

Perpetrators and methods of transnational repression and possible counter strategies



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Perpetrators and methods of transnational repression and possible counter-strategies

ABSTRACT

This study examines the perpetrators and methods of transnational repression within the European Union (EU) and suggests possible counter-strategies for EU institutions. The study explains how transnational repression relates to associated issues faced by the EU, such as foreign interference, disinformation, abuse of migration frameworks and hybrid threats. Whilst the scale, scope and methods of transnational repression comprise a global phenomenon, this problem is specifically prevalent within the EU. Three case studies feature perpetrator states active inside the EU: Russia, Iran and China. In response, legal frameworks and policy responses have been developed in relevant political contexts, including the United States of America, the United Kingdom, Australia, Canada and various EU Member States. The study concludes by providing recommendations for European institutions to address transnational repression.

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List of abbreviations

AFET	Committee on Foreign Affairs
AML/CFT	Anti-Money Laundering and Combating the Financing of Terrorism
BfV	Federal Office for the Protection of the Constitution
CAPE	Central Asia Political Exiles
DG	Directorate General
DOJ	Department of Justice
DSA	Digital Services Act
EEAS	European External Action Service
EU	European Union
FARA	Foreign Agents Registration Act
FBI	Federal Bureau of Investigation
FIMI	Foreign Information Manipulation and Interference
G7	Group of Seven
GRU	Foreign Military Intelligence Directorate
HKSAR	Hong Kong Special Administrative Region
HRDs	Human Rights Defenders
SLAPPs	Strategic Lawsuits Against Public Participation
UK	United Kingdom
UN	United Nations
USA	United States of America

Executive Summary

Transnational repression, when states reach across borders to silence dissent, is an increasingly significant problem for democracies around the world, including the European Union (EU) and its Member States. This study has been prepared for the European Parliament in order to explain what transnational repression is, how it manifests itself around the world and within the EU, what responses are already being delivered and what steps the EU should take to counter this problem.

Transnational repression falls within the context of human rights protection, foreign interference and hybrid threats. The paper explains ways in which transnational repression relates to these developed ideas already being applied in global democracies and across the EU. Transnational repression strongly affects EU interests, particularly: protection of individuals' rights on EU territory; defence of democracy and support for greater civic participation in democracy; protection of European and Member States' sovereignty as well as support for democracy outside the EU. Transnational repression is an issue which calls for an urgent and cohesive European response.

In section 1, this study first discusses the emergence of transnational repression as a recent discrete issue, addressing the debate on its definition and what role it could play in supporting further policy action. A basic consensus definition for transnational repression is provided, namely: when states reach across borders to silence dissent. This definition can operate across different multistakeholder initiatives to address the issue. The paper then engages with major areas of discussion about issues related to the definition, specifically: is transnational repression an element of foreign interference; who is targeted by transnational repression and what tactics used by perpetrators should be included in our understanding of transnational repression. It is argued that transnational repression can be considered as foreign interference, that the definition should be confined to actions which target people with a 'national connection' to the origin state and that it is better to include a broader range of tactics than maintain a narrow scope.

Key projects that have examined transnational repression are then detailed: the Freedom House transnational repression dataset, the Central Asian Political Exiles dataset, the Oxus Society and Uyghur Human Rights Project Transnational Repression against Uyghurs dataset and Alexander Dukalskis's Authoritarian Actions Abroad Dataset. The study's own dataset is explained, looking particularly at how to use Freedom House's data accurately. As a quantitative source, the study relies primarily on Freedom House's dataset.

In section 2, the global scale and scope of transnational repression is covered using Freedom House's dataset and the main categories of tactics are elucidated that have been examined by experts. Freedom House's data currently covers ten years, from 2014 to 2024 and includes 1 219 physical incidents perpetrated by 48 countries in 103 host countries. This section explains the main dynamics of how most transnational repression takes place, what types of transnational repression are most common and reviews existing scholarship on cooperation between originating and host states as well as regional clustering. The study then provides examples with reference to major categories of transnational repression not quantified in existing datasets: coercion-by-proxy, digital transnational repression, Interpol abuse, mobility controls and

financial transnational repression. The effects of transnational repression on targets are then discussed.

In section 3, the study describes transnational repression within the EU. Freedom House's data from 2014 to 2024 contains 139 incidents where host states are also EU Member States. There are an additional 189 incidents featuring non-EU members of the Council of Europe and Kosovo, which mostly originate in Türkiye. The study describes how EU data differs from global data and discusses the most common physical tactics inside the EU, namely, detentions and unlawful deportations. It then discusses Russia as the origin state with the highest number of incidents inside the EU and Poland as the host state with the highest number of incidents inside the EU and explanations for these phenomena. It then describes tactics not captured in the data that must still be considered as part of transnational repression in Europe. The study also elaborates on the emerging problem of proxy-conducted transnational repression, including that by organised crime groups, as an issue that has grown in prominence due to new forms of Russian and Iranian proxy transnational repression in particular.

In section 4, short case studies are provided highlighting three origin countries: Russia, Iran and China. These three are among the most prominent practitioners of transnational repression globally and have drawn notable attention for activities inside the EU over recent years. These case studies explain the unique features of each country's transnational repression activities, with a particular focus on activities inside the EU. This includes further discussion on the issue of organised crime cooperation and gig recruitment, particularly in the Russian and Iranian cases.

In section 5, existing legal and policy frameworks are explained that have been adopted in the EU and other democratic contexts. The study explains 'whole-of-government' American policies regarding transnational repression that were adopted in the Biden administration but reversed in the second Trump administration. It describes the approach taken to this issue in Australia, the United Kingdom and Canada, countries which have each adopted new laws countering foreign interference and imposing transparency requirements for foreign influence in political processes. It then describes existing actions taken by EU institutions and Member States, with a focus on Germany, Sweden and the Netherlands.

Finally, in section 6 the study provides recommendations for an EU-wide response to transnational repression. The first priority recommendation is for the EU to adopt a definition of transnational repression that would support other policy actions, with associated guidelines and language preferences. The second priority is to establish an institutional approach to information collection and knowledge generation, whether through the European External Action Service or the newly announced Centre for Democratic Resilience. The study provides additional recommendations for EU institutions to address transnational repression inside and outside the EU. It also recommends that Member States adopt their own official definitions of transnational repression, create and resource national hubs, adopt policies for outreach to affected communities, enact new policies to strengthen information-sharing, impose consequences on state actors that engage in transnational repression and sustain diplomatic engagement on transnational repression in third countries and at multilateral fora such as the United Nations and the Group of Seven.

1 Introduction

Over the last six years, the issue of transnational repression has emerged as one of increasing importance for democracies around the world, including the European Union (EU) and its Member States. This study provides the European Parliament with an explanation of what transnational repression is, how it takes place around the world and within the EU, what responses are already being delivered and what steps the EU should take to counter the problem.

Transnational repression sits at the juncture of human rights, foreign interference and hybrid threats. It is first and foremost a human rights problem: the purpose is to silence individuals seeking to exercise their fundamental rights to assemble, associate and express themselves. Because it involves the use of covert, coercive means against individuals and communities by foreign actors inside of democracies and contributes to undermining civic participation in democracy, it is also a form of foreign interference. Given that states use transnational repression to sow fear and instability in a society below the threshold that would provoke a military response, it may also be understood within the framework of hybrid threats. At an observational level, as will be further discussed in what follows, the networks that perpetrate transnational repression – both state actors and their proxies – often overlap and intersect with networks engaged in foreign information manipulation and interference (FIMI), sabotage, subversion as well as other foreign interference and hybrid threat campaigns inside Europe. Finally, and separately, transnational repression affects the ability of EU residents to advocate for democracy in countries outside the EU.

This means that transnational repression strongly affects EU interests. These include: protecting the rights of individuals on EU territory, whether citizens of a Member State or not; defence of democracy and support for greater civic participation in democracy; protection of European and Member State sovereignty; and support for democracy outside the EU. It also touches on the highly sensitive area of migration and its governance, as migration regulation practices can become tools that states exploit to enact transnational repression. Effectively responding to transnational repression will require examining practices within the EU and enabling Member States. Transnational repression threatens the rights of European residents, both citizens and non-citizens. It also threatens European democracy. It infringes upon the exercise of core freedoms of expression, association and assembly and undermines the rule of law within Europe. For these reasons, it merits a strategic response from the EU as a whole and its Member States.

1.1 Defining transnational repression

As a term, 'transnational repression' rose in significance only comparatively recently, following publication of a report by Freedom House in February 2021¹. Prior to that, the expression was used within academia and civil society, alongside *inter alia* 'extraterritorial authoritarianism' or 'transnational authoritarianism'². These studies were part of a broader trend toward examining

¹ N. Schenkkan and I. Linzer, '[Out of Sight, Not Out of Reach: The Global Scale and Scope of Transnational Repression](#),' Freedom House, February 2021.

² D. Moss, '[Transnational Repression, Diaspora Mobilization, and the Case of the Arab Spring](#)', *Social Problems*, Vol 63, No 4, 2016, pp. 480-498; M. Glasius, '[Extraterritorial Authoritarian Practices: A Framework](#)', *Globalizations*, Vol 15, No 2, 2018, pp. 179-197; A. Dukalskis et al., '[The Long Arm and the Iron Fist: Authoritarian Crackdowns and](#)

'global authoritarianism', which sought to overcome traditional approaches that had focused the study of authoritarianism on state actions within defined borders and explored how, after the Cold War, authoritarian forms of governance persisted and became fully integrated into global economic and governance structures³. Transnational repression as a sub-field engaged with how exiles and diasporas became targets as well as sometimes instruments of authoritarian practices⁴. Following the 2021 Freedom House report, there was an explosion of interest in the topic among policymakers in democracies, probably due to repercussions from foreign interference in the 2016 American elections and a desire to set a new policy agenda for the defence of democracy⁵. Since that time, there has been a growing body of research from academics, civil society organisations and diaspora communities further refining and describing transnational repression as a discrete problem within this broader context.

Greater research and policy attention to the problem has in turn provoked increased discussion about how to define transnational repression. Before engaging in the substance of this debate, it is important to note that an official definition is not a prerequisite for action. Foreign interference and hybrid threats, both key related terms used in this study, do not have globally agreed definitions themselves⁶. Furthermore, foreign interference does not have an official definition within the EU, which also deliberately retains a flexible definition of hybrid threats⁷. As quoted by the EU Hybrid Centre of Excellence, 'a general understanding of the concept is more useful than a fixed definition'⁸. Additionally, nearly all acts described under transnational repression are already against international law. Writing about threats against journalists in exile, the United Nations (UN) Special Rapporteur for Freedom of Expression Irene Khan has stated that 'there is no international legal gap, but there is a dangerous protection gap'⁹. In other words, the lack of a precise official definition is not necessarily an obstacle to action, so long as the key actors agree on the core concept.

[Transnational Repression](#)', *Journal of Conflict Resolution*, Vol 68, No 6, 2023; G. Tsourapas, '[Global Autocracies: Strategies of Transnational Repression, Legitimation, and Co-optation in World Politics](#)', *International Studies Review*, Vol 23, No 3, 2021, pp. 616–644.

³ S. Levitsky and L. Way, [Competitive Authoritarianism: Hybrid Regimes after the Cold War](#), Cambridge University Press, Cambridge, 2012; L. Diamond, M. Plattner and C. Walker, [Authoritarianism Goes Global: The Challenge to Democracy](#), Johns Hopkins University Press, Baltimore, 2016; A. A. Cooley and J. Heathershaw, [Dictators without Borders: Power and Money in Central Asia](#), Yale University Press, New Haven, 2017; F. Adamson, '[Spaces of Global Security: Beyond Methodological Nationalism](#)', *Journal of Global Security*, Vol 1, No 1, 2016, pp.19–35.

⁴ B. Baser and A. Öztürk, '[Positive and negative diaspora governance in context: From public diplomacy to transnational authoritarianism](#)', *Middle East Critique*, Vol 29, No 3, 2020, pp. 319–334; F. Adamson, '[Non-state authoritarianism and diaspora politics](#)', *Global Networks*, Vol 20, No 1, 2019, pp. 150–169.

⁵ N. Schenkan, M. Hasan and A. Ruud, '[Freedom House and the Transnational Repression Project](#)' in M. Hasan and A. Ruud (eds), *The Long Reach of the Strong Arm: Evolving Forms of Transnational Authoritarianism*, Springer, Cham, 2026 (forthcoming).

⁶ Canada, the United Kingdom and Australia have defined foreign interference legally in the past two years. See Australian Government, Department of Home Affairs, '[Defining Foreign Interference](#)', webpage, nd.

⁷ On hybrid threats: 'Definitions of hybrid threats and campaigns vary, since they need to remain flexible in order to allow for proper responses to the evolving nature of the threat' in European Council, '[Hybrid threats](#)', webpage, nd; H. Mildebrath, '[Foreign interference and EU preparedness](#)', PE 760.355, *European Parliamentary Research Service*, March 2024.

⁸ S. Monaghan, [Hybrid CoE Paper 12: Deterring hybrid threats: Towards a fifth wave of deterrence theory and practice](#), *Hybrid Center of Excellence*, March 2022, p. 11.

⁹ UN Human Rights Council, [Journalists in Exile: Report of the Special Rapporteur on the promotion and protection of the right to freedom of opinion and expression Irene Khan](#), A/HRC/56/53, 26 April 2024.

Within the community of experts working on transnational repression, there is agreement as follows: transnational repression is when states reach across borders to silence dissent. This is reflected by the definition provided in a recent UN Human Rights Office brief: 'transnational repression denotes acts conducted or directed by a state, or its proxy, to deter, silence or punish dissent, criticism or human rights advocacy towards it, expressed from outside its territory'¹⁰. The June 2025 Group of Seven (G7) Leaders' Statement on Transnational Repression, adopted after extensive consultation with experts and civil society, defines transnational repression as 'an aggressive form of foreign interference whereby states or their proxies attempt to intimidate, harass, harm or coerce individuals or communities outside their borders'¹¹.

