the adverse effects of their products on human rights. Without such expertise, companies risk failing to address human rights violations that could emerge from their products. As seen in previous sections, surveillance technologies have often been used as retaliation against human rights defenders. Furthermore, the EU must also consider how to support efforts in countries outside the EU to ensure that the law encourages an elevation of human rights standards throughout the whole global value chain and not just within the EU context.

7 Conclusion and recommendations

This paper has examined global trends of transnational repression against human rights defenders with a particular focus on human rights impacts and the curtailment of civic space. It has also considered the human rights obligations of EU Member States to address transnational repression, along with an outline of certain emerging policy responses in the US, Australia, the UK and some Member States. Analyses presented here and interviews conducted with interlocutors in international organisations as well as EU institutions indicate that, in the EU context, there is currently a lack of policy tools to protect human rights defenders at risk of transnational repression and political responses to the issue are only just beginning to emerge.

The relative paucity of action on transnational repression by the EU sends an unambiguous signal to dictators: namely, that authoritarian threats against human rights defenders living in exile or the diaspora are not among the EU’s priorities. In exceptional situations, policymakers in the EU can take a strong and united stance, as it was in the case of the Ryanair flight carrying the dissident Belarussian blogger Roman Protasevich. However, such reactions to single incidents are short-lived, whereas transnational repression is systematic, ongoing and evolving. Tackling this growing problem requires coordination, persistence and resolve. Given the global rise of authoritarian practices, it is expected that transnational repression incidents will continue to increase. By failing to respond to transnational repression, the EU effectively emboldens governments to continue reaching across borders to persecute and silence human rights defenders. Such an approach undermines the rights and freedom of individuals who turn to another country in search of protection and support.

Addressing transnational repression requires a unified and coordinated response from the EU and its Member States, building on cross-sectoral cooperation involving relevant EU institutions, law enforcement and other national government agencies, as well as civil society. Similar to the areas of counter-terrorism or organised crime, the EU should develop a common security framework on transnational repression with an information-sharing platform between civil society, intelligence services and national law enforcement agencies in Member States aimed at protecting targets and effectively addressing cases of transnational repression. As suggested in this paper, one avenue for implementing such platforms could be to extend the current mandate of Europol. At the same time, this approach would need to include civil society groups and affected human rights

defenders, building trust and integrating their perspectives to prevent and mitigate the risks of transnational repression. Here, the EU can play an important role in advancing human rights-led solutions to countering transnational repression. It can act as a transmitter of best practices, assist in effectively coordinating information sharing between law enforcement agencies of Member States as well as initiating prevention and education campaigns. Building accurate knowledge on transnational repression within the EEAS, Europol, the European Commission, and the European Council will further allow for informed decision-making on mitigating practices of transnational repression.

Transnational repression should also be tackled through national and international law. On this basis, targeted sanctions under the EUGHRSR should be imposed on individuals and entities involved in transnational human rights violations. As demonstrated in this paper, transnational repression remains largely unpunished and thus represents a tempting cost-efficient strategy for governments seeking to silence calls for accountability, transparency and human rights from individuals living in exile or in the diaspora.

7.1 Recommendations on current EU policy frameworks related to human rights defenders

Taking into account the input of human rights defenders and civil society groups working in the space of transnational repression, there is a need for the EU to update current policy formulations on human rights defenders to include this increasing problem and its impacts on human rights defenders. In particular:

- Update the EU Human Rights Defenders Guidelines to include transnational repression and its effects on human rights defenders.
- Revise the EU Action Plan on Human Rights and Democracy to include transnational repression and financial support mechanisms for at-risk human rights defenders.
- Extend the mandate of [ProtectDefenders.eu](#) to include human rights defenders targeted with transnational repression inside the EU. The current mandate applies only to human rights defenders outside of the EU.
- Human rights defenders should be enabled to obtain a secure legal status in their host state to reduce their exposure to transnational repression. To achieve this, various options arise, including: amending the EU Visa Code such that human rights defenders in the EU can have their stay within the EU extended by their EU host state where they are the target of transnational repression; expanding the Temporary Relocation Platform to include a focus on human rights defenders targeted with transnational repression; and opening up the EU Temporary Protection to include human rights defenders at risk of transnational repression. Such measures should be harmonised across EU Member States to ensure comprehensive protection across the Union³²³.

³²³ E. Guild, N. Vavoula and V. Apatzidou, [Enhancing the protection of human rights defenders \(HRDs\): Facilitating access to the EU and supporting HRDs from third countries](#), European Parliament's Directorate-General for External Policies of the Union, PE 754.445, January 2024.

7.2 Further recommendations to EU institutions

- The European Commission should formulate an inclusive definition of transnational repression based on the expertise and opinions of regional and international human rights experts and bodies. For this purpose, the Commission should liaise *inter alia* with ongoing initiatives under the G7 framework that aim to establish a definition of transnational repression and formulate responses. In this international context, the EU should support a definition that distinguishes transnational repression from other forms of foreign interference and foregrounds a human rights-centred approach.
- The European Commission should establish a mechanism to collect and document transnational repression incidents, coordinate policy responses and cooperation among EU institutions to address transnational repression and facilitate information exchange on transnational repression within relevant EU institutions, as well as with Member States and civil society.
- The European Commission should extend EU financial support for human rights defenders at risk of transnational repression within existing human rights defender-focused programmes in EU Member States. It should create additional funding for NGOs working on the documentation of transnational repression, awareness raising on transnational repression, together with support and capacity building for targeted communities.
- The European Commission should extend Europol's mandate to include transnational repression and conduct a targeted threat assessment on transnational repression. This step may help with improved information sharing and incident monitoring among Member States' law enforcement agencies and facilitate training on transnational repression.
- Establish stringent regulations and independent oversight to ensure transparency and accountability in the spyware market, in line with the recommendations of the PEGA Committee as adopted by the European Parliament³²⁴. This should include standards for the authorisation, execution and oversight of spyware operations by EU Member States, as well as clear provisions for effective redress.
- Enforce the DSA to ensure that social media platforms comply with their human rights obligations and develop appropriate mechanisms addressing threats of digital transnational repression against human rights defenders.
- Establish and adequately fund a research laboratory for independent research and forensic investigations into evolving digital threats, including the use of spyware and coordinated information manipulation against human rights defenders and other targets in civil society. This laboratory should work with independent experts, academia and civil society while also collaborating and exchanging knowledge with private sector cybersecurity experts and the Computer Emergency Response Team for EU institutions, bodies and agencies and the EU Agency for Cybersecurity. Research and public reporting raise awareness and bring

