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Situation of human rights defenders and whistleblowers in Europe

Information Note

Committee on Legal Affairs and Human Rights

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1. Summary

1. Since the last Information Note on the Situation of human rights defenders and whistleblowers in Europe was published in October 2023, governments have continued to exert very high levels of pressure on the brave individuals who sacrifice so much to protect the rights of their fellow citizens.

2. In order to sustain the illegal war of aggression against Ukraine, the governments of Russia and Belarus have further tightened their authoritarian grip on human rights defenders, particularly through the widening of “anti-extremist” and “foreign agent” legislation that was already extremely draconian. The situation in Azerbaijan has also deteriorated, as independent civil society there has faced a renewed crackdown through the imprisonment of journalists, activists, and civil society leaders. The repressive environment in Türkiye has been maintained, where the authorities’ refusal to protect human rights defenders is symbolised by their continued failure to abide by the rulings of the European Court of Human Rights in the case of Osman Kavala, in which the Court ordered the philanthropist’s immediate release.

3. Georgia once exemplified how protections of human rights defenders could be steadily improved over time, making it a shining example for its region and a safe haven for defenders from its authoritarian neighbours. However, over the past year the country has implemented Russian-style authoritarian policies, by adopting ‘foreign agent’ and ‘traditional values’ legislation that threaten to destroy independent civil society and undermine any hope for the effective protection of LGBTIQ rights.

4. Turning to thematic issues, the Information Note details how defenders of the rights of asylum seekers and refugees continue to be exposed to smear campaigns and severe judicial harassment. There are also allegations that these tools are increasingly being used against Environmental Rights Defenders.

5. This note covers events up to the end of December 2024.

2. Procedure and terms of reference

2.1. Procedure

6. On 8 October 2018 the Parliamentary Assembly ratified the terms of reference of a general rapporteur on the situation of human rights defenders, in order to keep this important issue high on the Assembly’s

* Document declassified by the Committee on 28 January 2025.

agenda.² Since that time the Committee on Legal Affairs and Human Rights has appointed four general rapporteurs on this issue. My predecessors Mr Raphaël Comte (Switzerland, ALDE), Ms Alexandra Louis (France, Alliance of Liberals and Democrats for Europe), and Ms Sunna Ævarsdóttir (Iceland, SOC) produced regular information notes and published statements on the situation of human rights defenders in Council of Europe member states. On 21 June 2023, the Committee on Legal Affairs and Human Rights appointed me as the fourth general rapporteur. My mandate was renewed on 27 June 2024.

2.2. *Terms of reference*

7. The committee and the Assembly have been monitoring the situation of human rights defenders in a targeted and specific way since 2006.³ For the Assembly, human rights defenders are “those who work for the rights of others”, i.e. individuals or groups who act, in a peaceful and legal way, to promote and protect human rights, whether they are lawyers, journalists, members of non-governmental organisations (NGOs) or others.⁴ Their right to take action to promote and protect human rights was first confirmed in the [United Nations Declaration on the Right and Responsibility of Individuals, Groups and Organs of Society to Promote and Protect Universally Recognized Human Rights and Fundamental Freedoms](#) of 9 December 1998 (hereafter, the “UN Declaration on Human Rights Defenders”). This Declaration, which states that “[e]veryone has the right, individually and in association with others, to promote and strive for the protection and realisation of human rights and fundamental freedoms at the national and international levels” (Article 1) and which stipulates that States must adopt measures to ensure this right (Article 2, 2.), reinforces the importance of states protecting it. At Council of Europe level, this was followed on 6 February 2018 by the adoption by the Committee of Ministers of the [Declaration on Council of Europe action to improve the protection of human rights defenders and promote their activities](#). On 14 November 2022 the Committee on Legal Affairs and Human Rights agreed to include the situation of whistle-blowers in the mandate of the General Rapporteur on the Situation of Human Rights Defenders and this was approved by the Bureau of the Assembly on 28 November 2022.⁵

8. The right to defend the rights of others is itself based on the fundamental rights recognised and protected by the European Convention on Human Rights (“the ECHR”), such as freedom of thought, conscience and religion (Article 9), freedom of expression (Article 10) and freedom of assembly and association (Article 11). In this regard, human rights defenders deserve particular attention, since violations of their rights, threats and violent acts against them are indicative of the general situation of human rights in the State concerned or a deterioration thereof.⁶ Council of Europe member States are therefore under an obligation to create an environment conducive to the activities of human rights defenders and to end all forms of intimidation and reprisals against them.⁷

9. Given that they refer to the definition of a “human rights defender” contained in the UN Declaration on Human Rights Defenders, my terms of reference, as proposed by the committee and approved by the Assembly, authorise me to address matters relating to cases of intimidation and reprisals suffered by human rights defenders, and to serious obstacles to their action in Council of Europe member States and other European States (e.g. murders, physical and psychological violence, arbitrary arrests, judicial and administrative harassment, smear campaigns and restrictions on their freedom of movement). In addition, I have been given responsibility for monitoring the activities of the various bodies and institutions of the Council of Europe and other international organisations dealing with issues relating to human rights defenders; representing the committee and the Assembly vis-à-vis the latter; making statements and calls for action in my capacity as general rapporteur or suggesting that the committee do so, and monitoring what follow-up has been given to previous Assembly resolutions and recommendations in this area.

² The ratification followed an initial debate which was held on 26 June 2018, concerning the report by Mr Egidijus Vareikis (Lithuania, EPP/CD) on “Protecting human rights defenders in Council of Europe member states”. Following the debate, the Assembly adopted [Resolution 2225 \(2018\)](#) and [Recommendation 2133 \(2018\)](#).

³ [Doc. 10985](#), 27 June 2006.

⁴ [Resolution 2225 \(2018\)](#), 26 June 2018, paragraph 1.

⁵ Synopsis of the meeting of the Committee on Legal Affairs and Human Rights held in Paris on 14 November 2022, [AS/Jur \(2022\) CB 09](#).

⁶ See the [Declaration on Council of Europe action to improve the protection of human rights defenders and promote their activities, 6 February 2008](#).

⁷ [Resolution 2225 \(2018\)](#), see footnote no. 4, paragraph 2.

10. Given that the particular situation of whistle-blowers will be examined in more detail in a report currently being prepared by Ms Anna-Kristiina Mikkonen (Finland, SOC), I have not included specific instances of persecution of whistle-blowers in the present note.

3. The situation of human rights defenders in Azerbaijan

11. Since the last information note in October 2023, Azerbaijan has further intensified its crackdown on human rights defenders, journalists, and civil society activists, utilising both judicial harassment and extra-legal actions to suppress dissent.⁸ This period has been marked by severe repression surrounding the snap presidential elections in February 2024 and the subsequent parliamentary elections in September 2024.⁹ Additionally, the UN Climate Change Conference ('COP29') in November 2024 has prompted further restrictions, with the government targeting human rights defenders and journalists, presumably in order to prevent criticism ahead of this important international event.¹⁰ In January 2024, the Parliamentary Assembly of the Council of Europe decided not to ratify the credentials of the Azerbaijani delegation, citing serious concerns about Azerbaijan's ongoing repression of human rights defenders, journalists, and civil society activists, as well as its refusal to cooperate with international oversight mechanisms.¹¹

3.1. Types of persecution

3.1.1. Targeting of civil society

12. In February 2024, the Parliamentary Assembly reported that Azerbaijan's civil society activists are heavily targeted for persecution and harassment.¹² Independent NGOs face arbitrary denial of registration, asset freezes, and the constant threat of criminal investigations.¹³ Activists who challenge government policies or expose corruption are frequently charged under vague financial crimes or accused of working with foreign entities.¹⁴ For example, Anar Mammadli, chair of the Election Monitoring and Democracy Studies Centre and Vaclav Havel Prize winner, was arrested in April 2024 and placed in pre-trial detention under charges of conspiring to bring money into the country illegally (Article 206.3.2 of the Criminal Code). Parliamentary Assembly rapporteurs expressed deep concern over the incident and urged the Azerbaijani authorities not to prosecute Mr Mammadli for his valuable human rights work.¹⁵

13. Civil society organizations that continue to operate are forced into precarious positions, often unable to access international funding due to the government's restrictive NGO laws.¹⁶ These laws allow the authorities to charge human rights defenders with financial crimes, especially when foreign funds are involved, leading to an almost total shutdown of independent civil society in Azerbaijan.¹⁷

3.1.2. Targeting of media

14. Amnesty International has reported that independent media outlets have also been subjected to a harsh crackdown, facing arbitrary arrests, closure, and fabricated criminal charges.¹⁸ The Media Law, which requires

⁸ Human Rights Watch, "[Azerbaijan: Vicious Assault on Government Critics](#)", 8 October 2024; Amnesty International, "[The State of the World's Human Rights](#)", April 2024p. 87-88.

⁹ Organization for Security and Cooperation in Europe, "[Election Observation Mission Republic of Azerbaijan – Early Presidential Election, 7 February 2024, Statement of Preliminary Findings and Conclusions](#)", 7 February 2024.

