

## **IFEX Submission: Expressing international solidarity and strengthening civic space through the IFEX Network**

*Submitted to the UN Independent Expert on human rights and international solidarity  
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[IFEX](#) is a global network that promotes and defends freedom of expression and information as a fundamental human right. It is a nexus for free expression expertise contributed by 119 member-organisations spanning over 70 countries who are committed to collaboration and transformative advocacy. We are pleased to present this submission to the Independent Expert on human rights and international solidarity in response to the call for inputs to the report on the participation of civil society organisations (CSOs) pursuing expressions of international solidarity through transnational, international, and regional networks, to be presented at the 56th session of the Human Rights Council.

### **Introduction**

International solidarity is a critical tool for countering repression. Networks like IFEX are uniquely placed to bring together different stakeholders to engage in collaborative advocacy and to provide operational support, access to resources, and other expressions of solidarity that strengthen the capacity of organisations to push back against authoritarian regimes and reinforce civic space.

The strength of the IFEX network rests on the combined efforts of member organisations working from the frontlines with communities as advocates, activists, and human rights defenders, bringing their local and thematic expertise and knowledge to address pressing freedom of expression and information issues.

However, governments are increasingly employing repressive tactics by abusing legislation and weaponizing existing regulations to control, target, or de-fund CSOs and the global partnerships and collaborations in which they engage. This creates barriers to their work which are compounded by restricted access to multilateral fora like the UN that are crucial for drawing attention to rights violations and holding States accountable.

Furthermore, as a fundamental and broad principle of international law that [underpins](#) the protection and promotion of human rights as outlined in the [preamble](#) and in [Articles 1](#) and [28](#) of the [Universal Declaration of Human Rights](#), the responsibility for this work is not civil society's alone; it is an integral part of States' international obligations.

This submission highlights broad trends in repressive legislation that affect international solidarity efforts, as well as some of the best practices identified by the IFEX network for pushing back against them, and puts forward recommendations for the Independent Expert, States, and other relevant stakeholders to consider when promoting and strengthening avenues for CSOs to pursue international solidarity.

### **Tactics and justifications used to undermine civic space and international solidarity**

Regressive legislation targeting civil society and civic space creates hostile and distressing environments that put pressure on CSOs, impeding their ability to operate safely and securely and putting the communities they defend at risk. IFEX member organisations have reported experiencing break-ins, harassment, surveillance, doxing, and attempts to criminalise their work; this has differentially impacted women and LGBTQI+ employees and individuals who face gender- and sexual-based harassment and violence. Tumultuous changes to the global political landscape in recent years have amplified these difficulties. The coup in Myanmar, Taliban takeover in Afghanistan, crackdown following elections in Belarus, invasion of Ukraine, and Israeli aggression have resulted in member organisations having to defend themselves against targeting, being forced into exile, relocating or registering organisations abroad, or finding alternative ways of sustaining operations.



## Legislation restricting CSO activities

Legislation targeting CSO operations with overbroad or burdensome provisions such as mandating registration, strict reporting requirements, and governmental oversight of activities, contributes to a hostile environment for civic space. Egypt's 2019 *Law on Regulating the Work of Civil Associations* imposes [stringent requirements](#) on CSOs, permitting their operations under the limited framework of “societal development” in alignment with the government’s plans and prohibiting civic work deemed to be “political,” or violating “public order” or “morals”. It grants the Ministry of Social Solidarity authoritative powers over the funding, activities, and dissolution of independent human rights organisations, enabling government authorities to intensify the [broader crackdown on human rights](#). The resulting environment has jeopardised civic space in the country by forcing many CSOs to close, including IFEX member the [Arabic Network for Human Rights Information \(ANHRI\)](#) which [suspended its operations](#) in 2022.

