



The Use of Transnational Repression in the Name of Security: Implications and Concerns

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Contents

About ICCT	iii
Abstract	1
Introduction	2
Transnational Repression: Tactics and National Security Risks	3
Two Broader Concerns Arising from Transnational Repression	4
Conclusion and recommendations	12
Bibliography	14
About the Author	19

Abstract

Transnational repression is no longer a hidden threat but a growing global challenge where authoritarian regimes reach beyond borders to silence critics through intimidation, violence, and digital espionage. This policy brief uncovers how these tactics undermine national security, erode the rule of law, and deepen divisions within host countries, especially those with vibrant diaspora communities. Often disguised as counter-terrorism, transnational repression exploits legal gaps and political polarisation, complicating efforts to counter it. In today's complex geopolitical climate, urgent, coordinated action is needed. This brief offers targeted policy recommendations to strengthen national and international capacities to address this escalating threat.

Introduction

Transnational repression (also known as foreign interference) is a form of “governments reaching across borders to silence dissent among diasporas and exiles, including through assassinations, illegal deportations, abductions, digital threats, Interpol abuse, and family intimidation”.¹ This phenomenon can occur everywhere, including in Western democracies with large diaspora communities, such as the United Kingdom, Canada,² or the United States. Transnational repression is not a new phenomenon. However, its frequency and complexity have grown considerably in recent decades. As the digital age has been unfolding, the scale and methods of modern transnational repression have expanded significantly, positioning it as a major concern in international law and national security debates. For instance, states such as Saudi Arabia, Turkey, and China have increasingly engaged in transnational repression through physical violence, advanced tools of cyber espionage and disinformation campaigns.³ Therefore, states increasingly perceive transnational repression as a threat to the rule of law, national security and human rights.

In June 2023, the Parliamentary Assembly of the Council of Europe recognised that transnational repression is a growing concern undermining the rule of law and human rights.⁴ A year later, in June 2024, the US Ambassador Michèle Taylor delivered a Joint Statement on Transnational Repression at the 56th Session of the United Nations Human Rights Council, underlining that the urgent and growing threat of transnational repression undermines national sovereignty, democracy, human rights, and fundamental freedoms.⁵ In its 2025 Homeland Threat Assessment, the US Department of Homeland Security identified transnational repression as one of the major threats to public safety.⁶ Similarly, in the Netherlands, the General Intelligence and Security Service (AIVD) and the National Coordinator for Security and Counterterrorism (NCTV) published a report on the topic in October 2024, naming transnational repression as a threat to national security.⁷ Moreover, since 15 May 2025, additional provisions have been added to the Dutch Criminal Code regarding punishable forms of espionage, including digital espionage and espionage activities targeting diaspora communities.⁸

Among the most recent developments is the G7 Leaders’ statement on transnational repression, issued on 17 June 2025, which announced plans to adopt a series of measures, including the development of a resilience and response framework and the launch of a Digital Transnational Repression Detection Academy.⁹ Additionally, on 18 June 2025, the United Nations Human Rights Office of the High Commissioner issued its first guidance paper on the topic of transnational repression.¹⁰

The present policy brief aims to unpack the ways in which transnational repression has been

1 Freedom House, “Transnational Repression”, <https://freedomhouse.org/report/transnational-repression>

2 See for example Tanya Mehra and Colin P. Clarke, “The India-Canada rift: Sikh Extremism and Tise of Transnational Repression”, *International Centre for Counter-Terrorism*, 17 October 2023 <https://icct.nl/publication/india-canada-rift-sikh-extremism-and-rise-transnational-repression>

3 Nate Schenkkan and Isabel Linzer, “Out of Sight, Not Out of Reach: The Global Scale and Scope of Transnational Repression”, *Freedom House*, February 2021, pp. 15-41 https://freedomhouse.org/sites/default/files/2021-02/Complete_FH_TransnationalRepressionReport2021_rev020221.pdf

4 Council of Europe, Parliamentary Assembly, Resolution 2509 (2023), Adopted by the Assembly on 23 June 2023.

5 US Mission to International Organizations in Geneva, “Joint Statement on Transnational Repression as Delivered by Ambassador Michèle Taylor”, 26 June 2024 <https://geneva.usmission.gov/2024/06/26/joint-statement-on-transnational-repression/>

6 US Homeland Security, “HS’ 2025 Homeland Threat Assessment Indicates the Threat of Domestic and Foreign Terrorism in the Homeland Remains High”, 2 October 2024 <https://www.dhs.gov/news/2024/10/02/dhs-2025-homeland-threat-assessment-indicates-threat-domestic-and-foreign-terrorism>

7 AIVD and NCTV, “Over de grens. Statelijke inmenging in diasporagemeenschappen in Nederland”, 17 October 2024 <https://www.aivd.nl/documenten/publicaties/2024/10/17/over-de-grens-statelijke-inmenging-in-diasporagemeenschappen-in-nederland>

8 NCTV, “Vanaf 15 mei: meer vormen van spionage strafbaar”, 15 May 2025 <https://www.nctv.nl/actueel/nieuws/2025/05/15/vanaf-15-mei-meer-vormen-van-spionage-strafbaar>

9 G7 Leaders’ statement, 17 June 2025, https://ec.europa.eu/commission/presscorner/detail/en/statement_25_1552

10 United Nations Human Rights Office of the High Commissioner, “Transnational Repression”, Civic Space Brief <https://www.ohchr.org/sites/default/files/documents/publications/transnational-repression-1-en.pdf>; See also Hilary Power, “UN Human Rights Office Calls for Action on ‘Transnational Repression’”, Human Rights Watch, 25 June 2025 <https://www.hrw.org/news/2025/06/25/un-human-rights-office-calls-for-action-on-transnational-repression>

used under the guise of countering terrorism, assess its implications on the national security of host states and highlight two critical areas of concern: the vulnerability of polarised societies and the challenges of addressing this issue within the current geopolitical landscape. It concludes with policy recommendations for strengthening national and international responses to this rising threat.

Transnational Repression: Tactics and National Security Risks

Transnational repression is not a new phenomenon. A famous example is Leon Trotsky's assassination in Mexico by the Soviet Union in 1940. However, over the years and with the advances of technology, transnational repression's tactics have been expanded. Although transnational repression is not universally defined, constitutive elements found in different definitions include government acts against dissents or their families who are living outside the state with the aim of silencing them.¹¹ These acts may include digital threats, kidnappings, assassinations, family intimidation, and detentions.¹² Interestingly, authoritarian regimes frequently justify their transnational repression practices by invoking the language of counter-terrorism and violent extremism, a strategy that both obscures the repressive nature of their actions and aligns them with global security norms. Such tactics have detrimental consequences for the national security of the host state. The present section will focus on these two key topics.

Links Between Transnational Repression and Countering Terrorism

According to Freedom House, 53 percent of physically targeted individuals are labelled as terrorists by the perpetrating governments.¹³ These individuals are often activists, journalists, academics, artists, human rights defenders or anyone perceived as an enemy to the government in place. For example, former Canadian Prime Minister Justin Trudeau revealed that his government had received credible information linking the Indian government to the murder of Hardeep Singh Nijjar, a Sikh separatist leader, in British Columbia.¹⁴ Mr Nijjar had been previously labelled by India as a terrorist and had been accused of leading a militant separatist organisation.¹⁵

Another example of transnational repression carried out under the guise of counter-terrorism is the Turkish government's response to the failed coup d'état in 2016, which included illegal renditions and other extraterritorial measures. According to Freedom House, most of the individuals targeted have been teachers or education administrators working at schools run by the Gülen movement around the world, considered, in the view of Turkey, as "legitimate counterterrorism targets."¹⁶ Freedom House highlighted in its 2021 report that every one of the 110 physical transnational repression cases documented as being carried out by the Turkish state concerned terrorism related accusations.¹⁷

Similarly, in Rwanda, Paul Rusesabagina, a Hutu, hotel manager at the time of the genocide, considered a supporter of terrorism by the Rwanda government, was rendered from Dubai to Kigali in 2020.¹⁸ He was later sentenced to 25 years imprisonment on terrorism charges before

¹¹ Freedom House, "Transnational Repression", <https://freedomhouse.org/report/transnational-repression>

¹² Ibid.