Beyond this broad agreement, there are three notable areas of debate about the definition: whether transnational repression is a form of foreign interference; which targets are included; and which tactics are included. Regarding the question of foreign interference, some experts and scholars have pushed back against the growing policy tendency, reflected for example in the G7 Leaders' Statement on Transnational Repression, to include transnational repression within the broader category of foreign interference. While foreign interference is generally characterised as attacking democratic institutions, transnational repression primarily attacks individuals and communities, with democratic institutions being impacted downstream. With that comes a fear that framing transnational repression in terms of foreign interference will result in policy responses emphasising host state institutional resilience rather than protection of human rights.

However, this need not be a contradiction. So long as the unique features of transnational repression are recognised and policies are developed with human rights protection at their core, there are clear policy benefits to be derived from addressing transnational repression within a broader portfolio of responses to foreign interference. As will be made clear later in the recommendations section, this study advocates the incorporation of transnational repression within the EU's growing body of work on countering foreign interference. Incorporating policies to address transnational repression alongside FIMI and weaponisation of migration can produce synergies because of organic overlap among these areas. If helpful for policy execution, a connection may also be drawn to hybrid threats. However, because that concept is grounded in defence and security studies, this policy link is more indirect.

Regarding transnational repression targeting, debate today centres on understanding who is included within the scope of transnational repression. In the original research by Freedom House, transnational repression referred only to individuals such as exiles and members of diasporas who have a 'national connection' to their state of origin. This refers to those who because of a migration background are linked to the origin state, even if they are citizens of the host state where they now reside. Other experts have argued for a widening of transnational repression to include individuals who are targeted by the state of origin, yet are *without* a national connection to the perpetrators. To give an example, under the original definition, threats against British lawyers for Hong Kong publisher Jimmy Lai are not transnational repression

¹⁰ UN Office of the High Commissioner of Human Rights, [Transnational Repression: What is Transnational Repression?](#), 18 June 2025.

¹¹ A. Kananaskis, '[G7 Leaders' Statement on Transnational Repression](#)', *Prime Minister of Canada*, 17 June 2025.

because the lawyers do not have a national connection to China¹². Similarly, Iranian hacking of European parliamentarians who are not from the Iranian diaspora is not transnational repression, but Iran's targeting of a Dutch member of parliament from the Iranian diaspora is¹³.

The arguments for widening the definition are, firstly, that actors engaged in repression do not necessarily care whether their target has a national connection and so a wider definition may facilitate a more accurate diagnosis *vis-à-vis* actors and their methods. Secondly, a wider definition may encourage a more robust response if it brings broader attention to the phenomenon. However, perpetrators of repressive actions regardless of national connections can still be captured within other responses to foreign interference and hybrid threats. For instance, a death threat against a British lawyer from a foreign source remains a threat that can be treated under British law.

We argue in this study for the original definition, namely that transnational repression should be used only for cases where there is a national connection to the origin state. This is in line with existing academic literature and emerging human rights literature¹⁴, where the focus is on tactics that states use to control populations abroad that they consider still to be under their jurisdiction. Authoritarian states for the most part no longer seek to restrict emigration, but instead allow people to go abroad, while seeking to retain control over them through various forms of coercion¹⁵. Additionally, widening the definition risks blurring it with a much larger variety of actions taken by states outside their borders, especially those actions that states take against perceived national security threats outside of armed conflict. These actions (such as cyberattacks, drone strikes, assassinations or renditions of those without a national connection) often constitute human rights violations, but cannot be construed as a coercive form of foreign interference. A wider definition risks clouding the issue and would shift countering transnational repression to a very different set of possible responses.

Responses required to address transnational repression that includes targets without a national connection are quite different from those focused on diasporas and exiles. Individuals with a national connection to the origin state are more likely to: have precarious immigration statuses in the host country; be mistrustful of host state authorities; lack clear avenues for seeking redress and be targeted through tactics specific to existing descriptions of transnational repression. In other words, widening the definition to include those without a national connection risks losing sight of what makes transnational repression a unique threat within a broader spectrum of foreign interference and hybrid threats. Hence, within the definition of transnational repression being advocated here, it is argued that only those acts should be retained that target individuals with a national connection to the origin state. Acts that target others may still be classified as foreign interference, but not transnational repression.

¹² H. Siddique, '[UK-based lawyers for Hong Kong activist Jimmy Lai targeted by Chinese state](#)', *The Guardian*, 15 February 2025.

¹³ A. Roussi and N. Vinocur, '[European Parliament's Iran delegation chair victim of Tehran-linked hacking](#)', *Politico*, 23 April 2025; NL Times, '[Dutch MP says he felt intimidated by Iranian regime's threatening email](#)', 4 January 2025.

¹⁴ Oxford Pro Bono Publico, '[Transnational Repression of Human Rights Defenders: References, definitions and protections under international human rights law](#)', September 2025.

¹⁵ G. Tsourapas, '[Global Autocracies: Strategies of Transnational Repression, Legitimation, and Co-optation in World Politics](#)', *International Studies Review*, Vol 23, No 3, 2021, pp. 616–644.

There is a second dimension to the debate about who transnational repression targets that deserves its own discussion: whether transnational repression describes attacks solely on 'dissidents' or 'human rights defenders (HRDs)' or if it encompasses a broader group. For example, in the UN Human Rights Office definition, reference is made to actions taken 'to deter, silence or punish dissent, criticism or human rights advocacy towards' the origin state¹⁶. In practice, transnational repression is determined by the threat perception of the origin state and individuals may be targeted merely because of their belonging to a persecuted group. For instance, Uyghurs have been targeted indiscriminately by the People's Republic of China due to their identity¹⁷. Similarly, after the religious movement of Fethullah Gülen broke with the government of Türkiye in 2013, movement members abroad were targeted even in cases where they were not individually engaged in acts of dissent or anti-government mobilisation¹⁸. In these and other similar cases, belonging to a group is enough to be treated as a threat by the origin state and subjected to repression. Identity is treated as a ground for repression, because the origin state anticipates members of the group will become dissidents or because expression of the identity itself threatens the government's ideology. For this reason, it is maintained in this study that transnational repression should encompass repressive acts against individuals with a national connection to the origin state, even when those individuals are not dissidents or HRDs.

A final area of debate concerns which tactics should be included within transnational repression. There is broad agreement on most transnational repression tactics. Reflecting this consensus, the UN Human Rights Office provides the following overall categories: acts of violence and intimidation outside the origin country; harassment through extradition requests; unlawful arrests or deportations; abuses of security laws with extraterritorial provisions; impediments to mobility; digital threats; as well as attacks and proxy punishment of relatives or associates still in the origin country.

However, there is still some disagreement about the inclusion of smear campaigns and strategic lawsuits against public participation (SLAPPs). States often engage in smear campaigns against exiles and diasporas as part of their efforts to silence dissent. This is an area in which transnational repression overlaps heavily with FIMI. The reason that some work on transnational repression (such as that of Freedom House) does not include smear campaigns within its scope is because they are already being covered better by work on information operations. Other researchers, though, do treat smear campaigns as a particular form of digital transnational repression operating alongside other tactics to achieve perpetrators' goals¹⁹. States also use SLAPPs in attempts to silence dissent beyond their borders²⁰. However, this too is an existing stream of work in many democracies, including the EU and its Member States, with developed

¹⁶ UN Office of the High Commissioner of Human Rights, [Transnational Repression: What is Transnational Repression?](#), 18 June 2025.

¹⁷ E. Lemon, B. Jardine and N. Hall, '[Globalizing minority persecution: Globalizing minority persecution: China's transnational repression of the Uyghurs](#)', *Globalizations*, Vol 20, No 4, 2022, pp. 564-580.

¹⁸ N. Schenkan, '[The Remarkable Scale of Turkey's "Global Purge": How It Became a Threat to the Rule of Law Everywhere](#)', *Foreign Affairs*, 29 January 2018.

¹⁹ Citizen Lab, '[Digital Transnational Repression Archives](#)', webpage, nd.; M. Michaelsen, [Silencing across Borders: Transnational repression and digital threats against exiled activists from Egypt, Syria, and Iran](#), *Hivos*, 2020.

²⁰ Foreign Policy Centre and Article 19, '[London Calling: The issue of legal intimidation and SLAPPs against media emanating from the United Kingdom](#)', February 2023.

responses being employed irrespective of the target²¹. In both cases, deciding on exclusion is not principled, but rather based on whether including these tactics helps identify specific methods of repression not otherwise incorporated into policy responses. In the spirit of working towards an inclusive position, therefore, for the purposes of this study, smear campaigns and SLAPPs are regarded as components of transnational repression. As with hybrid threats, it is more constructive to treat transnational repression as a broad phenomenon encompassing a flexible and evolving set of tactics instead of a fixed menu.

Hence, within this study, we propose the following definition:

Transnational repression occurs when states or their proxies act across borders to silence dissent. Transnational repression particularly targets people with a 'national connection' to the repressing state, among them nationals or former nationals as well as members of diasporas and those living in exile. Transnational repression seeks to interfere with the exercise of individuals' rights and should be understood as a form of foreign interference.

1.2 Data and sources

This section will review data regarding transnational repression with key findings being discussed in section 2 (scale, scope and methods). Because transnational repression has only recently emerged as a defined field of interest, data has been collected by experts and civil society organisations, including some representing diasporas from countries that practice transnational repression. No government or multilateral agency has announced a data collection project as yet.

In all approaches to studying transnational repression incidents, there are significant challenges to receiving information from those targeted. Firstly, those subject to transnational repression by definition face external security risks; reporting on transnational repression may increase that risk and lead to retribution. Secondly, those targeted with transnational repression may lack trust in host country authorities. This may be due to ingrained fears gained from living in authoritarian contexts about interacting with officials, or fear that interaction could lead to investigation or deportation on immigration grounds. Finally, official attempts to collect actionable information, if they do not have sufficient resource investment or if personnel lack adequate training in transnational repression, lead to inadequate responses. This in turn frustrates the targets of transnational repression and results in reduced reporting. These problems have undermined initiatives such as the United States of America (USA) Federal Bureau of Investigation (FBI) tipline for transnational repression. In the absence of official sources, civil society and expert sources have filled the gap. All data collection processes for transnational repression face a set of challenges that scholars have identified. At a minimum, these are: consistently defining transnational repression and the categories of coding (such as origin state, host state and type of incident); accurately identifying incidents as transnational repression with limited information; both data scarcity (the difficulty of obtaining records of incidents) and data abundance (the large number of incidents, especially in forms like digital transnational repression and coercion-by-

²¹ European Parliament and Council, [Directive on protecting persons who engage in public participation from manifestly unfounded claims or abusive court proceedings \('Strategic lawsuits against public participation'\)](#), *Official Journal of the EU*, L Series, 11 April 2024.

proxy) and ethical challenges involved in compiling and releasing information about contemporary acts of repression involving people who may be at ongoing risk²².

Freedom House's transnational repression dataset is the primary reference in this field because of its global scope and ongoing consistent updates. Hence, it will be the primary reference in this study. The organisation released its first global dataset of transnational repression incidents in 2021, covering the years 2014 to 2020. This was derived from open-source information about incidents of transnational repression from *inter alia* governmental sources, civil society reports, UN documents and news articles. Data is collected continually and publicly released after internal vetting at the beginning of each calendar year. The most recent Freedom House data update runs until the end of 2024 and will next be publicly available in early 2026 with data covering the whole calendar year 2025. The most recent release covers 1 219 incidents perpetrated by 48 governments in 103 countries from 2014 to 2024.

There are important details to understand about Freedom House's data in order to interpret it well. Firstly, it is deliberately limited in regard to timescale and what kinds of incidents are included. Project members felt that it was important to have a timeframe within which a comprehensive but detailed search of open sources could be achieved. Going further back in time would have entailed far more labour, but also introduced more uncertainty as to whether the global picture had been accurately captured. Secondly, only physical incidents are included, thus avoiding attempts to document comprehensively all prevalent forms of transnational repression such as digital threats and coercion-by-proxy (also sometimes called 'family intimidation'). These forms of transnational repression are so widespread that they are difficult to document fully and accurately using the chosen methods – the 'data abundance' problem described above. Freedom House decided instead to collect data on a much narrower set of categories where it felt confident it could capture the scale and scope accurately. It is important to note that Freedom House, as with all other experts and organisations in this field, still considers tactics such as digital transnational repression, coercion-by-proxy and mobility controls as forms of transnational repression.

Additionally, as with most other datasets described here, Freedom House data covers only those incidents that can be documented through open sources. As with other projects described below, this helped address an ethical question regarding data collection; namely, there is a risk of exposing or re-exposing individuals to transnational repression risks by including them in the dataset. The trade-off is that incidents without a public source are not included in the dataset, even when Freedom House is aware of them through other sources. These factors imply that the most commonly used dataset represents only a 'the tip of the iceberg', to quote Freedom House.

Other datasets

The Central Asia Political Exiles (CAPE) database was a project at the University of Exeter led by Dr John Heathershaw and Dr Saipira Furstenberg²³. CAPE covers the period 1990–2018 providing detailed dossiers of 278 individual political exiles from the five post-Soviet Central Asian countries and repressive actions taken against them outside of their origin countries. The

²² A. Dukalskis et al., '[Transnational repression: data advances, comparisons, and challenges](#)', *Political Research Exchange*, Vol 4, 2022.