¹⁰ Amnesty International, "[The Human Rights situation in Azerbaijan ahead of COP29](#)", 11 June 2024.

¹¹ Parliamentary Assembly of the Council of Europe ('PACE'), "Challenge, on substantive grounds, of the still unratified credentials of the parliamentary delegation of Azerbaijan", [Doc. 15898\(2024\)](#), 23 January 2024.

¹² PACE, "The honouring of obligations and commitments by Azerbaijan", [Doc. 15927](#), 12 February 2024.

¹³ Amnesty International, "[The Human Rights situation in Azerbaijan ahead of COP29](#)", 11 June 2024.

¹⁴ Ibid.

¹⁵ Lise Christoffersen (Norway, SOC) and Ian Liddell-Grainger (United Kingdom, EC/DA), Council of Europe Parliamentary Assembly (PACE) rapporteurs for the monitoring of Azerbaijan, and Hannah Bardell (United Kingdom, NR), PACE rapporteur on "Threats to life and safety of journalists and human rights defenders in Azerbaijan": '[PACE rapporteurs deeply concerned by the detention of Anar Mammadli](#)', website of the Parliamentary Assembly of the Council of Europe, 30 April 2024.

¹⁶ PACE, "Challenge, on substantive grounds, of the still unratified credentials of the parliamentary delegation of Azerbaijan", [Doc. 15898\(2024\)](#), 23 January 2024.

¹⁷ HRW, "[Azerbaijan: Vicious Assault on Government Critics](#)", 8 October 2024.

¹⁸ Amnesty International, "[The Human Rights situation in Azerbaijan ahead of COP29](#)", 11 June 2024, p. 3.

all media entities to register with the state, has been used to deny critical outlets the ability to operate legally, and those that manage to do so face severe financial and legal pressures.¹⁹

15. The United Nations Special Rapporteur on the situation of human rights defenders stated that in November 2023, Abzas Media, a leading investigative outlet, was raided by the authorities, resulting in the arrest of its director Ulvi Hasanli, editor-in-chief Sevinj Vagifgizi, and several staff members.²⁰ They were charged with smuggling funds into Azerbaijan, under Article 206.3.2 of the Criminal Code.²¹ Abzas Media had previously exposed high-level corruption.²² The Special Rapporteur expressed concern regarding the reported confiscation of electronic devices and documents from both the Abzas Media office and the residences of the arrested journalists and human rights defenders, which could jeopardize the confidentiality of their sources involved in anti-corruption investigations.²³ According to Amnesty International, journalists from other independent media outlets, such as Kanal 13, were also arrested on charges ranging from extortion to illegal land use.²⁴

3.1.3. Further enforcement of the legislative apparatus for persecuting human rights defenders

16. The Azerbaijani government has further “weaponized” its legislative framework to repress human rights defenders and opposition figures. Since 2014, the country’s restrictive NGO laws and media laws have stifled civil society by making it nearly impossible for independent organizations to legally register, receive funding, or operate without fear of retaliation.²⁵ There are numerous reports that the crackdown has further intensified during 2024.²⁶ According to Amnesty International, the situation for human rights defenders, journalists, and civil society in Azerbaijan has worsened over the past year.²⁷ The lead-up to COP29 has been marked by intensified repression, with authorities using legal measures to imprison human rights defenders and dismantle independent media.²⁸ Local human rights groups have reported that at least 303 individuals are imprisoned on political grounds.²⁹

3.2. Selected examples

17. İlhamiz Guliyev, a lawyer and former police officer, was detained in December 2023 on fabricated drug charges.³⁰ Guliyev had previously exposed how Azerbaijani police planted drugs on political activists in an anonymous interview to Abzas Media.³¹ A week later he was arrested.

18. Hafiz Babali, an investigative journalist, was detained in December 2023 under charges of smuggling.³² According to Amnesty International, Babali had been reporting on environmental issues linked to pollution at the Gedabek gold mine and was targeted after his outlet, Abzas Media, began planning further investigations into the matter.³³

¹⁹ Amnesty International, “[The State of the World’s Human Rights](#)”, April 2024, p. 87-88.

²⁰ Mary Lawlor, [Azerbaijan: Expert concerned about prosecution of human rights defenders and journalists](#), 15 August 2024. Mr Ulvi Hassanli participated as an expert in a hearing held in April 2023 by the Committee on Legal Affairs and Human Rights and the Monitoring Committee of the Assembly.

²¹ HRW, “[We Try to Stay Invisible](#)”: Azerbaijan’s Escalating Crackdown on Critics and Civil Society”, October 2024, p. 22.

²² Front Line Defender, “[Nargiz Absalamova, Hafiz Babali, and Elnara Gasimova of Abzas Media detained on money smuggling charges](#)”, 7 March 2024.

²³ Mary Lawlor, [Azerbaijan: Expert concerned about prosecution of human rights defenders and journalists](#), 15 August 2024.

²⁴ Amnesty International, “[The Human Rights situation in Azerbaijan ahead of COP29](#)”, 11 June 2024, p. 3.

²⁵ Amnesty International, “[The Human Rights situation in Azerbaijan ahead of COP29](#)”, 11 June 2024.

²⁶ HRW, “[We Try to Stay Invisible](#)”: Azerbaijan’s Escalating Crackdown on Critics and Civil Society”, October 2024.

²⁷ Ibid.

²⁸ Amnesty International, “[The Human Rights situation in Azerbaijan ahead of COP29](#)”, 11 June 2024.

²⁹ PACE, [Deteriorating situation of human rights, rule of law and democracy in Azerbaijan](#), 1 October 2024.

³⁰ HRW, “[We Try to Stay Invisible](#)”: Azerbaijan’s Escalating Crackdown on Critics and Civil Society », October 2024, p. 25-26.

³¹ Ibid.

³² Mary Lawlor, [Azerbaijan: Expert concerned about prosecution of human rights defenders and journalists](#), 15 August 2024.

³³ Amnesty International, “[The State of the World’s Human Rights](#)”, April 2024, p. 88.

19. In March 2024, Amnesty International reported that members of the Institute for Democratic Initiatives, including Akif Gurbanov and Ruslan Izzatli, were arrested and charged with smuggling after a raid on their office revealed funds allegedly brought into the country illegally.³⁴

4. The situation in Belarus

20. Since the release of the last information note on human rights defenders on 18 October 2023, the situation of human right defenders in Belarus has also deteriorated further. Over the past year, the Belarusian authorities have intensified measures aimed at curtailing civil liberties and suppressing dissent.³⁵ Legislative amendments and newly enacted laws have been instrumental in facilitating the continued persecution of human rights defenders, lawyers, journalists, and political activists.³⁶ Despite some symbolic gestures, such as the pardon of several individuals convicted for participating in the 2020 protests,³⁷ the Belarusian authorities have intensified their efforts to silence dissent as the Presidential election scheduled for 2025 is approaching.

4.1. Types of persecution

4.1.1. Persecution of lawyers

21. According to Human Rights Watch ('HRW'), the legal profession in Belarus has come under increasing pressure. The authorities have systematically targeted lawyers defending political prisoners or individuals accused of extremism. Belarusian authorities create numerous obstacles to prevent lawyers from effectively carrying out their professional duties from the moment they take on a politically motivated case.³⁸ On 28 February 2024, Belarusian authorities carried out a raid against lawyers, detaining at least 12.³⁹ HRW has stated that the persecution of Belarusian lawyers handling politically motivated cases "grossly violates the guarantees provided by international standards for the functioning of lawyers and Belarus's international human rights obligations."⁴⁰

22. Notably, all decisions regarding the professional status of lawyers are made by the Ministry of Justice, violating the international principles protecting the independence of the bar.⁴¹ HRW has reported that disbarments, punitive prosecutions, and the revocation of legal licenses have since become routine, with more than 140 lawyers disbarred since 2020.⁴² Currently, six⁴³ lawyers are serving prison sentences, ranging from 6 to 10 years, on politically motivated charges, with others forced to cease practicing due to the highly restrictive conditions.⁴⁴

4.1.2. Targeting of civil society and media

23. The targeting of civil society and media is particularly significant, given that a substantial number of human rights defenders are closely affiliated with or operate within these sectors. The United Nations High Commissioner for Human Rights has stated that the government has also continued to expand the Republican List of Extremist Materials.⁴⁵ This list now includes independent media, social media channels, and human

³⁴ Amnesty International, ["Azerbaijan: Campaign of intimidation against independent media continues with raid on Toplum TV"](#), 7 March 2024. Mr Gurbanov was this year's nominee for the Vaclav Havel Prize.

³⁵ Viasna, ["Human rights situation in Belarus. September 2024"](#), 8 October 2024; Human Rights Watch ('HRW'), ["World Report 2024: Belarus"](#), 2023.

³⁶ Anaïs Marin, "Situation of human rights in Belarus - Report of the Special Rapporteur on the situation of human rights in Belarus, Anaïs Marin", 9 May 2024, A/HRC/56/65, p. 3-4; Viasna, ["Human rights situation in Belarus. September 2024"](#), 8 October 2024.