¹³ Freedom House, "Policy Recommendations: Transnational Repression", <https://freedomhouse.org/policy-recommendations/transnational-repression>

¹⁴ Geeta Pandey and Zoya Matee, "Hardeep Singh Nijjar: Canada accuses India of role in Sikh leader's murder", *BBC*, 19 September 2023 <https://www.bbc.com/news/uk-66848041>

¹⁵ Ibid.

¹⁶ Nate Schenkkan and Isabel Linzer, "Out of Sight, Not Out of Reach: The Global Scale and Scope of Transnational Repression", p. 39.

¹⁷ Ibid.

¹⁸ Ibid, p. 24.

being pardoned and released from prison in 2023.¹⁹ The Tajik government has also been known to use anti-terrorism legislation to suppress dissent, particularly targeting human rights defenders.²⁰ In 2023, UN experts expressed concern over the government's practice of labelling human rights defenders as extremists or terrorists.²¹ According to these experts, eight of the nine cases they raised with the Tajik government involved individuals who were reportedly accused of offences related to extremism and terrorism.²²

These examples demonstrate how accusations of terrorism are increasingly being used by regimes as a pretext to justify transnational repression acts. The label of "terrorist" serves as a tool to delegitimise dissent and circumvent international norms. In many cases, the individuals targeted have not been involved in any violent activity but are instead prominent voices challenging state narratives or advocating for political reform.

In addition to the above-mentioned tactics, Interpol's Red Notice has also been manipulated to arrest and extradite targeted individuals in the name of security. Interpol's Red Notice Programme allows member states to share alerts about wanted criminals. It constitutes a request to law enforcement worldwide to locate and provisionally arrest a person wanted by a national or international jurisdiction with the view to extradition.²³ As Interpol has limited capacity to vet these notices, they can be instrumentalised to detain and extradite individuals wanted on the basis of political reasons.²⁴

According to a recent media article, "Interpol's lack of transparency allows China to use 'red notices' to repatriate its targets".²⁵ Advocates say that China most frequently cites financial crimes as the justification for requesting a Red Notice.²⁶ Uyghur rights advocates who have long opposed Beijing's repression of minorities have faced accusations of terrorism. For example, in 2003, China requested a Red Notice for Muslim Uyghur activist Abdulkadir Yapchan, now residing in Turkey, alleging that he and ten other Uyghurs were involved in terrorism and other offences.²⁷ In 2021, Idris Hasan, an ethnic Uyghur who has been living in Turkey since 2012, was arrested at Casablanca airport on a transit flight from Turkey to Western Europe on the basis of an Interpol Red Notice. He is considered a terrorist by the Chinese government, and he is currently in detention in Morocco and at high risk of being extradited to China after the Moroccan Court of Cassation ruling in favour of his extradition.²⁸

Interpol notifications have also led to the detentions of German-Turkish writer Doğan Akhanli and Swedish-Turkish journalist Hamza Yalçın in August 2017, while two individuals accused of membership in the PKK were unlawfully deported to Turkey from Serbia and Bulgaria.²⁹ In the United States, Russian national Alexey Kharis was denied asylum and held in Immigration and Customs Enforcement (ICE) detention for fifteen months following his arrest based on a Russian

19 The Guardian, "Hotel Rwanda's Paul Rusesabagina released from prison" 25 March 2023 <https://www.theguardian.com/world/2023/mar/24/hotel-rwanda-paul-rusesabagina-to-be-released-from-prison>

20 Saipira Furstenberg, Marcus Michaelsen and Siena Anstis, "Transnational repression of human rights defenders: The impacts on civic space and the responsibility of host states" *External Policies Analysis and Support Unit Directorate-General for External Policies of the Union* PE 754.475, June 2025, p. 26.

21 UN Special Procedures, "Tajikistan: UN experts deplore criminal proceedings against human rights defenders", 4 July 2023 <https://www.ohchr.org/en/press-releases/2023/07/tajikistan-un-experts-deplore-criminal-proceedings-against-human-rights>

22 Ibid.

23 Interpol, Red Notices <https://www.interpol.int/en/How-we-work/Notices/Red-Notices/View-Red-Notices>

24 Nate Schenkkan and Isabel Linzer, "Out of Sight, Not Out of Reach: The Global Scale and Scope of Transnational Repression", p. 12.

25 Simon Lepître and ICIJ, "Interpol: A tool in China's arsenal of transnational repression" *Le Monde*, 29 April 2025 https://www.lemonde.fr/en/international/article/2025/04/29/interpol-a-tool-in-china-s-arsenal-of-transnational-repression_6740746_4.html

26 Scilla Alecci and ICIJ, "Chinese authorities exploited Interpol and strong-armed one of the world's richest men to pursue a target", International Consortium of Investigative Journalists, 29 April 2025 <https://www.icij.org/investigations/china-targets/interpol-red-notice-police-warrant-jack-ma/>

27 Ibid.

28 Amnesty International, "Morocco : Ethnic Uyghur at Risk of Extradition to China" <https://www.amnesty.org.uk/urgent-actions/ethnic-uyghur-risk-extradition-china>

29 Nate Schenkkan and Isabel Linzer, "Out of Sight, Not Out of Reach: The Global Scale and Scope of Transnational Repression", p. 40.

Red Notice.³⁰ The Tajik government has reportedly used Interpol Red Notices to pursue political opponents abroad, including the alleged issuance of notices against 2,528 citizens—most of whom are accused of terrorism-related offences.³¹ Similarly, the Azerbaijani government has reportedly issued several Red Notices targeting critics living in exile within the EU.³² For instance, in January 2020, Dashgyn Agalarli, an Azerbaijani opposition activist and political exile, was detained in Poland based on an Interpol Red Notice at the request of Azerbaijan for alleged tax evasion.³³

The misuse of counter-terrorism rhetoric and international cooperation mechanisms, such as Interpol's Red Notice Programme, threatens freedom of expression, political participation, and the protection of human rights on an international scale while undermining the global counter-terrorism efforts. As these practices grow more sophisticated and coordinated, they raise serious concerns about the erosion of international legal norms and the complicity or passive tolerance of third-party states in enabling or ignoring such violations.

Transnational Repression's Impact on the National Security of the Host State

Considering the advances in technology and the frequency of acts related to transnational repression, several governments have recently identified this phenomenon as a threat to national security. For instance, the Dutch AIVD and NCTV consider transnational repression as a threat to national security.³⁴ The UK National Security Act 2023, which makes provision about threats to national security, includes foreign interference.³⁵ The same goes for the US Department of Homeland Security, which includes transnational repression in its 2025 Homeland Threat Assessment under the public safety and security section.³⁶ According to the 2025 Homeland Threat Assessment, the US, China, Iran, and Russia are the main governments posing a threat. The impact of transnational repression on national security can include access to state secrets by individuals supporting the foreign power, manipulation of the host State's institutions, terrorist acts, the misuse of Interpol's Red Notice system or diplomatic tensions.

Regarding access to state secrets, in October 2023, a Dutch citizen with a Moroccan background was arrested on his way to Morocco carrying a large amount of digital state secret documents, including an analysis by the AIVD on Moroccan intelligence activities in the Netherlands.³⁷ This information was acquired through his position at the NCTV. He is currently suspected of violating state secrets possibly on behalf of a foreign power and the Public Prosecution Service believes that the suspected individual has been in contact with the Moroccan intelligence for more than three decades.³⁸ As this example demonstrates, individuals who are working on behalf of foreign

30 Matt Apuzzo, "How Strongmen Turned Interpol Into Their Personal Weapon" *The New York Times*, 22 March 2019 <https://www.nytimes.com/2019/03/22/world/europe/interpol-most-wanted-red-notices.html>; Nate Schenkkan and Isabel Linzer, "Out of Sight, Not Out of Reach: The Global Scale and Scope of Transnational Repression", p. 6.

