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Fighting back against transnational repression

Report¹

Committee on Legal Affairs and Human Rights

Rapporteur: Mr Constantinos EFSTATHIOU, Cyprus, Socialists, Democrats and Greens Group

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1. Reference to Committee: [Doc. 16017](#), Reference 4829 of 30 September 2024.



A. Draft resolution²

1. The plight of exiled political dissidents, journalists and human rights defenders does not end once they have escaped from the oppressive systems of their home States. As instances of foreign interference have increased in frequency and severity, authoritarian regimes have found new ways to subjugate their opponents beyond their borders. Such cases of transnational repression, whether involving the use of violence or the misuse of legitimate international co-operation tools, violate the rule of law and State sovereignty, infringe the human rights of the individuals targeted and pose a serious threat to national security.
2. The seriousness of the issue of transnational repression is clearly illustrated by Freedom House, one of the most prominent United States-based non-governmental organisations, which has documented 1 375 instances of physical transnational repression, since 2014, perpetrated by 54 origin States, affecting 107 host States. Among the top ten perpetrators of physical transnational repression, Freedom House lists China, Türkiye, the Russian Federation, Tajikistan, Egypt, Turkmenistan, Cambodia, Uzbekistan, Iran and Belarus.
3. The Parliamentary Assembly condemns all forms of transnational repression. It reiterates that acts of transnational repression perpetrated by member States and those that occur or have effects in their territories undermine the values and principles of the Council of Europe and are incompatible with the European Convention on Human Rights (ETS No. 5).
4. Due to the lack of a tailored legal framework, including the absence of a common definition of transnational repression, many cases remain unidentified, and the true scale of this phenomenon may be even greater. Despite attempts to define the term in various domestic legal instruments and by civil society organisations, no universally agreed definition currently exists.
5. Consequently, the Assembly holds that the term “transnational repression” should be understood as a form of foreign interference by a State, its organs, proxies and/or persons whose actions can be attributed to that State, employed to intimidate, silence, harass, coerce, abduct, harm or kill individuals beyond the State’s borders, including political dissidents, activists, human rights defenders, journalists, political opponents, religious and ethnic minority groups, academics, members of diaspora and exile communities and/or their relatives, regardless of their nationality. Transnational repression methods involve, but are not limited to:
 - 5.1. murder, the threat or use of violence;
 - 5.2. unlawful rendition and/or abduction;
 - 5.3. unlawful electronic or in-person surveillance;
 - 5.4. harassment or unlawful detention of family members in the origin State;
 - 5.5. misuse of legitimate international legal co-operation mechanisms, such as the INTERPOL notice system, extradition requests, mutual legal assistance frameworks and anti-money laundering and counter-terrorist financing measures;
 - 5.6. doxing (publicly and unlawfully disclosing personally identifiable information about an individual or organisation with the intention of harassing or causing distress) and the release of sensitive personal information;
 - 5.7. unwarranted designation as a terrorist or extremist;
 - 5.8. mobility restrictions, including through passport cancellation and denial of consular services;
 - 5.9. recourse to strategic lawsuits against public participation (SLAPPs).
6. The Assembly considers that, under certain circumstances, victims of transnational repression who are detained pursuant to an abusive INTERPOL Red Notice or extradition request may fulfil the criteria for a political prisoner, as listed in [Resolution 1900 \(2012\)](#) “The definition of political prisoner”. Accordingly, States which refuse to consider the political motivation behind such requests should be regarded as facilitators of transnational repression, thus sharing the responsibility for the human rights violations committed against its victims. The Assembly reminds member States that mutual legal assistance under international treaties and co-operation mechanisms should be carried out in full compliance with international human rights law, including their obligations under the European Convention on Human Rights, which transcend national

2. Draft resolution adopted by the committee on 26 May 2026.

borders. Member States should therefore pay particular attention to specific and credible allegations of transnational repression and political persecution when examining international co-operation requests, especially those that could result in an individual's arrest and detention.

7. The Assembly is further concerned by repeated allegations that anti-money laundering and anti-corruption measures are being misused for the purpose of transnational repression. It calls on national law enforcement authorities to ensure that any such proceedings respect the right to a fair trial and the presumption of innocence, in accordance with Article 6 of the European Convention on Human Rights.

8. The Assembly welcomes the fact that, since the adoption of its [Resolution 2509 \(2023\)](#) "Transnational repression as a growing threat to the rule of law and human rights", attempts to combat transnational repression have been undertaken through several international and domestic initiatives. In particular, during the 2025 G7 Summit in Canada, leaders committed to countering the threat of transnational repression by fostering a common understanding of the phenomenon, raising awareness and promoting accountability. The European Parliament adopted a resolution on addressing transnational repression of human rights defenders, and several domestic legislative or other measures were taken by States such as France, Germany, the Netherlands, Switzerland, the United Kingdom, Canada and the United States of America.

9. The Assembly believes that only a co-ordinated international response can adequately counter the threat to national security, human rights and the rule of law posed by transnational repression. The Council of Europe possesses both the necessary expertise and the international outreach to lead these efforts.

10. Reiterating its support for the Secretary General's initiative to establish a New Democratic Pact for Europe, the Assembly believes that properly addressing the phenomenon of transnational repression will increase European democratic security and strengthen the international rules-based order, including through co-operation between member and observer States.

11. Accordingly, the Assembly calls on all member and observer States as well as States whose parliament enjoy observer or partner for democracy status with the Assembly, to:

- 11.1. enact legislation or introduce other equivalent instruments aimed at preventing and combating transnational repression, including through the criminalisation of its methods and adoption of a definition of transnational repression;
- 11.2. prosecute perpetrators of transnational repression to the fullest extent of the law;
- 11.3. treat transnational repression as an aggravating factor when prosecuting crimes committed within its context;
- 11.4. apply targeted sanctions against foreign officials, individuals and entities involved in acts of transnational repression, using Magnitsky-type legislation or similar instruments;
- 11.5. apply all available legal measures against foreign diplomats, consuls and other foreign officials involved in transnational repression, including by declaring them *personae non gratae* and imposing visa restrictions upon them;
- 11.6. designate a relevant domestic focal point responsible for shaping and co-ordinating State policy to counter transnational repression, including through monitoring, awareness raising, community outreach, regular reporting and international co-operation;
- 11.7. set up dedicated reporting avenues, allowing victims of transnational repression to alert relevant authorities, and ensuring staffing by adequately trained officials, appropriate follow-up and sufficient resources;
- 11.8. create training programmes for law enforcement authorities focused on preventing, identifying, investigating and responding to transnational repression;
- 11.9. make available accessible resources for vulnerable groups and possible targets of transnational repression, providing information on its potential forms, reporting avenues and support, in relevant languages and subject to regular review and update;
- 11.10. establish outreach programmes aimed at building trust and effective co-operation with communities exposed to the risk of transnational repression, such as diaspora groups, political dissidents, exiled journalists and human rights defenders;
- 11.11. work closely with like-minded countries, affected communities and civil society actors in shaping transnational repression prevention and response mechanisms;

11.12. regularly exchange information on transnational repression trends, both bilaterally and within multilateral fora, including the Council of Europe, the European Union, North Atlantic Treaty Organization (NATO), Organization for Security and Cooperation in Europe (OSCE) and the United Nations;

11.13. co-ordinate efforts aimed at increasing the level of transparency within INTERPOL, in particular by championing reforms enabling the disclosure of information on identified attempts to misuse the INTERPOL notice system and the publication of decisions of the Commission for the Control of INTERPOL's Files;

11.14. regularly inform INTERPOL about the outcomes of domestic extradition proceedings, especially in cases concluding with a refusal to extradite the individual sought;

11.15. increase funding for the INTERPOL bodies responsible for preventing the misuse of its system, including the Notices and Diffusions Task Force and the Commission for the Control of INTERPOL's Files;

11.16. take into account States' transnational repression records when considering extradition requests and other forms of mutual legal assistance;

11.17. consider introducing mechanisms to facilitate the issuance of relevant identity and/or travel documents for victims of transnational repression who are affected by mobility restrictions and are legally resident within the territory of the State concerned. This would apply to cases where the State of origin refuses to issue or renew such documents in order to coerce these individuals into returning to their homeland where they would risk being subjected to further politically motivated persecution;

11.18. enable easier access to courts and introduce effective legal remedies for victims of transnational repression, including those who are denied access to financial or digital services based on an abusive designation as a terrorist or extremist, and proactively monitor the credibility of such foreign designations;

11.19. investigate possible transnational repression angles when processing asylum applications, particularly in cases involving individuals seeking refuge from States known for misusing counter-terrorist tools against political opponents.

