Submission to the Universal Periodic Review of Tajikistan
53rd Session of the UN Universal Periodic Review (UPR)

Joint submission by the International Federation for Human Rights (FIDH) and the World Organisation Against Torture (OMCT), within the framework of the Observatory for the Protection of Human Rights Defenders

A. Introduction

1. This submission was prepared by the **International Federation for Human Rights (FIDH)** and the **World Organisation Against Torture (OMCT)** within the framework of its joint program, **the Observatory for the Protection of Human Rights Defenders**.
2. **The International Federation for Human Rights (FIDH)** is an international human rights organisation federating 196 member organisations from 116 countries. Since its foundation in 1922, FIDH has been defending all civil, political, economic, social, and cultural rights set out in the Universal Declaration of Human Rights (UDHR).
3. **The World Organisation Against Torture (OMCT)** is the largest global network of organisations dedicated to ending torture, combating impunity, and protecting human rights defenders. Working with 200 member organisations in over 90 countries, OMCT provides support to victims and safeguards those at risk. It is part of the European Union's Human Rights Defenders Mechanism (ProtectDefenders.eu) and the United Against Torture Consortium. OMCT also provides a comprehensive and holistic system of support and protection for human rights defenders.
4. Since 1997, FIDH and OMCT work together under a unique partnership, the Observatory for the Protection of Human Rights Defenders.
5. This report examines the Government of Tajikistan's compliance with its international human rights obligations, including under the International Covenant on Civil and Political Rights (ICCPR), with a focus on the situation of human rights defenders (HRDs) and civil society organizations (CSOs) in the country. The submission focuses on that issue in particular, as the defenders living in the country or even in exile cannot speak freely without risking reprisals.

B. Review

6. Tajikistan made significant human rights commitments during its third Universal Periodic Review (UPR) in 2021, notably supporting several recommendations concerning a safe and enabling environment for HRDs.
7. Tajikistan **accepted four** recommendations to strengthen its legal frameworks protecting freedom of expression and association for HRDs (**123.67)**, to foster a safe environment for HRDs free from persecution and harassment, especially for women defenders **(123.138)**, to refrain from imposing restrictions on civil society and HRDs **(123.143)**, and to guarantee HRDs' freedom to exercise their activities without risk of reprisals **(123.163)**.[1]
8. However, Tajikistan **did not accept three critical recommendations** addressing systemic persecution (**123.149**), elimination of restrictive legislation (**123.151**), and ending transnational repression of HRDs (**123.169**), claiming that "there are no cases of persecution for professional or political reasons".
9. Tajikistan's mid-term report on the implementation of recommendations from United Nations member states[2] adopted during the third-cycle Universal Periodic Review contains no information regarding the situation of HRDs.
10. In 2023, in order to implement recommendations from United Nations member states, a Presidential Decree of the Republic of Tajikistan established and approved the National Action Plan for implementing recommendations from United Nations member states in accordance with the Universal Periodic Review procedure (third cycle) for 2023–2026. However, the environment for CSOs and HRDs remained unfavorable throughout 2021–2025, as this period has been characterized by reduced funding, administrative pressure, the forced dissolution of organizations, widespread self-censorship, as well as arbitrary detentions and judicial harassment of HRDs.

C. Criminalization of Human Rights Work

11. Despite Tajikistan's international commitments, the human rights situation in the country, particularly concerning HRDs as well as independent journalists and political dissidents, has deteriorated significantly since 2021. This decline became especially pronounced after the protests and violent crackdown in the Gorno-Badakhshan Autonomous Oblast (GBAO) in 2021–2022, following which dozens of protesters, including HRDs and journalists, were arrested and sentenced to lengthy prison terms,[3] and hundreds of CSOs were dissolved.
12. Repressions and persecution forced many HRDs to leave the country or to reorient their activities. According to the Special Rapporteur on the situation of human rights defenders, following her visit to Tajikistan in 2022, there was limited awareness and

[1] Report of the Working Group on the Universal Periodic Review – Tajikistan, A/HRC/49/12, 6 January 2022, and its Addendum, A/HRC/49/12/Add.1, 29 December 2021.