31 Saipira Furstenberg, Edward Lemon and John Heathershaw, "Spatialising State Practices through Transnational Repression," *European Journal of International Security*, 6, no. 3 (2021): 371; See also Human Rights Watch, "Tajikistan: Tajik Activist Deported from Germany Jailed", 20 November 2024 <https://www.hrw.org/news/2024/11/20/tajikistan-tajik-activist-deported-germany-jailed>

32 Open Caucasus Media, "Azerbaijan seeks arrest of critics abroad", 10 September 2020, <https://oc-media.org/azerbaijan-seeks-arrest-of-critics-abroad/>; See also Saipira Furstenberg, Marcus Michaelsen and Siena Anstis, "Transnational repression of human rights defenders: The impacts on civic space and the responsibility of host states", p. 12.

33 Jam News, "Azerbaijani political emigrant detained in Poland on charges of tax evasion released on bail", 9 January 2020, <https://jam-news.net/interpol-detains-azerbaijani-political-emigre-intends-to-deport-him/>

34 AIVD and NCTV, "Over de grens. Statelijke inmenging in diasporagemeenschappen in Nederland", p. 6.

35 UK Public General Acts, National Security Act 2023 c.32 <https://www.legislation.gov.uk/ukpga/2023/32/contents>

36 US Department of Homeland Security, "Homeland Threat Assessment 2025", p. 8 https://www.dhs.gov/sites/default/files/2024-10/24_0930_ia_24-320-ia-publication-2025-hta-final-30sep24-508.pdf

37 AIVD and NCTV, "Over de grens. Statelijke inmenging in diasporagemeenschappen in Nederland", p. 29; De Volkskrant, "OM: Topmedewerker van Nationaal Coördinator Terrorismedbestrijding spioneerde voor Marokko", 7 February 2024 <https://www.volkskrant.nl/binnenland/om-topmedewerker-van-nationaal-coordinator-terrorismedbestrijding-spioneerde-voor-marokko~b5b19da7/?referrer=https://www.google.com/>; Openbaar Ministerie, "Medewerkers NCTV en politie aangehouden", 1 November 2023 <https://www.om.nl/actueel/nieuws/2023/11/01/medewerkers-nctv-en-politie-aangehouden>

38 AIVD and NCTV, "Over de grens. Statelijke inmenging in diasporagemeenschappen in Nederland", p. 29.

powers involved in transnational repression acts might play a crucial role in exposing important state secrets to these powers. Such acts have an impact on national security and the rule of law.

According to the Freedom House, most physical transnational repression acts (detentions and unlawful deportations) involve the exploitation of the host state's institutions.³⁹ Manipulating the host state's institutions for the illegal transfer of the targeted individuals to the state of origin undermines the rule of law of the host state.⁴⁰ For instance, the request for extradition in an asylum case can result in detention, rejection of asylum protection, and extradition. Even if detention does not lead to extradition, it can have important consequences on the targeted individual's life. Moreover, the misuse of counter-terrorism legislation might lead to the extradition, conviction, and imprisonment of victims of transnational repression.

National security can also be threatened through transnational repression acts when such acts have detrimental consequences on diplomatic relations between states. A case that attracted the attention of the media concerns the poisoning of former Russian FSB agent Alexander Litvinenko in 2006 in London, which caused tensions between the UK and Russia. A request for extradition from the UK Crown Prosecution Service to Russia of one of the two suspects was denied by the Russian authorities.⁴¹ In response to the refusal to extradite, the UK government expelled four Russian diplomats, launched an internal review of cooperation with Russia, suspended negotiations for a bilateral visa-facilitation agreement and hardened visa requirements.⁴² A similar case is the murder of journalist Jamal Khashoggi in the Saudi consulate in Istanbul in 2018, which impacted relations between Saudi Arabia and other states, notably the US and Turkey. Turkey's targeting of perceived opponents associated with the Gulen movement has also caused diplomatic issues with states hosting large Turkish diaspora communities, in particular Germany, the US, and Canada.

Furthermore, transnational repression acts can lead to violations of territorial integrity. As the former Canadian Prime Minister, Justin Trudeau, stated regarding the murder of Hardeep Singh Nijjar, "[a]ny involvement of a foreign government in the killing of a Canadian citizen on Canadian soil is an unacceptable violation of our sovereignty".⁴³ State sovereignty is a fundamental principle of international law, which refers to a state's exclusive right over its territory. When a foreign government carries out repressive activities on another state's soil, such as illegal renditions, assassinations, surveillance and intimidation, without prior permission of the state, apart from violating international human rights law, it also violates the host state's sovereignty.

Transnational repression poses a risk to national security and the rule of law of the host state. To reach their targets, foreign powers often need to manipulate the institutions of the host state, misuse international cooperation mechanisms or resort to espionage. Such acts expose states' secrets and diplomatic relations as well as the operation of administrative procedures, notably asylum applications, to danger. Host states should be aware of the threats posed by transnational repression to be able to respond accordingly.

39 Nate Schenkkan and Isabel Linzer, "Out of Sight, Not Out of Reach: The Global Scale and Scope of Transnational Repression", p. 4.
40 Ibid.

41 UK Parliament, Alexander Litvinenko (Case Update), Volume 463: debated on Monday 16 July 2007 [https://hansard.parliament.uk/commons/2007-07-16/debates/0707162000003/AlexanderLitvinenko\(CaseUpdate\)](https://hansard.parliament.uk/commons/2007-07-16/debates/0707162000003/AlexanderLitvinenko(CaseUpdate))

42 Duncan Allan, "Managed Confrontation: UK Policy Towards Russia After the Salisbury Attack", *Chatham House*, 14 December 2020 <https://www.chathamhouse.org/2018/10/managed-confrontation-uk-policy-towards-russia-after-salisbury-attack-0/uks-response>

43 Geeta Pandey and Zoya Matee, "Hardeep Singh Nijjar: Canada accuses India of role in Sikh leader's murder".

Two Broader Concerns Arising from Transnational Repression

Today, transnational repression is a growing threat. By targeting dissidents and their families abroad, often under the guise of counter-terrorism, authoritarian regimes not only silence opposition but also compromise the sovereignty and security of host states. In parallel, transitional repression is a challenge for societies and international relations. Transnational repression can give rise or exacerbate already existing tensions among different communities within a society or members of the same community. Moreover, the shifting landscape of international relations, the global resurgence of extremist ideologies, rapid technological developments, and the erosion of multilateral norms collectively hinder the prospects for sustained inter-state dialogue on the issue, let alone the achievement of an international regulation. The present section will examine transnational repression's impact on polarised societies and explore the challenges posed by the current geopolitical landscape and persisting impunity in effectively regulating this phenomenon.

Challenges for Polarised and Divided Societies

Violent incidents linked to transnational repression can instil fear and deepen divisions within diaspora communities, while also fuelling prejudice and racism against them from the broader society. Transnational repression's tactics mainly target members of the foreign power's diaspora community living in exile, asylum seekers or refugees in the state of residency.⁴⁴ Such practices encompass a series of human rights violations of the targeted individuals and diaspora communities, notably the right to freedom of movement, right to seek asylum, right to freedom of expression. In addition, their family members back home may also be targeted or used as a trap to bring the targeted individuals back home or in a third state, where they could be arrested and transferred to the state of origin.⁴⁵ Targeted individuals who arrive at the host state hoping to find a secure environment to continue their lives find themselves deprived of enjoying fundamental human rights and living under fear. In parallel, violence within a diaspora community might exacerbate bias, stereotypes, and racism toward the members of the latter. This creates two kinds of polarisation: one within the diaspora community and one between the diaspora community and the local community of the host state.