³⁷ HRW, ["World Report 2024: Belarus"](#), 2023.

³⁸ HRW, ["I Swear to Fulfill the Duties of Defense Lawyer Honestly and Faithfully": Politically Motivated Crackdown on Human Rights Lawyers in Belarus"](#), May 2024, p.1.

³⁹ Viasna, ["Минимум 12 задержанных: что известно о рейде КГБ на адвокатов"](#), 29 February 2024,.

⁴⁰ HRW, ["I Swear to Fulfill the Duties of Defense Lawyer Honestly and Faithfully": Politically Motivated Crackdown on Human Rights Lawyers in Belarus"](#), May 2024, p.85.

⁴¹ Ibid, p. 62.

⁴² Ibid, p. 75.

⁴³ Maksim Znak, Aliaksandr Danilevich, Vital Brahinet, Anastasiya Lazarenka, Yuliya Yurhilevich, and Aliaksei Barodka.

⁴⁴ HRW, ["I Swear to Fulfill the Duties of Defense Lawyer Honestly and Faithfully": Politically Motivated Crackdown on Human Rights Lawyers in Belarus"](#), May 2024, p.40.

⁴⁵ United Nations High Commissioner for Human Rights, ["Situation of human rights in Belarus in the run-up to the 2020 presidential election and in its aftermath - Report of the United Nations High Commissioner for Human Rights"](#), 15 March 2024, A/HRC/55/61, p. 4.

rights organisations.⁴⁶ As of December 2023, 167 entities had been designated as “extremist”, including the Belarusian Association of Journalists and the Viasna Human Rights Center (‘Viasna’).⁴⁷ This designation means that any form of cooperation or interaction with these entities carries the risk of prosecution for “facilitating extremist activities”.⁴⁸ Additionally, the United Nations High Commissioner for Human Rights has reported that there has been an increase of criminal sanctions for donations made to these organisations, in some cases even before the organisation was labelled as “extremist”, resulting in criminal liability for “financing extremism”.⁴⁹

4.1.3. Persecution of human rights defenders in exile and their families

24. The persecution of human rights defenders in exile, along with their families, underscores the extended reach of threats and reprisals beyond national borders, further endangering their work and personal safety. According to HRW, Belarusians who have fled the country due to political persecution remain at risk of state harassment, and their family members in Belarus face retaliation. New amendments to the law on citizenship came into force, allowing the authorities to revoke the citizenship of Belarusians abroad, even if they have no other citizenship, if they have been convicted of “participation in an extremist organisation” or “seriously harming the interests of Belarus”.⁵⁰ Additionally, Resolution No. 798 of November 2023 introduced an obligation for Belarusians abroad to report detailed personal and family-related information to the authorities, increasing fears of privacy violations and reprisals.⁵¹ Also those who engage in peaceful activism abroad risk being subjected to criminal prosecution.⁵²

25. Viasna has confirmed that family members of human rights defenders are also targeted. In January 2024, security forces carried out a series of raids on individuals involved in the INeedHelpBY initiative, a network that supports the families of political prisoners. At least 287 individuals were detained, with many facing charges of facilitating extremist activities.⁵³

4.2. Selected examples

26. Leanid Sudalenka, a prominent human rights defender, lawyer and head of the Homel branch of Viasna, was sentenced in absentia to five years’ imprisonment on 17 June 2024.⁵⁴ The Homel branch gives legal advice to victims of human rights violations. He is an active campaigner and advocate for the abolition of the death penalty in Belarus. Leanid Sudalenka is laureate of the 2018 ‘Liberty, Equality, Fraternity’ Human Rights Prize of the French Republic. He was found guilty of “facilitating extremist activity”.

27. Barys Haretski, the deputy chairman of the Belarusian Association of Journalists, has been an advocate for freedom of expression and the protection of journalists’ rights. In May 2024, law enforcement conducted a raid on his residence in Minsk and initiated a criminal investigation, forcing him to remain in exile after leaving Belarus in 2021.⁵⁵

28. In December 2024, a Belarusian court sentenced opposition activist Dzmitry Kuchuk to six years in prison and fined him \$6,000 for alleged public order violations and actions undermining national security.⁵⁶

⁴⁶ Viasna, “[Human rights situation in Belarus. September 2024](#)”, 8 October 2024.

⁴⁷ United Nations High Commissioner for Human Rights, “Situation of human rights in Belarus in the run-up to the 2020 presidential election and in its aftermath - Report of the United Nations High Commissioner for Human Rights”, 15 March 2024, A/HRC/55/61, [Situation of human rights in Belarus in the run-up to the 2020 presidential election and in its aftermath - Report of the United Nations High Commissioner for Human Rights - Advance unedited version | OHCHR](#), p. 4.

⁴⁸ Ibid.

⁴⁹ Ibid.

⁵⁰ HRW, “World Report 2024: Belarus”, 2023, [World Report 2024: Belarus | Human Rights Watch \(hrw.org\)](#).

⁵¹ Anaïs Marin, “Situation of human rights in Belarus - Report of the Special Rapporteur on the situation of human rights in Belarus, Anaïs Marin”, 9 May 2024, A/HRC/56/65, p. 4.

⁵² Viasna, “[The Investigative Committee has initiated a criminal case against Platform 2025](#)”, 8 October 2024.

⁵³ Viasna, “[Human rights situation in Belarus. September 2024](#)”, 8 October 2024.

⁵⁴ Front Line Defenders, “[Human rights defender Leanid Sudalenka sentenced to 5 years of prison time in absentia](#)”, 19 June 2024.

⁵⁵ Front Line Defenders, “[Criminal case against human rights defender in exile Barys Haretski launched](#)”, 22 May 2024.

⁵⁶ Viasna, “[Dzmitry Kuchuk. Political prisoner](#)”, December 2024.

following his February arrest near the Russian Embassy in Minsk when he was commemorating Alexei Navalny.⁵⁷

29. These cases, reflect the Belarusian government's strategy of using the legal system to suppress the work of human rights defenders and legal professionals. As stated by Human Rights Watch, human rights work remains de facto illegal in Belarus.⁵⁸

5. The situation in Georgia

30. In the past year, Georgia has enacted and expanded several laws impacting human rights defenders, civil society organisations, and media outlets.⁵⁹ The adoption of the Law on Transparency of Foreign Influence in May 2024 and the Law on Family Values and Protection of Minors in September 2024 imposes significant restrictions on civil society and limits freedoms of association and expression.⁶⁰

5.1. Types of persecution

5.1.1 A legislative arsenal for persecuting human rights defenders

31. The Law on Transparency of Foreign Influence, passed in May 2024, mandates that all non-governmental organisations (NGOs) and media outlets receiving over 20% of their funding from foreign sources register as “organisations serving the interests of a foreign power”.⁶¹ The law requires these organisations to disclose detailed financial records, including sensitive donor and beneficiary information. Enforcement measures allow the Ministry of Justice to inspect and fine organisations up to 25,000 GEL (USD \$9,300) for non-compliance.⁶² The Venice Commission concluded that the restrictions imposed by the law on the rights to freedom of expression, freedom of association, and privacy fail to meet the “requirements of legality, legitimacy, and necessity in a democratic society,” and violate the principles of proportionality and non-discrimination.⁶³

32. The Law on Family Values and Protection of Minors, introduced in September 2024, imposes even stricter limitations on public advocacy by prohibiting any expression of opinion or gathering related to LGBTIQ rights.⁶⁴ According to the Council of Europe Commissioner for Human Rights, this law foresees fines and prison sentences for what it deems as “promotion” of non-traditional relationships, extending restrictions to schools, media, and healthcare.⁶⁵ The law also bars legal recognition of gender identity and restricts adoption rights for LGBTIQ individuals, effectively silencing the community and its supporters.⁶⁶

⁵⁷ The Washington Post, “[Belarus convicts well-known activist and sentences him to 6 years in prison](#)”, 27 December 2024.

⁵⁸ HRW, “[Belarus: Crackdown Amid Growing Information Vacuum](#)”, 11 January 2024.

⁵⁹ Human Rights Watch (‘HRW’), “[World Report 2023: Georgia](#)”, 2023.

⁶⁰ HRW, “[Georgia: Violent Attacks on Government Critics](#)”, 20 August 2024; ⁶⁰ Irene Khan (Special Rapporteur on the promotion and protection of the right to freedom of opinion and expression) Gina Romero Rodriguez (Special Rapporteur on the rights to freedom of peaceful assembly and of association), Tlaleng Mofokeng (Special Rapporteur on the right of everyone to the enjoyment of the highest attainable standard of physical and mental health), Ana Brian Nougères (Special Rapporteur on the right to privacy), Farida Shaheed (Special Rapporteur on the right to education), and Graeme Reid (Independent Expert on protection against violence and discrimination based on sexual orientation and gender identity), “[Georgia must repeal discriminatory law targeting LGBT persons and human rights activists: UN experts](#)”, 26 September 2024.

⁶¹ HRW, “[Foreign Agent Laws in the Authoritarian Playbook](#)”, 19 September 2024.