²³ Exeter Central Asian Studies Network, '[Political Exiles \(2014–2020\)](#)', webpage, nd.

entries are narrative and highly detailed based on open-source information gathered by the project team. The CAPE methodology inspired Freedom House's work, which is why there is some 'family resemblance' especially in terms of how data is collected and processed. However, there are significant differences. Firstly, CAPE is designed around individuals, so that each entry concerns a specific person rather than a discrete incident of transnational repression. Secondly, the data is structured around three stages of what the project team called 'extraterritorial security measures': stage 1, the individual is charged or subject to an extradition request or Interpol notice; stage 2, the individual is arrested, detained, or extradited; and stage 3, the individual suffers transnational violence. Not all individuals in the database are subject to all three stages. Although the project is no longer active, CAPE remains a valuable resource for researchers of Central Asia and transnational repression because recorded activity extends over a long period and there is a high level of detail covered. It has thus inspired many other projects on transnational repression.

The China's Transnational Repression of Uyghurs dataset was produced by the Oxus Society for Central Asian Affairs and the Uyghur Human Rights Project as part of the report 'No Space Left to Run: China's Transnational Repression of Uyghurs'²⁴. The dataset covers 7 108 incidents of transnational repression affecting Uyghurs and other non-Han people tied to the Xinjiang Uyghur Autonomous Region from 1997 until March 2021. One of the founders of the Oxus Society and co-authors of the report is Dr Edward Lemon who worked on the CAPE project at the University of Exeter and so the methodology for this dataset also draws from CAPE's approach in terms of using stages 1–3 to classify incidents of transnational repression. Although entries in this dataset are less thorough than that of CAPE, they are supplemented by an extensive narrative report providing details about many key incidents. The dataset is extremely valuable for cataloguing China's campaign against Uyghurs and other ethnic minorities abroad, which is one of the largest and most impactful campaigns of transnational repression over recent decades.

The Authoritarian Actions Abroad Database was a project undertaken by Professor Alexander Dukalskis of University College Dublin that he used for his book 'Making the World Safe for Dictatorship'²⁵. It covers actions from 1991 to 2019 encompassing 1 177 incidents. As with other datasets described here, it drew upon CAPE for inspiration in terms of using open sources and categorising incidents even though it does not use the stage 1–3 classification. Some of the incidents include many people and so the number of individuals covered is at least 2 585. The dataset itself does not provide detailed narrative descriptions of incidents, but the large number of incidents and their sourcing make for easy analysis of the data.

In addition to these datasets, there is a large and growing body of literature published over the past five years comprising high-standard qualitative research by civil society organisations and think tanks on transnational repression. This includes work by, *inter alia*, Human Rights Watch, Amnesty International, Doublethink Lab, Safeguard Defenders, Hindus for Human Rights,

²⁴ Uyghur Human Rights Project and Oxus Society for Central Asian Affairs, [No Space Left to Run: China's Transnational Repression of Uyghurs](#), 2021. Data available for download at Oxus Society, '[Incidents of Transnational Repression](#)', webpage, nd.

²⁵ A. Dukalskis, [Making the World Safe for Dictatorship](#), Oxford University Press, Oxford, 2021. For data and methodology, see A. Dukalskis, '[Appendix 2 Authoritarian Actions Abroad Database \(AAAD\) — Codebook, Version 5](#)', in *Making the World Safe for Dictatorship*, Oxford University Press, Oxford, 2021.

Egyptian Human Rights Forum and Citizen Lab²⁶. Freedom House has also published a number of other reports on different aspects of transnational repression, including host state responses, transnational repression of students and journalists as well as studies of specific tactics such as mobility controls²⁷.

1.3 Methodology

The primary method used in this study was desk-based analysis, supplemented with incident data from existing datasets of transnational repression and interviews with activists, journalists and experts on transnational repression as well as EU legal experts and policymakers. The study is built first and foremost on the growing body of peer-reviewed research pertaining to transnational repression in political science, sociology and international relations. However, also taken into account is an even larger volume of research by human rights experts, advocacy organisations and bodies representing activists and diasporas affected by transnational repression. The study authors also consulted in depth the literature on hybrid threats and foreign interference in the EU and other democracies. Where appropriate, also incorporated were conclusions from a recent paper on Transnational Repression of Human Rights Defenders produced for the European Parliament's subcommittee on human rights²⁸.

For its data source, the study relied primarily on Freedom House's dataset of physical and direct transnational repression incidents. All data analysis was conducted solely by the authors of this study. Freedom House staff were also consulted to ensure that the data was being interpreted consistently. Alexander Dukalskis's Authoritarian Actions Abroad Database, Exeter CAPE database and the Oxus Society's China's Transnational Repression of Uyghurs dataset were cross-referenced to ensure comprehensiveness. The authors also consulted the Abdorrahman Center for Human Rights 'Iran: State Violence Beyond Borders' dataset for information from the case study on Iran. In addition, the authors analysed public reports of transnational repression recorded by researchers, civil society organisations and journalists who were not contained in these datasets.

To understand the impact of transnational repression on its targets and the state of policy responses as seen by those most affected, the authors conducted 15 interviews with activists, journalists and experts affected by or studying transnational repression. This included three individuals from Russia, three from Iran, another working at an Iranian diaspora organisation, one from Egypt, two from Hong Kong, one from Tibet, one from Xinjiang, one from Vietnam and two

²⁶ Human Rights Watch, ["We Will Find You": A Global Look at How Governments Repress Nationals Abroad](#), 22 February 2024; Amnesty International, ["On My Campus, I Am Afraid": China's Targeting of Overseas Students Stifles Rights](#), 13 May 2024; E. Hsu and A-M. Lau, [Silenced Voices, Hidden Struggles: PRC Transnational Repression on Overseas Human Right Activists Report](#), *Doublethink Lab*, 1 June 2023; L. Harth and Y. Chen, [Chasing Fox Hunt: Tracing the PRC's Forced Return Operations around the Globe](#), *Safeguard Defenders*, 15 April 2024; Hindus for Human Rights, ["Transnational Repression Resource Guide"](#), webpage, nd; Egyptian Front for Human Rights and Egyptian Human Rights Forum, ["Transnational Repression: Targeting Egyptian Human Rights Defenders in the Diaspora"](#), 30 September 2024; Citizen Lab, ["Digital Transnational Repression Archives"](#), webpage, nd. In addition, there is a new historical dataset on Latin America that was released in July 2025: M. Spektor et al., ["Introducing the Latin American Transnational Surveillance \(LATS\) Dataset"](#), *Journal of Peace Research*, Vol 62, No 4, July 2025.

²⁷ Freedom House, ["Transnational Repression Reports"](#), webpage, nd.

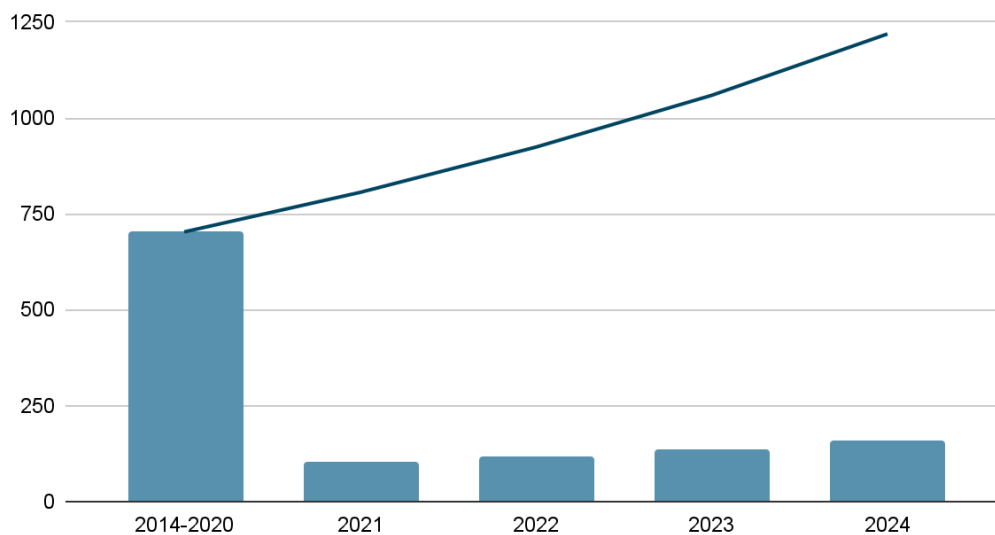
²⁸ S. Furstenberg, M. Michaelsen and S. Anstis, [Transnational repression of human rights defenders: The impacts on civic space and the responsibility of host states](#), PE 754.475, *European Parliament Directorate-General for External Policies of the Union*, 2025.

independent experts studying transnational repression. Also interviewed was a group of activists working to address transnational repression in a European country. Participants were selected via trusted well-established professional connections and snowball sampling. To understand existing European responses to transnational repression in particular, seven interviews were conducted with officials in different EU policy bodies. All 22 interviews were semi-structured and conducted 'on background' to preserve interviewees' anonymity.

2 Scale, scope and methods of transnational repression

This section looks at transnational repression from a global perspective. Freedom House's data currently covers ten years, from 2014 to 2024 and includes 1 219 physical incidents perpetrated by 48 origin countries in 103 host countries. Freedom House has released new data every year for the last five years with the number of incidents, origin countries and host countries increasing annually²⁹. Due to the organisation's reliance on open-source information for its data, this increase could be attributable not only to an increase in media attention and policy interest but also to the growth in transnational repression itself.

Figure 1 Cumulative and annual TNR incidents



Source: Freedom House data 2014-2024

Despite the large and increasing number of originating states, nearly 80 % of all incidents are attributed to the dataset's top ten states, which are in descending order: China, Türkiye, Tajikistan, Russia, Egypt, Cambodia, Turkmenistan, Iran and Uzbekistan tied with Belarus. As has

²⁹ All figures are provided by Freedom House in Transnational Repression Database, version 6, last updated 20 January 2025. The database is available on request from Freedom House through the email research@freedomhouse.org, subject line Transnational Repression Data Request. Calculations in this study were done by the authors and are their sole responsibility.

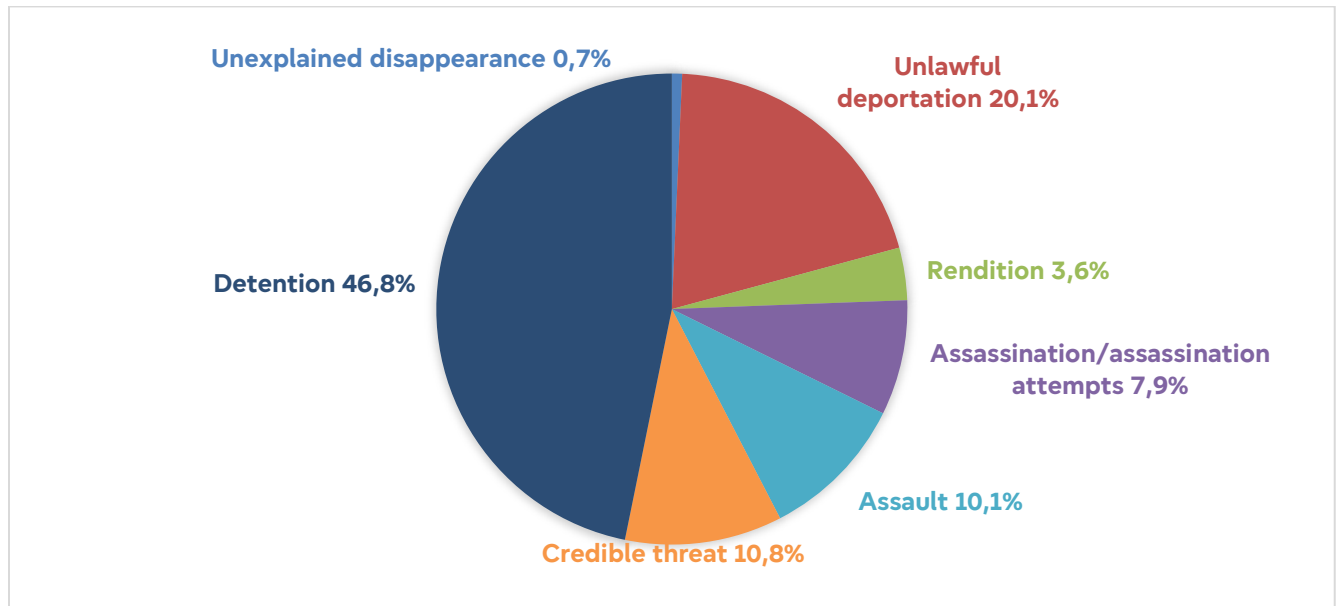
been the case since the dataset was first released, China is by far the top perpetrator, accounting for 22 % of incidents worldwide according to the most recent data.

From a global perspective, most incidents take place in authoritarian or semi-authoritarian countries that neighbour perpetrators of transnational repression, given that when people flee, they go to the safest place they can reach. Democracies' relative geographic distance from many of the countries people are fleeing, coupled with increasing difficulties in accessing democracies means that people will often wind up in other host states. This is why countries such as Türkiye (95 incidents as a host state) and Thailand (219 incidents) that share relatively safe and porous borders with many autocracies wind up being major host states for transnational repression. Even Russia is a common host state for Central Asian and other exiles from neighbouring countries, accounting for 131 incidents as a host state, despite its obvious lack of human rights protection.

In terms of tactics, Freedom House divides physical tactics into the following labels that it uses in coding:

- **Assassination/Assassination attempt;**
- **Assault;**
- **Credible threat**, defined as a threat deemed sufficiently serious by law enforcement officials in the host country that they act to prevent it through additional protective actions for targets, such as arranging their moves to hidden locations;
- **Detention**, meaning being held for more than 12 hours at the origin country government's request;
- **Rendition**, referring to a forcible return to the origin country without legal process or with only the barest hint of a legal process. Freedom House includes within this category the cases of abductions (in which a person was taken by the origin country government with little or no involvement by the host country government) as well as deportations (in which the individual was held incommunicado, without access to a lawyer or with such an expedited process that they did not have an opportunity to challenge the deportation and thus were effectively rendered without protection);
- **Unlawful deportation**, defined as a forcible return with some violations of due process to an origin country where the person was liable to be subjected to persecution; and
- **Unexplained disappearance**, referring to incidents in which a person has disappeared and the origin country government is presumed to be responsible but there is no confirmation as to where the person physically is.