Zimbabwe’s pending *Private Voluntary Organisations (PVO) Amendment Bill* also threatens the operations of CSOs by using [recommendations](#) of the [Financial Action Task Force](#) – an intergovernmental body devising policies for combatting money laundering and terrorist financing – to establish provisions for excessive oversight and interference, harsh penalties for unregistered organisations, and the possibility of deregistration and financial expropriation without judicial oversight or appeal. IFEX member the [Media Institute for Southern Africa - Zimbabwe \(MISA\)](#) has [led efforts](#) among IFEX members to build support and pressure to withdraw the bill until it undergoes broad consultations and can be reformed in line with domestic law and international and regional standards. It was [returned](#) to Parliament in late 2023 but stands to be brought back, putting members like MISA at risk.

Initially [withdrawn](#) on 14 February 2024, Kyrgyzstan’s proposed draft law “*On Amendments to Certain Legislative Acts of the Kyrgyz Republic*” (*Law of the Kyrgyz Republic “On Non-Commercial Organizations” and the Criminal Code of the Kyrgyz Republic*) was [adopted](#) a week later by Parliament, albeit without the provision on criminal liability. The law has consistently drawn [criticism](#) from civil society and high-level actors including [UN Special Rapporteurs](#), the [U.S. government](#), and the [OSCE](#) for its implications for free expression and association in the country by restricting the activities of foreign-funded organisations. In November 2023, the EU Delegation to the Kyrgyz Republic [warned](#) the bill could affect the ability of the EU and other international donors to carry out international cooperation activities in the country. Local IFEX members the [Media Policy Institute](#) and [Public Association “Journalists”](#) now risk being subjected to this law. By heavily mirroring the 2012 [Russian “foreign agents” law](#), Kyrgyzstan demonstrates a concerning [pattern](#) of governments learning and adapting from one another to intentionally adopt problematic legislation.

## Misusing anti-terrorism and extremism legislation

In 2023, under the *Law of the Republic of Belarus on Countering Extremism*, IFEX member the [Belarusian Association of Journalists \(BAJ\)](#) was [designated](#) an “extremist formation” by the Belarus state security agency (KGB) and listed in the Belarus Ministry of Internal Affairs’ database of “extremist formations”. They were already [shut down](#) in August 2021; however, the support of networks like IFEX has enabled BAJ to continue operations in exile. Regardless of legal status, organisations like BAJ require visibility, cooperation and support from the international community to legitimise their work, push back against government targeting, mitigate risks from problematic legislation, and sustain their work via funding, relocation support, psychosocial assistance, and other resources.

An amendment to Article 193-1 of the Belarusian Criminal Code in January 2022 [criminalises](#) individuals participating in unregistered or liquidated NGOs. As Belarus and Russia have recently [proposed](#) sharing lists of “extremist” individuals and organisations, this could intensify coordinated attacks on civil society. In February 2024, the government of Russia [designated](#) IFEX member [ARTICLE 19](#) as an “undesirable” organisation under the “undesirable organizations” law (or *Federal Law of 23.05.2015 N 129-FZ “On amendments of some legislative acts of the Russian Federation”*). The law permits authorities to extrajudicially declare foreign and international organisations perceived to be a threat to Russia’s constitutional order or national security as “undesirable” and could lead to the criminalisation of Russian nationals who partner with, co-operate with, or access ARTICLE 19’s materials. This sets a dangerous precedent for other authoritarian governments, with coordinated efforts potentially extending to targeting foreign individuals and civil society.

Restrictions on foreign funding to Palestinian human rights and civil society groups have been ongoing for years under [Israeli legislation](#) such as the *Counter-Terrorism Law of 2016* and *1945 Defense (Emergency) Regulations*, and by [conditions set by international donors](#). However, since October 2023 funding restrictions have [tightened](#) as institutions like the [European Commission](#) and various governments in [Europe](#) and [North America](#) have pulled funding with [concerns](#) that they are being