12. Referring to the European Parliament resolution of 13 November 2025 on addressing transnational repression of human rights defenders, the Assembly calls on the European Union and the European External Action Service to integrate measures aimed at combating all forms of transnational repression in their sanctions regimes, human rights protection clauses (such as in trade agreements or other instruments), external policy and dialogue.

13. The Assembly further calls on the Financial Action Task Force (FATF) and the Committee of Experts on the Evaluation of Anti-Money Laundering Measures and the Financing of Terrorism (MONEYVAL) to treat the misuse of FATF recommendations and anti-money laundering and counter-terrorist financing methods for the purpose of transnational repression as grounds for finding a State to be non-compliant with these recommendations and subject to grey listing.

14. The Assembly invites the European Court of Human Rights to consider instructing respondent States, when indicating interim measures or adopting judgments in removal cases bearing signs of possible transnational repression, to inform INTERPOL about such decisions and personal details of the applicant, in order to prevent a possible future misuse of its system.

15. The Assembly calls on its General Rapporteur for political prisoners and its General Rapporteur on the situation of human rights defenders and whistleblowers to pay particular attention to cases of transnational repression when carrying out their respective mandates.

B. Draft recommendation³

1. Referring to its Resolution ... (2026) “Fighting back against transnational repression”, the Parliamentary Assembly notes the grave threat posed by tactics employed by authoritarian regimes beyond their borders to repress political opponents and silence dissent. Regardless of the method used, such practices violate State sovereignty, democratic and national security, as well as the human rights of the individuals targeted. In order to combat this intensifying phenomenon adequately, the Council of Europe should lead international efforts to offer a co-ordinated response, based on the best practices of its member and observer States, while also taking the input of civil society into account. Accordingly, the Assembly recommends that the Committee of Ministers:

- 1.1. as a matter of priority, consider drawing up a recommendation to member States on preventing and punishing transnational repression, taking into account best practices from member and observer States. Such a recommendation should include a definition of transnational repression and set out minimum legislative and other measures to equip member States with effective tools to curb this phenomenon and protect its victims;
- 1.2. instruct the European Committee on Crime Problems to examine the feasibility of criminalising transnational repression as a distinct offence;
- 1.3. consider the most appropriate forum within the Council of Europe to facilitate regular exchanges of information regarding cases of transnational repression as well as to enable member and observer States to share and promote best practices in fighting back against this phenomenon;
- 1.4. regularly organise a thematic discussion on transnational repression in Europe;
- 1.5. consider introducing dissuasive measures to sanction States Parties to the Council of Europe conventions on extradition, mutual legal assistance and similar instruments, where these instruments are misused for the purpose of carrying out transnational repression.

3. Draft recommendation adopted by the committee on 26 May 2026.

C. Explanatory memorandum by Mr Constantinou Efstathiou, rapporteur⁴

1. Introduction

1. In 2006, a former Russian Federal Security Service (FSB) officer and defector, Alexander Litvinenko, was poisoned with polonium in London and subsequently died. In its judgment in the case of *Carter v. Russia*,⁵ the European Court of Human Rights found that the Russian Federation was responsible for his death. This is perhaps the best-known example of transnational repression together with the assassination of Saudi dissident journalist Jamal Khashoggi, who was murdered and dismembered by Saudi agents inside the Saudi consulate in Istanbul, in October 2018.⁶ Unfortunately, there are many more similar examples. Extraterritorial persecution of political opponents, dissidents, journalists, and human rights defenders has become a routine tactic for authoritarian regimes. Their methods have also become increasingly sophisticated. While “classic” transnational repression methods – that is, those involving the threat or use of violence – still remain prevalent, authoritarian States continue to find new ways to spread fear and repress their critics, typically through the misuse of lawful international co-operation tools.

2. The present report is not intended to be an exhaustive documentation of all instances or forms of transnational repression. Although some cases described herein concern particular individuals or States, my main goal is to identify trends, key legislative and policy gaps, as well as best practices in countering transnational repression, building upon the Assembly’s past work on this subject, namely [Resolution 2509 \(2023\)](#). I believe that democratic States should work more closely with one another in responding to transnational repression, including through co-ordinated actions at both the bilateral and multilateral levels.

3. During the preparation of this report, the committee held a hearing with the participation of experts: Mr Alex Tinsley, a barrister at Doughty Street Chambers and member of Lawyers Against Transnational Repression; Mr Stephen Reimer, Associate Fellow at the Royal United Services Institute and Adjunct Professor at the Paris School of International Affairs, Sciences Po Paris; and Dr Shaipira Furstenberg, an independent consultant. I am grateful for their valuable contributions.

4. I also conducted two fact-finding visits. In March 2026, I visited INTERPOL Headquarters in Lyon, France, where I had the pleasure of meeting with the Notices and Diffusions Task Force and the Secretariat of the Commission for the Control of INTERPOL’s Files. It was a highly productive meeting, conducted in the spirit of mutual understanding, which enabled me to learn more about the factors that allow some States to attempt to misuse the INTERPOL system. In May 2026, I visited Washington, D.C., where I discussed possible responses to transnational repression with representatives of the US Department of State, the New Lines Institute for Strategy and Policy, the National Endowment for Democracy, the Free Russia Foundation, and Freedom House. I am grateful to the Government of the United States of America for its invitation and assistance. I also recommend excellent recent reports published by the New Lines Institute⁷ and Freedom House,⁸ which inspired many of my proposals and constitute a valuable resource for creating policy responses to transnational repression.

2. Recent practices and cases of transnational repression in Europe

5. As of April 2026, Freedom House, a renowned American non-governmental organisation focusing on the promotion of democracy, political freedom, and human rights, reported 1,375 cases of transnational repression perpetrated since 2014, by 54 governments in 107 States.⁹ According to Freedom House, the most prolific perpetrator of transnational repression is the Government of China, followed by Türkiye, Russia, Tajikistan, Egypt and Turkmenistan. This latest data demonstrates a significant increase in cases compared to April 2023, when Freedom House reported 854 cases.¹⁰ In the following chapters I will present some recent examples of transnational repression.

4. This explanatory memorandum is drawn up under the responsibility of the rapporteur.

5. *Carter v. Russia*, no. 20914/07, 21 September 2021.

6. [French judge probes MBS over Khashoggi killing](#).

7. Ted R. Bromund, *How does the Abuse of Interpol Contributes to Transnational Repression*, New Lines Institute for Strategy and Policy, 14 July 2025, available at: <https://newlinesinstitute.org/intl-law-peace/how-the-abuse-of-interpol-contributes-to-transnational-repression/>.

8. Grady Vaughan, Yana Gorokhovskaia, *Collaboration and Resistance: Tracking Transnational Repression in 2025*, Freedom House, February 2026, available at: <https://freedomhouse.org/report/special-report/2026/collaboration-and-resistance-tracking-transnational-repression-2025>.

9. <https://freedomhouse.org/report/special-report/2026/collaboration-and-resistance-tracking-transnational-repression-2025>.

2.1. The power of fear – transnational repression through harassment and the threat or use of violence

2.1.1. The Russian Federation

6. In Chechnya (Russian Federation), there is a long-standing record of violent repression, often resorting to collective punishment, torture and targeting of the families of perceived opponents of Ramzan Kadyrov.

7. In December 2021, some fifty relatives of activists and human rights defenders living abroad, including those of Tumsu Abdurakhmanov, an opposition blogger residing in Sweden, were abducted in Chechnya.¹¹ On 23 December 2021, Mr Abdurakhmanov published a screenshot of an anonymous message threatening violence against his kidnapped family members unless he apologised to Ramzan Kadyrov and stopped publicly criticising the Chechen regime. The message was sent from a WhatsApp account with a profile picture of a young man in a black uniform bearing a SOBR (Chechnya's Special Rapid Response Unit) patch, standing in front of a poster of Akhmat Kadyrov, Ramzan Kadyrov's father.¹²

8. Khasan Khalitov, another Chechen human rights defender based in Türkiye, informed that his relatives, including his sister and brother-in-law, were also abducted around the same time as those of Mr Abdurakhmanov.¹³ In June 2023, his father and two brothers were arbitrarily detained and reportedly disappeared by the Chechen authorities.¹⁴ These abductions align with a persistent pattern of collective punishment, in which the Chechen leadership targets entire families, including distant relatives, to punish dissent of a single person.