³²⁴ European Parliament, [European Parliament recommendation of 15 June 2023 to the Council and the Commission following the investigation of alleged contraventions and maladministration in the application of Union law in relation to the use of Pegasus and equivalent surveillance spyware](#), 2023/2500(RSP), P9_TA(2023)0244, 15 June 2023.

transparency into the practices of digital transnational repression perpetrators and their enablers (e.g., spyware companies, hack-for-hire, 'black Public Relations' services and social media platforms).

7.3 Recommendations on EU foreign policy tools to counter transnational repression

- Expand the current EUGHRSR to include transnational repression. The EU and its Member States should consider listing under its Global Human Rights Sanctions Regime and country-specific regimes individuals or entities responsible for devising and implementing serious cases of transnational repression. The EU Global Human Rights Sanctions should be used consistently and without selectivity. The use of targeted sanctions such as denying or revoking visas or asset freezing would play a key role in raising the cost of transnational repression for perpetrators.
- Restrict or suspend financial assistance and aid in bilateral cooperation agreements with states that are engaging in repressive acts abroad and consider transnational repression-related risks when preparing funding, cooperation and partnership agreements with third countries.
- Raise transnational repression in all appropriate forums and diplomatic channels, such as human rights dialogues and bilateral cooperation with states that engage in transnational repression and include public mention of such activity in statements following dialogues. The EU should remind those governments of their obligations under international law as well as regional and international human rights treaties. The EU should further hold regular consultations with civil society actors on the ongoing practice of transnational repression before a Human Rights Dialogue.
- Strengthen the language referring to transnational repression in the next round of Foreign Affairs Council conclusions on EU priorities in the UN Human Rights fora by committing to take action in response to transnational repression and lead future joint initiatives at the UN Human Rights Council. The EEAS should include, in its guidance to responsible members of EU delegations on human rights defenders, practical instructions on how to protect human rights defenders at risk of transnational repression.

7.4 Recommendations to EU Member States

- Following the adoption of a definition of transnational repression at EU level, adopt and codify this definition in domestic legislation. Introduce a comprehensive legal framework to respond to transnational repression.
- Implement a 'whole-of-government' approach, coordinated by one government agency or contact point, to address transnational repression, involving all relevant government agencies (including cybersecurity agencies, law enforcement, migration authorities and foreign ministries). Critically assess how domestic state institutions may be facilitating or cooperating in acts of transnational repression (for example, by undertaking extraditions or deportations of human rights defenders targeted with transnational repression) and take steps to prevent such participation.

- Systematically record cases of transnational repression by establishing a contact point to coordinate data collection and documentation of incidents. Implement accessible reporting procedures (hotlines) and devote resources to engagement with vulnerable exile and diaspora communities. Record incident data to a centralised EU mechanism dedicated to tracking repressive incidents across Member States.
- Establish and finance support mechanisms for human rights defenders at risk of transnational repression, including psychological support, legal advice, digital security training and immigration and asylum support. Provide support and funding for CSOs working on the documentation of transnational repression incidents as well as community-level protection and support mechanisms.
- Provide training on transnational repression methods, impacts and appropriate responses to law enforcement agencies in close cooperation with civil society and independent experts. Ensure that law enforcement agencies recognise transnational repression as a distinct threat to the human rights of exiled and diaspora human rights defenders and comply with their obligations under human rights law to prevent incidents through, for example, developing an extensive 'duty to warn' system.
- Educate immigration officers in consulates and staff within external service providers who handle visa applications about transnational repression. Understanding transnational repression is particularly important for government agencies processing asylum claims, together with those reviewing requests for extradition and other forms of legal cooperation with foreign states.
- Apply rigorous scrutiny to Interpol Notices. Law enforcement and immigration agencies should independently verify Interpol Notices issued by the origin country before using them against designated individuals in EU Member States.
- Facilitate visas for human rights defenders at risk of transnational repression, prioritise fast-tracking asylum for human rights defenders and ensure family reunification. Implement programmes and initiatives that ensure human rights defenders at risk of transnational repression have secure legal status in their EU host states.
- National cybersecurity agencies should actively track digital forms of transnational repression, provide relevant and up-to-date information regarding threats faced by human rights defenders within the EU Member State to the public and offer tailored guidance to communities on how to protect themselves. These agencies need to engage in active information-sharing and coordinate with affected communities to facilitate protection against digital forms of transnational repression.
- Implement recommendations of the PEGA Committee to address the threat of spyware proliferation and abuse.
- Enforce the due diligence obligations outlined in the Directive on corporate sustainability due diligence to ensure that technology companies captured by the directive identify and address potential human rights risks associated with their products.

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