Regarding the first kind of polarisation, transnational repression can lead to distrust and division among members of the diaspora communities.⁴⁶ Individuals might avoid contact with other members of the community or not express their political preferences for fear of being reported.⁴⁷ In addition, pre-existed divisions due to cultural, religious or political differences within the diaspora community might be exacerbated through the interference of the foreign government⁴⁸. This can lead to polarisation, social tensions, and acts of violence.

For example, monitoring and surveillance techniques have been used by China to assess the daily activities of Uyghur diaspora members.⁴⁹ These techniques aim at breaking the family connections to prevent the maintenance of Uyghur culture and the sharing of information in and out of the region.⁵⁰ In parallel, China has been using intimidating tactics to divide diaspora

44 Human Rights Watch, "Q&A: Transnational Repression", June 2024, <https://www.hrw.org/news/2024/06/12/qa-transnational-repression>

45 For instance, United States Attorney's Office, "Manhattan U.S. Attorney Announces Kidnapping Conspiracy Charges Against An Iranian Intelligence Officer And Members Of An Iranian Intelligence Network", *Press Release*, 13 July 2021 <https://www.justice.gov/usao-sdny/pr/manhattan-us-attorney-announces-kidnapping-conspiracy-charges-against-iranian>

46 AIVD and NCTV, "Over de grens. Statelijke inmenging in diasporagemeenschappen in Nederland", p. 37.

47 Ibid.

48 Ibid.

49 David Tobin and Nyrola Elimä, "We know you better than you know yourself": China's transnational repression of the Uyghur diaspora", *University of Sheffield*, p. 29 <https://www.sheffield.ac.uk/seas/research/we-know-you-better-you-know-yourself-chinas-transnational-repression-uyghur-diaspora>

50 Ibid., p. 30

communities. Several Uyghurs living abroad have been forced into spying on human rights campaigners under threats against their families back home.⁵¹

Similarly, the public hearings conducted in the context of the Canadian Public Inquiry into Foreign Interference in Federal Electoral Processes and Democratic Institutions⁵² revealed the impact of transnational repression on diaspora communities in Canada, notably the Iranian and the Russian diaspora. Regarding the former, witness Dr Hamed Esmaeilion, Iranian-Canadian novelist and human rights activist, indicates that “every time we go to rallies several members of the community, they wear masks, sunglasses, hats to not be identified” adding that transnational repression “doesn’t let the members of the community to get engaged in – especially in political levels.”⁵³ Yuriy Novodvorskiy, a critic of the Russian regime and director and founding member of the Russian Canadian Democratic Alliance, describes that several members of the Russian diaspora prefer not to speak out against the Russian regime or even retreat entirely from politics for fear of retribution.⁵⁴

Regarding potential polarisation between diaspora communities and the local community of the host state, according to a report co-authored by the Dutch AIVD and NCTV, transnational repression acts within communities can foster distrust and negative perceptions of those communities among the wider Dutch society.⁵⁵ The report cites examples which can fuel such perceptions, notably incidents involving alleged espionage or other activities perceived to be against Dutch national interests, as well as nuisances resulting from tensions within the diaspora community.⁵⁶ The perception of disruption, whether due to visible disorder or criminal activity, can also influence these negative judgments. These elements combined can create a narrative that associates certain communities with instability or threats, deepening societal divides and reinforcing stereotypes. This cycle of mistrust can lead to further alienation, both from the state and from broader segments of the population, making integration and cohesion more challenging.

The consequences of transnational repression on the polarisation of society should not be disregarded. Transnational repression acts deprive individuals of living their lives without fear and integrating into the host state’s society. In addition, diaspora communities can be divided, and violence can rise amongst their members. Moreover, transnational repression can reinforce negative stereotypes and xenophobic attitudes in the broader host society. In this way, the repressive tactics of foreign governments can indirectly contribute to social polarisation within democratic societies, exacerbating existing tensions and undermining multicultural integration efforts.

Geopolitical Obstacles and the Global Accountability Gap

In the current geopolitical landscape, transnational repression has become an increasingly prominent and concerning tool used by authoritarian and hybrid regimes to extend their control beyond their borders. As global migration rises and diasporas grow more politically active, many governments have intensified efforts to monitor, intimidate, and silence dissidents abroad. This

51 Sam Judah, “China Using Families as ‘Hostages’ to Quash Uyghur Dissent Abroad”, *BBC*, 31 July 2023 <https://www.bbc.com/news/world-66337328>

52 Public Inquiry into Foreign Interference in Federal Electoral Processes and Democratic Institutions – Initial Report by the Honourable Marie-Josée Hogue, Commissioner, 3 May 2024 https://foreigninterferencecommission.ca/fileadmin/user_upload/Foreign_Interference_Commission_-_Initial_Report__May_2024_-_Digital.pdf

53 Public Inquiry Into Foreign Interference in Federal Electoral Processes and Democratic Institutions, Volume 6, 27 March 2024 Statement by Dr. Hamed Esmaeilion, p. 77 https://foreigninterferencecommission.ca/fileadmin/user_upload/PIFI_-_Public_Hearings_-_Volume_6_-_March_27__2024-Floor_transcript.pdf

54 Public Inquiry Into Foreign Interference in Federal Electoral Processes and Democratic Institutions, Volume 6, 27 March 2024 Statement by Mr. Yuriy Novodvorskiy, p. 88-89 https://foreigninterferencecommission.ca/fileadmin/user_upload/PIFI_-_Public_Hearings_-_Volume_6_-_March_27__2024-Floor_transcript.pdf

55 AIVD and NCTV, “Over de grens. Statelijke inmenging in diasporagemeenschappen in Nederland”, p. 37.

56 Ibid.

trend is deeply intertwined with evolving dynamics in international politics, the rise of extremism around the globe, technological advancements, and the weakening of multilateral norms. Today's complex geopolitical climate impedes coherent and effective regulatory responses.

Current geopolitical tensions, such as those between the West and China, Russia's war in Ukraine, and across the Middle East, have intensified the use of transnational repression. In parallel, such tensions have a detrimental impact on the possibilities of dialogue and cooperation among states to fight against such practices. As competition increases, some states are using repression abroad not only to eliminate perceived threats but also to send a signal to allies and adversaries about the reach of their power.

The lack of international coordination and the uneven responses of host countries exacerbate the problem. At the EU level, acts of transnational repression are often treated primarily as national security matters to be addressed by the affected member state, without adequate consideration of the broader human rights implications.⁵⁷ However, this approach can have serious consequences for targeted communities, undermining their ability to engage in cross-border political and social advocacy.⁵⁸

Additionally, some states have been complicit—whether intentionally or passively—in facilitating renditions, denying asylum, or turning a blind eye to intimidation campaigns. For instance, in March 2022, Spain extradited Algerian asylum seeker and former army corporal Mohamed Benhalima—despite United Nations Refugee Agency warnings of torture risk—leading to his imprisonment, a death sentence in absentia, and allegations of torture upon his return.⁵⁹

Transnational repression also undermines accountability efforts and, consequently, compromises the international fight against impunity for human rights violations. Transnational repression often occurs in a legal grey zone by manipulating international law and taking advantage of legal gaps. For instance, transnational repression through abuse of consular services, for example, the refusal to renew or issue official documents,⁶⁰ as a way to target dissenting citizens living abroad, it may violate the right to nationality, but it will often be left unaddressed as an act of transnational repression. An interesting example concerns Belarus. In September 2023, the Belarusian government issued a decree which provided that passports could not be renewed from abroad.⁶¹ This legislation impacted between 200,000 to 500,000 Belarusians who are estimated to live in exile, putting them at risk in case they return to Belarus to renew their documents, but also impeding their life abroad.⁶² However, holding a government accountable for transnational repression on the basis of such acts would be extremely challenging as such policies are part of the state's internal affairs. In addition, gathering evidence of transnational repression in order to hold perpetrators accountable for these acts is not an easy task, mainly as not all forms of transnational repression are criminalised.