used for “terrorist organizations” or “incitement to hatred and violence”. This has had [ramifications](#) for many Palestinian organisations monitoring the crisis and defending human rights, such as IFEX member [Zamleh -The Arab Center for Social Media Advancement](#). It has also affected [humanitarian aid and assistance](#) after funding was cut to the UN agency for Palestinian refugees, in violation of [Part II of the Fourth Geneva Convention](#) and the [norms of customary international law](#). In terms of interfering with international solidarity, the situation is compounded by a growing global stigmatisation of public support to Palestinians as some States are [cracking down](#) on peaceful protests in [violation](#) of the rights to free expression and assembly under Articles 19 and 21 of the [International Covenant on Civil and Political Rights](#). Consequently, various CSOs have stepped up to fill the vacuum of support and solidarity. IFEX members have been [calling](#) for a ceasefire, monitoring [online](#) and [offline](#) violations, [providing](#) safety guidance to journalists, [committing funds](#) to support journalists, [advocating](#) for journalist safety, demanding transparent [investigations](#) to prevent impunity, compiling [evidence](#), and [platforming](#) Palestinian voices, among [many other efforts](#).

### Accusations of “Foreign interference”

In Cambodia, a [potential foreign interference law modelled](#) on Singapore’s Foreign Interference Act could be used to control CSO access to foreign funding if authorities deem such funds as interfering with national interests and sovereignty. Following the 2023 elections which saw [warnings of foreign interference](#) in the lead-up, the government announced upcoming foreign policy plans with an emphasis on “implementing foreign policies that ensure national integrity, sovereignty and independence”, suggesting a possible resurfacing of discussions around the law. IFEX members like the [Cambodian Center for Human Rights](#) and [Cambodian Centre for Independent Media](#) could risk losing funds that sustain their vital UN and international advocacy efforts to draw attention to human rights violations and escalating repression in the country.

Similarly, Venezuela’s pending “*Law on Control, Regulation, Performance and Financing of Non-Governmental and Related Organisations*”, which [depicts](#) CSOs as “enemies of the country” using “illicit funds” to “finance terrorism”, would require CSOs to provide “information regarding the constitution, statutes, activities and origin, administration and destination of an organisations’ resources,” with specific details on funding sources. If passed, this could jeopardise funding for many organisations, including IFEX members [Espacio Público](#) and [IPYS Venezuela](#), resulting in a devastating impact on civic space at a time when Venezuela is already undergoing a structural crisis that relies on social and humanitarian assistance and [foreign-funded aid](#) in an electoral year.

### Blocking UN accreditation

The ability to monitor and participate in multilateral processes is critical to the international solidarity efforts of CSOs. At the UN, accreditation provides opportunities for dialogue and cooperation between civil society and State representatives on important issues, including drawing attention to rights violations, addressing fundamental human rights issues and challenges organisations face, and holding States accountable to their human rights obligations. Yet for years, the UN has [denied CSOs accreditation](#) through the politicised Economic and Social Council’s Committee on Non-Governmental Organizations (ECOSOC Committee on NGOs). Despite criticisms by UN officials, including the [High Commissioner for Human Rights](#), [Special Rapporteur on freedom of association and peaceful assembly](#), civil society-friendly States, and civil society representatives, Member States with [deeply problematic](#) human rights records continue to sit on the Committee and [obstruct access](#) by asking often redundant or irrelevant questions of CSO applicants, resulting in years-long deferrals.

Since 2017, IFEX’s application has been repeatedly deferred, hampering efforts to bring trustworthy information, knowledge and perspectives to UN human rights mechanisms – particularly from local member organisations and those working with vulnerable and marginalised communities whose voices are critical, yet too often left out of the conversation. Progressively anti-democratic and authoritarian legislation will only further hinder accreditation and rob the UN of the expertise needed to challenge such legislation and address urgent global issues. Civil society groups that have been critical of certain countries, work without their national government’s endorsement, or engage with issues related to the rights of ethnic minority groups, LGBTQI+ people, women’s rights, reproductive rights, caste, and freedom of expression and association, have historically been [prevented](#) from accreditation.

Barriers to participation are exacerbated by the UN’s recent [denial](#) of CSOs’ remote participation in the HRC, UPR, and treaty body sessions in 2024. The requirement to participate in person contributes to the loss of valuable perspectives and voices at the UN, especially from already vulnerable and marginalised communities.