9. In January 2022, Zarema Musayeva, wife of a former Chechen Supreme Court judge and mother of a prominent lawyer associated with the Committee for the Prevention of Torture (an NGO which has recently been renamed the Crew Against Torture), Abubakar Yangulbaev, was forcibly removed from her home in Nizhniy Novgorod by a group of police officers – claiming to be from Chechnya – and taken 2,000 km away to Grozny. High-ranking Chechen officials, including Mr Kadyrov, had publicly threatened Ms Musayeva and her family, proposing to "hunt them down" and "cut their heads off". In a recent judgment, the European Court of Human Rights held that Ms Musayeva's arrest and detention had been arbitrary and intended as retaliation against her family, who were involved in human rights work and opposition activities in Chechnya. Consequently, the Court found that the Russian Federation had violated Article 18 in conjunction with Article 5 of the European Convention on Human Rights (ETS No. 5).¹⁵ While this case technically occurred within the Russian Federation, the involvement of local Chechen officials travelling far beyond the boundaries of Chechnya justifies, in my view, its inclusion in this report.

10. On 13 February 2024, Maxim Kuzminov, a Russian military pilot who in 2023 escaped to Ukraine in a Russian Mi-8 helicopter, delivering the aircraft and sensitive military equipment to Ukrainian forces, was found dead in Villajoyosa, Spain. Following his defection, Mr Kuzminov became a vocal critic of Russia's full-scale invasion of Ukraine, stating that he opposed the war and did not want to be complicit in what he described as a genocide against the Ukrainian people.¹⁶ His body was discovered in a parking garage, bearing multiple gunshot wounds. Spanish intelligence services believed Mr Kuzminov's assassination to be a targeted killing ordered by Russian intelligence.¹⁷

11. In March 2024, Leonid Volkov, a key aide to the late Russian opposition leader Alexei Navalny, was attacked with a hammer outside his home in Vilnius. Mr Volkov was briefly hospitalised for a broken arm and trauma to his head. Throughout 2024, eight suspects were identified by Polish prosecutors, including six Poles, one Belarusian and one Russian. The latter is believed to be the attack's mastermind, which investigators believed was motivated by Mr Volkov's opposition work.¹⁸

10. <https://freedomhouse.org/article/ten-findings-ten-years-data-transnational-repression>.

11. www.rferl.org/a/russia-abductions-chechnya-rights-relative/31626705.html.

12. <https://meduza.io/en/feature/2021/12/30/nobody-canceled-blood-feuds>.

13. <https://oc-media.org/dozens-of-relatives-of-government-critics-reportedly-kidnapped-in-chechnya/>.

14. www.hrw.org/world-report/2025/country-chapters/russia.

15. *Zarema Musayeva and Others v. Russia*, no. 4573/22, 28 May 2024.

16. www.cbsnews.com/news/russian-defector-maxim-kuzminov-killing-60-minutes/.

17. <https://elpais.com/espana/2024-02-22/pistoleros-enviados-por-moscu-mataron-al-desertor-refugiado-en-alicante-segun-los-servicios-de-inteligencia-espanoles.html>.

18. www.gov.pl/web/prokuratura-krajowa/informacja-o-sledztwie-dotyczacym-pobicia-rosyjskiego-opozycjonisty-leonida-w; PACE rapporteur condemns attack against Leonid Volkov and calls for the protection of Russian dissidents.

12. Russian indigenous activists are also subjected to transnational repression. Pavel Sulyandziga, a member of the Udege people, obtained political asylum in the United States in 2017 due to threats and persecution by the Russian FSB. Despite relocating to Maine with his family, the Russian Government continues to harass him through pressing criminal charges and targeting his remaining family members in Russia.¹⁹

13. In 2023, Natalia Arno, President of the Free Russia Foundation and currently a member of the Assembly's Platform for Dialogue with Russian Democratic Forces, was poisoned while on a trip to Berlin and Prague, presumably by Russian intelligence services using a nerve agent similar to that previously used against another Russian dissident and former political prisoner, Vladimir Kara-Murza.²⁰

14. On 3 March 2025, the Russian Prosecutor General decided to label ALDE, one of five political groups in the Assembly, as an "undesirable" organisation.²¹ Russian citizens who participate in the activities of an "undesirable" organisation face fines and potential imprisonment of up to six years. Even sharing hyperlinks or co-operating with such organisations can lead to legal consequences.²²

2.1.2. Belarus

15. The Belarusian regime also employs various measures, both within Belarus and extraterritorially, to pressure, intimidate, and repress exiled dissidents. These tactics include actions targeting the families, loved ones, and business partners of those who have left and include opening criminal investigations, holding trials in absentia, expropriating property in Belarus and expelling some released political prisoners without any documents. On 31 January 2022, the police detained Anatol Latushka, a cousin of a prominent opposition figure in exile and member of the delegation of Democratic Belarusian Forces, Pavel Latushka, and reportedly tortured him to extract information. Anatol Latushka was later sentenced to six years in prison on politically motivated charges. Similarly, relatives of Belarusian volunteers supporting Ukraine in its defence against Russian aggression faced imprisonment on trumped-up charges.²³

16. Belarusian authorities have a history of publicly threatening activists abroad with passport cancellations, arrests, kidnappings, and forced repatriation. In 2021, Aleh Haidukevich, Deputy Chairman of the Standing Committee on International Affairs in the House of Representatives of the National Assembly of Belarus, stated that dissidents could be detained in other countries and returned to Belarus "in the trunk".²⁴ On 25 April 2024, at the National Assembly of Belarus, Lukashenko warned that those opposing the regime could endanger their relatives in Belarus, escalating fear among critics in exile.²⁵

17. The Lukashenko regime has also intensified its use of surveillance technology to monitor and punish dissenters abroad. Reports indicate that emigrants began receiving electronic messages from security forces in April 2024, with officers extracting information from private chats. One such message came from a Telegram account linked to the General Directorate for Combating Organised Crime and Corruption (GUBOPiK), warning a dissident to remove comments from chat rooms if he intended to return. Another individual reported receiving threats about potential harm in exile, illustrating the regime's willingness to extend its reach beyond Belarusian borders.²⁶

2.1.3. China

18. There are also disturbing reports of intimidation and surveillance by the Chinese authorities of Chinese students studying in Europe and the US. Amnesty International found that the Chinese authorities created a climate of fear which has had a chilling effect on the exercise of the rights to freedom of expression, association and peaceful assembly. This has been done by harassing Chinese students abroad or their family members in China, taking photographs of the students at protests abroad or tracking their social media activities.²⁷

19.

20. www.france24.com/en/live-news/20231003-organs-failing-russian-activist-s-poisoning-ordeal.

21. www.aldeparty.eu/blog/news-11/joint-alde-party-lymec-statement-on-designation-as-undesirable-in-russia-139.

22. www.after-russia.org/en/explained/russian-undesirable-organisation-law.

23. https://isans.org/wp-content/uploads/2024/06/transnational_repression_belarus_isans_10.06.2024.pdf.

24. Council Decision (CFSP) 2025/385 of 24 February 2025 amending Decision 2012/642/CFSP concerning restrictive measures in view of the situation in Belarus and the involvement of Belarus in the Russian aggression against Ukraine.