Moreover, nowadays, transnational repression often happens in the digital sphere through cyberattacks or digital surveillance, which might leave no proof behind or exploit legal gaps.⁶³

57 Saipira Furstenberg, Marcus Michaelsen and Siena Anstis, "Transnational repression of human rights defenders: The impacts on civic space and the responsibility of host states", p. 36.

58 Ibid, pp. 8-9.

59 Human Rights Watch, "We Will Find You" A Global Look at How Governments Repress Nationals Abroad", 22 February 2024, p. 27 https://www.hrw.org/sites/default/files/media_2024/02/global_transnationalrepression0224web_0.pdf

60 Ibid, p. 27.

61 Ibid, p. 28

62 Council of Europe, Parliamentary Assembly, "Belarusians in exile: an overlooked issue addressed by the Parliamentary Assembly", 25 January 2023 <https://pace.coe.int/en/news/8955/belarusians-in-exile-an-overlooked-issue-addressed-by-the-parliamentary-assembly>

63 Siena Anstis and Ronald J. Deibert, "Silenced by Surveillance: The Impacts of Digital Transnational Repression on Journalists, Human Rights Defenders, and Dissidents in Exile", 25-05 Knight First Amendment Institute, 18 February 2025, <https://knightcolumbia.org/content/silenced-by-surveillance-the-impacts-of-digital-transnational-repression>; Marcus Michaelsen, "The Digital Transnational Repression Toolkit, and Its Silencing Effects" in Nate Schenkkan et al (eds) Perspectives on "Everyday" Transnational Repression in an Age of Globalization, Freedom House (2020) pp. 4-8 https://freedomhouse.org/sites/default/files/2020-07/07092020_Transnational_Repression_Globalization_Collection_of_Essays_FINAL_.pdf

Indeed, such tactics are difficult to detect, and the international law framework is scarce.⁶⁴ This situation has negative consequences on the international human rights framework and human rights institutions, which seem unprepared and inefficient to provide holistic protection from transnational repression. Similarly, at the domestic level, states often overlook the rights and protection of victims of digital transnational repression. For example, a report by the Citizen Lab highlights how digital transnational repression severely hampers the advocacy efforts of exiled activists in Canada, while government responses remain inadequate, offering little support to affected migrants and refugees despite Canada's human rights commitments.⁶⁵

Furthermore, transnational repression is often committed by individuals under state immunity or by government officials protected by the regime in power. These individuals will hardly ever be brought before courts, a situation which enhances the lack of accountability. For example, Saudi authorities never arrested the most senior officials involved in the murder of the journalist Jamal Khashoggi at the Saudi consulate in Istanbul.⁶⁶ According to a US intelligence report, the Saudi Crown Prince Mohammed bin Salman had approved the operation in Istanbul.⁶⁷

In some cases, the host state's government might contribute to transnational repression for economic or diplomatic benefits.⁶⁸ Additionally, criminal gangs have been used by governments to carry out transnational repression acts.⁶⁹ While prosecutions may occur in these cases, they often target only the direct perpetrators—members of the criminal gangs—rather than the state behind the act. Iran, for instance, has repeatedly relied on organised criminal gangs, such as Foxtrot, Hell's Angels, and Rumba, to target dissidents and carry out attacks on Israeli and Jewish targets throughout Europe, including Sweden, Germany, France, and Belgium.⁷⁰ In one notable case, the Dutch AIVD found strong indications that Iran had collaborated with a Dutch criminal gang in the murder of Ali Motamed,⁷¹ an electrician killed in December 2015. Motamed's real identity was later revealed to be Mohammad Reza Kolahi Samadi, a former member of the Mujahideen el-Khalq (MEK), who had been sentenced to death in Iran for a deadly bomb attack in Tehran in 1981.⁷² In the Motamed murder, the two perpetrators have been convicted.⁷³ Another conviction linked to the case was overturned on appeal in January 2025.⁷⁴ Most recently, on 15 July 2025, the EU imposed sanctions on eight individuals and the Zindashti Network—a criminal group linked to the Iranian Ministry of Intelligence and Security (MOIS)—for having carried out numerous acts of transnational repression.⁷⁵ These acts, conducted on behalf of Iranian state bodies, were aimed at silencing opponents and dissidents of the Islamic Republic of Iran living abroad.⁷⁶

64 Human Rights Watch, "We Will Find You" A Global Look at How Governments Repress Nationals Abroad", p. 29; Siena Anstis and Ronald J. Deibert, "Silenced by Surveillance: The Impacts of Digital Transnational Repression on Journalists, Human Rights Defenders, and Dissidents in Exile".

65 Noura Al-Jizawi et al., "Psychological and Emotional War Digital Transnational Repression in Canada", *Research Report* no 151, 1 March 2022 <https://utoronto.scholaris.ca/server/api/core/bitstreams/84d7937d-3383-48e7-9b0d-51ba9a70b4ef/content>

66 Human Rights Watch, "We Will Find You" A Global Look at How Governments Repress Nationals Abroad", p. 27.

67 Office of the Director of National Intelligence, "Assessing the Saudi Government's Role in the Killing of Jamal Khashoggi", 11 February 2021 <https://www.dni.gov/files/ODNI/documents/assessments/Assessment-Saudi-Gov-Role-in-JK-Death-20210226v2.pdf>

68 See regarding China Human Rights Watch, "We Will Find You" A Global Look at How Governments Repress Nationals Abroad", p. 11

69 See Marlies Glasius (2023) *Authoritarian Practices in a Global Age*. Oxford: Oxford University Press.

70 Matthew Levitt and Sarah Boches, "Iranian External Operations in Europe: The Criminal Connection", *International Centre for Counter-terrorism*, 16 October 2024 <https://icct.nl/publication/iranian-external-operations-europe-criminal-connection>

71 Ministerie van Buitenlandse Zaken, "Brief van de Ministers van Buitenlandse Zaken en van Binnenlandse Zaken en Koninkrijksrelaties", 8 January 2019 https://www.parlementairemonitor.nl/9353000/1/j4nvgs5k9j27kof_j9vvij5epmj1ey0/vkv5g5fhzmzo/f=/kst35000v56.pdf

72 Paul Vugts, "In Almere geliquideerde 'Ali' achter beruchtste aanslag Iran", *Het Parool*, 26 May 2018 <https://www.parool.nl/nieuws/in-al-merre-geliquideerde-ali-achter-beruchtste-aanslag-iran~bcc384f7/>

73 AD/Algemeen Dagblad, "Celstraffen tot 25 jaar voor moord op Ali Motamed" 12 April 2019 <https://www.bd.nl/binnenland/celstraffen-tot-25-jaar-voor-moord-op-ali-motamed~a6df9fd47/?referrer=https%3A%2F%2Fwww.google.com%2F>

74 Paul Vugts, "'Noffel' krijgt in hoger beroep geen levenslang, maar ruim 25 jaar cel", *Het Parool*, 22 January 2025 <https://www.parool.nl/misdaad/noffel-krijgt-in-hoger-beroep-geen-levenslang-maar-ruim-25-jaar-cel~b0395234/>

75 Council of the European Union, "Iran: Council sanctions eight individuals and one entity over serious human rights violations and transnational repression" *Press Release* 600/25, 15 July 2025 <https://www.consilium.europa.eu/en/press/press-releases/2025/07/15/iran-council-sanctions-eight-individuals-and-one-entity-over-serious-human-rights-violations-and-transnational-repression/pdf/>; Council of the European Union, Council implementing regulation (EU) 2025/1396 of 15 July 2025 implementing Regulation (EU) 2020/1998 concerning restrictive measures against serious human rights violations and abuses, *Official Journal of the European Union*, 15 July 2025 https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=OJ:L_202501396.