The distribution of incidents among these tactics is as follows:

Figure 2 Distribution of transnational repression incidents by category

Source: Freedom House data 2014–2024

As can readily be seen, the largest number of incidents by type are detentions (503), renditions (269) and unlawful deportations (241)³⁰. This points to the importance of cooperation between origin and host states in the majority of transnational repression incidents coded by Freedom House (note that renditions may include cooperation between origin and host states). Of the 1 219 incidents, according to Freedom House's coding, 780 (64 %) involve cooperation between host and origin states. As scholars Marcus Michaelsen and Kris Ruijgrok have observed, such cooperation is more likely when both host and origin states are autocratic. When the host state is democratic, origin states are more likely to engage in direct attacks because democratic host states are less likely to cooperate³¹. This may also increase incentives to use long-distance tactics such as coercion-by-proxy. Similarly, scholars Rebecca Cordell and Kashmiri Medhi have found that host states with weaker rule of law and more economic dependence on the perpetrator/origin states are more likely to cooperate in transnational repression³².

Transnational repression is also regionally clustered, meaning that it occurs most densely between countries that are close to each other geographically. Recurring patterns of transnational repression in certain subregions are likely to indicate the establishment of informal or even formal modes of regional cooperation to suppress transnational dissent. This is visible in what Human Rights Watch has called the 'swap mart' of Southeast Asia, in Central Asia, among

³⁰ The incidents included in Freedom House's data are vetted to ensure both confidence in the source of information and confidence that the incident is driven by the origin state. Therefore detentions and deportations without origin-state motivation (e.g. when an individual is detained solely on a host country immigration-law violation and subsequently deported) are not included in the data.

³¹ M. Michaelsen and K. Ruijgrok, '[Autocracy's Long Reach: Explaining host country influences on transnational repression](#)', *Democratization*, Vol 31, No 2, 2024, pp. 290–314.

³² R. Cordell and K. Medhi, '[Transnational Repression: International cooperation in silencing dissent](#)', *International Studies Quarterly*, Vol 68, No 3, 2024.

countries participating in the Arab Interior Ministers' Council in the Middle East and increasingly in East Africa³³.

2.1 Additional types of transnational repression that cannot be quantified

As explained in the introduction, certain tactics of transnational repression are so prevalent that they cannot be reliably quantified through the counting approach that Freedom House and other researchers have employed. These tactics nevertheless have an enormous impact on exiles and diasporas. Furthermore, they have been the subject of extensive research and reporting. These include:

Coercion-by-proxy, also sometimes called 'family intimidation' or 'proxy punishment', refers to a situation where the origin state threatens, harasses, attacks or imprisons someone remaining in the origin state close to the person being targeted. For example, a common tactic that the Uyghur diaspora has faced is when Chinese agents call them while in the presence of family members in the Uyghur homeland to pressure them to keep silent, inform on other members of the diaspora or return³⁴. Coercion-by-proxy is a notoriously difficult policy problem because the harassing or threatening action takes place wholly inside the origin state, where the proxy is located and targeted. This makes host state or other country interdiction or accountability very difficult. The targeting of family members can inflict severe trauma on the individual located abroad and is a key issue that policymakers must address to build trust with targets of transnational repression.

Digital transnational repression, also known as digital threats, is the use of information and communication technologies for the purpose of targeted intimidation, harassment and covert surveillance. Digital transnational repression can take many forms, including: public harassment on social media; threats communicated via direct messaging; malicious release of private or falsified personal information ('doxxing') and hacking electronic devices or personal social media or email accounts. Participants in digital transnational repression include: the law enforcement or intelligence agencies of origin states; private companies and 'hackers-for-hire' contracted to remotely surveil targets; together with origin state-linked proxies who individually or collectively communicate threats to targeted individuals³⁵. Digital threats have unique characteristics that distinguish them from other forms of transnational repression. Compared with direct physical attacks, it can often be difficult to attribute instances of digital transnational repression directly to specific state actors. Online harassment campaigns involve anonymous or bot accounts with unclear connections to an origin state, while spyware is designed to disguise the identity of

³³ Human Rights Watch, [Thailand: 'Swap Mart' Targets Foreign Dissidents, Refugees](#), 15 May 2024; Americans for Democracy and Human Rights in Bahrain, ['Transnational Repression by the GCC: the Misuse of Intergovernmental Organizations'](#), 23 June 2025; A. A. Cooley and J. Heathershaw, [Dictators without Borders: Power and Money in Central Asia](#), Yale University Press, New Haven, 2017.

³⁴ D. Tobin and N. Elimä, ["We know you better than you know yourself": China's transnational repression of the Uyghur diaspora](#), University of Sheffield, 2023.

³⁵ B. Marczak et al., [The Kingdom Came to Canada: How Saudi-Linked Digital Espionage Reached Canadian Soil](#), Citizen Lab, 1 October 2018; J. Scott-Railton et al., [By Whose Authority? Pegasus targeting of Russian & Belarusian-speaking opposition activists and independent media in Europe](#), Citizen Lab, 30 May 2024.

actors responsible for digital surveillance³⁶. The technical sophistication of certain forms of digital transnational repression, such as ‘zero click’ attacks that allow perpetrators to infect a device with spyware without any action from the user³⁷, makes it difficult for individuals to defend themselves against these threats. Digital transnational repression also often displays a distinctly gendered dimension, with women HRDs, activists and others confronting threats of sexual violence and misogynistic online smear campaigns³⁸. These digital threats can have a silencing effect on targeted individuals, who may reduce their online activities or self-censor to avoid further harassment and attacks.

Leveraging the ubiquity of internet communication technologies in the lives of diaspora members, origin states use digital transnational repression to threaten individuals who lie beyond their physical reach. At the same time, digital transnational repression can intersect with other forms of transnational repression, including long-distance threats and direct attacks. Originating states may contact diaspora members by phone calls, video calls or direct messaging via text, email or social media, to communicate threats of ‘proxy punishment’ against family members back home³⁹. Origin states can also covertly surveil via spyware the personal contacts of high-profile individuals targeted for direct physical attack, as was the case with Jamal Khashoggi’s family and associates both prior to and following his murder by Saudi government agents in 2018⁴⁰.

Interpol abuse most often becomes apparent as part of another type of transnational repression incident, especially detentions and unlawful deportations. Abuse of Interpol’s mechanisms is uniquely dangerous because of how rapidly and widely notices are disseminated⁴¹. However, the analysis here applies to other forms of abusive requests, whether bilateral (including mutual legal assistance treaties) or through regional organisations. Interpol is an intergovernmental institution which facilitates the sharing of information between national law enforcement institutions. Nearly all countries in the world are members and have access to the organisation’s mechanisms. This dissemination can take various forms and involve many subjects. The most prominent type of communication is a ‘notice’, the famous ‘Red Notice’: a notification to other members that an individual is sought for prosecution or arrest⁴². When a host state border service or law enforcement representative processes an individual and sees that they have a notice against them, they may take that as a reason to detain the individual, even though the threshold for having a notice issued is much lower than that for an arrest warrant. This tactic can

³⁶ N. Aljizawi et al., [Psychological and Emotional War: Digital Transnational Repression in Canada](#), *Citizen Lab*, 1 March 2022.

³⁷ B. Marczak et al., [Virtue or Vice? A First Look at Paragon’s Proliferating Spyware Operations](#), *Citizen Lab*, 19 March 2025.

³⁸ N. Aljizawi et al., [No Escape: The Weaponization of Gender for the Purposes of Digital Transnational Repression](#), *Citizen Lab*, 2 December 2024; S. Anstis and É. LaFlèche, [Gender-based digital transnational repression as a global authoritarian practice](#), *Globalizations*, Vol 22, No 4, 2025.

³⁹ S. Judah, [China using families as ‘hostages’ to quash Uyghur dissent abroad](#), *BBC*, 30 July 2023; J. Gunter, [The cost of speaking up against China](#), *BBC*, 30 March 2021.

⁴⁰ S. Kirchgaessner, [Saudis behind NSO spyware attack on Jamal Khashoggi’s family, leak suggests](#), *The Guardian*, 18 July 2021.

⁴¹ E. Lemon, [‘Weaponizing Interpol’](#), *Journal of Democracy*, Vol 30, No 2, 2019.

⁴² There are eight other kinds of notices pertaining to different types of information sought or notifications provided. Interpol also has additional mechanisms, such as the Stolen and Lost Travel Documents (SLTD) database, about which civil society groups have raised concern regarding abuse. See Arrested Lawyers Initiative, [Report on Turkey’s Abuse of INTERPOL’s Stolen and Lost Travel Documents Database](#), 1 June 2023.

be used by origin states to ‘find and fix’ individuals in place for other forms of transnational repression. Selahaddin Gülen, a nephew of exiled preacher Fethullah Gülen, was kidnapped by Türkiye from Kenya in 2021 after being initially detained on a Red Notice, which was revoked on appeal two months after he had been abducted⁴³. The tactic can also be used to harass individuals, who must expend considerable time and expense to have a notice cleared or to avoid dangerous jurisdictions if they become aware of one.

Interpol’s Constitution prohibits the organisation from undertaking ‘any intervention or activities of a political, military, religious or racial character’⁴⁴, but over the years there have been many confirmed incidents when notices (or diffusions, a different kind of dissemination made directly by states with a lower threshold for distribution) have been abused on political grounds so as to locate and detain individuals. Addressing Interpol abuse has been the subject of many reform efforts over the years by concerned civil society organisations, experts and lawyers⁴⁵. There have been some positive changes in terms of policies and procedures at Interpol, notably the establishment of the Notices and Diffusions Task Force, which reviews for compliance before dissemination. There has also been some strengthening of the Commission for the Control of Interpol’s Files, which *post facto* reviews notices for which there are petitions. Nonetheless, the problem remains potentially significant. Across many years, the average rate of notices found to be non-compliant when examined by the Commission for the Control of Interpol’s Files is over 50 %, despite the initial Notices and Diffusions Task Force review. Part of the problem may be that Interpol’s budget for compliance and oversight has not been increased⁴⁶, while the number of notices processed by Interpol has grown exponentially.

At the host-state level, addressing Interpol abuse requires affirming in domestic law that notices and diffusions are not subject to the same scrutiny as arrest warrants before they are issued and hence should not be treated as such. States should ensure that relevant personnel in law and immigration enforcement positions who receive Interpol data understand these limitations and thus act only within appropriate bounds. This must be institutionalised through formal policies and recurring trainings to ensure that personnel are held accountable for correct interpretation of Interpol data.

Mobility controls, also called ‘impediments to mobility’, refer to situations where states place unwarranted controls on documents needed for international travel, particularly by cancelling passports, restricting access to consular services, revoking nationality and denying re-entry⁴⁷. Individuals subject to transnational repression often do not have documents issued by states other than the origin state. Hence, origin states can use this leverage to coerce individuals to visit consulates, where they may be subject to threats, interrogation or worse; the reason Jamal Khashoggi went to the Saudi consulate in Istanbul was to secure a marriage certificate. As with

⁴³ Human Rights Watch, ‘[Kenya: Investigate Deportation of Turkish National](#)’, News Release, 1 July 2021; Journalists and Writers Foundation, ‘[Abuse of Interpol’s Notice System by Turkey](#)’, 22 November 2021.

⁴⁴ INTERPOL, ‘[Legal Documents](#)’, webpage, nd.

⁴⁵ Fair Trials, [Defending Human Rights, Strengthening Interpol](#), nd; T. Bromund, [How the Abuse of Interpol Contributes to Transnational Repression](#), *New Lines Institute*, 14 July 2025; Red Notice Monitor, [website](#), nd.

⁴⁶ B. Keith and C. González Ruiz, ‘[A Numbers Game: The Worrying Data of Non-Compliant Notices Registered by Interpol](#)’, *Red Notice Monitor*, 14 April 2025.

⁴⁷ UN Human Rights Office of the High Commissioner, ‘[Transnational Repression](#)’, nd; A. Slipowitz, J. White and Y. Gorokhovskaia, [No Way In or Out: Authoritarian Controls on the Freedom of Movement](#), *Freedom House*, August 2024.

Interpol abuse, states may also use passport cancellation or refusal to renew as ways of ‘fixing’ individuals in place so that they cannot cross international borders or are forced to return⁴⁸. This can then make it easier to target them with other tactics. The recent use of extraterritorial arrest warrants (‘bounties’) by the Hong Kong government against exiled activists can also be seen as a form of mobility control, as shown in the recent denial of Hong Kong activist Nathan Law’s entry to Singapore⁴⁹. These tactics can severely impact individuals’ professional and personal lives, as well as their ability to advocate for human rights.

The abuse of mobility controls as a transnational repression tool demands that host states take account of how their own visa and asylum processes may facilitate this tactic. Requiring individuals to obtain documents from origin states, especially by entering consulates, can expose them to threats and coercion. Belarus’s announcement in 2023 that passports could not be renewed abroad sparked widespread fears in the diaspora of repression if they returned to the country⁵⁰. Policies preferencing short-term and single-entry visas can force individuals to engage repeatedly with consulates and officials. Policies that depend on access to an unexpired national passport increase the leverage that origin states have over individuals abroad; origin states have in the past tried to force individuals to return to their territory for passport renewals⁵¹.