⁶² HRW, “[Georgia: Violent Attacks on Government Critics](#)”, 20 August 2024.

⁶³ Venice Commission, “[Urgent Opinion on the Law of Georgia on Transparency of Foreign Influence](#) », 21 May 2024.

⁶⁴ Irene Khan (Special Rapporteur on the promotion and protection of the right to freedom of opinion and expression) Gina Romero Rodriguez (Special Rapporteur on the rights to freedom of peaceful assembly and of association), Tlaleng Mofokeng (Special Rapporteur on the right of everyone to the enjoyment of the highest attainable standard of physical and mental health), Ana Brian Nougères (Special Rapporteur on the right to privacy), Farida Shaheed (Special Rapporteur on the right to education), and Graeme Reid (Independent Expert on protection against violence and discrimination based on sexual orientation and gender identity), “[Georgia must repeal discriminatory law targeting LGBT persons and human rights activists: UN experts](#)”, 26 September 2024.

⁶⁵ Michael O’Flaherty, “[Letter to chairman of parliament Georgia by Michael O’Flaherty](#)”, 6 September 2024.

⁶⁶ Ibid.

5.1.2. Targeting of civil society

33. In June 2024 the Parliamentary Assembly expressed its concern that Georgian authorities have increasingly harassed civil society, demonstrators, journalists and members of parliament, including by excessive and disproportionate use of force by the police.⁶⁷ Reports indicate that activists opposing the Law on Transparency of Foreign Influence face defamation and intimidation; posters labelling them as “foreign agents” or “enemies of the state” are displayed near their homes, and anonymous threats are made against them and their family members.⁶⁸ International bodies, including the European Union, have expressed serious concerns, noting that such measures undermine the role of civil society as a necessary element in democratic governance.⁶⁹

34. Since the protests in Georgia that began after Prime Minister Irakli Kobakhidze announced a pause in EU accession negotiations on 28 November 2024, civil society has reported particular brutality by security forces against peaceful protesters.⁷⁰ The Georgian Young Lawyers’ Association reported escalating state violence, including torture, beatings, arbitrary detentions, chemical-laced water cannons, and attacks by hired thugs, with journalists and demonstrators among the primary targets.⁷¹

5.1.3. Targeting of media

35. According to HRW, journalists covering government policies or human rights issues face threats and violence.⁷² Independent media outlets have similarly been impacted by the Law on Transparency of Foreign Influence, which subjects them to registration and exhaustive reporting obligations if they receive foreign funding.⁷³ These requirements place financial and administrative burdens on media outlets, leading to concerns about self-censorship and operational difficulties. HRW reported that in October 2023, the powers of the Georgian National Communications Commission were expanded, allowing it to impose fines and revoke licenses for broadcast content deemed as inciting hatred or promoting terrorism.⁷⁴ This regulatory change has led to fears that media critical of government actions could face censorship or closure.⁷⁵

5.1.4. Harassment and intimidation of human rights defenders

36. The Parliamentary Assembly has expressed its concern in regard to harassment and threats against human rights defenders in Georgia, particularly those opposing the Law on Transparency of Foreign Influence.⁷⁶ According to HRW, intimidation campaigns often target both human rights defenders and their family members, with anonymous phone calls, defamation, and physical threats aimed at deterring them from activism.⁷⁷ The Law on Administrative Offences is also used to detain protesters on vague charges, allowing for high fines and extended administrative detention.⁷⁸

37. For example, HRW reported that Gia Japaridze, a 50-year-old professor and former diplomat, was assaulted and later hospitalised in May 2024 after days of receiving threatening phone calls warning him to cease his opposition to the Law on Transparency of Foreign Influence.⁷⁹ Though the police recognized him as a victim of a crime and initiated an investigation, no suspects have been identified.⁸⁰

⁶⁷ PACE, [Challenges to democracy in Georgia Res. 2561 \(2024\)](#), , 27 June 2024.

⁶⁸ Ibid.

⁶⁹ European Union External Action Service, “[Georgia: Statement by the High Representative and the Commissioner for Neighbourhood and Enlargement on the adoption of the “transparency of foreign influence” law](#),” 17 April 2024.

⁷⁰ HRW, “[Georgia: Brutal Police Violence Against Protesters](#)”, 23 December 2024.

⁷¹ Jam News, “[Human rights activists: police violence against protesters in Georgia is a crime](#)”, 27 December 2024.

⁷² HRW, “[World Report 2023: Georgia](#)”, 2023.

⁷³ HRW, “[Georgia: Violent Attacks on Government Critics](#)”, 20 August 2024.

⁷⁴ Ibid.

⁷⁵ Ibid.

⁷⁶ PACE, [Challenges to democracy in Georgia Res. 2561 \(2024\)](#), , 27 June 2024.

⁷⁷ HRW, “[Georgia: Violent Attacks on Government Critics](#)”, 20 August 2024.

⁷⁸ PACE, [Challenges to democracy in Georgia Res. 2561 \(2024\)](#), , 27 June 2024.

⁷⁹ HRW, “[Georgia: Violent Attacks on Government Critics](#)”, 20 August 2024.

⁸⁰ Ibid.

5.2. Selected examples

38. According to Frontline Defenders, Eduard Marikashvili, chairperson of the Georgian Democracy Initiative, was fined 500 GEL (EUR 175) by the Tbilisi City Court on 27 September 2023 for “hooliganism” under Article 166 of the Code of Administrative Offences, following his participation in a peaceful protest.⁸¹ Marikashvili, a prominent human rights lawyer, has been vocal in challenging state policies on transparency and democratic reforms.⁸²

39. HRW reported that Nikoloz Managadze, a 21-year-old activist and founder of the student protest group For Freedom, was assaulted on two occasions in 2024.⁸³ The first attack in April 2024 occurred outside Tbilisi State University and left him with a mild concussion. A second attack in June left him with a dislocated shoulder and concussion, requiring hospitalisation. Despite police acknowledgment of the attacks, no arrests have been made.⁸⁴

40. According to HRW, the legal and political environment in Georgia has become increasingly challenging for human rights defenders.⁸⁵ The Law on Transparency of Foreign Influence and the Law on Family Values represent significant challenges to freedoms of association, expression, and assembly, restricting the operation of NGOs, independent media, and LGBTIQ advocates.

41. According to HRW, during a police crackdown near the Georgian parliament in November 2024, individuals, including businessman Avtandil Kuchava and poet Zviad Ratiani, were brutally beaten, with Kuchava losing consciousness multiple times and suffering a shoulder fracture.⁸⁶ Similarly, journalist Aleksandre Keshelashvili, wearing press gear, was allegedly beaten by masked officers, while investigations into the abuse have not led to any charges.⁸⁷

6. The situation in the Russian Federation

42. Since October 2023, the environment for human rights defenders in Russia has remained highly challenging. Human Rights Watch (‘HRW’) has reported that human rights defenders continue to face harassment, physical violence, smear campaigns, and arbitrary detention and even death⁸⁸, alongside violations of fundamental freedoms, including the freedoms of expression, assembly, and association.⁸⁹ A combination of legal amendments, criminal prosecutions, and violent repression has been employed to systematically silence dissent, targeting in particular those opposing Russia's ongoing war of aggression against Ukraine.⁹⁰

43. According to the civil society organisation ZMINA, as of December 2024, at least 121 Ukrainian human rights defenders, activists, volunteers, and journalists had been killed due to Russia's full-scale invasion of Ukraine.⁹¹ The main causes of death include rocket attacks on civilian targets, targeted shootings of humanitarian or evacuation vehicles and convoys by the Russian military, extrajudicial executions and torture in places of illegal detention, and mine explosions during humanitarian missions.⁹²

⁸¹ Frontline Defenders, “[Court relies on scant evidence in attempt to justify Eduard Marikashvili hooliganism charge](#)”, 13 November 2023.

⁸² Ibid.

⁸³ HRW, “[Georgia: Violent Attacks on Government Critics](#)”, 20 August 2024.

⁸⁴ Ibid.

⁸⁵ Human Rights Watch (‘HRW’), “[World Report 2023: Georgia](#)”, 2023.

⁸⁶ HRW, “[Georgia: Brutal Police Violence Against Protesters](#)”, 23 December 2024.

⁸⁷ Ibid.

⁸⁸ Alexei Navalny died custody after 37 months behind bars and being sent to one of Russia's most remote and harshest prisons; Human Rights Watch (‘HRW’), “[Russia: Navalny Dies in Prison](#)”, 16 February 2024.

⁸⁹ HRW, “[Russia's legislative minefield: Tripwires for Civil Society Since 2020](#)”, August 2024, p. 5-6.

⁹⁰ Ibid.

⁹¹ Zmina Center for Human Rights, “[ZMINA presents a memorial report on the fallen activists and journalists](#)”, 27 December 2024.

⁹² Ibid.