[2] "Interim Report on the Implementation of Recommendations Made by Member States of the UN Human Rights Council under the Universal Periodic Review of the Republic of Tajikistan (Third Cycle)", available at https://www.ohchr.org/en/hr-bodies/upr/upr-implementation ("Tajikistan, Third Cycle") [in Russian].

[3] International Partnership for Human Rights (IPHR), "Tajikistan: Escalating tensions & crackdown on human rights defenders & journalists", 15 September 2022.

understanding of the role of a human rights defender in the country. The term carries negative connotations, causing some civil society members to distance themselves from public identification as HRDs.[4]

13. There are implicitly taboo topics on which Tajik human rights organizations cannot work without risking criminal prosecution, leading to extensive self-censorship. While not codified in law, there is a clear understanding, based on documented prosecutions, harassment campaigns, and official statements, which issues must be avoided to escape charges such as extremism, terrorism, or treason. These include:

    - Electoral rights;
    - Freedom of religion;
    - The rights of ethnic minorities;
    - Freedom of expression;
    - LGBTQI+ rights.

D. Administrative Pressure on Human Rights Organisations

14. Despite accepting recommendations during previous UPR cycles to strengthen civil society space, Tajikistan continues to pressure and restrict non-governmental organizations.
15. In Tajikistan, CSOs are operated as public associations and, in some cases, as public foundations. A draft law on non-profit organizations has been under development for several years, however, there has been no recent information about its progress. The Ministry of Justice has announced plans for broad consultations with CSOs once the draft is completed; however, the development process has been suspended, and CSOs have not received recent invitations to participate. The lack of transparency regarding the law's content and timeline for its completion remains a concern.
16. The Law “On Public Associations”[5] imposes more complex registration procedures on these organizations than on other types of entities. Requirements such as mandatory re-registration when changing a legal address significantly complicate NGO operations, as organizations often need to relocate. In practice, re-registration is difficult, with authorities frequently delaying the process on various procedural obstacles that are not applied to commercial entities. The Tajik Tax Code[6] does not reflect the non-profit nature of these organizations, offering no distinction or tax benefits compared to commercial actors.
17. The legal grounds for suspending or dissolving public associations are vaguely defined, leaving broad discretion to the authorities. There is also no clear list of oversight bodies or unified procedures for inspections, apart from general rules applied by the Ministry of Justice. Any activities of public associations (including educational and other events) must be coordinated with and approved by local authorities (*khukumats*).

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[4] UN Special Rapporteur on the Situation of Human Rights Defenders, Report of the Visit to Tajikistan, A/HRC/55/50/Add.1, 16 January 2024, para. 40.

[5] OSCE/ODIHR Database of Legal Reviews and Legislation “Legislationline”, "Law of the Republic of Tajikistan 'On Public Associations”, 2007.

[6] Committee on Taxes of the Republic of Tajikistan (Кумитаи андоз), "Tax Code of the Republic of Tajikistan" (Кодекси молиявии Ҷумҳурии Таджикистон), 2025.

18. Although Tajikistan does not have a "foreign agents" law, NGOs are required to report all received grants within ten days to the authorities, with no option for electronic submission. Failure to comply may result in heavy fines or even liquidation of an organisation. This requirement is particularly burdensome for organizations in remote regions. Public associations are frequently subjected to inspections, often initiated at the request of security agencies, with oversight bodies exceeding their mandates and focusing on identifying and prosecuting violations rather than ensuring compliance.
19. Thus, between May 2022 and August 2023, over 700 organizations have been dissolved.[7] Many organizations were forced to close following the 2021–2022 protests in the GBAO. Of approximately 300 registered CSOs that existed in early 2022 in the GBAO, only around 10 percent remained operational in 2024.[8]
20. While some closures were technically voluntary, numerous NGOs reported being pressured or coerced into dissolving by authorities who summoned their directors to the Ministry of Justice or local officials, threatening to shut them down if they did not self-dissolve.[9] Many founders and staff of these organizations were forced to leave the country under threat of criminal prosecution.
21. Thus, in 2022, Lawyer Association of Pamir (LAP) was liquidated without court review or legal justification. The organization was simply notified by the Ministry of Justice that it had been closed. LAP was one of the few CSOs in GBAO working to promote human rights and fundamental freedoms.[10]
22. In 2023, Tajikistan's Ministry of Justice liquidated the Independent Center for Human Rights Protection (ICHRP), an organization that provided legal assistance and support to victims of forced evictions and other vulnerable groups such as journalists and victims of torture.[11] While the government claimed the organization failed to submit timely financial statements and lacked regional branches, international human rights organizations disputed these justifications, arguing that the allegations did not justify the closure of ICHRP.[12]