Finally, a growing area of concern is **financial transnational repression**. This occurs when origin states abuse measures such as anti-money laundering and combating the financing of terrorism (AML/CFT) tools to restrict individuals’ international access to financial services such as bank accounts. State entities disseminate false allegations of money laundering, terrorism affiliation or other criminal activity, whether publicly or through dedicated channels created for anti-money laundering and combating the financing of terrorism tools, which can result in private financial institutions restricting access on a compliance basis⁵². Being unable to open and retain access to financial services makes it difficult to travel and engage in activism, or even normal life⁵³.

For example, when Russia’s Rosfinmonitoring agency updates its list of ‘terrorists’ and ‘extremists’, that information is automatically incorporated into private compliance databases that banks and financial institutions use to control for AML/CFT⁵⁴. Nicaraguans who were forced out of the country have had their accounts closed or frozen⁵⁵. Similar tactics have been used by

⁴⁸ The Associated Press, [‘Belarus bans citizens from renewing passports abroad, spreading fear among those who fled’](#), 5 September 2023.

⁴⁹ The Associated Press, [‘Overseas Hong Kong pro-democracy activist Nathan Law denied entry to Singapore’](#), NPR, 29 September 2025; EEAS, [‘Hong Kong: Statement by the Spokesperson on extraterritorial arrest warrants’](#), 31 July 2025.

⁵⁰ AP News, [‘Belarus bans citizens from renewing passports abroad, spreading fear among those who fled repression’](#), The Associated Press, 5 September 2023.

⁵¹ A. Slipowitz, J. White and Y. Gorokhovskaia, [No Way In or Out: Authoritarian Controls on the Freedom of Movement](#), Freedom House, August 2024.

⁵² Inter-Parliamentary Alliance on China, [‘IPAC Parliamentarians Call on HSBC to Unfreeze Hong Kong Pro-Democracy Activist’s Accounts’](#), 8 February 2021.

⁵³ S. Reimer, [Weaponisation of the FATF Standards: A Guide for Global Civil Society](#), Royal United Services Institute, 11 June 2024.

⁵⁴ A. Prokopenko, [‘The Kremlin Has Weaponized Western Financial Checks to Punish Russian Dissidents’](#), Carnegie Politika, 13 November 2025.

⁵⁵ Group of Human Rights Experts on Nicaragua, [Nicaragua: Persecution Beyond Borders: Exile and Transnational Human Rights Violations](#), 23 September 2025

many countries, including China, Belarus and Türkiye⁵⁶. As with abusive extradition requests and notices, once a freeze is imposed, it can be very difficult for individuals to resolve, even with specialised legal counsel. At the core of this issue is the role of host-country financial regulators, who must recognise that financial institutions' compliance with AML/CFT regulations can be weaponised to target civil society and thus should build in safeguards to prevent this manipulation.

2.2 Effects of transnational repression on targets

Transnational repression has severe effects on its targets and on the broader community that may not be directly targeted but fears it could be. The most obvious forms have direct and physical impact: assassinations, assaults and kidnappings violate individuals' rights to life and liberty in unambiguous ways, making it impossible to speak, assemble and associate. Preventive steps to address these threats can themselves have consequences. For targets who are aware of credible threats, they constantly need to: move locations; avoid certain settings; and avoid putting friends and family at risk, which can itself be traumatising and silencing. It also places them in a precarious relationship with the host state, where they feel they must perform as a 'victim' and refrain from criticising the host state in order to retain protection, another way that transnational repression can affect freedom of expression⁵⁷. If they do not receive host-state protection or feel that the state response is inadequate, this can often lead to frustration and a sense of abandonment.

Other, so-called 'everyday' tactics such as coercion-by-proxy and digital transnational repression also take a severe toll. Targets of transnational repression change their behaviour in response to surveillance in ways that make activism, journalism and other forms of democratic engagement more costly⁵⁸. The targets of digital transnational repression – often in the form of personalised and gender-based attacks on social media platforms and messengers – experience constant fear and stress, especially when combined with the risk of physical threats. However, taking steps to prevent digital transnational repression makes activism and journalism more difficult. Such steps include locking or deactivating social media accounts, changing phone numbers regularly, or adopting more stringent digital security measures. Maintaining digital security requires constant training and vigilance for individuals, or finding and working with the small number of qualified experts who support activists abroad. Even then, perpetrating states have distinct advantages in terms of resources and technical expertise. In the 21st century, a digital profile is unavoidable and digital transnational repression makes maintaining that profile more costly.

To mitigate the risk of coercion-by-proxy, individuals may cut themselves off from contact with family who remain in the origin country in an effort to protect them, even though it comes at the cost of losing touch with their loved ones⁵⁹. People whose families have been targeted can

⁵⁶ Amnesty International, '[Turkey: Weaponizing Counterterrorism](#)', 2021.

⁵⁷ B. Baser and A. Öztürk, '[From exit to voice: Reflections on exile through the accounts of Turkey's intelligentsia](#)', *Middle East Critique*, Vol 31, No 4, 2022, pp. 401-415.

⁵⁸ M. Michaelsen, '[Silencing across Borders: Transnational repression and digital threats against exiled activists from Egypt, Syria, and Iran](#)', *Hivos*, 2020.

⁵⁹ CNN, '[Family of Hong Kong pro-democracy activist Nathan Law taken in for questioning by the police](#)', 11 July 2023.

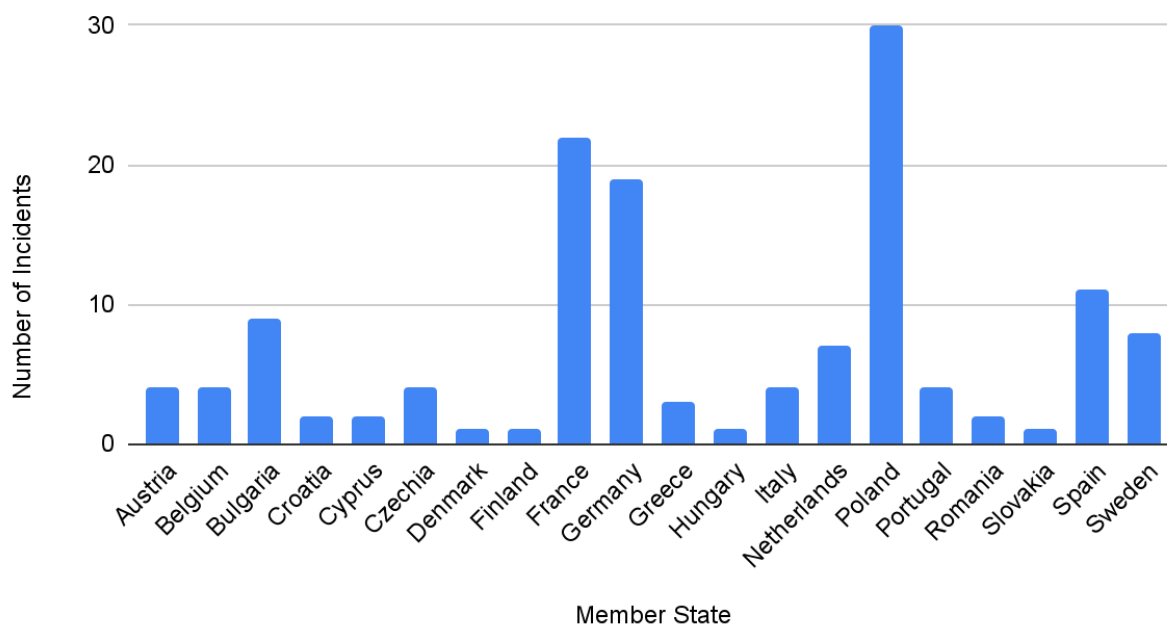
experience severe anxiety and psychological trauma⁶⁰. These impacts also degrade community and civic participation, not only among those targeted but also among the wider community aware of transnational repression. Because targeted individuals fear repercussions for themselves or their families and hence become unsure who they can trust, they may withdraw from their communities and decline to participate in public life. In addition, those who are not targeted still fear becoming targets, leading to a broader chilling effect across entire communities. On top of the impacts on individuals, these effects have stark implications for democratic engagement. Transnational repression can coerce people into self-censorship and disengagement from civic life, undermining freedoms of expression, association and assembly.

Among activists and HRDs affected by transnational repression, there is a nascent but growing movement to speak openly about the issue and its effects, and to organise into initiatives to advocate for protection and accountability. This is reflected in various initiatives bringing together diaspora and human rights organisations, as well as experts in a number of countries such as the United Kingdom (UK) and Germany⁶¹.

3 Transnational repression in the EU

Freedom House's data from 2014 to 2024 contains 139 incidents where the host state is an EU Member State. The incidents are distributed among Member States as follows:

Figure 3 Number of incidents by EU host state



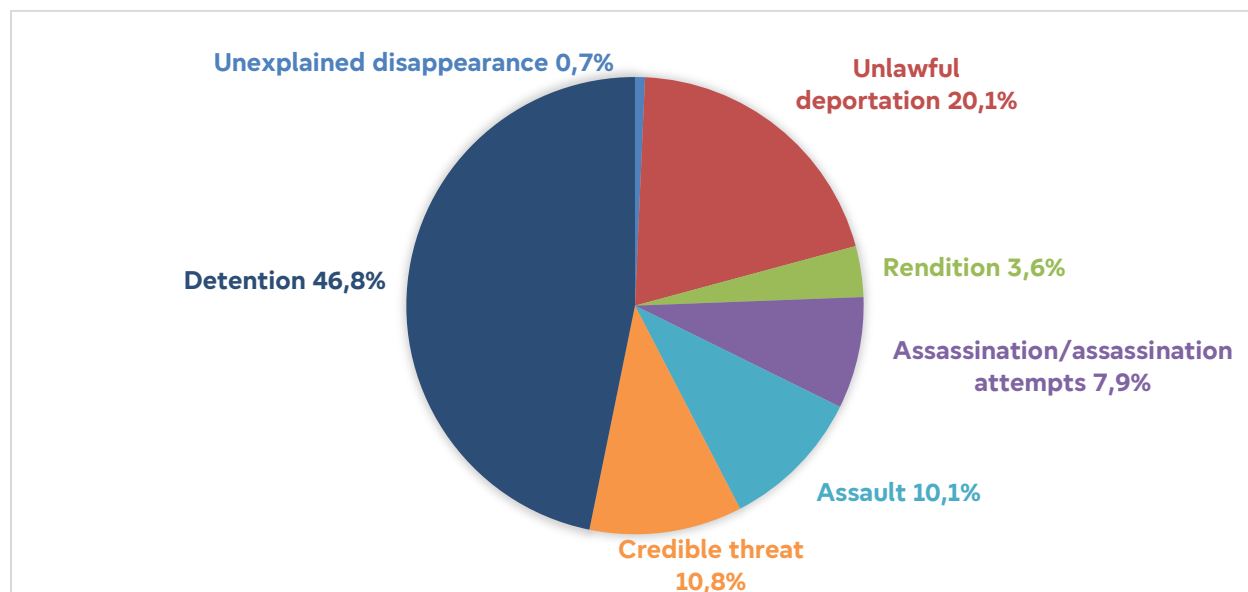
Source: Freedom House Data 2014–2024

⁶⁰ A. Qin and S.-L. Wee, [“A Daily Cloud of Suffering”: A Crackdown in China Is Felt Abroad](#), *New York Times*, 6 November 2021.

⁶¹ Lancaster University, [‘Tackling Transnational Repression’](#), webpage, nd; Coalition Against Transnational Repression in Germany, [website](#), nd.

There are seven Member States for which no incidents are recorded: Estonia, Ireland, Latvia, Lithuania, Luxembourg, Malta and Slovenia. The dataset records an additional 189 incidents in non-EU members of the Council of Europe and Kosovo. Most of those incidents are in Türkiye (95). Russia, though no longer a member of the Council of Europe, is also a frequent host state (131 incidents).

Figure 4 Distribution of incident types within the EU



Source: Freedom House Data, 2014-2024

Regarding incident distribution globally (see section 2), in comparative terms, fewer renditions have occurred in the EU. This reflects the difficulty that origin states have in obtaining cooperation from Member State security services to abduct individuals, which is the most common method of conducting renditions. Most renditions take place either between neighbouring countries where the security services cooperate closely, or in cases like those of China and Türkiye, where the origin country exerts sufficient global influence to wage a campaign of kidnappings in countries around the world with local security service cooperation. Conversely, the proportion of assassinations/assassination attempts and assaults inside the EU is higher than those at global level, probably because origin states resort to more costly and risky direct physical attacks when they are unable to reach their targets by other means, as discussed in section 2.

In terms of the most common physical tactics observed within the EU, detentions and unlawful deportations, many of the dataset cases pertain to individuals who have asylum claims pending or have crossed borders into the EU recently, often coming from Central Asia and Russia. The prevalence of incidents in this area is indicative of deeper problems in European migration and asylum processing systems. Particularly for individuals who do not have high political profiles, lack resources for quality legal representation and face allegations of extremism from the origin state, the risk of return to the origin state is high. Host states too often accept information provided by origin states alleging that individuals are 'extremists' or 'terrorists', even when there is ample documentation suggesting that the origin state uses manipulated or far-fetched

definitions of the terms. For instance, the government of Tajikistan has classified various political parties and movements as extremist organisations on false bases and host states have repeatedly cooperated with Tajikistan to return dissidents facing such accusations. They are detained pending return to their origin state; many detentions result in returns that are then coded as unlawful deportations. Many of these unlawful deportations should be understood as akin to 'disguised extradition'⁶², meaning that the person is deported to the origin state in a manner that circumvents the lengthy and often politically sensitive process of extradition.