6.1. Types of persecution

6.1.1. The expansion of the legislative apparatus for persecuting human rights defenders

44. Russia has enacted and amended several laws, since October 2023, that further escalate its repression of dissent.⁹³ A major development was the broadening of the scope of "foreign agent" legislation.⁹⁴ The law now also allows authorities to conduct unscheduled inspections of any party potentially connected to foreign agents, based on complaints from any individual or organization, regardless of nationality.⁹⁵ The European Court of Human Rights has also stated that Russia's "foreign agent" legislation breaches the European Convention on Human Rights in its recent judgement on 22 October 2024.⁹⁶ The Court criticized the law as "arbitrary" and applied in an "overly broad and unpredictable manner".

45. A February 2024 law increased penalties the spreading of "fake news" about Russia's military and allows for the confiscation of property from those convicted under these charges, targeting exiled human rights defenders and their families.⁹⁷ Furthermore, a March 2024 law prohibits any form of advertising in media designated as "foreign agents," cutting off a vital revenue stream and further marginalizing these outlets.⁹⁸

6.1.2. Targeting of human rights defenders in Russian occupied territory in Ukraine

46. According to Front Line Defenders, human rights defenders in Russian-occupied Ukraine have faced severe persecution.⁹⁹ Human rights defenders, including activists, journalists, and lawyers, have been targeted for documenting war crimes, defending Ukrainian sovereignty, and opposing the occupation.¹⁰⁰

47. The Crimean Human Rights Group has stated that censorship laws and harsh penalties, including property confiscation under a 2024 law, are used to punish those who expose Russian war crimes or support Ukraine.¹⁰¹ Front Line Defenders reported that activist Kulamet Ibraimov was imprisoned in Crimea, where individuals faced charges, fines, or pre-trial detention for allegedly "discrediting" or spreading "false" information about the Russian military.¹⁰² Iryna Horobtsova's case further exemplifies this type of repression: after being abducted in Kherson in retaliation for her humanitarian work and public opposition to the occupation, she was sentenced in August 2024 to 10.5 years in a Russian penal colony on charges of espionage.¹⁰³

6.1.3. Targeting of civil society and media

48. Targeting civil society and media directly affects human rights defenders as a significant number of human rights defenders are closely linked to or active in these organisations. According to HRW, the repression of civil society organisations and media has intensified, with dozens of NGOs being forced to close or cease operations due to new laws targeting "undesirable" organizations.¹⁰⁴ Additionally, the Russian

⁹³ HRW, "[Russia's legislative minefield: Tripwires for Civil Society Since 2020](#)", August 2024.

⁹⁴ Order of the Russian Government №1818 of October 31, 2023; HRW, "[Russia's legislative minefield: Tripwires for Civil Society Since 2020](#)", August 2024, p. 78.

⁹⁵ Ibid.

⁹⁶ [Kobaliya and others v. Russia](#) (39446/16), judgement of 22 October 2024.

⁹⁷ Human Rights Watch, "[Update on Human Rights in the Russian Federation and the Continuing Need for a Special Rapporteur on Russia](#)", 28 August 2024.

⁹⁸ Ibid.

⁹⁹ Front Line Defenders, "[Global Analysis 2023/24](#)", 22 May 2024, p. 86.

¹⁰⁰ Ibid.

¹⁰¹ Crimean Human Rights Group, "[Review on the human rights situation in Crimea January – March 2024](#)", 6 May 2024, p. 8.

¹⁰² Front Line Defenders, "[Global Analysis 2023/24](#)", 22 May 2024, p. 22, 87.

¹⁰³ Ibid., p. 82.

¹⁰⁴ In January 2024, the authorities labeled the prominent NGO *Help Needed* a "foreign agent." The organization, which had been providing essential services to marginalized communities, was forced to close after heavy fines and legal harassment made continued operations impossible; HRW, "[Update on Human Rights in the Russian Federation and the Continuing Need for a Special Rapporteur on Russia](#)", August 28 2024.

authorities blocked major platforms like WhatsApp, Signal, and YouTube, and amended legislation to ban advertisements on unregistered social media channels with over 10,000 followers.¹⁰⁵

49. Since October 2023, HRW reported that the Russian authorities added 74 new organisations to the “undesirable organisations” list, including international human rights groups such as Freedom House and the Boris Nemtsov Foundation for Freedom.¹⁰⁶ Their websites were blocked and any public association with them became grounds for criminal prosecution. Grigory Melkonyants, co-chair of the election monitoring group Golos, was arrested in August 2024 on charges of leading an “undesirable organisation.” Melkonyants had been instrumental in documenting electoral fraud in Russia, and his prosecution represents a broader effort to dismantle independent election monitoring in the country.¹⁰⁷

50. UN experts have reported that the past year has seen an escalation in the persecution of journalists in Russia.¹⁰⁸ Wall Street Journal reporter Evan Gershkovich was sentenced to 16 years in prison on espionage charges by a court in Yekaterinburg, while Radio Free Europe/Radio Liberty journalist Alsu Kurmasheva received a 6.5-year sentence in Kazan for “spreading fake news about the Russian army.”¹⁰⁹ Both were convicted following secretive and expedited trials, with the charges linked to their reporting on Russia and the war in Ukraine.¹¹⁰

51. The Parliamentary Assembly of the Council of Europe has previously stated that the abuse of the criminal justice system has resulted in a complete suppression of civil society and political and media pluralism.¹¹¹

6.1.4. *Persecution of lawyers*

52. HRW has reported that human rights lawyers in Russia and in Russian-occupied Crimea are subjected to systemic persecution. For example, on 13 October 2023, Aleksei Navalny’s lawyers—Vadim Kobzev, Igor Sergunin, and Aleksei Liptser—were arrested and charged under Article 282.1(2) of the Criminal Code for “participation in an extremist association” linked to organisations founded by Navalny, which were designated as “extremist” in 2021.¹¹² These charges carry severe penalties - up to six years in prison. Separately, human rights lawyer Aleksey Ladin, known for defending Crimean political prisoners, has also faced repeated persecution.¹¹³ In October 2023, Ladin was detained and sentenced to 14 days of administrative arrest and fined 45,000 rubles for “discrediting” the Russian military. He has since been disbarred. Another lawyer, Emil Kurbedinov, was detained in February 2024 in Simferopol for allegedly disseminating false information, demonstrating ongoing legal harassment of lawyers advocating for politically persecuted individuals.¹¹⁴

6.1.5. *Targeting of LGBTI rights defenders*

53. In December 2023, Russia’s Supreme Court ruled that “the International LGBTI Movement” is an “extremist organisation.” According to HRW, this has led to penalties for at least 27 individuals displaying LGBTI symbols, such as the rainbow flag.¹¹⁵ Additionally, in May 2023, human rights defender Yan Dvorkin was fined for violating the “LGBTI propaganda” law after denouncing homophobic speech from public officials.¹¹⁶

¹⁰⁵ HRW, [“Update on Human Rights in the Russian Federation and the Continuing Need for a Special Rapporteur on Russia”](#), August 28 2024.

¹⁰⁶ Ibid.

¹⁰⁷ Ibid.

¹⁰⁸ Mariana Katzarova and Mary Lawlor, [“Russia: All remaining human rights defenders, journalists and anti-war critics convicted in sham trials must be released, say UN experts”](#), 2 August 2024.

¹⁰⁹ Ibid.

¹¹⁰ Ibid.

¹¹¹ Parliamentary Assembly Council of Europe, “Alexei Navalny’s death and the need to counter Vladimir Putin’s totalitarian regime and its war on democracy”, [Res. 2540 \(2024\)](#).

¹¹² Amnesty International, [“Russian Federation/Ukraine \(Crimea\): Human rights lawyers must be immediately and unconditionally released”](#), 27 October 2023.

¹¹³ Front Line Defenders, [“Human rights lawyer Aleksey Ladin disbarred”](#), 26 July 2024.

¹¹⁴ Crimean Human Rights Group, [“Review on the human rights situation in Crimea January – March 2024”](#), 6 May 2024, p. 8.

¹¹⁵ Human Rights Watch, [“Update on Human Rights in the Russian Federation and the Continuing Need for a Special Rapporteur on Russia”](#), 28 August 2024.

¹¹⁶ Front Line Defenders, [“Global Analysis 2023/24”](#), 22 May 2024, p. 92.