E. Arbitrary Detentions and Judicial Harassment of HRDs

23. The persecution of HRDs, journalists, and civil society activists also escalated dramatically. Following peaceful protests in GBAO in November 2021 and May 2022, Tajikistan initiated an unprecedented crackdown on the Pamiri ethnic group, focusing on HRDs and civil society actors.
24. HRDs, journalists, and representatives of the Pamiri minority have been subjected to arbitrary detention.[13] At least five HRDs were arrested and sentenced to prison terms

[7] UN Office of the High Commissioner for Human Rights (OHCHR), "Tajikistan: UN Expert Criticises Dissolution of 700 NGOs", 8 March 2024.
[8] Ibid.
[9] Ibid.
[10] International Partnership for Human Rights, "Tajikistan: Continuous crackdown on civil society", 14 March 2023.
[11] International Partnership for Human Rights and World Organisation Against Torture, "Tajikistan: well-known human rights NGO liquidated by court order", 16 March 2023.
[12] Ibid.
[13] International Federation for Human Rights and World Organisation Against Torture, "Tajikistan: Arbitrary detention of human rights defender Ulfathonim Mamadshoeva and attack on four journalists", 31 May 2022.

ranging from 10 to 30 years.[14] Those detained were subjected to ill-treatment and torture.[15] The trials were held in closed sessions and violated fair trial standards. Several defense lawyers refused to represent HRDs and civil activists involved in cases related to the GBAO events, citing harassment and threats against legal professionals working on such matters.[16]

25. In 2021, lawyers, HRDs, and activists established **"Commission 44"** in GBAO to investigate police brutality from November 2021 that resulted in one civilian death and injuries. The Commission repeatedly criticized government authorities for lack of transparency during its investigation. In May 2022, at least 13 members of "Commission 44", including prominent HRDs and lawyers, were arbitrarily detained and charged with "participation in a criminal association" (Article 187, Part 2 of the Criminal Code), facing 16 to 30 years of imprisonment.[17] In particular, Manuchehr Kholiknazarov, Director of the Lawyer Association of Pamir and a co-founder of “Commission 44”, was sentenced to 16 years of imprisonment in a strict regime penal colony.[18]
26. Following renewed demonstrations in May 2022, the Tajik government reportedly killed approximately 40 Pamiris and arbitrarily detained 205 activists. In a globally unprecedented transnational repression, over 20 Pamiri activists have been forcibly returned from Russia to Tajikistan and given lengthy sentences. Internet access in the GBAO was cut off for more than 100 days. In 2022 and 2023, some 50,000 (or 25% of the population) Pamiri residents of GBAO fled the region. At least four Pamiri activists died in prison in 2025.[19]
27. Another concerning issue is the situation of women HRDs, who comprise the majority of human rights professionals in the country. They face specific forms of discrimination and harassment, including gender-specific cyberattacks and online bullying.
28. Among the HRDs unlawfully detained and convicted from GBAO is Ulfathonim Mamadshoeva, a woman HRD, founder of NGO Nomus VaInsof, representative of the Pamiri minority group and a journalist. Arrested in May 2022, she was charged for “public calls for violent change of constitutional order” and sentenced to 21 years in prison on 9 December 2022. Reports indicate she was ill-treated and tortured to extract confessions.[20]

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[14] World Organisation Against Torture, "Tajikistan: UN Experts Urge Unconditional Release of Arbitrarily Detained Pamiri Human Rights Defenders", 12 July 2024); UN Office of the High Commissioner for Human Rights (OHCHR), "Tajikistan: UN Expert Fears Crackdown Against Pamiri Minority Could Spiral", 20 May 2022.