## Expressions of solidarity through the IFEX network

As repression grows globally and civic space shrinks, international solidarity efforts become paramount for pushing back against the encroachment on human rights. Being a network, IFEX can engage various stakeholders including allies, State, and intergovernmental actors on key issues while platforming and supporting member organisations and other civil society partners in various ways.

**Cross-sector multistakeholder engagement:** Participation in groups such as the [Community of Democracies Working Group on Enabling and Protecting Civil Society \(CoD WGEPCS\)](#), which comprises CSO and diplomatic stakeholders, has allowed IFEX to refer concerning legislation targeting civil society in Belarus, Kyrgyzstan, Nicaragua, Venezuela, and Zimbabwe, among others, for action. IFEX is also a co-facilitator of the [Media Freedom Coalition's Consultative Network](#) which brings CSOs and States together to inform diplomatic efforts to promote press freedom, globally. At members' requests and with their support, IFEX has referred and supported cases requiring urgent intervention, such as that of Belarusian journalist Larysa Shchyrakova who was sentenced and imprisoned on fabricated charges in retaliation for her journalistic work, and Palestinian journalist Shireen Abu Akleh, who was killed by an Israeli soldier while reporting on the Jenin refugee camp raid. Cases have also included raising States' awareness of situations of concern, such as reforms to Indonesia's Criminal Code threatening journalistic freedoms and safety, and the proposed UN Cybercrime Treaty which could become a global tool for oppression.

**Working with allies and partners in civil society:** IFEX is active in many CSO-led coalitions, such as the [International Civil Society Coalition on the Safety of Journalists \(SoJ Coalition\)](#), which monitors and advocates for improved safety and protection for journalists. In 2022, IFEX contributed to the SoJ Coalition's [Vienna Call to Action](#), which contains recommendations for governments and oversight bodies to improve the implementation of the UN Plan of Action on the Safety of Journalists and the Issue of Impunity. In the Call, IFEX drafted guidance calling for States to better address gender-based violence facing women journalists. IFEX has also launched and facilitated coordination groups with participating local and international CSOs to address urgent situations in Belarus and Nicaragua, providing affected member organisations with a space for campaigning and advocacy support.

**Fostering collaboration within and beyond the network:** IFEX's 2023 Collaboration Code [report](#) revealed that members find a culture of collaboration to be integral for building connections, exchanging ideas, engaging in cross-cutting areas on free expression and information issues, and amplifying information-sharing. However, there is still a need for IFEX and other organisations to deepen understanding of practices and principles that underpin 'genuine collaboration' between CSOs and other non-CSO other stakeholders. Members emphasised the importance of continuing to engage with the discomfort of talking about power and privilege to better tackle inequities within and beyond the IFEX network. Consequently, IFEX is reviewing and implementing recommendations to further enhance collaboration and solidarity, including making space for collective reflection through a decolonised lens, developing tools to guide future cooperation, enhancing capacity of members to engage and advocate with non-CSO stakeholders, and encouraging donors to see relationships and collaboration as necessary components for change.

**Encouraging member-led exchanges:** IFEX has promoted member-led convenings as an important tool for solidarity on key issues. Members in Asia have held capacity-building consultations and workshops for addressing online and tech-facilitated gender-based violence; members in the Europe and Central Asia region have organised coordination meetings on the safety of journalists in Belarus; and virtual cross-regional exchanges have taken place between members in Africa and Asia regarding strategies to build momentum towards implementing access to information legislation. These exchanges build trust and solidarity within the network, bolstering other collaborative advocacy initiatives like [joint statements](#) and [solidarity campaigns](#) on pressing issues raised by members.