6.2. Selected examples

54. Alexey Sokolov, a human rights defender from Yekaterinburg, was arrested on 5 July 2024 under charges of “repeated demonstration of extremist symbols”¹¹⁷ for allegedly displaying Facebook’s logo on the Telegram channel “Ural Human Rights Defenders.”¹¹⁸ Front Line Defenders reported that this arrest followed a search of his home by law enforcement, during which documents authorizing Sokolov to represent prisoners before UN treaty bodies were seized in the absences of lawyers.¹¹⁹ Sokolov is the head of the human rights organisation “Legal Basis.”¹²⁰

55. On July 25, 2024, the Russian Ministry of Justice classified the informal group Aborigen-Forum as an “extremist” organisation. This classification exposes individuals connected to the group to potential legal actions, including fines and prison terms of up to 10 years under Articles 282.1 to 282.4 of the Russian Criminal Code. Aborigen-Forum is a collective of human rights defenders, experts, and activists advocating for the rights of Indigenous Peoples in the North, Siberia, and the Far East. Their efforts focus on legal monitoring, policy analysis, and raising awareness about injustices faced by indigenous communities.¹²¹

56. In August 2024, a major international prisoner exchange led to the release of 16 political prisoners, including Gershkovich, Kurmasheva, opposition figure Vladimir Kara-Murza, and others.¹²² However, experts noted that up to 1,372 individuals remain detained in Russia on politically motivated charges, underscoring the continued crackdown on dissent and free expression since the full-scale invasion of Ukraine.¹²³ Any form of criticism of the Russian authorities continues to be severely suppressed.¹²⁴

7. The situation in Türkiye

57. Since the release of the last information note on human rights defenders on 18 October 2023, the situation of human right defenders in Türkiye shows no signs of improvement. At the end of her mandate, Dunja Mijatović, former Council of Europe Commissioner for Human Rights, concluded that the ongoing decline of civil society and human rights defenders in Turkey had intensified particularly since the state of emergency declared in July 2016; and that, despite the lifting of the state of emergency in 2018, the situation has not improved. The negative impact of the state of emergency persists, intensified by new restrictive laws aimed at silencing dissent.¹²⁵

7.1. Types of repression

7.1.1. Direct attacks

58. According to the former Council of Europe Commissioner for Human Rights, the Turkish journalist community is facing a number of significant risks, including physical attacks and a lack of accountability for crimes committed against them.¹²⁶ Notably, according to a survey conducted by Free Turkish Press in 2023, approximately 88% of journalists surveyed indicate they feel unsafe.¹²⁷

59. As an example of impunity for past instances of attacks, in June 2024, the Diyarbakır 10th High Criminal Court delivered a verdict of acquittal for three police officers involved in the killing of Tahir Elçi, a prominent

¹¹⁷ Part 1 of article 282.4 of the Russian Criminal Code.

¹¹⁸ ¹¹⁸ Mariana Katzarova and Mary Lawlor, “[Russia must free human rights defender Alexey Sokolov arrested for posting Facebook logo: UN experts](#)”, 26 July 2024.

¹¹⁹ Front Line Defenders, “[Human rights defender Aleksei Sokolov transferred to a psychiatric hospital](#)”, 24 September 2024.

¹²⁰ Ibid.

¹²¹ Front Line Defenders, “[Indigenous Peoples' Rights Association Aborigen-Forum listed as “Extremist”](#)”, 8 August 2024.

¹²² Mariana Katzarova and Mary Lawlor, “[Russia: All remaining human rights defenders, journalists and anti-war critics convicted in sham trials must be released, say UN experts](#)”, 2 August 2024.

¹²³ Ibid.

¹²⁴ Amnesty International, “[The State of the World's Human Rights](#)”, April 2024, p. 316-317.

¹²⁵ Memorandum by Dunja Mijatović, the former Council of Europe Commissioner for Human Rights, “[Memorandum on freedom of expression and of the media, human rights defenders and civil society in Türkiye](#)”, 5 March 2024, p. 6.

¹²⁶ Ibid, p. 5.

¹²⁷ Free Turkish Press, “[Why journalists don't feel safe in Turkey](#)”, 7 August 2023.

human rights lawyer who was shot in 2015.¹²⁸ According to the Council of Europe Platform for the Safety of Journalists, as of February 2024, six cases of impunity for the murder of journalists were identified in Türkiye, including for the killing of Hrant Dink in 2007.¹²⁹

7.1.2. Intimidation and threats

60. According to civil society organisations, there is a worrying increase in informal detentions, threats and intimidation of university students, journalists, and political activists in Türkiye.¹³⁰ As an example, Eren Keskin, a prominent human rights lawyer and co-chair of the Human Rights Association (İHD) in Türkiye, who has been continuously judicially harassed for many years, was recently also subjected to a targeted smear campaign by ultra-nationalist social media accounts, resulting in a series of threats and insults following her participation in an Armenian Genocide Remembrance event.¹³¹

61. Furthermore, there are concerns over the intensifying discrimination, intimidation, and violence faced by Türkiye's LGBTIQ organisations, which are frequently subjected to restrictive measures, including legal sanctions, hate speech, and smear campaigns.¹³²

7.1.3. Legal harassment

62. According to the World Organisation against Torture, legal harassment of human rights defenders in Türkiye has intensified through the misuse of laws on national security, counterterrorism, and defamation.¹³³ As an example, Kurdish HRDs Eren Keskin and Güllistan Yarkin faced charges for "publicly denigrating the Turkish Nation" after remarks made during the Armenian Genocide Commemoration in 2021 (although they were eventually acquitted).¹³⁴ According to the former Council of Europe Commissioner for Human Rights, strategic lawsuits against public participation (SLAPPs) have also become a significant tool to suppress dissent in Türkiye, particularly against journalists.¹³⁵

63. According to civil society organisations, judicial authorities in Türkiye rely on an expansive interpretation of vaguely formulated national security legislation, combined with extremely weak or altogether non-existent evidence, to initiate proceedings against government critics on the basis of their legitimate activities.¹³⁶ The prolonged arbitrary detention and abusive proceedings against human rights defender Osman Kavala, and opposition politicians Selahattin Demirtaş and Figen Yüksekdağ, are the best known.¹³⁷ Another example of legal harassment is the shutting down of the independent station Açık Radyo in October 2024 by Türkiye's Radio and Television Supreme Council, after a guest referred to the 1915 atrocities against Armenians as "genocide".¹³⁸

64. Furthermore, female journalists are facing increased legal harassment, as evidenced by the case of Ayça Söylemez, who was sentenced to three years in prison for an article about a former judge and deputy justice minister and was subsequently acquitted in March 2024.¹³⁹ Of particular note, according to a report by Women's Press Freedom, in 2023 Türkiye had the highest number of legal harassment cases targeting women

¹²⁸ See for example, Amnesty International, "[Türkiye: Acquittal of three police officers for involvement in killing of human rights lawyer a huge blow to justice](#)", 12 June 2024.

¹²⁹ Council of Europe Platform for the Safety of Journalists, "[Türkiye](#)", 2024.

¹³⁰ Relief Web, "OMCT Briefing Note on Enforced Disappearance in Turkey", 30 August 2022.

¹³¹ International Federation for Human Rights, "[Turkey: Acts of harassment and threats against Eren Keskin and the Human Rights Association \(İHD\)](#)", 30 January 2024.

¹³² See for example, Amnesty International, "[Joint statement regarding Türkiye's treatment of LGBTIQ+ people and human rights defenders, following the publication of the European Commission's 2023 Enlargement Package](#)", 20 November 2023.

¹³³ World Organisation Against Torture, "[Joint trial observation report on the case of Kurdish human rights defenders and İHD members Eren Keskin Güllistan Yarkin](#)", 28 August 2024.

¹³⁴ Ibid.

¹³⁵ Memorandum by Dunja Mijatović, the former Council of Europe Commissioner for Human Rights, "[Memorandum on freedom of expression and of the media, human rights defenders and civil society in Türkiye](#)", 5 March 2024, p. 5.

¹³⁶ Human Rights Watch, "[Submission by Human Rights Watch on Türkiye to the Human Rights Committee](#)", 23 October 2024, p. 3.

¹³⁷ Ibid.

¹³⁸ The Conversation, "[Turkey's silencing of an independent radio station highlights the country's escalating assault on media freedom](#)", 10 December 2024.

¹³⁹ Women Press Freedom, "[Türkiye: Bianet's Ayça Söylemez Acquitted of 'Targeting Counter-Terrorism Official'](#)", 27 July 2023.

journalists in the world.¹⁴⁰ Similarly, Şebnem Korur Fincancı, former head of the Turkish Medical Association and a human rights advocate, faces over seven years in prison after calling for an independent investigation into alleged chemical weapon use by the Turkish armed forces in the Kurdistan region of Iraq.¹⁴¹

7.1.4. Transnational repression

65. Additionally, Turkish human rights defenders in exile are subjected to harassment by both direct physical attacks and abuse of lawful measures, including strategic use of asset freezes and misusing the Interpol system.¹⁴² As an example, Muammer Burtacgiray, who is alleged to be affiliated with the Gülen Movement, was included in the Erdoğan administration's Orange Notice alerts, and labelled a "wanted terrorist", which resulted in the closure of his bank accounts and damage to his reputation. The bank accounts of the NGO Human Rights Defenders, where he was employed, were also terminated.¹⁴³

8. Environmental Human Rights Defenders

66. Following the release of the latest information note on human rights defenders on 18 October 2023, the situation of environmental human rights defenders (EHRDs) continues to be of concern. There have been widespread reports of legal actions, smear campaigns, and increasingly harsh penalties for those engaged in protest.¹⁴⁴

8.1. Forms of repression

8.1.1. SLAPPs

67. According to the UN Special Rapporteur on Environmental Defenders under the Aarhus Convention, there has been a notable increase in the use of strategic lawsuits against public participation (SLAPPs) against environmental defenders across Europe.¹⁴⁵ SLAPPs constitute abusive litigation designed to impede the dissemination of information and silence those reporting on matters of public interest. According to environmental civil society organisations, these lawsuits burden EHRDs with lengthy and costly legal battles.¹⁴⁶ During the reporting period SLAPPs have been widely used in Europe, particularly in the UK.¹⁴⁷

8.1.2. Criminalisation

68. According to the Special Rapporteur, the repression and criminalisation of environmental defenders in policies and legislation is becoming increasingly prominent.¹⁴⁸ Following the 2023 European Union Terrorism Situation and Trend (TE-SAT) report, environmental activism is being labelled as a potential terrorist and

¹⁴⁰ Ibid.