76 Ibid.

Notwithstanding these efforts, accountability for transnational repression remains largely absent. The prevailing impunity for transnational repression undermines both the effectiveness and the public trust in the international institutions, particularly the United Nations. Despite several reports and statements of UN bodies,⁷⁷ the absence of a definition of transnational repression and the overly broad definition of terrorism in national legislation enable governments to misuse counter-terrorism legislation to achieve extraditions or impend the life of the opposition living abroad with little to no concrete consequence on them (for example, sanctions).⁷⁸ Geopolitical considerations and alliances further impact the effectiveness of international organisations' intervention. The inertia of international institutions deepens public distrust in these organisations and the international human rights framework. At the same time, the erosion of international norms through transnational repression poses a profound threat to the global order by normalising the violation of state sovereignty and human rights beyond borders. Authoritarian regimes increasingly disregard the foundational principle that states should not interfere in the internal affairs of other countries, using tactics such as intimidation, abductions, and assassinations of dissidents abroad. This disregard undermines long-standing diplomatic norms and weakens the protection afforded to asylum seekers. In the absence of meaningful condemnation or enforcement measures, these practices persist, further weakening the norms that uphold international law and human rights.

In conclusion, the current geopolitical landscape, characterised by interstate tensions, lack of international cooperation, erosion of public trust in international institutions, and accountability gap, has created significant challenges for governments. These complexities not only hinder effective regulation of transnational repression but also make it increasingly difficult for states to engage in constructive dialogue on the issue. Unless the international community collectively reaffirms human rights norms and ensures accountability for violations, transnational repression will continue to undermine the international order and benefit states and actors involved in such activities.

⁷⁷ UN Press Release, "Transnational repression of journalists threatens democracy: Special Rapporteur", 26 June 2024 <https://www.ohchr.org/en/press-releases/2024/06/transnational-repression-journalists-threatens-democracy-special-rapporteur>; UN Press Release, "Violence and threats against journalists reporting on Iran from abroad must stop, warn UN experts", 30 May 2024 <https://www.ohchr.org/en/press-releases/2024/05/violence-and-threats-against-journalists-reporting-iran-abroad-must-stop>; UN Report of the Special Rapporteur on the situation of human rights in Eritrea, Mohamed Abdelsalam Babiker, A/HRC/56/24, 7 May 2024 <https://documents.un.org/doc/undoc/gen/g24/073/00/pdf/g2407300.pdf>; International Service for Human Rights, "States must desist from and ensure accountability for transnational repression", 27 June 2024 <https://ishr.ch/latest-updates/states-must-desist-from-and-ensure-accountability-for-transnational-repression/>; Lily Sparks, "Concerns Over 'Transnational Repression' Raised at UN Rights Body", *Human Rights Watch*, 28 June 2024 <https://www.hrw.org/news/2024/06/28/concerns-over-transnational-repression-raised-un-rights-body>

⁷⁸ See regarding transnational repression in the MENA, MENA Rights Group, "Transnational Repression in the MENA: The Role of Regional Organisations Engaged in Counter-terrorism", 4 July 2024 <https://menarights.org/en/articles/transnational-repression-mena-role-regional-organisations-engaged-counter-terrorism>

Conclusion and Recommendations

Transnational repression is not a new phenomenon. Nevertheless, technological developments have expanded its use. Manipulating legal gaps, counter-terrorism legislations, international and national institutions and cooperation mechanisms, transnational repression presents a wide range of consequences for individuals, communities and states. Recently, several states and international organisations started highlighting the risks posed by this phenomenon. However, the threat seems to be growing faster than the framework for its regulation. To mitigate the impact of transnational repression, this policy brief proposes the following recommendations.

To international organisations:

Adopt a definition for transnational repression and a legal framework to regulate the phenomenon. The definition and the legal framework should take into account the nature and characteristics of the phenomenon as well as the risks that it poses to national security, individual rights, and global human rights norms. It should adopt a human rights-centred approach to address the far-reaching consequences of this phenomenon on individuals and communities.

Explore existing tools for addressing transnational repression, such as sanctions against states and individuals engaging in such activities. Measures can also encompass diplomatic pressure, visa restrictions, asset freezes, and the use of international legal mechanisms. Given the growing scope of the phenomenon, a comprehensive strategy combining these tools can strengthen deterrence and ensure a more effective, coordinated response.

Create a dedicated monitoring and coordination mechanism to systematically document cases of transnational repression, enabling timely analysis and response. Such a mechanism would facilitate information sharing between institutions, states, and civil society, fostering greater transparency and accountability. At both international and regional levels, coordinated structures can improve early warning, enhance response efficiency, and strengthen collective resilience against these threats.

Establish vetting procedures for the Interpol Red Notice to ensure requests from governments with records of transnational repression are carefully scrutinised. Such safeguards would help prevent the misuse of international law enforcement systems for politically motivated purposes. Rigorous evaluation, transparency, and oversight mechanisms can protect targeted individuals, uphold human rights standards, and maintain the integrity of global policing cooperation.

Raise Awareness of Transnational Repression. International organisations, including the UN and EU, should promote awareness of transnational repression as a threat to human rights and democratic institutions. This includes integrating the issue into relevant policy frameworks, conducting public briefings, and supporting capacity-building for member states and civil society. A coordinated approach will strengthen protection for those affected and improve institutional responses.

To states:

Incorporate and codify the definition of transnational repression into national legislation once adopted at the international and/or regional level. This clear legal framework should enable consistent identification, prosecution, and prevention of such acts, enhance victim protection, promote accountability, and ensure domestic laws align with international human rights standards and commitments.

Establish specialised offices within law enforcement departments. Law enforcement personnel should have specific training and knowledge to deal efficiently with the full spectrum of transnational repression threats. However, it is important to acknowledge potential resource constraints and limited bandwidth within these departments, which may require careful prioritisation, additional funding, and strategic allocation of personnel to ensure these offices can operate effectively without overburdening existing capacities.

Raise awareness of transnational repression within national institutions through a designated coordination body, such as an inter-agency task force within relevant ministries. Officials handling asylum applications should receive targeted training to recognise and address transnational repression tactics in their assessments. States should strengthen resilience to foreign interference by updating protocols, fostering inter-agency cooperation, and integrating these issues into legal frameworks. Collaboration with civil society and diaspora groups is important, alongside regular monitoring to improve responses over time.

Establish support services for victims of transnational repression. These services should offer confidential counselling and legal aid tailored to the unique challenges victims of transnational repression face. They must be accessible, culturally sensitive, and staffed by professionals trained in transnational repression issues. Collaboration between government agencies, NGOs, and international partners is essential to provide timely and effective assistance.

Reach diaspora communities through outreach strategies and facilitate reporting of acts constituting transnational repression. Diaspora communities can play a vital role in countering transnational repression. Establishing alliances with the communities, being attentive to their need for protection from attacks against their members, and creating adequate mechanisms for reporting, which take into consideration the risks that reporting such acts implies, should be a priority for states.