25. Lukashenko Says Dozens Of Russian Nukes Deployed in Belarus.

26. Transnational repression in Belarus: A multifaceted instrument to silence the dissent – iSANS.

27. Amnesty International, "On my campus, I am afraid: China's targeting of overseas students stifles rights", 2024; see also www.ft.com/content/f219a89f-dd11-41a3-bc96-998e2a9deae6 and

19. In February 2024, the Swiss Government adopted a report on the situation of Tibetans and Uyghurs living in Switzerland, also addressing the issue of transnational repression. Tibetan and Uyghur activists encounter malware infections, hacking attempts, blocked social media accounts and disrupted websites aimed at obtaining personal data and hindering their activities. Individuals report being followed, photographed, and monitored during political gatherings and everyday activities such as visiting cafes or shops. Attempts to recruit diaspora members as informants are made through threats to their families in China or promises of economic benefits if they co-operate. Activists receive intimidating phone calls, often at unusual hours, along with messages showing images of injured people to scare them into ceasing their criticism of the Chinese Government. Political activities can lead to visa denials, with the Chinese authorities potentially requiring co-operation and spying as conditions for issuing a visa. Pressure is applied on families in China through threats of arrest, house searches, and other forms of harassment if family members abroad engage in political activities. An incident in Basel involved Chinese diplomats forcefully disrupting a Tibetan protest, with physical confrontations reported. The government noted that both federal technical universities (ETH Zurich and EPFL) are aware that foreign intelligence services are monitoring certain students and researchers.²⁸

20. The so-called Chinese “informal police stations” also deserve mention as possible conduits for carrying out acts of transnational repression. In 2022, Dutch media obtained evidence indicating that the “overseas service stations”, which promise to provide diplomatic services to Chinese travellers, are being used to repress Chinese dissidents in Europe. According to the Spain-based NGO Safeguard Defenders, the public security bureaus from two Chinese provinces had established 54 “overseas police service centres” across five continents and 21 countries, including in Europe.²⁹ According to Safeguard Defenders, tackling transnational crime and providing assistance to Chinese citizens abroad serve as a cover to threaten critics of the Chinese Government and coerce them into returning to China.

21. In October 2022, a violent altercation broke out during a pro-democracy protest outside the Chinese Consulate in Manchester, United Kingdom. Video footage captured several men from the consulate tearing down banners before dragging a peaceful protester, Bob Chan, inside the gates and assaulting him. The Chinese Consul-General, Zheng Xiyuan, later admitted on camera to being involved, claiming it was his “duty” to respond to insults against his country’s leader. The incident sparked a diplomatic dispute, leading the UK Government to demand that the officials involved have their immunity lifted for police questioning. Instead of complying, the Chinese Government recalled six diplomats, including the Consul-General, effectively removing them from the country and thus avoiding criminal prosecution.³⁰

22. On 7 May 2026, a court in London convicted two men, including a UK immigration officer, of spying on behalf of China, targeting prominent Hong Kong’s pro-democracy dissidents living in Britain.³¹

2.1.4. Iran

23. Since the Islamic revolution of 1979, the Ayatollah regime has carried out multiple deadly attacks beyond its borders, continuing in a more systematic and more extensive way the “legacy of terror” once perfected by SAVAK, the Shah’s secret police. One recent example was the 2024 stabbing of journalist Pouria Zeraati outside his home in London. Mr Zeraati, a presenter for the Persian-language news channel Iran International, survived the attack, but investigators later characterised the stabbing as a “warning shot” from the regime intended to silence critical media coverage. Following the assault, the suspects fled the country within hours, and the ongoing threat to his life eventually forced Mr Zeraati to leave the United Kingdom entirely.³² This incident followed several warnings from UK intelligence services about credible plots by Iran to kidnap or kill individuals deemed enemies of the State residing in London.

24. Across the Atlantic, the United States has disrupted multiple high-profile plots targeting Iranian American journalist Masih Alinejad at her home in Brooklyn. In 2021, federal prosecutors unsealed an indictment revealing a complex Iranian intelligence scheme to kidnap Ms Alinejad via the New York waterfront and forcibly rendition her to Iran by boat. When that plan was foiled, the efforts shifted toward an

www.dw.com/en/amnesty-international-increased-repression-against-chinese-students-abroad/a-69049796.

28. Swiss Federal Council, “Situation von tibetischen und uigurischen Personen in der Schweiz, Bericht des Bundesrates in Erfüllung des Postulates 20.4333 APK-N vom 9. November 2020”, 12 February 2024, p. 21. Available at: www.admin.ch/gov/de/start/dokumentation/medienmitteilungen.msg-id-104104.html.

29. <https://safeguarddefenders.com/en/blog/110-overseas-230000-chinese-persuaded-return>.

30. www.bbc.com/news/uk-63972640.

31. www.theguardian.com/uk-news/2026/may/07/two-men-guilty-spying-for-china-uk-wai-yuen.

32. www.theguardian.com/global-development/article/2024/jul/16/iran-tv-presenter-pouria-zeraati-stabbed-london-flees-abroad-safety-transnational-repression.

assassination plot in 2022 involving a hired gunman who was arrested outside her residence with a loaded assault rifle. Several individuals involved in the plots were recently sentenced to twenty-five years' imprisonment.³³

2.1.5. Türkiye

25. In 2021, Orhan İnandı, the founder and director of the Sapat school network in Kyrgyzstan, was abducted by the Turkish MİT (*Milli İstihbarat Teşkilatı* – the National Intelligence Organisation of Türkiye) in Kyrgyzstan and unlawfully renditioned to Türkiye, where he faced terrorism-related charges owing to his alleged ties to the “Gülen movement”. Turkish President Recep Tayyip Erdoğan had acknowledged in a statement that Mr İnandı was indeed abducted by MİT, lauding the agency's efforts in the rendition.³⁴ In 2023, Mr İnandı was sentenced to 21 years' imprisonment for “establishing an armed terrorist group”.³⁵ His wife claimed that her husband had been tortured in Turkish custody and deprived of access to adequate medical treatment.³⁶

26. In 2021, Erk Acarer, a Turkish journalist living in Germany, was attacked with a knife outside his Berlin home by three men. The assault occurred late in the evening in his apartment courtyard, resulting in head swelling that required hospitalisation. Mr Acarer, a columnist for Türkiye's independent BirGün newspaper, linked the attack to his criticism of the ruling Justice and Development Party (AKP) and its ally, the Nationalist Movement Party (MHP). German police confirmed the attack, stating that it could be related to Mr Acarer's journalism. In a video, he recounted that one attacker warned him that he should stop his criticism of Türkiye's government.³⁷

27. On 21 March 2022, the Committee to Protect Journalists called for a thorough investigation by the Swedish authorities into the attack on Ahmet Dönmez – a Turkish journalist. He was assaulted two days earlier by unknown perpetrators after his car was hit from behind. He sustained head trauma and was hospitalised. Mr Dönmez, who covers Turkish politics and reports on allegations of corruption, was targeted while driving home with his young daughter. He moved to Sweden in 2015 due to “political pressure” in Türkiye. Since then, the Turkish authorities accused his former media outlet (Zaman) of ties to the “Gülen movement”.³⁸

28. A leaked Turkish Government document, dated 18 January 2024, revealed that Turkish intelligence services, operating from the embassy in Stockholm, have been spying on journalists in Sweden, including those of Turkish origin and enjoying political asylum. The alleged surveillance operation, reportedly supervised by the Turkish ambassador, involved collaboration between multiple intelligence agencies. The intelligence collected was shared with Turkish authorities, including MİT and the Security General Directorate, in an apparent attempt to suppress independent journalism. The European Federation of Journalists condemned these actions, calling them a threat to press freedom and freedom of expression.³⁹

29. In July 2025, two Turkmen dissident bloggers, Alisher Sakhatov and Abdulla Orusov, went missing after being released from a Turkish detention centre, raising suspicions that they had been unlawfully deported to Turkmenistan or subjected to enforced disappearance.⁴⁰

2.1.6. Azerbaijan

30. In December 2023, Azerbaijani journalist Elmaddin Shamilzade was reportedly harassed by three men at a bar in Tbilisi. One man threatened him with a knife and asked questions about Azerbaijan. Mr Shamilzade, who is the editor-in-chief of an independent media outlet Avastor TV, believed that his attackers acted at the behest of the Azerbaijani Government and were sending a warning that he could be tracked down even abroad.⁴¹

33. <https://apnews.com/article/iran-assassination-plot-journalist-masih-alinejad-055b2e2a7079d96ce8b759b0750f9420>.

34. www.rferl.org/a/kyrgyzstan-turkey-erdogan-turkey-gulen-inandi/31342458.html.

35. www.rferl.org/a/kyrgyzstan-inandi-abducted-turkey-prison-gulen/32462396.html.

36. Abducted and tortured, educator İnandı gives details of his ordeal at the first hearing of his trial – Stockholm Center for Freedom.

37. www.tagesspiegel.de/berlin/erdogan-kritiker-erk-acarer-in-berlin-angegriffen-5403043.html.