To avoid international legal prohibitions on *refoulement*, or the forcible return of individuals to a country where they are liable to be subjected to persecution, such deportations may rely on assurances from the origin state that the person will not face torture or ill-treatment, even when there is an established pattern of such treatment within the origin state. This is common in cases within Freedom House's dataset, where most of the origin states have well-established reputations for systemic torture and ill treatment in custody. In some cases, formal extradition procedures are followed but with manifest errors or failures, as in the return of political activist Hizbullo Shoalozoda to Tajikistan in 2020, which the Austrian Supreme Court ruled was illegal following his return and imprisonment in Tajikistan⁶³. Another large group of detention cases feature individuals with refugee status in a different European country (including states that are not members of the EU), who are detained due to bilateral extradition requests or Interpol notices or diffusions from the origin state when entering or travelling in a different European host state. This reflects the difficulty in reconciling aggressive use of extradition requests (for example, as recently employed by the Hong Kong government) or the Interpol system for notices with refugee status and the challenges that states often have with adequately vetting as well as interpreting notices and diffusions. While most of these detentions are resolved with the release of individuals rather than their return to origin states, the fear and trauma of detention, sometimes for weeks, still have a heavy impact on targets.

Effective data protection is important for preventing detention as a method of transnational repression. As the European Data Protection Supervisor has written, 'data protection is one of the last lines of defence for vulnerable individuals, such as migrants and asylum seekers approaching EU borders'⁶⁴. As the EU seeks to overhaul procedures across Member States, including through the implementation of the new Screening Regulation in mid-2026, it should take steps to prevent abuse of information-sharing mechanisms for transnational repression. This can include monitoring, training and awareness-raising within relevant institutions, as discussed in the recommendations section of the report.

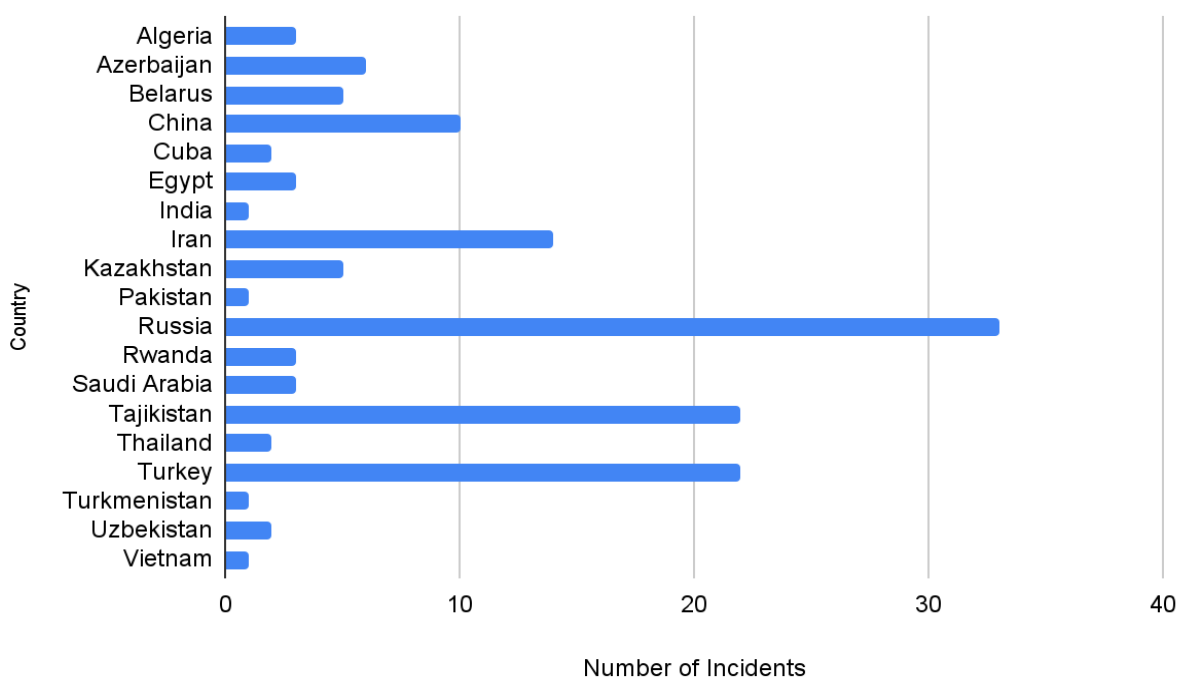
There are 19 countries in the dataset attributed as origin states of incidents inside the EU. This means that of the 48 countries documented by Freedom House, nearly 40 % have at least one documented incident within the EU.

⁶² Council of Europe Committee of Experts on the Operation of European Conventions in Criminal Matters, [Note on the relationship between extradition and deportation/expulsion](#), PC-OC (2012) 08 rev2, 15 November 2012; M. Macovei, [The right to liberty and security of the person: A guide to implementation of Article 5 of the European Convention on Human Rights](#), Directorate General of Human Rights Council of Europe, December 2004, pp.14, 39.

⁶³ RadioFreeEurope RadioLiberty, ['Austria's Supreme Court Invalidates Extradition of Tajik Activist'](#), 10 July 2020.

⁶⁴ European Data Protection Supervisor, [Opinion 9/2025: on the Proposal for a Regulation establishing a common system for the return of third-country nationals staying illegally in the European Union](#), May 2025.

Figure 5 Number of incidents within EU host states by origin state



Source: Freedom House Data 2014–2024

The diversity of origin states committing acts of transnational repression inside the EU reflects the wide range of countries from which people seek refuge in the EU. This speaks to the need for ensuring the provision of ‘actor agnostic’ policies which address the problem, meaning that they are inclusive of different targeted communities and the threats against them.

As can be seen, Russia has the highest number of incidents in the dataset (33), or 24 % of the total. More details on Russia’s use of transnational repression globally and within the EU will be discussed by means of the case study which follows in section 4. Tajikistan and Türkiye are tied with the second-highest number of incidents, with 22 each. Poland has the highest number of incidents as a host state in the EU (30) and these represent a relatively high concentration of incidents in one host state from these origin countries. The most common dyad (pair of origin and host states) within the data is Russia–Poland (14 incidents, 42 % of Russia’s total in the EU), followed closely by Tajikistan–Poland (11 incidents, 50 % of Tajikistan’s total). By comparison, Türkiye’s 22 incidents as an origin state are distributed across 7 different countries, with France and Bulgaria having the most incidents (6 or 27 %). France (22 incidents), Germany (19) and Sweden (11), all following Poland in having most incidents within the EU.

The high number of incidents in Poland is probably due to a number of factors. Firstly, geography is significant: Poland’s land border with Belarus is a common pathway for people fleeing authoritarian governments of their own volition in the former Soviet Union. Nearly all of Poland’s 30 incidents originate from these countries, the only exception being two incidents originating

in China⁶⁵. Geography has also been a factor in Poland receiving large numbers of migrants over the last decade, including those resulting from Belarus's instrumentalisation of migration flows. Incidents of transnational repression have followed crises in the origin countries: Tajikistan's severe crackdown in 2015 on all political opposition resulted in a huge wave of political emigration, a portion of which reached Poland⁶⁶; along with increased repression in Russia since 2012 and Belarus since 2020 have contributed to new exoduses from those countries⁶⁷.

Secondly, Poland has detained and returned individuals without adequate process, including some to countries where torture and ill treatment are endemic and well documented⁶⁸. Such practices increase the chances of what Freedom House terms unlawful deportation⁶⁹. All but one of the 30 incidents recorded in Poland represent detention or unlawful deportation. As a positive development, in 2023 the Polish Supreme Court made two individual rulings that found there is no guarantee that deportees' rights would be respected if returned to Russia and Belarus⁷⁰, which can be expected to reduce the chances of deportation to those countries.

As explained in the previous sections, Freedom House and other datasets on transnational repression capture only certain types of transnational repression that are amenable to open-source counting. There remain vast numbers of transnational repression incidents that are absent from the dataset, but should nevertheless be kept in mind when describing the problem and thinking about responses. The main strategy here involves digital transnational repression and coercion-by-proxy, or family intimidation. Additionally, many countries employ mobility controls (such as cancelling passports or restricting access to documents needed for international travel) in efforts to silence speech outside their borders. Countries that practice physical transnational repression typically also engage in mobility controls⁷¹. With the prevalence of these tactics, at the very least, it can be assumed that for all origin countries conducting physical transnational repression inside the EU, exiles from those countries are to some extent experiencing the impact.

While harder to quantify, research has consistently shown that these 'everyday' tactics have a debilitating cumulative effect on exiles and diasporas⁷². Activists engage in self-censorship,

⁶⁵ As a matter of classification, transnational repression does not include 'pushbacks', meaning when a receiving country 'pushes back' without legal process a migrant who crossed into the receiving country irregularly. This is because there is typically no role for the origin state in a pushback. The discussion here and the Freedom House dataset do not refer to pushbacks but to other detentions and deportations. For discussion of pushbacks at the Polish-Belarusian border, see UN Human Rights Council, [Visit to Poland: Report of the Special Rapporteur on the human rights of migrants, Felipe González Morales](#), A/HRC/53/26/Add.1, 21 April 2023.

⁶⁶ Human Rights Watch, [Tajikistan: Reverse Political Party Closure: Allow Islamic Renaissance Party of Tajikistan to Operate](#), News Release, 14 September 2015.

⁶⁷ Crackdowns at home have been found to lead to transnational repression. See A. Dukalskis et al., [The Long Arm and the Iron Fist: Authoritarian Crackdowns and Transnational Repression](#), Vol 68, No 3, 2023, pp.1051-1079.

⁶⁸ Helsinki Foundation for Human Rights, [Submission to UN Special Rapporteur on the Human Rights of Migrants](#), 28 February 2022.

⁶⁹ Commissioner for Human Rights Government of Poland, [A foreigner was deported despite the ECHR issuing an interim measure. The explanations of the Border Guard](#), webpage, 8 August 2023.

⁷⁰ Helsinki Foundation for Human Rights, [Transfer of foreigners to Russia and Belarus after 24 February 2022 in the light of the latest rulings of the Supreme Court](#), 7 September 2023.

⁷¹ A. Slipowitz, J. White and Y. Gorokhovskaia, [No Way In or Out: Authoritarian Controls on the Freedom of Movement](#), *Freedom House*, August 2024.

⁷² N. Schenkan et al., [Perspectives on 'Everyday' Transnational Repression in an Age of Globalization](#), *Freedom House*, July 2020.

isolate themselves socially out of fear and sometimes quit engaging in civil society or dissident activities altogether⁷³. Women activists experience disproportionate threats, stemming from gender-specific attacks that seek to denigrate and isolate them not only from their families but also from their communities⁷⁴. Additionally, these non-physical forms of transnational repression bolster other threats. Online surveillance, digital intimidation, coercion-by-proxy and mobility controls can all lead to individuals cooperating with the perpetrator state, to the extent of reporting on other members of a diaspora, to stop threats to themselves. Surveillance is also a common prerequisite and prelude for physical attacks. These various forms of non-physical transnational repression create substantial obstacles to reporting and engaging with authorities, especially in environments where targets lack regularised migration status or perceive that host-state authorities are biased against individuals with migration backgrounds. Overcoming such obstacles requires reporting mechanisms to involve in-person outreach to communities and those affected. Responses to transnational repression must take into account the full and evolving scale of methods that states use and the reasons why subjects may not easily engage with authorities.

3.1 Emerging issues: Proxy-conducted transnational repression, including that perpetrated by organised crime groups

A growing issue in Europe and around the world is the use of proxies, such as organised crime groups, to conduct transnational repression. As with the phenomenon broadly, while not wholly new⁷⁵, the scale and scope of proxy-conducted transnational repression appear to be growing with its parameters changing in response to changes in technology and the international order. Proxy-conducted transnational repression is part of a wider shift in which states participate in an emerging market for authoritarian services, including spyware, sabotage, hacking, degradation of information environments, money laundering and physical attacks. In this sense, proxy-conducted transnational repression is one feature of a larger structural change⁷⁶.

There is a growing number of cases where states are hiring individuals or groups to conduct surveillance, make threats and commit assaults. These groups even carry out assassinations and kidnappings on behalf of state actors⁷⁷. A prime example is the recent disruption of a Bulgarian group in the UK that had been working on behalf of Russia to conduct surveillance and sabotage, as well as plotting transnational repression against Russians abroad. To paraphrase the Head of

⁷³ S. Anstis and R. J. Deibert, [Silenced by Surveillance: The Impacts of Digital Transnational Repression on Journalists, Human Rights Defenders, and Dissidents in Exile](#), Knight First Amendment Institute at Columbia University, 18 February 2025.

⁷⁴ M. Michaelsen and S. Anstis, ['Gender-based digital transnational repression and the authoritarian targeting of women in the diaspora'](#), *Democratization*, Vol 32, No 6, 2025, pp.1518-1540; N. Aljizawi et al., [No Escape: The Weaponization of Gender for the Purposes of Digital Transnational Repression](#), *Citizen Lab*, 2 December 2024

⁷⁵ A. Khoshnood, ['The Islamic Republic of Iran's use of criminal intermediaries for extraterritorial assassinations and covert violence: a gray zone strategy of outsourced repression'](#), *Small Wars & Insurgencies*, 2025, pp. 1-29.

⁷⁶ N. Schenkan, ['The Golden Age of Transnational Repression'](#), *Journal of Democracy*, Vol 36, No 4, 2025, pp. 36-50; R. Deibert, ['Subversion Inc.: The Age of Private Espionage'](#), *Journal of Democracy*, Vol 33, No 2, 2022, pp. 28-44.