Bibliography

AD/Algemeen Dagblad, “Celstraffen tot 25 jaar voor moord op Ali Motamed” 12 April 2019 <https://www.bd.nl/binnenland/celstraffen-tot-25-jaar-voor-moord-op-ali-motamed~a6df9fd47/?referrer=https%3A%2F%2Fwww.google.com%2F>

AIVD and NCTV, “Over de grens. Statelijke inmenging in diasporagemeenschappen in Nederland”, 17 October 2024 <https://www.aivd.nl/documenten/publicaties/2024/10/17/over-de-grens-statelijke-inmenging-in-diasporagemeenschappen-in-nederland>

Alecci, Scilla and ICIJ, “Chinese authorities exploited Interpol and strong-armed one of the world’s richest men to pursue a target”, International Consortium of Investigative Journalists, 29 April 2025 <https://www.icij.org/investigations/china-targets/interpol-red-notice-police-warrant-jack-ma/>

Al-Jizawi, Noura et al., “Psychological and Emotional War Digital Transnational Repression in Canada”, Research Report no 151, 1 March 2022 <https://utoronto.scholaris.ca/server/api/core/bitstreams/84d7937d-3383-48e7-9b0d-51ba9a70b4ef/content>

Allan, Duncan, “Managed Confrontation: UK Policy Towards Russia After the Salisbury Attack”, *Chatham House*, 14 December 2020 <https://www.chathamhouse.org/2018/10/managed-confrontation-uk-policy-towards-russia-after-salisbury-attack-0/uks-response>

Amnesty international, “Iran: Family of women’s rights activist arrested in despicable attempt to intimidate her into silence”, 25 September 2019 <https://www.amnesty.org/en/latest/press-release/2019/09/iran-family-of-womens-rights-activist-arrested-in-despicable-attempt-to-intimidate-her-into-silence/>

Amnesty International, “Morocco : Ethnic Uyghur at Risk of Extradition to China” <https://www.amnesty.org.uk/urgent-actions/ethnic-uyghur-risk-extradition-china>

Anstis, Siena and Ronald J. Deibert, “Silenced by Surveillance: The Impacts of Digital Transnational Repression on Journalists, Human Rights Defenders, and Dissidents in Exile”, 25-05 Knight First Amendment Institute, 18 February 2025, <https://knightcolumbia.org/content/silenced-by-surveillance-the-impacts-of-digital-transnational-repression>

Apuzzo, Matt, “How Strongmen Turned Interpol Into Their Personal Weapon” *The New York Times*, 22 March 2019 <https://www.nytimes.com/2019/03/22/world/europe/interpol-most-wanted-red-notice.html>

Council of Europe, Parliamentary Assembly, “Belarusians in exile: an overlooked issue addressed by the Parliamentary Assembly”, 25 January 2023 <https://pace.coe.int/en/news/8955/belarusians-in-exile-an-overlooked-issue-addressed-by-the-parliamentary-assembly>

Council of Europe, Parliamentary Assembly, Resolution 2509 (2023), Adopted by the Assembly on 23 June 2023.

Council of the European Union, “Iran: Council sanctions eight individuals and one entity over serious human rights violations and transnational repression” Press Release 600/25, 15 July 2025 <https://www.consilium.europa.eu/en/press/press-releases/2025/07/15/iran-council-sanctions-eight-individuals-and-one-entity-over-serious-human-rights-violations-and-transnational-repression/pdf/>

Council of the European Union, Council implementing regulation (EU) 2025/1396 of 15 July 2025 implementing Regulation (EU) 2020/1998 concerning restrictive measures against serious human rights violations and abuses, Official Journal of the European Union, 15 July 2025 https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=OJ:L_202501396.

De Volkskrant, “OM: Topmedewerker van Nationaal Coördinator Terrorismebestrijding spioneerde voor Marokko”, 7 February 2024 <https://www.volkskrant.nl/binnenland/om-topmedewerker-van-nationaal-coordinator-terrorismebestrijding-spioneerde-voor-marokko~b5b19da7/?referrer=https://www.google.com/>

Freedom House, “Policy Recommendations: Transnational Repression”, <https://freedomhouse.org/policy-recommendations/transnational-repression>

Freedom House, “Transnational Repression”, <https://freedomhouse.org/report/transnational-repression>

Furstenberg, Saipira, Edward Lemon, and John Heathershaw. “Spatialising State Practices through Transnational Repression.” *European Journal of International Security* 6, no. 3 (2021): 358–78

Furstenberg, Saipira, Marcus Michaelsen and Siena Anstis, “Transnational repression of human rights defenders: The impacts on civic space and the responsibility of host states” External Policies Analysis and Support Unit Directorate-General for External Policies of the Union PE 754.475, June 2025

G7 Leaders’ statement, 17 June 2025, https://ec.europa.eu/commission/presscorner/detail/en/statement_25_1552 Glasius, Marlies (2023) *Authoritarian Practices in a Global Age*. Oxford: Oxford University Press

Human Rights Foundation, “HRF Condemns Second Assassination Plot Against Iranian Activist Masih Alinejad”, 8 November 2024 <https://hrf.org/latest/hrf-condemns-second-assassination-plot-against-iranian-activist-masih-alinejad/>

Human Rights Watch, “Q&A: Transnational Repression”, June 2024, <https://www.hrw.org/news/2024/06/12/qa-transnational-repression>

Human Rights Watch, “Tajikistan: Tajik Activist Deported from Germany Jailed”, 20 November 2024 <https://www.hrw.org/news/2024/11/20/tajikistan-tajik-activist-deported-germany-jailed>

Human Rights Watch, “Turkey: Enforced Disappearances, Torture” 29 April 2020 <https://www.hrw.org/news/2020/04/29/turkey-enforced-disappearances-torture>

Human Rights Watch, “We Will Find You” A Global Look at How Governments Repress Nationals Abroad”, 22 February 2024, p. 27 https://www.hrw.org/sites/default/files/media_2024/02/global_transnationalrepression0224web_0.pdf

International Service for Human Rights, “States must desist from and ensure accountability for transnational repression”, 27 June 2024 <https://ishr.ch/latest-updates/states-must-desist-from-and-ensure-accountability-for-transnational-repression/>

Interpol, Red Notices <https://www.interpol.int/en/How-we-work/Notices/Red-Notices/View-Red-Notices>

Jam News, “Azerbaijani political emigrant detained in Poland on charges of tax evasion

released on bail”, 9 January 2020, <https://jam-news.net/interpol-detains-azerbaijani-political-emigre-intends-to-deport-him/>

Judah, Sam, “China Using Families as ‘Hostages’ to Quash Uyghur Dissent Abroad”, BBC, 31 July 2023 <https://www.bbc.com/news/world-66337328>

Leplâtre, Simon and ICIJ, “Interpol: A tool in China’s arsenal of transnational repression” *Le Monde*, 29 April 2025 https://www.lemonde.fr/en/international/article/2025/04/29/interpol-a-tool-in-china-s-arsenal-of-transnational-repression_6740746_4.html

Levitt, Matthew and Sarah Boches, “Iranian External Operations in Europe: The Criminal Connection”, *International Centre for Counter-terrorism*, 16 October 2024 <https://icct.nl/publication/iranian-external-operations-europe-criminal-connection>

Michaelsen, Marcus, “The Digital Transnational Repression Toolkit, and Its Silencing Effects” in Nate Schenkkan et al (eds) *Perspectives on “Everyday” Transnational Repression in an Age of Globalization*, Freedom House (2020) https://freedomhouse.org/sites/default/files/2020-07/07092020_Transnational_Repression_Globalization_Collection_of_Essays_FINAL_.pdf

Ministerie van Buitenlandse Zaken, “Brief van de Ministers van Buitenlandse Zaken en van Binnenlandse Zaken en Koninkrijksrelaties”, 8 January 2019 https://www.parlementairemonitor.nl/9353000/1/j4nvgs5kjg27kof_j9vvij5epmj1ey0/vkv5g5fhzmzo/f=/kst35000v56.pdf

Mehra, Tanya and Clarke, Colin P., “The India-Canada rift: Sikh Extremism and Rise of Transnational Repression”, *International Centre for Counter-Terrorism*, 17 October 2023 <https://icct.nl/publication/india-canada-rift-sikh-extremism-and-rise-transnational-repression>

MENA Rights Group, “Transnational Repression in the MENA: The Role of Regional Organisations Engaged in Counter-terrorism”, 4 July 2024 <https://menarights.org/en/articles/transnational-repression-mena-role-regional-organisations-engaged-counter-terrorism>

NCTV, “Vanaf 15 mei: meer vormen van spionage strafbaar”, 15 May 2025 <https://www.nctv.nl/actueel/nieuws/2025/05/15/vanaf-15-mei-meer-vormen-van-spionage-strafbaar>