38. <https://cpj.org/2022/03/exiled-turkish-journalist-ahmet-donmez-attacked-in-sweden/>.

39. <https://nordicmonitor.com/2024/02/turkish-embassy-spied-on-journalists-in-sweden-leaked-government-document-reveals/>.

40. www.hrw.org/news/2025/07/30/turkiye-turkmen-risking-deportation-reported-missing.

41. www.voanews.com/a/beyond-azerbaijan-s-borders-journalists-are-wary-of-retaliation-/7437787.html.

31. On 18 February 2026, Emin Huseynov, an independent Azerbaijani journalist, stated that he had been followed by unknown persons in Geneva, Switzerland, after asking a question about crackdown on political opponents and independent media in Azerbaijan to President Ilham Aliyev during the Munich Security Conference in Germany.

2.2. Under the guise of justice – weaponising legitimate tools to punish dissent

32. In its [Resolution 2509 \(2023\)](#), the Assembly already expressed its concern that INTERPOL Red Notices, extradition proceedings, and other forms of interstate legal assistance, such as anti-money laundering and anti-terror financing measures, were being misused to carry out transnational repression. It appears that very little progress has been made in preventing such abuses.

33. It appears that the INTERPOL system continues to be misused to punish activists for their work. An example of its misuse might be the case of an environmental activist, Paul Watson, a devoted anti-whaling activist. Mr Watson was arrested on 21 July 2024 in Nuuk, Greenland, based on an INTERPOL Red Notice issued by Japan, which was seeking his extradition on charges relating to the alleged boarding of a Japanese whaling ship Shōnan Maru 2 in the Southern Ocean in February 2010. The charges, including one of assault, carried a sentence of up to 15 years' imprisonment. In December 2024, the Danish Government decided not to extradite Mr Watson, who was then released from custody.⁴²

34. In 2024, the Assembly also considered the case of Julian Assange, whose legal battle against a possible extradition to the United States lasted for more than a decade. In its [Resolution 2571 \(2024\)](#), the Assembly observed that Mr Assange's prosecution in the United States and the resulting detention in the United Kingdom with a view to extradition were a form of punishment for engaging in activities that journalists perform on a daily basis. It further noted that the disproportionately severe charges brought by the United States against Julian Assange under the Espionage Act, exposing him to a risk of de facto life imprisonment, combined with his conviction and sentencing under the Espionage Act for what was, in essence, news gathering and publishing, warranted the designation of Mr Assange as a political prisoner, within the meaning of [Resolution 1900 \(2012\)](#).

35. A blue notice (an alert seeking information on someone) was used in 2019 by the Russian Federation to alert the American immigration authorities about a Russian dissident, Vitaly Bogomazov, who was living in Florida. Immigration officials arrested him for overstaying his visa. Mr Bogomazov was awaiting a decision on his asylum application, claiming that he would face risks in Russia because he had a company that published a newspaper critical of Vladimir Putin and Russia's war on Ukraine. The blue notice claimed he was wanted for the assault and homicide of a man who, according to Russian court records, was still alive. Mr Bogomazov was awaiting a decision on whether he could be deported to Russia.⁴³

36. On 30 October 2023, Andriy Hniot, a Belarusian filmmaker, was arrested at Belgrade airport upon arrival from Bangkok based on an INTERPOL Red Notice issued at Belarus' request for alleged tax evasion. Mr Hniot gained international prominence for his involvement in documenting the 2020 protests against Mr Lukashenko's forged re-election. Initially, a Serbian court ruled in favour of extradition, but an appeals court later overturned this decision, citing procedural violations and remitting his case for re-examination.⁴⁴ After spending a year in detention, on 31 October 2024, Mr Hniot was released by Serbian authorities, as detention with a view to extradition cannot exceed one year under Serbian law, and promptly departed the country.⁴⁵

37. Belarus and Russia have a close relationship in the area of extradition, with over 80% of requests being granted. Those Belarusians who fled to Russia after participating in protests against the falsified elections of 2020 were promptly deported back to Belarus despite their well-founded fears of potential torture upon their return. Media reports and human rights activists indicate that in 2021, Russian authorities detained and extradited approximately 20 protesters to Minsk, where they faced the risk of unfair trials and probable torture. This occurred despite interim measures prohibiting their removal being issued by the European Court of Human Rights. Despite the clearly trumped-up nature of charges pressed by the Belarusian authorities, the Russian judicial authorities proceeded with the "forced expulsion" of opposition figures to Belarus, citing violations of registration requirements.⁴⁶

42. www.theguardian.com/world/2024/dec/17/denmark-refuses-to-extradite-whaling-activist-paul-watson-to-japan-says-lawyer.

43. [Despite Interpol Fixes, Strongmen Find New Ways to Abuse It – The New York Times \(nytimes.com\)](https://www.nytimes.com/2024/12/17/world/europe/denmark-refuses-extradite-whaling-activist-paul-watson-to-japan.html).

44. www.rferl.org/a/serbia-belarus-extradition-hnyot-interpol/32999599.html.

45. <https://balkaninsight.com/2024/11/01/belarus-activist-freed-from-detention-in-serbia-leaves-for-eu/>.

46. www.rferl.org/a/russia-extradites-guitarist-belarus/31452472.html;

38. In April 2024, a delegation from Belarus' Criminal Investigation Department of the Ministry of Internal Affairs visited Kazakhstan. During this visit, they discussed exchanging information about wanted individuals, the procedures for processing requests, and the mechanisms for implementing these actions.⁴⁷ The number of requests for international legal assistance from Belarus to Kazakhstan has significantly increased, from 65 in 2021 to 1,080 in 2024, possibly exposing dissidents from both States under the guise of prosecuting criminal activity.⁴⁸

39. In recent years, Kazakhstan has heavily relied on the case of BTA Bank to conduct surveillance, harassment, and defamation campaigns against dissidents in Europe.⁴⁹ The case involves allegations of embezzlement and money laundering during Mukhtar Ablyazov's tenure as the bank's chairman from 2005 to 2009. Mr Ablyazov, a vocal critic of the Kazakh Government, is accused of embezzling approximately USD 6 billion from the bank, leading to its nationalisation in 2009. Mr Ablyazov claims that the charges are politically motivated, aimed at silencing him as an opposition figure.⁵⁰ Kazakhstan used this case to harass government's critics, under the guise of mutual legal assistance agreements. It has also initiated civil and criminal proceedings in multiple countries, including the United Kingdom, United States, Ukraine, and Russia, often using BTA Bank as a purported victim to justify these actions. Kazakhstan has also sought extradition of individuals linked to Mr Ablyazov, claiming they are involved in financial crimes. At the same time, critics argue these efforts are politically driven and aimed at silencing critics.

40. The case of Botagoz Jardemalie seems to perfectly illustrate the interplay of various forms of transnational repression used by Kazakhstan. Ms Jardemalie, a Kazakh human rights lawyer who defended opposition members and activists, fled Kazakhstan and was granted political asylum in Belgium in 2013. The same year, at the request of Kazakhstan, INTERPOL published a Red Notice targeting Ms Jardemalie for arrest on criminal charges. However, the Red Notice was later cancelled for non-compliance with INTERPOL rules against political abuses. In 2014-2015, she was illegally surveilled by a Russian citizen and two former East German Stasi agents, who were sentenced by a Belgian court in 2019 to imprisonment for their actions. According to the criminal case, the men searched for information about her contacts and travels and tried to bribe Ms Jardemalie's lawyer in Brussels to access her documents and obtain her residence address.⁵¹ The federal prosecutor suspected that they were planning to forcibly return her to Kazakhstan, as their activities succeeded a failed attempt by Kazakhstan to have her extradited. In 2017, Ms Jardemalie's brother, Iskander Yerimbetov, was detained on seemingly arbitrary charges. The UN Working Group on Arbitrary Detention, in its opinion No. 67/2018, considered his detention to be arbitrary and aimed at forcing Ms Jardemalie to return to Kazakhstan.⁵²

41. Despite all these concerning developments, in 2019, Belgium granted a mutual legal assistance request issued by Kazakhstan in a criminal case involving money laundering allegations against Ms Jardemalie and her brother. This allowed Belgian police, accompanied by two unidentified Kazakh officers, to search through her apartment and access sensitive documents.⁵³ The Belgian Constitutional Court granted Ms Jardemalie the right to challenge the legality of mutual legal assistance provided to Kazakhstan and to access the case file. Although the Belgian authorities had given assurances that co-operation with Kazakhstan would be suspended while her case was pending, Kazakhstan reportedly received a copy of the documents used to execute the Kazakh request and was invited to participate in the proceedings by a Belgian prosecutor.⁵⁴ Fair Trials, a reputed NGO, expressed its concern that Belgium allowed its judicial system to be misused to repress a Kazakh political dissident.⁵⁵

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47. Беларусь и Казахстан обсудили вопросы выдачи людей в межгосударственном розыске — REFORM.news (ранее REFORM.by).