¹⁴¹ Amnesty International, "[Write for Rights case booklet](#)", November 2024, p. 13.

¹⁴² Human Rights Watch, "[We Will Find You](#)": A Global Look at How Governments Repress Nationals Abroad", 22 February 2024.

¹⁴³ Dr. Yasir Gökçe, Mayra Russo and Sara Kezia Heinonen, "[Weaponizing Financial Systems Erdoğan's Transnational Repression to Muzzle Dissidents Abroad](#)", 29 August 2024.

¹⁴⁴ See for example, Global Witness, "[Global Witness Annual Defenders Report 2023/2024. Missing Voices. The violent erasure of land and environmental defenders](#)", 10 September 2024, p. 45.

Statement by Michel Forst, UN Special Rapporteur on Environmental Defenders under the Aarhus Convention, "[On the draft text of the Committee of Ministers' \(CM\) Recommendation on Countering Strategic Lawsuits against Public Participation \(SLAPPs\)](#)", 2 August 2023, p. 2.

¹⁴⁶ See for example Global Climate Legal Defence, "[The Dangerous Lives of Climate Defenders](#)", p. 3.

¹⁴⁷ See for example, Global Witness, "[Global Witness Annual Defenders Report 2023/2024. Missing Voices. The violent erasure of land and environmental defenders](#)", 10 September 2024, p. 47.

¹⁴⁸ Position Paper by Michel Forst, UN Special Rapporteur on Environmental Defenders under the Aarhus Convention, "[State repression of environmental protest and civil disobedience: a major threat to human rights and democracy](#)", 28 February 2024, p. 9.

extremist threat,¹⁴⁹ and legislation is being used to introduce new offences, impose harsher sentences, and ban certain forms of protest.¹⁵⁰

69. For example, in Italy, the 2024 "Eco-vandalism" law imposes prison sentences of up to five years and fines of up to €10,000 for vandalism during protests. Even minor damage, such as spraying washable paint, could result in six months' imprisonment. The situation worsened in December 2024 with draft Bill 1236 on public security, which broadens the scope of crime committed in certain areas such as roads, railways, and airports, and appears specifically designed to target environmental protesters. In a letter to the President of the Senate of Italy, Commissioner O'Flaherty urged members of the Senate to amend the Bill to comply with Council of Europe human rights standards, expressing concern over vague definitions of offences that could lead to arbitrary and disproportionate penalties regarding freedom of expression and of peaceful assembly.¹⁵¹

70. As another example, in August 2024, the Misdemeanour Court in Belgrade sentenced environmental human rights defenders Ivan Bijelić, Nikola Ristić, and Jevđenij Julijan Dimitrijević to 40 and 30 days in prison for allegedly disrupting public order during a peaceful protest against lithium mining.¹⁵² Despite the Court of Appeal subsequently overturning the decision and ordering a retrial, the initial arrests and charges serve to illustrate how legal actions can be employed with the intention of intimidating and discouraging activism.

8.1.3. Vilification and Public Smear Campaigns

71. According to the Special Rapporteur, EHRDs, particularly those engaged in peaceful protest and civil disobedience, are increasingly subjected to negative portrayals by political figures and the media.¹⁵³ In countries such as Austria, France, Germany, Spain, Sweden and the UK, public officials, including parliamentarians and ministers, have labelled environmental movements as a "threat to democracy" and referred to activists as "ecoterrorists" or criminals.¹⁵⁴

72. Additionally, the Special Rapporteur has identified a tendency for the media to amplify these narratives through the use of derogatory language, a focus on disruptions caused by protests, and an inadequate explanation of the reasons behind them. This framing reinforces the perception of environmental protests as illegal or violent, and of environmental movements as criminal organisations.

8.1.4. Direct Attacks

73. Consequently, the Special Rapporteur maintains that vilification tactics often encourage violent behaviour against EHRDs, as seen in 2023 in Germany, where protesters have been physically attacked by road users.¹⁵⁵ Additionally, they provide justification for the use of repressive measures, typically reserved for organised crime and terrorism, against peaceful activists. This discourages public participation in protests, as individuals fear being labelled as criminals, thus undermining the exercise of fundamental rights like freedom of expression, freedom of peaceful assembly and association.

74. Moreover, according to the Special Rapporteur, the police tend to increasingly rely on heavy-handed tactics against EHRDs during protests, including the use of water cannons and pepper spray.¹⁵⁶

¹⁴⁹European Union Agency for Law Enforcement Cooperation, "[European Union Terrorism Situation and Trend report 2023 \(TE-SAT\)](#)", 19 December 2023, p. 65.

¹⁵⁰ Position Paper by Michel Forst, UN Special Rapporteur on Environmental Defenders under the Aarhus Convention, "[State repression of environmental protest and civil disobedience: a major threat to human rights and democracy](#)", 28 February 2024, p. 9.

¹⁵¹ Commissioner for Human Rights, "[The Commissioner asks the Italian Senate to amend the 'security bill' to safeguard human rights](#)", 20 December 2024.

¹⁵² Front Line Defenders, "[Three environmental human rights defenders sentenced to prison hours after their arrest | Front Line Defenders](#)", 26 August 2024.

¹⁵³ Position Paper by Michel Forst, UN Special Rapporteur on Environmental Defenders under the Aarhus Convention, "[State repression of environmental protest and civil disobedience: a major threat to human rights and democracy](#)", 28 February 2024, p. 8.

¹⁵⁴ Ibid., page 9

¹⁵⁵ Ibid.

¹⁵⁶ Resilience, 11 July 2024 "[Environmental protesters under attack and often treated as terrorists: Interview with Michael Forst](#)", 11 July 2024.

9. Human Rights Defenders Assisting Refugees, Asylum Seekers and Migrants in Europe

75. Following the release of the latest information note on human rights defenders on 18 October 2023, the situation of human rights defenders (HRDs) assisting refugees, asylum seekers, and migrants in Europe remains a cause for significant concern. According to Dunja Mijatović, Council of Europe Commissioner for Human Rights until March 2024, the current attacks are linked to increasingly restrictive and asylum and migration policies in Europe which are non-compliant with international human rights standards.¹⁵⁷ This hostility extends beyond traditional HRDs, impacting various individuals who provide support, including teachers and medical professionals.

9.1. Forms of repression

9.1.1 Hostile Rhetoric

76. The rise of anti-refugee and anti-migrant rhetoric in Council of Europe member states is closely linked to a shift in policy towards deterrence, often using the terminology of 'illegal migration' to describe asylum seekers. According to the former Commissioner, such language portrays human rights defenders as complicit in illegal migration and a threat to national security.¹⁵⁸

9.1.2 Threats, Violence and Surveillance

77. As stated by the former Commissioner, many HRDs assisting refugees, asylum seekers, and migrants have faced violent attacks, including beatings, property damage, and even bombings.¹⁵⁹ This violence often comes from individuals or groups emboldened by hostile official rhetoric, including paramilitary and vigilante organisations. A recent incident involved the bombing of the office of Kisa, an NGO assisting refugees, asylum seekers and migrants in Cyprus.¹⁶⁰ Kisa believes the attack was carried out by groups motivated by racism and nationalism, following threats they had received.¹⁶¹

78. The former Commissioner maintains that in addition to physical threats, HRDs frequently endure online harassment, hate speech, and racial abuse.¹⁶²

9.1.3 Criminalisation

79. As indicated by the former Commissioner, individuals engaged in the provision of humanitarian assistance have reportedly been subjected to accusations and prosecutions for facilitating irregular migration, often without a clear distinction between criminal intent and humanitarian actions.¹⁶³ According to civil society organisations, in Europe, over 100 people, including doctors, lawyers, journalists, and humanitarian workers, faced criminal charges last year for facilitating irregular migration,¹⁶⁴ with sociologist Ieva Raubisko and her colleague Egils Grasmanis among those charged for allegedly assisting Syrian refugees at the Belarus-Latvia border.¹⁶⁵

¹⁵⁷ Recommendation by Dunja Mijatović, former Council of Europe Commissioner for Human Rights, "[Protecting the Defenders. Ending repression of human rights defenders assisting refugees, asylum seekers and migrants in Europe](#)", 21 February 2024, p. 10.

¹⁵⁸ *Ibid.*, page 11.

¹⁵⁹ *Ibid.*, page 13.

¹⁶⁰ See for example, The Guardian, "[People helping asylum seekers in Europe face rising violence, report warns](#)", 22 February 2024.