Office of the Director of National Intelligence, “Assessing the Saudi Government’s Role in the Killing of Jamal Khashoggi”, 11 February 2021 <https://www.dni.gov/files/ODNI/documents/assessments/Assessment-Saudi-Gov-Role-in-JK-Death-20210226v2.pdf>

Openbaar Ministerie, Medewerkers NCTV en politie aangehouden, 1 November 2023 <https://www.om.nl/actueel/nieuws/2023/11/01/medewerkers-nctv-en-politie-aangehouden>

Open Caucasus Media, “Azerbaijan seeks arrest of critics abroad”, 10 September 2020, <https://oc-media.org/azerbaijan-seeks-arrest-of-critics-abroad/>

Pandey, Geeta and Zoya Matee, “Hardeep Singh Nijjar: Canada accuses India of role in Sikh leader’s murder”, BBC, 19 September 2023 <https://www.bbc.com/news/uk-66848041>

Power, Hilary, “UN Human Rights Office Calls for Action on ‘Transnational Repression’”, *Human Rights Watch*, 25 June 2025 <https://www.hrw.org/news/2025/06/25/un-human-rights-office-calls-for-action-on-transnational-repression>

Public Inquiry into Foreign Interference in Federal Electoral Processes and Democratic Institutions – Initial Report by the Honourable Marie-Josée Hogue, Commissioner, 3 May

- 2024 https://foreigninterferencecommission.ca/fileadmin/user_upload/Foreign_Interference_Commission_-_Initial_Report__May_2024_-_Digital.pdf
- Public Inquiry Into Foreign Interference in Federal Electoral Processes and Democratic Institutions, Volume 6, 27 March 2024 Statement by Dr. Hamed Esmaeilion, p. 77 https://foreigninterferencecommission.ca/fileadmin/user_upload/PIFI_-_Public_Hearings_-_Volume_6_-March_27__2024-Floor_transcript.pdf
- Public Inquiry Into Foreign Interference in Federal Electoral Processes and Democratic Institutions, Volume 6, 27 March 2024 Statement by Mr. Yuriy Novodvorskiy, p. 88-89 https://foreigninterferencecommission.ca/fileadmin/user_upload/PIFI_-_Public_Hearings_-_Volume_6_-March_27__2024-Floor_transcript.pdf
- Schenkkan, Nate and Linzer, Isabel, "Out of Sight, Not Out of Reach: The Global Scale and Scope of Transnational Repression", *Freedom House*, February 2021, pp. 15-41 https://freedomhouse.org/sites/default/files/2021-02/Complete_FH_TransnationalRepressionReport2021_rev020221.pdf
- Sparks, Lily, "Concerns Over 'Transnational Repression' Raised at UN Rights Body", Human Rights Watch, 28 June 2024 <https://www.hrw.org/news/2024/06/28/concerns-over-transnational-repression-raised-un-rights-body>
- The Guardian, "Hotel Rwanda's Paul Rusesabagina released from prison" 25 March 2023 <https://www.theguardian.com/world/2023/mar/24/hotel-rwanda-paul-rusesabagina-to-be-released-from-prison>
- Tobin, David and Elimä, Nyrola, "We know you better than you know yourself": China's transnational repression of the Uyghur diaspora", University of Sheffield, p. 29 <https://www.sheffield.ac.uk/seas/research/we-know-you-better-you-know-yourself-chinas-transnational-repression-uyghur-diaspora>
- UK Parliament, Alexander Litvinenko (Case Update), Volume 463: debated on Monday 16 July 2007 [https://hansard.parliament.uk/commons/2007-07-16/debates/0707162000003/AlexanderLitvinenko\(CaseUpdate\)](https://hansard.parliament.uk/commons/2007-07-16/debates/0707162000003/AlexanderLitvinenko(CaseUpdate))
- UK Public General Acts, National Security Act 2023 c.32 <https://www.legislation.gov.uk/ukpga/2023/32/contents>
- UN Special Procedures, "Tajikistan: UN experts deplore criminal proceedings against human rights defenders", 4 July 2023 <https://www.ohchr.org/en/press-releases/2023/07/tajikistan-un-experts-deplore-criminal-proceedings-against-human-rights>
- UN Report of the Special Rapporteur on the situation of human rights in Eritrea, Mohamed Abdelsalam Babiker, A/HRC/56/24, 7 May 2024 <https://documents.un.org/doc/undoc/gen/g24/073/00/pdf/g2407300.pdf>
- UN Press Release, "Violence and threats against journalists reporting on Iran from abroad must stop, warn UN experts", 30 May 2024 <https://www.ohchr.org/en/press-releases/2024/05/violence-and-threats-against-journalists-reporting-iran-abroad-must-stop>
- UN Press Release, "Transnational repression of journalists threatens democracy: Special Rapporteur", 26 June 2024 <https://www.ohchr.org/en/press-releases/2024/06/transnational-repression-journalists-threatens-democracy-special-rapporteur>

United Nations Human Rights Office of the High Commissioner, “Transnational Repression”, Civic Space Brief <https://www.ohchr.org/sites/default/files/documents/publications/transnational-repression-1-en.pdf>;

United States Attorney’s Office, “Manhattan U.S. Attorney Announces Kidnapping Conspiracy Charges Against An Iranian Intelligence Officer And Members Of An Iranian Intelligence Network”, Press Release, 13 July 2021 <https://www.justice.gov/usao-sdny/pr/manhattan-us-attorney-announces-kidnapping-conspiracy-charges-against-iranian>

United States Attorney’s Office, “Manhattan U.S. Attorney Announces Kidnapping Conspiracy Charges Against An Iranian Intelligence Officer And Members Of An Iranian Intelligence Network”, Press Release, 13 July 2021 <https://www.justice.gov/usao-sdny/pr/manhattan-us-attorney-announces-kidnapping-conspiracy-charges-against-iranian>

US Department of Homeland Security, “Homeland Threat Assessment 2025”, p. 8 https://www.dhs.gov/sites/default/files/2024-10/24_0930_ia_24-320-ia-publication-2025-hta-final-30sep24-508.pdf

US Homeland Security, “HS’ 2025 Homeland Threat Assessment Indicates the Threat of Domestic and Foreign Terrorism in the Homeland Remains High”, 2 October 2024 <https://www.dhs.gov/news/2024/10/02/dhs-2025-homeland-threat-assessment-indicates-threat-domestic-and-foreign-terrorism>

U.S. Department of Justice, Office of Public Affairs, “Justice Department Announces Murder-For-Hire Charges Against Islamic Revolutionary Guard Corps Brigadier General and Former Intelligence Officer and Members of an Iranian Intelligence Network”, Press Release, 22 October 2024 <https://www.justice.gov/opa/pr/justice-department-announces-murder-hire-charges-against-islamic-revolutionary-guard-corps>

U.S. Department of Justice, office of Public Affairs, “Justice Department Announces Murder-For-Hire and Related Charges Against IRGC Asset and Two Local Operatives”, Press Release, 8 November 2024 <https://www.justice.gov/opa/pr/justice-department-announces-murder-hire-and-related-charges-against-irgc-asset-and-two>

US Mission to International Organizations in Geneva, “Joint Statement on Transnational Repression as Delivered by Ambassador Michèle Taylor”, 26 June 2024 <https://geneva.usmission.gov/2024/06/26/joint-statement-on-transnational-repression/>

Vugts, Paul, “In Almere geliquideerde ‘Ali’ achter beruchtste aanslag Iran”, Het Parool, 26 May 2018 <https://www.parool.nl/nieuws/in-almere-geliquideerde-ali-achter-beruchtste-aanslag-iran~bcc384f7/>

Vugts, Paul, “‘Noffel’ krijgt in hoger beroep geen levenslang, maar ruim 25 jaar cel”, Het Parool, 22 January 2025 <https://www.parool.nl/misdaad/noffel-krijgt-in-hoger-beroep-geen-levenslang-maar-ruim-25-jaar-cel~b0395234/>

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