48. <https://eng.belta.by/society/view/belarus-kazakhstan-agree-to-cooperate-in-cybercrime-investigation-165798-2025/>.

49. <https://en.odfoundation.eu/a/726482,transnational-persecution-of-bota-jardemalie-by-the-regime-in-kazakhstan-and-its-agents-in-the-eu-statement-of-international-human-rights-and-rule-of-law-defenders/>.

50. www.rferl.org/a/facebook-announces-new-ad-rules-to-ward-off-election-meddling/29736532.html.

51. www.fidh.org/en/issues/human-rights-defenders/belgium-kazakhstan-judicial-harassment-against-ms-botagoz-jardemalie.

52. Opinion No. 67/2018 concerning Iskander Yerimbetov (Kazakhstan), Doc. A/HRC/WGAD/2018/67, 30 January 2019.

53. <https://protect-lawyers.org/en/case/botagoz-jardemalie/>.

54. www.lesoir.be/263653/article/2019-11-29/trois-barbouzes-condamnes-pour-lespionnage-de-la-refugiee-kazakhe-bota;

www.omct.org/en/resources/urgent-interventions/belgium-kazakhstan-judicial-harassment-against-ms-botagoz-jardemalie; Belgium/Kazakhstan: Judicial harassment against Ms. Botagoz Jardemalie.

55. www.fairtrials.org/articles/news/belgiums-continued-judicial-cooperation-with-kazakhstan-raises-human-rightsconcerns/.

42. Sadly, the case of Ms Jardemalie is not the only example of Kazakhstan misusing the mutual legal assistance framework for the purpose of persecuting the opponents of its government. In fact, in 2022, the European Court of Human Rights delivered a judgment in the case of *Shorazova v. Malta*, which concerned the freezing of the applicant's assets pursuant to a mutual legal assistance request by Kazakhstan. The Court found a violation of Article 1 of Protocol No. 1 to the Convention and held that Ms Shorazova was deprived of relevant procedural safeguards against an arbitrary or disproportionate interference. Importantly, it also held that the applicant's deceased husband was an established political adversary to the Kazakh regime and could have been the subject of reprisals on their part, including trumped up charges which could have extended to the applicant. The Court further expressed doubts as to whether fighting crime was the general interest at stake in this case.⁵⁶

43. In early 2026, Kazakhstan deported several Russian anti-war activists. Alexander Kachkurkin, an IT specialist accused of treason, was handed over to Russian security forces in February after being detained on seemingly fabricated misdemeanour charges. During the same period, Kazakh authorities approved the extradition of several high-profile figures, including anti-war activist Yulia Yemelyanova and military deserter Semyon Bazhukov, often while their asylum applications or legal appeals were still technically pending. These incidents seemed to mark an end to Kazakhstan's status as a relatively safe haven for those fleeing mobilisation and political persecution, as the government has begun prioritising its bilateral security obligations over international human rights norms. This sudden policy reversal has left thousands of Russian exiles in the region vulnerable to State-sponsored kidnapping and forced return, reflecting a broader trend of narrowing sanctuary for the Kremlin's opponents across Central Asia.⁵⁷

44. Sir William Browder's grim experience, as presented in his brilliant books "Red Notice" and "Freezing Order", sheds light on the misuse of the Red Notice framework by the Russian authorities, seemingly under the guise of justice. Unfortunately, such practices are not limited to the Russian Federation. Many other States make use of issuing a large number of extradition requests (often unjustified) to punish political opponents.

45. I am also concerned by the increasing trend of misusing anti-corruption measures as a method of transnational repression. In 2025, I twice attended the *in absentia* trial in Kyiv of a former Ukrainian Member of Parliament, now living in the United Kingdom and facing extradition to Ukraine on corruption charges. I regret to say that the judicial proceedings against him in Ukraine raise serious concerns regarding the impartiality of the judges and the authenticity of the charges.

46. Another troubling example of weaponising legitimate tools to punish dissent is the misuse of anti-money laundering measures. Authoritarian governments can exploit AML regulations to target political opponents by filing false reports, leading financial institutions to flag these individuals as suspicious. The secretive nature of AML procedures and the "no tipping" rule can make it difficult for dissidents to understand why they are being targeted or to challenge false accusations. The "no tipping" rule restricts financial institutions from disclosing information about suspicious activity reports (SARs) or similar filings. Being flagged as high-risk can lead to financial exclusion, making it difficult for dissidents to access financial services necessary for their basic subsistence and legal defence.

47. In December 2021, Ismail Sezgin, the director of the Centre for Hizmet Studies in London, was blacklisted as a terrorist financier by Türkiye for his alleged membership in what the Turkish authorities call the "Fethullah Terrorist Organisation" (FETÖ/PDY), commonly known as the "Gülen movement", a designation he denies. In consequence, his name was automatically added to World-Check (now LSEG), a database used by financial institutions for due diligence, under the category "non-conviction terror." Although World-Check later noted that the allegations against him were baseless and recategorised his entry, they refused to remove it entirely, citing the need for financial institutions to be aware of his designation by Türkiye to comply with legal obligations. As a result of his account being flagged by World-Check, Western Union began blocking his transactions and other financial institutions denied his applications for banking services.⁵⁸

48. A similar ordeal was faced by Mehmet Baltaci, a London-based businessman, who in 2020 was marked by World-Check under the "non conviction terror" category. He was also designated by Türkiye as an "alleged associate" of two suspected members of the Gülen movement, an allegation he denies. As a result thereof, more than 10 bank accounts across three countries were closed, and another bank refused to provide services to Mr Baltaci, severely hampering his business activity. Mr Baltaci sued World-Check and his claim was settled in April 2023 with World-Check removing his profile from its database, retracing the claims and agreeing not to publish the inaccurate information again.⁵⁹

56. *Shorazova v. Malta*, no. 51853/19, 3 March 2022.

57. <https://carnegieendowment.org/russia-eurasia/politika/2026/03/kazakhstan-political-extraditions>

58. www.moneylaundering.com/news/global-aml-standards-third-party-databases-inadvertently-aiding-authoritarianism/.

49. In 2024, the Royal United Services Institute, a British think-tank, published a policy brief analysing how the Financial Action Task Force's (FATF) standards have been abused or misused by authoritarian regimes. Its brief describes how, for instance, the FATF Recommendation 4 on asset freezing provisions, when misapplied for malicious purposes, can disrupt civil society organisations' access to funds and operations, causing long-term incapacitation. The misuse of these provisional measures without proper judicial review triggers unjust and extended asset freezes. FATF Recommendations 37, 38, and 39 concerning mutual legal assistance and extradition enable States to carry out transnational repression, granting home countries access to privileged information on dissidents in host countries to sustain campaigns against them. The Royal United Services Institute correctly, in my view, concluded that these abuses represent a double threat: they reduce civil society's impact on democracy and further expose societies to the harms of illicit finance, crime and corruption by discrediting anti-money laundering tools.⁶⁰

2.3. Mobility restrictions

50. Transnational repression through passport denial has emerged as a strategic tool in Turkmenistan and Belarus, exacerbating the vulnerability of dissidents abroad. Turkmenistan's refusal to renew passports at consulates forces Turkmen citizens living abroad, including human rights activists, to return home, risking persecution, arrest, and even torture.⁶¹ Similarly, Belarus implemented a decree in September 2023 requiring citizens staying abroad to renew their passports in Belarus, effectively isolating those unable or unwilling to return due to fear of persecution.⁶² Such a policy creates significant obstacles in managing property, obtaining education credentials, and securing inheritance. Furthermore, it puts citizens at risk of deportation, as they may face obstacles in obtaining residence permits without valid identity documents. The denial of essential documents, such as birth certificates for children born abroad, indeed leaves many citizens undocumented and unable to access basic services.⁶³ Similarly, obtaining basic paperwork, such as duplicates of civil registry records, university degree authentications or issuing a power of attorney, now requires the applicant to be physically present in Belarus.⁶⁴