**Supporting members through critical security challenges:** IFEX has also supported members facing critical security situations through resource-sharing, funding and advocacy. Following the Taliban takeover, IFEX supported the [Afghanistan Journalists Center \(AFJC\)](#) by providing relocation support, funding and advocacy with diplomatic stakeholders, to bolster that member's capacity to operate in exile. In Myanmar, IFEX supported [Mizzima's](#) protection and the defence of staff members targeted by the State with attacks and arrests by contributing logistical support, funding, relocation support, and safety resources. Recently, IFEX has been providing funding, advocacy and communications support to [7amleh, I'lam - Arab Center for Media Freedom, Development and Research](#), and the [Palestinian Center for Development & Media Freedoms \(MADA\)](#). The ever-changing and high-risk environment facing members has led IFEX to develop an interdisciplinary, intersectional, and integrated approach to tackle multiple threats and barriers, and immediate and long-term changes to members' contexts. IFEX's Holistic Responses to Critical Contexts approach aims to ensure ongoing support and solidarity to members by

strengthening the safety and defence of member organisations and the individuals within them. It includes consideration of physical and occupational safety, digital and information security, psychosocial support, well-being, and an awareness of sociocultural differences and discriminatory impacts.

**Funding the network:** Reliable and accessible sources of funding are necessary for organisations to continue their work. In addition to sustaining the IFEX network's operations, IFEX relies on funding to effectively facilitate members' participation in multistakeholder spaces and processes, push back against authoritarian regimes, promote national and regional advocacy with stakeholders, support member operations during challenging or emergency periods, foster relationships within and outside the network, and support in strengthening their institutions. Flexible funding that contributes to sustaining members' operations and missions has been valuable for those facing financial instability due to regressive laws, political instability, targeted attacks, or those that are historically underrepresented in the funding ecosystem, while project grants have supported members in specific initiatives in sustainable ways. Project grants include support for research into pressing free expression and information issues; campaigning and advocacy for the rights of vulnerable and marginalised groups; monitoring of human rights violations; engagement in human rights mechanisms and processes at regional and international levels; development of core institutional strategies including organisational policies, strategic plans, fundraising plans; and development of organisational holistic security protocols, practices, and culture including legal, digital, physical, workplace, and psycho-social safety.

## Conclusion

IFEX's networked approach strengthens international solidarity in a number of ways, including: serving as a buffer against authoritarian regimes; facilitating the support and resources needed to enable local member organisations on the frontlines to continue carrying out their work; connecting local members to allies, high-level actors, and other stakeholders; and platforming the voices that are often excluded from the spaces that need to hear them the most. However, this is not a replacement for the necessary action of States, regional, and international institutions. States and institutions must do more to uphold the principle of international solidarity, which includes refraining from normalising legislative abuse targeting civil society, holding each other accountable for human rights violations, adhering to international human rights obligations, and ensuring a healthy and free civic space for CSOs to carry out their work. It also requires States to engage equitably with civil society by ensuring they have access to multilateral spaces, holding inclusive consultations, strengthening international cooperation efforts, facilitating flexible funding and sustainable resourcing to support their work, and championing the voices and experiences of vulnerable and marginalised communities.

Without this enabling environment, international solidarity efforts fall short of their potential to achieve the significant change needed for cooperative efforts to tackle the attacks on civic space and other critical global challenges.

We request the Independent Expert on human rights and international solidarity's report to the Human Rights Council make recommendations for States to:

1. Commit to and uphold the principle of solidarity and international human rights obligations under the International Covenant on Civil and Political Rights to respond to, address, and pursue measures conducive to creating the conditions for engaging in international solidarity;
2. Refrain from drafting and using overbroad, punitive, disproportionate and discriminatory legislation to target CSOs, and engage with civil society through a transparent, equitable, and inclusive process to develop laws in line with international human rights standards, including holding diverse, multistakeholder, and participatory consultations;
3. Commit to reforming regulatory bodies, such as the ECOSOC Committee on NGOs, that are overly politicised, restrictive, and otherwise used to deny CSOs legitimacy or legal status, and ensure CSOs are accredited through regimes that are fair, transparent and meet international standards conducive to an enabling environment for healthy civic space, international solidarity efforts, and the exercise of freedom of expression and other fundamental human rights; and
4. Guarantee a broader enabling environment for CSOs to engage in expressions of international solidarity by ensuring they are not subject to censorship and reprisals, including being blocked from participation in UN processes, or subjected to loss of funding, arrest, attack, harassment, persecution, criminalisation, travel bans, or other forms of penalisation for their work.