[15] UN Office of the High Commissioner for Human Rights (OHCHR), "Tajikistan: UN Experts Deplore Criminal Proceedings Against Human Rights Defenders", 4 July 2023.

[16] Ibid.; see also UN Working Group on Arbitrary Detention, Opinion No. 18/2024 concerning Ulfatkhonim Mamadshoeva and Sorbon Yunoev (Tajikistan), A/HRC/WGAD/2024/18, 5 June 2024; Opinion No. 19/2024 concerning Faromuz Irgashov, Khursandsho Mamadshoev and Manuchehr Kholiknazarov (Tajikistan), A/HRC/WGAD/2024/19, 4 June 2024.

[17] International Federation for Human Rights and World Organisation Against Torture, "Tajikistan: Arbitrary Detention of lawyers Manuchehr Kholiknazarov, Faromuz Irgashov and Khursand Mamadshoev", 15 June 2022.

[18] International Federation for Human Rights and World Organisation Against Torture, “Tajikistan: Human rights defender Manuchehr Kholiknazarov must be immediately released”, 3 April 2023.

[19] International Federation for Human Rights (FIDH) and World Organisation Against Torture, “Tajikistan: End systematic repression of Pamiri People”, 4 August 2025.

[20] International Federation for Human Rights and World Organisation Against Torture, "Tajikistan: Arbitrary Detention of lawyers Manuchehr Kholiknazarov, Faromuz Irgashov and Khursand Mamadshoev", *supra* note 17; UN Working Group on Arbitrary Detention, Opinion No. 18/2024 concerning Ulfatkhonim Mamadshoeva and Sorbon Yunoev (Tajikistan), *supra* note 16.

29. Rukhshona Khakimova was convicted of high treason on 5 February 2025 and sentenced to eight years of imprisonment based on her professional work conducting a politically sensitive poll about China's influence in Tajikistan. Her prosecution is characterized by serious procedural irregularities, including proceedings held behind closed doors, and the denial of contact with her young children, including an infant who was still breastfeeding at the time of her arrest.[21]
30. The UN Special Rapporteur on the situation of HRDs was denied access to GBAO and was prevented from visiting detainees or investigating detention conditions during her visit to Tajikistan in 2022.[22]

F. Conclusions

31. The human rights situation in Tajikistan remains a matter of serious concern. Despite its commitments to strengthen legal frameworks protecting freedom of expression and association for HRDs, to foster a safe environment free from persecution and harassment, to refrain from restricting civil society, and to ensure that defenders can operate without fear of reprisals, the government continues to shut down NGOs, persecute HRDs, and force them to cease their activities or leave the country. Many remain unjustly imprisoned on politically motivated charges, creating a chilling effect for other activists.

G. Recommendations

32. In light of the above, FIDH and OMCT call on States to recommend to the government of Tajikistan to:

- Repeal or amend legislation on non-governmental organizations that is inconsistent with international standards on freedom of association, in order to bring it fully into line with Tajikistan's international human rights obligations;
- Ensure a safe and enabling environment for all human rights defenders, guaranteeing in all circumstances their physical integrity and psychological well-being, and their ability to carry out their legitimate work free from intimidation, harassment, reprisals or undue restrictions;
- Ensure full respect for fair trial proceedings and due process;
- Immediately and unconditionally release those detained or prosecuted solely for carrying out their legitimate human rights work or exercising their fundamental freedom;
- Take effective measures to eliminate all forms of discrimination against HRDs, particularly women HRDs and defenders belonging to groups exposed to heightened risk of marginalisation;
- End all forms of transnational repression against HRDs;
- Respect, protect and fulfil in all circumstances the rights to freedom of expression, peaceful assembly and association in Tajikistan, as enshrined in

[21] International Federation for Human Rights (FIDH) and World Organisation Against Torture (OMCT), "Tajikistan: Criminalisation and arbitrary detention of journalist Ruhshona Khakimova", 3 March 2025.
[22] UN Special Rapporteur on the situation of human rights defenders, Report of the Visit to Tajikistan, *supra* note 4, para. 48.

international human rights law and particularly in Articles 19, 21 and 22 of the International Covenant on Civil and Political Rights.