51. In August 2018, the head of the Open Dialogue Foundation, Lyudmyla Kozlovska, a Ukrainian national residing in Poland and married to a Polish citizen, Bartosz Kramek, a civic activist, was denied entry to Belgium following an alert introduced to the Schengen Information System by the Polish authorities. The alert was based on grounds of national security. Ms Kozlovska argued that the introduction of an alert was a form of political repression used by Poland because of her and her husband's criticism of the then-Polish Government. Following a series of appeals, in 2024, her name was finally removed from the register of persons whose stay in Poland was considered undesirable.⁶⁵ In March 2025, Mr Kramek informed that the Warsaw Regional Prosecutor had opened an investigation into possible abuse of power by the former Minister-Co-ordinator of Special Services, his deputy, officers of the Internal Security Agency (*Agencja Bezpieczeństwa Wewnętrznego*) and the Head of the Aliens Office, who are alleged to have intentionally produced unreliable documents to falsely accuse Ms Kozlovska of constituting a threat to the national security of Poland.⁶⁶

3. Fighting back against transnational repression

3.1. Follow-up to *Resolution 2509 (2023) Recommendation 2257 (2023)* by the Council of Europe

52. In its *Resolution 2509 (2023)*, the Assembly called on States to protect individuals within their jurisdiction from transnational repression, and refrain from rendering, transferring, deporting or extraditing those facing it. It further called for an official definition of the practice, a mechanism to report and track it, as well as a series of steps to prevent it, including: additional vetting of extradition requests, Red Notices and other forms of international legal assistance from countries known to engage in transnational repression; expelling or declining to accredit diplomats involved in transnational repression; sanctions on perpetrators and

59. www.telegraph.co.uk/news/2023/07/20/data-giant-refinitiv-wrongly-labelled-businessman-terrorist/.

60. <https://rusi.org/explore-our-research/publications/policy-briefs/suppression-launders-using-fatf-fig-leaf-target-civil-society>.

61. Severe Hardship for Turkmens Arbitrarily Denied Passport Renewal Abroad | Human Rights Watch.

62. Belarus dispatch: thousands of Belarusians abroad can no longer renew their passports after expiration – JURIST – News.

63. Turkey: Turkmen Activists Face Deportation | Human Rights Watch.

64. www.hrw.org/news/2023/09/08/belarus-decree-puts-exiled-citizens-risk.

65. <https://oko.press/szefowa-fundacji-otwarty-dialog-moze-wrocic-do-polski>.

66. <https://x.com/ODFoundation/status/1899018205961609723>.

enablers of the practice; restricting the export of surveillance technology to countries which engage in it. In its [Recommendation 2257 \(2023\)](#), the Assembly recommended that the Committee of Ministers review and update its 2011 Guidelines on “Eradicating impunity for serious human rights violations”, with a view to including transnational repression techniques, and consider drawing up a recommendation to member States on the fight against transnational repression, including a common definition of transnational repression.

53. In its written comments on [Recommendation 2257 \(2023\)](#), the Steering Committee for Human Rights (CDDH) noted that phenomena of the type described in [Resolution 2509 \(2023\)](#) are a matter of serious concern, inconsistent with the values and principles of the Council of Europe, and may contravene its member States' legal obligations, notably under the European Convention on Human Rights. The CDDH considered that rather than revising the Committee of Ministers' 2011 Guidelines on eradicating impunity for serious human rights violations, a more feasible and flexible approach would be to draw up a recommendation to member States on the fight against transnational repression, as also proposed by the Assembly.

54. Indeed, in its [Reply to Recommendation 2257 \(2023\)](#), the Committee of Ministers explained that its existing Guidelines on eradicating impunity for serious human rights violations of 2011 already cover those transnational repression methods or techniques that can be considered as “acts in respect of which States have an obligation under the Convention, and in the light of the Court's case law, to enact criminal law provisions”. Other techniques mentioned by the Assembly, such as passport cancellation and denial of consular services, which do not engage criminal law, fall outside the scope of the current Guidelines. It further informed that it had given terms of reference to the CDDH to prepare a study on the need for and feasibility of (an) additional non-binding instrument(s) to complement the current Guidelines, and that it invited the CDDH to bear in mind [Recommendation 2257 \(2023\)](#) in this work, where appropriate.

55. I submitted an intervention to the CDDH, recommending that a direct reference to transnational repression be added to the draft Study on complementing the 2011 Guidelines against impunity for serious human rights violations. I noted that transnational repression encompasses a variety of methods, including physical attacks abroad, misuse of legal co-operation tools, restrictions on mobility, and remote intimidation or surveillance. These actions pose complex legal and practical challenges, as the existing Guidelines focus only on domestic issues. Since transnational repression involves extraterritorial violations and State misuse of international mechanisms, I also recommended conducting a study on a separate, comprehensive non-binding instrument. This would provide tailored guidance on prevention, investigation, protection, and improved international co-operation, addressing the broader scope of State responsibility. Regrettably, my proposal was not included in the Study adopted.⁶⁷

3.2. Selected State practice

56. The report prepared by the Swiss Government contains several recommendations for countering transnational repression in Switzerland. It suggests engaging in diplomatic dialogue with States responsible for transnational repression to make it clear that such actions are not tolerated by Switzerland. At the national level, the report calls for the exploration and definition of responsibilities, procedures, communication channels, and effectiveness of current instruments in dealing with transnational repression cases. It emphasises the need to sensitise and train federal, cantonal, and municipal authorities to better identify, handle, and report cases of transnational repression. The report also recommends promoting and institutionalising communication with affected diaspora groups. Furthermore, it suggests evaluating the necessity and relevance of potential low-threshold advisory services for victims and witnesses of transnational repression. The overall goal is to enhance the authorities' understanding and ability to effectively manage and mitigate the impacts while ensuring the protection of fundamental rights and sovereignty.

57. At the end of 2024, the French General Directorate for Internal Security (*Direction générale de la Sécurité intérieure*, DGSi) created a website (in French, English, Arabic, Chinese and Russian) informing about measures undertaken by the French authorities to combat transnational repression. It contains information about the phenomenon itself, examples thereof, and a dedicated contact channel which allows victims and witnesses of a transnational repression operation to report it to the authorities.⁶⁸

58. The report on Transnational Repression in the United Kingdom, published in July 2025 by the UK Parliament's Joint Committee on Human Rights⁶⁹ identifies transnational repression as a significant and under-recognised threat that undermines the UK's ability to protect the rights of both citizens and those

67. [Eradication of impunity for serious HR violations \(CDDH-ELI\) – Human Rights Intergovernmental Cooperation.](#)

68. www.dgsi.interieur.gouv.fr/english/fight-against-transnational-repression.

69. <https://publications.parliament.uk/pa/jt5901/jtselect/jtrights/681/report.html>.

seeking safety within its borders. One of its key findings is that the UK currently lacks a formal, legal definition for this phenomenon, what has hindered effective data collection, monitoring, and the development of a coherent national strategy. The Joint Committee notes that while China, Russia, and Iran are the most flagrant perpetrators, other States – most notably Eritrea – frequently use tactics such as digital surveillance, intimidation of families abroad, and the misuse of international mechanisms like INTERPOL to silence dissidents on UK soil. Furthermore, the report highlights that existing protections against Strategic Lawsuits Against Public Participation (SLAPPs) are currently limited to economic crimes, leaving journalists and activists vulnerable to State-aligned legal harassment. To combat these evolving threats, the Joint Committee recommends that the UK Government urgently adopt a formal definition of transnational repression and require all police forces to collect specific data on State-linked harassment and coercion. A key proposal is the establishment of a dedicated national reporting hotline staffed by trained personnel to build trust with affected communities and standardise the current inconsistent police response. Additionally, the government is urged to work with “Five Eyes” partners to reform INTERPOL's processes and introduce a mechanism to alert individuals to politically motivated Red Notices, while also reviewing the national sanctions framework to specifically capture the full range of transnational repression tactics.