⁷⁷ L. Cecco and H. Ellis-Petersen, ['India, gangs ... or both? Who is behind assassinations of Canadian Sikhs?'](#), *The Guardian*, 14 May 2024.

the Metropolitan Police Counterterrorism Unit⁷⁸, this is 'outsourced' espionage. In more complex plots, those hired are sometimes unaware of who their employer is, with the plot being part of an ongoing relationship between an organised crime network and the origin state. The leader or leadership of such an organised crime group may be located in the origin state or adjacent territory where the origin state has influence, while its network extends into the host state. Organised crime networks' experience in operating clandestinely makes them natural partners for states seeking to conduct illegal operations abroad. Criminal networks, in turn, benefit from the origin states' protection and resources which help these networks advance their interests⁷⁹.

Alternatively, the proxy relationship is formed through online platforms and in methods that resemble 'gig work', with children and youths in particular hired through digital platforms, such as Telegram, by anonymous patrons and paid small amounts of money to commit minor but dangerous acts. In part, this appears to be the method of the Foxtrot Network in Sweden, an Iran-linked organised crime network that has hired local youths remotely to undertake threats and acts of sabotage⁸⁰. A group of young men recently convicted of an arson attack on a London warehouse connected to supplies for Ukraine were also allegedly recruited to conduct surveillance for the kidnapping of a Russian restaurant owner who has criticised the Kremlin⁸¹. Nordic countries have recently raised the issue of gang recruitment with social media platforms directly⁸². The shift to subcontracting follows the same economic logic as in other, non-criminal, areas: the principal ordering the attack trades professionalism and oversight for lower cost, speed, deniability and offloading of risk. Even when the attack fails or is foiled, the principal is not exposed and can quickly move on to find another willing subcontractor⁸³. These acts may have little significance individually, but cumulatively they create a large impact. In its latest report drawing the connection between organised crime and hybrid threats, the EU Agency for Law Enforcement Cooperation's Serious and Organised Crime Threat Assessment publication refers to this as 'the woodpecker *modus operandi*', because each individual strike does little damage, but over time it weakens the tree⁸⁴.

Regarding the methods of financial support for transnational repression activities, the new trend of gig recruitment reflects some innovation in the use of cryptocurrencies and digital payments. As states, including some in the EU, have enacted new sanctions regimes and developed tools to apply heightened scrutiny to licit means for moving funds, there has been an increase in the popularity of these methods for criminal activity, including transnational repression⁸⁵. The relatively unregulated nature of cryptocurrency platforms and the ability to launder illicit funds through them make them an attractive option for moving money to recipients for illicit enterprises. Within the billions of euros (or more) of illicit funds being moved through such

⁷⁸ R. Comerford and C. Bell, 'Six Bulgarians jailed for spying for Russia', *BBC*, 12 May 2025.

⁷⁹ EU Agency for Law Enforcement Cooperation, [The changing DNA of serious and organised crime](#), 2025.

⁸⁰ Säkerhetspolisen, 'Iran is using criminal networks in Sweden', 30 May 2024; M. Abbasian, 'Iran deployed Swedish gangs to target enemies abroad – broadcaster', *Iran International*, 21 June 2025.

⁸¹ A. Campbell and K. Armstrong, 'Three men found guilty of Wagner-linked attack in London', *BBC*, 8 July 2025.

⁸² Justits Ministeriet, 'Nordiske justitsministre i fælles opråb til techgiganter: "Der skal ryddes op"' [Nordic justice ministers in joint appeal to tech giants: "Clean up is needed"], 9 December 2024.

⁸³ D. Richterova et al., 'Russian Sabotage in the Gig-Economy Era', *The RUSI Journal*, Vol 169, No 5, 2024, pp. 10–21.

⁸⁴ EU Agency for Law Enforcement Cooperation, [The changing DNA of serious and organised crime](#), 2025.

⁸⁵ C. Raggett, [Rocket from the Crypto: State-backed Criminal Groups and the Fintech Sector](#), *Centre for Emerging Technology and Security*, 22 November 2024.

platforms, payments for transnational repression probably constitute only a very small part and do not require bespoke methods⁸⁶.

Within Europe specifically, one reason why origin states are shifting more towards proxies is because their official agents are increasingly denied access to EU territory. Expelling hundreds of Russian diplomats from Europe has reduced the ability of Russian intelligence services to operate under official cover on EU soil. Russian embassies continue to be hubs for transnational repression activities, but they have fewer available personnel. Iran has also seen diplomats expelled from various countries in Europe, in part due to uncovered transnational repression plots. Scrutiny grew especially after an Iranian diplomat was arrested for using his diplomatic pouch as part of a plot to bomb an Iranian opposition rally in Belgium⁸⁷. Another major threat actor, Türkiye, has faced growing constraints on its operations inside Europe due to diplomatic pressure and closer monitoring not only of its diplomats but also the Presidency of Religious Affairs (Diyanet), the Turkish state body that operates mosques and provides imams⁸⁸.

In discussing the use of proxies for transnational repression, it is also important to note that origin states often seek to employ members of their own diaspora who are viewed as loyal against other parts viewed as threats. This may be through recruitment induced by the provision of material benefits, but it may also simply be the outcome of coercion. For example, members of the Uyghur community abroad have reported being threatened in order to force them to report on other members of the community⁸⁹. In other cases, 'loyal' members of the diaspora who support the origin-state government may seek out opportunities to intimidate and threaten those who are seen as going against the government abroad⁹⁰. It can be difficult to determine when these threats occur organically and when they are requested or supported by the origin state.

Care must be shown in responding to transnational repression to address the mix of threats, inducements and genuine loyalty that may lead members of the same diaspora to act as agents for the origin state in transnational repression plots. Because they are experiencing increasing difficulties in implementing transnational repression directly, states seek proxies to undertake such work. In this regard, the logic of transnational repression by proxy fits within the conceptual framework of hybrid threats, which gain prominence when the threat actor is deterred from overt military action. It is the same logic driving hybrid threat actors to cooperate more with proxies in other contexts, leading to more cooperation for transnational repression. Indeed, in many cases, the same threat actors and the same proxies that are engaged in other hybrid threat activities are also responsible for transnational repression. The distinction that policymakers in democracies draw between these tactics is not made by the perpetrators.

⁸⁶ A. Shin, '[About the Coin Laundry Investigation](#)', [International Consortium of Investigative Journalists](#), 17 November 2025.

⁸⁷ M. Levitt and S. Boches, '[Iranian External Operations in Europe: The Criminal Connection](#)', *International Centre for Counter-Terrorism*, 16 October 2024.

⁸⁸ N. Ashdown, '[The Long Arm of Transnational Repression in Europe](#)', *Green European Journal*, 29 November 2021.

⁸⁹ D. Tobin and N. Elimä, '[We know you better than you know yourself](#)': China's transnational repression of the Uyghur diaspora', *University of Sheffield*, 2023.

⁹⁰ B. Baser and A. Öztürk, '[From exit to voice: Reflections on exile through the accounts of Turkey's intelligentsia](#)', *Middle East Critique*, Vol 31, No 4, 2022, pp. 401–415.

4 Origin country case studies

This section provides case studies from three important origin countries for transnational repression: Russia, Iran and China. The case studies describe how and why they engage in transnational repression, with a focus on activities inside the EU.

4.1 Russia

Russia is one of the world's most prolific and aggressive perpetrators of transnational repression, being responsible for 86 incidents in Freedom House's most recent dataset and hence rated fourth among origin states in the world. The country is particularly notable for the prominent role that assassinations/attempted assassinations play in its tactics: of 60 such cases in the dataset, 13 are attributed to Russia as the origin state. Russia is also responsible for 33 incidents within the EU, the largest number of any origin country, with a further 19 taking place in Council of Europe states outside the EU. As noted earlier, Russia is also a very prominent host state due to its large immigrant population, authoritarian neighbours and poor rule of law record.

Russia's use of transnational repression is rooted in a long history of efforts to control and coerce diaspora movements abroad, dating back to the Russian Empire and the Soviet Union. These practices were reinvigorated and expanded after Vladimir Putin gained the presidency in 2000 and set about restoring the country's security services' control over political life. In keeping with other Kremlin initiatives, this campaign has been operated by overlapping and at times competing intelligence agencies: the foreign military intelligence directorate (GRU); the Foreign Intelligence Service and the Federal Security Service. At the same time, there has been a parallel campaign led by the Republic of Chechnya's leadership against the Chechen diaspora.

4.1.1 The Kremlin's use of transnational repression

Prior to the full-scale invasion of Ukraine in 2022, unlike many other leading practitioners of transnational repression, the Russian government's use was relatively more targeted. Average Russians abroad engaged in various forms of activism or speech in person or online and experienced little in the way of repercussions or interest shown by Moscow⁹¹. Instead, the government focused on driving key individuals out of the country, controlling major cultural institutions among the diaspora such as the Russian Orthodox Church and ensuring that opposition leaders abroad and their information flows were not effective in reaching audiences inside the country⁹². These measures sought to isolate exiled critics from influence inside Russia and to ensure the Kremlin's control over Russian cultural and social spaces around the world.

When the Kremlin did use transnational repression, it targeted high-profile former insiders such as prominent financiers, oligarchs and former members of the security services. Within this range, Russia's transnational repression was notable for its violence and its methods: not only were assassinations unusually prominent as a tactic within the state's repertoire, but the methods of those assassinations were often flamboyant and unambiguously attributable to

⁹¹ Freedom House, '[Case studies: Russia](#)' in *Out of Sight, Not Out of Reach: The Global Scale and Scope of Transnational Repression*, Freedom House, February 2021.

⁹² A. Soldatov and I. Borgoran, [The Compatriots: The Brutal and Chaotic History of Russia's Exiles, Émigrés, and Agents Abroad](#), Public Affairs, New York, 2019.

Russia's security services – a kind of 'implausible deniability' – making clear that the acts were intended as threats. Such was the case with the poisoning of Alexander Litvinenko in the UK during 2006 using a radioactive polonium isotope as well as the poisoning of Sergei Skripal and his daughter with the nerve agent *novichok* in 2018. In these cases, the methods of attack appear to have been intended to signal ruthlessness and spread fear. President Vladimir Putin has himself endorsed violent transnational repression operations, for instance personally welcoming the murderer of a Chechen exile who was returned to Russia from Germany in a prisoner swap⁹³.

High-profile targets and former insiders have also faced sophisticated hacking and spyware campaigns, even though the scale of digital transnational repression against the broader diaspora has been much lower than in other cases. Russia was also a pioneer of sorts in the abuse of Interpol notices to produce host-state actions against individuals abroad. Despite reforms at Interpol and increased attention to this problem, there continue to be incidents where Russians are inappropriately detained abroad under notices⁹⁴.

However, the Kremlin's use of transnational repression significantly changed with the full-scale invasion of Ukraine in February 2022. Following the invasion and escalating repression of anti-war and opposition activism inside the country, Russians fled abroad *en masse*. Hundreds of thousands more left when 'partial mobilisation' was announced in September 2022, creating a very large new diaspora, much of it clustered in countries bordering Russia where the Russian security services retain operational freedom. The result has been increased relevance for diaspora activism and with it an increase in efforts to surveil, monitor and control Russians abroad. This widening of targets has produced a series of detentions, deportations and abductions of everyday activists and military deserters from countries such as Kazakhstan, Kyrgyzstan, Georgia, Uzbekistan and Armenia, which had previously not been prominent host states for Russian transnational repression. For example, in 2023 Russia abducted and rendered a soldier, Dmitriy Setrakov, who had deserted and fled to Armenia⁹⁵. In the same year, Russia abducted and rendered two left-wing activists, Lev Skoryakin and Alyona Krylova, from Kyrgyzstan⁹⁶.

Another notable way to detect the change is Russia's increasing use of coercion-by-proxy or family intimidation. A staple tactic of governments that use transnational repression, coercion-by-proxy, was rare in Russia prior to 2022 (with the exception of the Chechen case where it was prevalent, see below). Following the full-scale invasion and the mass flight of Russians abroad, though, it has become common for the families of Russians abroad to receive 'visits' within Russia from security services⁹⁷. Based on the accounts of Russian exiles and responses from host state security services, including some in Europe, there have also been increased efforts to infiltrate antiwar and opposition activist groups, to surveil online and offline activities and to dissuade activists from engaging in advocacy through threats against themselves and their

⁹³ S. Walker and D. Cole, '[Kremlin admits Vadim Krasikov is a Russian state assassin](#)', *The Guardian*, 2 August 2024.

⁹⁴ B. Visnjic, '[Russian arrested in Montenegro on Moscow's warrant fights extradition](#)', *Balkan Insight*, 26 July 2024.

⁹⁵ The Moscow Times, '[Russian Deserter Taken to Russia After Detention in Armenia – Activists](#)', 19 December 2023; Meduza, '[Armenia refuses to extradite former Russian soldier wanted for desertion](#)', 21 July 2025.

⁹⁶ Azattyk, '[В Кыргызстане задержан российский активист Лев Скорякин](#)' ['Russian activist Lev Skoryakin detained in Kyrgyzstan'], 9 June 2023; Azattyk, '[В Бишкеке суд заключил под стражу российскую активистку Алену Крылову](#)' ['Court in Bishkek places Russian activist Alyona Krylova in detention'], 12 June 2023.

⁹⁷ Interview with Russian Exile 2, September 2025; Interview with Russian Exile 3, September 2025.

families⁹⁸. At the same time, Russia has not given up on pursuing high-profile individuals and journalists with violent plots. Many exiles have claimed in various incidents to have been poisoned abroad under circumstances that resemble the confirmed poisonings of opposition activists Vladimir Kara-Murza and Alexei Navalny⁹⁹. Furthermore, in 2024 a Russian pilot who defected to Ukraine was murdered in Spain, in what appears to have been a targeted assassination¹⁰⁰.