¹⁶¹ Cyprus Mail, "[Kisa offices destroyed in apparent attack](#)", 5 January 2024.

¹⁶² Recommendation by Dunja Mijatović, former Council of Europe Commissioner for Human Rights, "[Protecting the Defenders. Ending repression of human rights defenders assisting refugees, asylum seekers and migrants in Europe](#)", 21 February 2024, p. 14.

¹⁶³ Recommendation by Dunja Mijatović, former Council of Europe Commissioner for Human Rights, "[Protecting the Defenders. Ending repression of human rights defenders assisting refugees, asylum seekers and migrants in Europe](#)", 21 February 2024, p. 14.

¹⁶⁴ See for example, Info Migrants, "[Criminal charges against migrant rights defenders rising, NGO finds](#)", 9 April 2024.

¹⁶⁵ Front Line Defenders, "[Ieva Raubiško, who is on trial for assisting asylum seekers, is facing a final hearing](#)", 17 September 2024.

9.1.4. SLAPPs

80. According to the former Commissioner, human rights defenders have furthermore been faced with legal proceedings from third parties, some of which can be characterised as strategic lawsuits against public participation (SLAPPs), when reporting on activities that negatively impact on the human rights of refugees, asylum seekers and migrants.¹⁶⁶ As an example, Panayote Dimitras, a prominent Greek defender of migrants' rights, faces persistent judicial harassment, asset freezes, and restrictive travel measures, including criminal charges against him and his wife for alleged financial misconduct.¹⁶⁷

10. Migration Status of Human Rights Defenders

81. A persistent challenge confronting human rights defenders who have fled their home country to a State in Europe is the difficulty in acquiring and preserving their migration status.¹⁶⁸ According to the UN Women, migrant women human rights defenders often face higher risks due to their migration status, such as arrest, detention, deportation and refoulement.¹⁶⁹

82. According to the EU Agency for Fundamental Rights, poor awareness of relocation programmes, logistical and financial barriers pose a significant challenge to human rights defenders, while widespread visa denials, delays, or refusals due to criminalisation in their home countries are a major issue.¹⁷⁰

10.1. Reported examples

83. In May 2024, disabled Azerbaijani activist Famil Khalilov, who had previously been deported from Sweden, was reported to have been detained in Baku on dubious drug charges, while his family faced threats, following a raid by men dressed as civilians.¹⁷¹ A similar alleged pattern of persecution against deported dissidents was illustrated by the cases of Samir Ashurov and Emin Malikov, who, following their deportation from Germany, were imprisoned on drugs charges.¹⁷²

84. Kazakhstani human rights defender Daniyar Khasenov who claimed to have fled his home country in 2019 to escape politically motivated persecution, was denied asylum by Lithuania's Migration Department.¹⁷³ Lithuania's refusal of asylum, despite appeals from European Parliament members, international human rights organisations, including a written declaration by PACE members¹⁷⁴, and Kazakhstani civil society, is reported to have placed Khasenov in imminent danger.¹⁷⁵

85. Another reported example, which concluded positively, is that of Belarusian filmmaker and activist Andrey Gnyot. He fled Serbia for an EU country after his year-long detention in Serbia expired and an Interpol warrant against him was cancelled. Accused by Belarus of tax evasion, Gnyot insists that the charges are a political reprisal for his role in founding the Free Association of Athletes of Belarus, supporting protests in 2020.¹⁷⁶

10.2. The need for adequate protection

86. The Parliamentary Assembly has raised the issue of the protection of human rights defenders from extradition and deportation on numerous occasions.

¹⁶⁶ Recommendation by Dunja Mijatović, former Council of Europe Commissioner for Human Rights, "[Protecting the Defenders. Ending repression of human rights defenders assisting refugees, asylum seekers and migrants in Europe](#)", 21 February 2024, p. 16.

¹⁶⁷ The Observatory for the Protection of Human Rights Defenders, "[Greece: Continued judicial harassment of migrants' rights defender Panayote Dimitras](#)", 14 August 2024.

¹⁶⁸ See for example, EU Agency for Fundamental Rights, "[Protecting human rights defenders at risk: EU entry, stay and support](#)", 11 July 2023; France Justice, "[What's driving France's sudden deportation of Kurdish activists?](#)", 25 October 2024; ; HRW, "[Tajik Activist in Germany at Risk of Deportation](#)", 31 October 2024.

¹⁶⁹ UN Women, "[Policy-brief-Protecting-women-human-rights-defenders in migration contexts](#)", 2022.

¹⁷⁰ EU Agency for Fundamental Rights, "[Protecting human rights defenders at risk: EU entry, stay and support](#)", 11 July 2023.

¹⁷¹ OC Media, "[Deportations from the West: the story of families sent back to Azerbaijan](#)", 26 December 2024.

¹⁷² Ibid.

¹⁷³ Open Dialogue Foundation, "[Transnational Persecution of Daniyar Khasenov](#)", 6 November 2024.

¹⁷⁴ PACE, "[Hold Kazakhstan accountable for its transnational and domestic repression](#)", Doc. 16057, 2 October 2024.

¹⁷⁵ Open Dialogue Foundation, "[Transnational Persecution of Daniyar Khasenov](#)", 6 November 2024.

¹⁷⁶ Balkan Insight, "[Belarus Activist Freed From Detention in Serbia Leaves for EU](#)", 1 November 2024.

87. Assembly Resolution 2541 on 'The arbitrary detention of Vladimir Kara-Murza and the systematic persecution of anti-war protesters in the Russian Federation and Belarus' called on member States to refuse extradition requests for Belarusian and Russian nationals that could be considered to be politically motivated.¹⁷⁷ Similarly, Assembly Resolution 2509 on 'Transnational repression as a growing threat to the rule of law and human rights', recognised unlawful deportations as a form of transnational repression and called upon states to ensure that their domestic laws provide mechanisms to prevent, investigate and prosecute such actions.¹⁷⁸

88. Numerous reports from civil society and international organisations offer insights into the struggles faced by human rights defenders when applying for visas to enter European states. These reports advocate for adequate support and protection for these individuals from third countries.¹⁷⁹

89. The European Parliament's Study on Enhancing the Protection of Human Rights Defenders (2023) sets out several key recommendations for the improvement of the status of human rights defenders within the European Union. These include expediting visa applications, waiving fees, and accepting minimal documentation; allowing human rights defenders to apply for visas or residence permits from outside their country of origin; ensuring appeals against refusals or database entries; and leveraging the Temporary Protection Directive to disapply mass-influx requirements. A study commissioned by the European Parliament's Sub-Committee on Human Rights proposed a series of measures to enhance the protection of HRDs from third countries, such as comprehensive rights, financial support, and mobility within the EU, supported by training for officials and monitoring mechanisms.¹⁸⁰ Such proposals should be seriously considered, not only within the EU but across the Council of Europe space.

11. Conclusion

90. The above examples demonstrate that persecution of human rights defenders has been particularly widespread or significant in Azerbaijan, Belarus, Georgia, Russia, and Türkiye. Defenders working on particular issues have suffered persecution in multiple States, particularly those working on the rights of migrants, asylum seekers and refugees, and the environment. Whilst the misuse of criminal law continues to be the most common attack faced by human rights defenders, there are also significant reports of refusals to register civil society organisations, smear campaigns, violence, and the use of SLAPPs.

91. Ongoing work by the Committee on Legal Affairs and Human Rights will address some of these issues in more detail. These include 'Threats to life and safety of journalists and human rights defenders in Azerbaijan';¹⁸¹ 'Ensuring better protection of whistle-blowers in Europe';¹⁸² and 'Fighting back against transnational repression'.¹⁸³ I urge the Committee on Legal Affairs and Human Rights to pay close attention to the findings of this Information Note and the above-mentioned reports under preparation – and to consider what steps can be taken to protect brave defenders and whistleblowers working in Europe today.

¹⁷⁷ PACE, "The arbitrary detention of Vladimir Kara-Murza and the systematic persecution of anti-war protesters in the Russian Federation and Belarus", Resolution 2541 (2024).

¹⁷⁸ PACE, "Transnational repression as a growing threat to the rule of law and human rights", Resolution 2509 (2023).

¹⁷⁹ See for example, CEELI Institute, "Human Rights Defenders in EU Visa Policy: Recommendations for Reform", 2021; European Parliament, "Enhancing the protection of human rights defenders (HRDs): Facilitating access to the EU and supporting HRDs from third countries", January 2024; EU Agency for Fundamental Rights, "Protecting human rights defenders at risk: EU entry, stay and support", 11 July 2023.

¹⁸⁰ European Parliament, "Enhancing the protection of human rights defenders (HRDs): Facilitating access to the EU and supporting HRDs from third countries", January 2024, p. 66 – 73.

¹⁸¹ Following from Motion 15521. The former rapporteur was Hannah Bardell – at the time of writing a new rapporteur is pending appointment.

¹⁸² Following from Motion 15919, Rapporteur: Anna-Kristiina Mikkonen.

¹⁸³ Following from Motion 16017. At the time of writing, the rapporteur is pending appointment.