59. In the United States, the Federal Bureau of Investigation has increasingly prioritised the fight against transnational repression by treating these extraterritorial threats as direct violations of federal law and American sovereignty. The FBI has established a dedicated Transnational Repression Cell to co-ordinate intelligence and investigations, while also implementing specialised training for field agents to help them distinguish State-sponsored harassment from routine criminal activity. Public outreach is a central pillar of their strategy, involving the launch of a dedicated tipline and the distribution of educational resources to diaspora communities (in several languages) to encourage the reporting of stalking, digital threats, and coercion. Furthermore, the FBI works closely with the Department of Justice to secure indictments against foreign operatives and uses the Foreign Agents Registration Act (FARA) to expose and prosecute individuals working covertly for hostile governments.⁷⁰

60. The Transnational Repression Policy Act (TRPA), a draft bill tabled in the US Congress in 2025, aims to codify a “whole-of-government” approach to protecting dissidents and activists on US soil. The TRPA mandates the creation of a comprehensive interagency strategy to identify and counter the tactics of authoritarian regimes, including the use of commercial spyware and the misuse of INTERPOL notices. Key provisions include the definition of “transnational repression”, potential criminalisation of gathering information on diaspora communities for foreign powers and the expansion of the legal definition of foreign agents to better capture modern repressive tactics. Additionally, the draft legislation proposes mandatory training for all government personnel and diplomatic staff to recognise the signs of transnational repression, while also authorising targeted sanctions and visa bans against foreign officials who orchestrate such abuses.⁷¹

61. In Germany, the government's response to transnational repression has evolved through a combination of diplomatic measures and heightened domestic surveillance of foreign intelligence activities. Following high-profile incidents like the 2019 Tiergarten assassination and repeated threats against Iranian and Egyptian dissidents in Berlin, German authorities have intensified the surveillance of “community monitoring” tactics used by authoritarian regimes to intimidate exiles. In 2025 and early 2026, the Federal Ministry of the Interior introduced a strategy of “defensive architecture”, which includes the use of the Federal Office for the Protection of the Constitution (BfV) to identify and expel foreign operatives operating under diplomatic cover. While Germany has traditionally relied on existing criminal statutes and the expulsion of diplomats to signal its “red lines”, there has been increasing legislative pressure in 2026 to establish a dedicated national co-ordination office.⁷²

3.3. INTERPOL

62. In May 2024, the Committee on Legal Affairs and Human Rights held a follow-up hearing on the topic of transnational repression. During that hearing, in particular, representatives of INTERPOL explained what measures had been undertaken in the past several years to limit the scope for abuse of its system. In 2017, its General Assembly adopted a policy on refugee cases, according to which INTERPOL may not issue Red Notices for individuals who obtained refugee status. Similarly, INTERPOL would not issue a Red Notice against an individual who was wanted for using freedom of expression in their State, against political opposition and/or dissidents. We were told that INTERPOL cannot instruct countries how to act upon a notice or any other request: each State bears full responsibility for its actions. Under the relevant rules, it was up to

70. www.fbi.gov/investigate/counterintelligence/transnational-repression.

71. www.billtrack50.com/billdetail/1902743/multi-collapse.

72. <https://iphronline.org/articles/report-assessing-tnr-response-germany/>.

each State to flag to INTERPOL any compliance issues identified in notices issued by other States. If a determination was made that a Red Notice did not comply with the Constitution or the Rules on the Processing of Data, the data would be deleted from the INTERPOL's system. In cases of repeated non-compliance, corrective measures could be applied, starting with enhanced supervision to a full suspension of a member State's access to the system. They were not designed as punitive measures, but INTERPOL considered them effective to deter non-compliance and prevent any attempts at misuse of its system. As of May 2024, there were six States subjected to various levels of corrective measures. INTERPOL's public website included statistics on non-compliance, and the basis upon which the decision was made to either refuse or cancel a notice/diffusion request.

4. Conclusions and recommendations

63. While preparing my report, I asked several known or suspected victims of transnational repression to reply to a questionnaire concerning their experiences of being affected by this phenomenon, including impacts on their personal safety, well-being, and travel restrictions. As some of them requested anonymity, I will not list their identities. Many of their contributions helped me to identify gaps in existing policy or legislation. Despite living under different jurisdictions and being exposed to various methods of transnational repression, the responses were strikingly similar. Almost everyone noted that being the subject of an INTERPOL notice, an extradition request, or a similar measure created reputational stigma (despite the political nature of the request), resulted in significant legal costs, and had a seriously negative effect on their personal well-being, causing constant fear of arrest, resignation from international travel, loss of assets, or missed professional opportunities. Female victims were subjected to sexist and/or sexually explicit attacks, for example, being accused of engaging in sex work or threatened with sexual violence. Those affected also experienced social isolation, with friends distancing themselves in order to avoid possible personal risks. Several responses indicated that, despite having reported in-person surveillance or attacks in their State of residence, the host authorities were unwilling to take decisive action, apparently for fear of jeopardising their relationship with the perpetrator State.

64. The examples of acts of transnational repression presented herein clearly demonstrate that there is a significant legal and policy gap which must be filled in order to effectively combat transnational repression. I am particularly concerned about the apparent ease with which authoritarian regimes are able to repress dissidents on European soil. The marked increase in acts of transnational repression warrants a unified European response and enhanced co-operation. This is particularly pressing given that authoritarian regimes appear to inspire one another to develop new and increasingly sophisticated methods of transnational repression with which they harass opponents and silence dissent.

65. Over the course of preparing this report, it became clear to me that the lack of a unified definition of "transnational repression" constitutes the most significant gap that must be urgently bridged. While most States have already enacted provisions enabling them to prosecute perpetrators of the most prevalent acts of transnational repression, many instances continue to go under-reported, as the absence of a universally accepted definition obstructs reliable data collection. My proposal for such a definition is inspired by the draft US Transnational Repression Policy Act, as well as by input from Freedom House and the New Lines Institute for Strategy and Policy. I am opposed to limiting the definition solely to acts of transnational repression committed by a State against its own citizens. I believe that cases such as those of Paul Watson and Sir William Browder (mentioned above) should be classified as transnational repression, regardless of the fact that neither individual was a citizen of the country seeking his extradition (Japan and the Russian Federation, respectively). Given the evolving nature of transnational repression, I also consider that any catalogue of its methods must remain open-ended rather than exhaustive.

66. As regards data collection, I believe that the most straightforward solution to ensure reliability is to consider a transnational repression context as an aggravating circumstance under criminal law. Separately, I have proposed that States consider specifically criminalising transnational repression as a distinct offence. At present, certain transnational repression methods might be prosecuted as espionage- or stalking-related offences; however, some acts will not meet the necessary threshold and remain unpunished. I am referring particularly to acts such as photographing participants at a demonstration and subsequently providing their images to their State of origin or reporting on students discussing sensitive topics at foreign universities, thereby exposing them or their relatives to harassment.

67. My proposals for the creation of dedicated reporting avenues and outreach programmes are inspired by best practices in Council of Europe member and observer States, as presented in greater detail above. While certain basic measures, such as staffing by specifically trained personnel and publishing information in various languages, will be common to each State, tailored measures will be required according to the specific nature and origin of the risks faced.

68. Turning to INTERPOL reform, it appears to me that there is a significant lack of co-ordination among democratic States in ensuring transparency and governance motivated by human rights considerations. Considering the broad composition of INTERPOL – of which, as of 2022, approximately 58% of members were regarded as “partly free” or “not free” by the Freedom House – only through close co-ordination can those States sharing the values of the Council of Europe ensure that the system does not become increasingly susceptible to misuse. Regard must be had to the fact that the National Central Bureaus (NCBs) representing States within INTERPOL are, in essence, police authorities. I believe that enhanced domestic co-ordination is required to ensure that the bodies responsible for the protection and promotion of human rights have a greater impact on INTERPOL’s governance and reform efforts.

69. Finally, I would like to add that I remain extremely concerned about the recent imposition of completely unjustified sanctions against officials of the United Nations and judges of the International Criminal Court. Some of these could potentially be described as transnational repression and appear to seriously undermine the functioning of international courts and organisations, as well as the international legal order more generally. Considering that the Committee on Legal Affairs and Human Rights is preparing a dedicated report on this issue (under the rapporteurship of my colleague, Mr Tekke Panman, Netherlands, EPP/CD), I have decided not to address this situation in the context of this report.