Another significant change has been increasing reliance on proxies to enact transnational repression plots (see previous section). As states have expelled Russian diplomats, especially in response to the full-scale invasion, it has grown harder for Russian agents to operate directly. This has led to innovation in terms of 'outsourcing' transnational repression, as well as other hybrid tactics within Europe. For example, the Bulgarian GRU network that was disrupted by British police targeted both British institutions and Russian dissidents abroad¹⁰¹. GRU Unit 29155 has been sanctioned by the EU as well as its allies for actions that encompass a range of destabilisation activities, among them assassination attempts¹⁰².

4.1.2 Chechnya's use of transnational repression

At the same time and in parallel, Chechens abroad face their own campaign of transnational repression directed against them by Chechen Republic leader Ramzan Kadyrov and his inner circle. Of the 86 incidents attributed to Russia since 2014 in Freedom House's dataset, 32 are connected to Chechnya. This is a small province of 1.5 million people in the North Caucasus that fought two unsuccessful wars for independence from Russia in the 1990s. The Chechen Republic was eventually 'pacified' through a campaign of mass atrocities by the Russian military and the former separatists who joined it. Due to the horrors of this conflict and the police state that ensued after the war ended, Chechens fled Russia in large numbers, especially to Europe and Türkiye. Unlike the Kremlin campaign prior to 2022, the campaign against Chechens has for two decades encompassed the diaspora in its totality and is built on an infrastructure of pervasive surveillance, infiltration and violent coercion-by-proxy directed against family members still in Chechnya and Russia.

Ramzan Kadyrov has openly threatened Chechens abroad. In 2016, he made remarks on state TV addressing his diaspora critics: 'you are harming yourselves. At some point, after 5 to 10 years you will have to return, or your parents will say you should come back, or you will be chased from Europe. Then there will be nowhere for you to go and then we will make you answer for every

⁹⁸ A. Sahlberg and D. Öhman, '[Russian peace activist to be deported and banned for 20 years — classed as security threat](#)', *Sveriges Radio*, 21 February 2025; interview with Russian Exile 2, September 2025.

⁹⁹ Meduza, '[С осени 2022 года произошла серия отравлений россиян, уехавших из страны. Пострадали журналистки Елена Костюченко и Ирина Баблюян, а также глава фонда «Свободная Россия» Наталия Арно](#)' ['Since autumn 2022 there have been a series of poisonings of Russians who have left the country. Journalists Elena Kostyuchenko and Irina Babloyan, as well as as head of the Free Russia Foundation Natalia Arno have suffered'], 15 August 2023.

¹⁰⁰ M. Macias, '[A man shot dead in Spain may be a Russian army defector](#)', *NPR*, 22 February 2024.

¹⁰¹ R. Comerford and C. Bell, '[Six Bulgarians jailed for spying for Russia](#)', *BBC*, 12 May 2025.

¹⁰² Council of the EU, '[Council Decision \(CFSP\) amending Decision \(CFSP\) 2024/2643 concerning restrictive measures in view of Russia's destabilising activities](#)', 2024/3174, 16 December 2024; Government of the UK, '[Profile: GRU cyber and hybrid threat operations](#)', 18 July 2025.

one of your words, for every action you have taken'¹⁰³. The Chechen campaign is notable for its extreme violence considering the small size of the Chechen diaspora, which numbers at most in the low hundreds of thousands. In the last 10 years, there have been assassinations/attempted assassinations against Chechen opponents of the government in France, Sweden, Germany, Ukraine, Austria and Türkiye. This campaign of violence waged from Grozny operates with Kremlin approval and sometimes with shared resources. In at least one case, the murder of Selimkhan Khangoshvili in Berlin in 2019, the killer was a confirmed Federal Security Service asset run through Moscow, rather than a Chechen hire¹⁰⁴. In other cases, the level of involvement or awareness on the part of Moscow is less clear. Conversely, ethnic Russian exiles have noted Chechens being hired for surveillance and intimidation¹⁰⁵ and a Chechen was found guilty in 2023 of collecting information about the Iranian exiled media outlet Iran International in London¹⁰⁶.

At the other end of the spectrum, Chechens face extreme difficulties obtaining asylum in the EU, with many incidents in Freedom House's dataset concerning the detention and deportation of Chechens and other people from the North Caucasus back to Russia. HRDs have alleged that many of these deportations have been conducted under secret agreements with Russian authorities¹⁰⁷. Those returned are frequently imprisoned and tortured, others are killed in 'counterterrorism operations' that North Caucasian human rights activists have said are more like extrajudicial executions¹⁰⁸. The pace of incidents originating in Chechnya appears to have slowed in the last two years, with Freedom House recording no new incidents with a Chechnya nexus in 2024 – the first time that has happened since the dataset was created. Many explanations for the change are possible: deploying personnel to fight for Russia in Ukraine has preoccupied Kadyrov and his inner circle; Kadyrov himself is experiencing serious health problems, prompting uncertainties about succession in the republic¹⁰⁹. It may also be that non-public policy changes in key host states would make the detention and return of Chechens less likely.

Russia's use of transnational repression has prompted significant policy responses from the EU and Member States, as well as their allies. As noted above, these have included coordinated diplomatic expulsions, for instance in response to the Skripal poisoning in 2018, and the development of new sanctions mechanisms and contributed to the development of new mechanisms for monitoring hybrid threats and sharing intelligence. These responses have changed Russia's behaviour in notable ways, but not stopped it from seeking to enact new plots. Moscow continues to adapt its tactics in response to new constraints, including by resorting more to proxies and less professional recruited agents¹¹⁰.

¹⁰³ Caucasian Knot, '[Кадыров угрожает эмигрантам из Чечни](#)' [[Kadyrov Threatens Emigrants from Chechnya](#)], Author's own translation], youtube page, 8 June 2016.

¹⁰⁴ T. Escritt, '[Who is Vadim Krasikov, Russian hitman freed from German jail in prisoner swap?](#)', *Reuters*, 1 August 2024.

¹⁰⁵ Interview with Russian journalist, September 2025.

¹⁰⁶ Iran International, '[London suspect in terror plot against Iran International found guilty](#)', 20 December 2023.

¹⁰⁷ M. Wyrwał and M. Żmudka, '[Poland vs. Azamat Baiduyev: how an EU member state deported a Chechen refugee back to face the Kadyrov regime](#)', *Open Democracy*, 21 September 2018; E. Milashina, '[Chechens in Europe](#)', nd.

¹⁰⁸ OC Media, '[Chechnya leader Ramzan Kadyrov reportedly suffering from pancreatic necrosis](#)', 26 August 2020.

¹⁰⁹ Meduza, '[Chechnya leader Ramzan Kadyrov reportedly suffering from pancreatic necrosis](#)', 22 April 2024.

¹¹⁰ S. Greene et al., '[War Without End: Russia's Shadow Warfare](#)', *Center for European Policy Analysis*, 19 November 2025.

4.2 Iran

Iran is one of the world's best-known perpetrators of transnational repression. Within Freedom House's dataset, 47 incidents have been recorded with Iran as an origin state since 2014, which ties Iran with Uzbekistan as eighth among the most frequent perpetrators in the world. Of 47 incidents in all, 14 were recorded in the EU and another 25 in non-EU Council of Europe countries, most in Türkiye. Probably because Iran has very few opportunities for cooperation with European governments, most recorded incidents in the EU involve assassinations/attempted assassinations or credible threats of violence against dissidents. Only two of the 14 incidents in the EU are detentions and none are unlawful deportations. The 14 incidents are distributed widely across seven different EU host countries.

Iran has a consistent and longstanding practice of pursuing its opponents abroad, dating back to the earliest years of the Islamic Republic, when its agents targeted former officials of the shah's regime as well as opposition and human rights activists around the globe. There is ample proof that extraterritorial operations are closely tied to the government's identity and organising principles¹¹¹. Documentary evidence shows that overseas assassinations have been directed by the government's top leadership, organised under the Ministry of Intelligence and the Islamic Revolutionary Guards Corp Quds Force¹¹². Based on publicly available official information, including sanctions listings by the EU and its allies, the Ministry of Intelligence and the Quds Force continue to direct these activities abroad¹¹³. The importance of transnational repression for the government may be because the revolution's leaders themselves organised their takeover in exile and therefore perceive diaspora mobilisation as a potent threat. Open-source databases that have documented Iranian external operations since 1979 describe hundreds of assassinations/attempted assassinations in many countries during the first two decades after the revolution¹¹⁴.

Many of these Iranian-origin incidents occurred in Europe, among them the assassination of former prime minister Shapour Bakhtiar in Paris¹¹⁵ and the Mykonos Restaurant murders of three Iranian Kurdish activists in Berlin, both in 1992¹¹⁶. Where there were investigations, trials of the accused exposed extensive evidence of direct Iranian government involvement in assassinations

¹¹¹ A. Khoshnood, M. Norell and A.M. Khoshnood, '[A Growing Security Threat: Iranian Intelligence Operations in Scandinavia \(Part One: Denmark and Norway\)](#)', *Middle East Quarterly*, Vol 32, No 3, 2025.

¹¹² Iran Human Rights Documentation Center, [No Safe Haven: Iran's Global Assassination Campaign](#), 3 February 2011.

¹¹³ Council of the EU, '[Iran: Council sanctions eight individuals and one entity over serious human rights violations and transnational repression](#)', Press release, 15 July 2025; Council of the EU, [Regulation on specific restrictive measures directed against certain persons and entities with a view to combating terrorism](#), *Official Journal of the EU*, L Series, 31 January 2025.

¹¹⁴ '[Iran: State Violence Beyond Borders](#)' is a project of the Abdorrahman Boroumand Center for Human Rights cataloguing extrajudicial killings by the Iranian government since 1979. The data is not strictly confined to transnational repression, because it includes extrajudicial killings within Iran itself and includes a small number of people without a national connection to Iran (such as certain Americans killed in Lebanon by Iranian proxies). It covers 909 extrajudicial killings, at least 217 of which are outside of Iran. The data provides detailed narratives about incidents where available, though the level of detail varies across incidents. 'Iranian External Operations: Map and Timeline' is a project of the Washington Institute for Near East Policy that has collected information on a range of Iranian operations abroad, some but not all of which meet the definition of transnational repression used in this report. M. Levitt, [Introducing the Iranian External Operations Map and Timeline](#), *Washington Institute for Near East Policy*, 2 August 2024.

¹¹⁵ D. Geist, '["Darker Horizon": The Assassination of Shapour Bakhtiar](#)', *PBS*, 6 August 2011.

¹¹⁶ Iran Human Rights Documentation Center, [Murder at Mykonos: Anatomy of a Political Assassination](#), 3 February 2011.

abroad¹¹⁷. The international backlash to Iran's use of transnational repression and the post-9/11 crackdown on terrorist financing and material support led to a lull in Iran-origin exile assassinations and kidnappings during the 2000s, so much so that the Iran Human Rights Documentation Centre wrote in 2011 that the government had 'abandoned its campaign of overseas assassinations because of international pressure'¹¹⁸.

Any reprieve was short-lived, though, and since 2011 there have been many violent plots. These include the killing of two exiles in the Netherlands in 2015 and 2017 as well as the disrupted bomb plot targeting a Mojahedin e-Khalq rally in Belgium during 2018, which resulted in the prosecution of a participating Iranian diplomat¹¹⁹. In three recent incidents, Iran successfully lured opposition exiles out of North America and Europe to third countries where they were then abducted and taken to Iran. These individuals, Ruhollah Zam, Jamshid Sharmahd and Habib Asyud, were all imprisoned, tried and executed in Iran. Although the abductions took place outside Europe, all had a European connection: Sharmahd was a dual German and Iranian national living in the USA, Zam had been living in France with refugee status and Asyud was a Swedish citizen.

As in other campaigns of transnational repression, increased activity by the government abroad is probably connected to growing insecurity at home. The government faces extreme pressure due to international sanctions, corruption and external threats from Israel and the USA. Uprisings such as the student protests of 1999, the Green Movement of 2009–2010, the November 2019 protests and the Woman, Life, Freedom movement of 2022 are evidence of mass popular discontent. Particularly starting with the spread of satellite television in the late 1990s and then with the emergence of the internet in the 2000s, diaspora journalism and activism have become even more relevant to disseminating information globally and within Iran. Exiled media, activists, and journalists channel information out of and back into the country about protests, as well as other key events that undermine the government's image¹²⁰.

In response, Iranian exiles report that the net cast by Iran's government is wider now than it has ever been, with more casual and less politically engaged Iranians on the receiving end of visits to their families still in Iran or at greater risk of detention if they return to Iran¹²¹. As with the China and Russia cases, Iran is known for developing and deploying its own sophisticated 'spear phishing' and hacking campaigns against dissidents. Constant attempts to penetrate digital accounts are paired with pervasive digital threats directed against exiles, creating an expectation of constant surveillance and vulnerability to digital attack that reshapes how exiles behave individually and with each other¹²². There are also regular attempts at infiltration by Iranian agents into diaspora organisations. By increasing mistrust among exiles and pressing

¹¹⁷ A. Cowell, '[Berlin court says top Iran leaders ordered killings](#)', *The New York Times*, 11 April 1997.

¹¹⁸ Iran Human Rights Documentation Center, '[No Safe Haven: Iran's Global Assassination Campaign](#)', 3 February 2011.

¹¹⁹ BBC, '[France bomb plot: Iran diplomat Assadollah Assadi sentenced to 20 years](#)', 4 February 2021.

¹²⁰ R. Kumar, '[Not quite the Arab Spring: how protestors in Iran are using social media in innovative ways](#)', *Reuters Institute for the Study of Journalism*, 6 December 2022; M. A. Salih, '[A geography of protest: Inside the rise of Iran's minority factor](#)', *The Atlantic Council*, 23 September 2025.

¹²¹ Interview with Iranian activist, September 2025.

¹²² M. Michaelsen, '[Exit and voice in a digital age: Iran's exiled activists and the authoritarian state](#)', *Globalizations*, Vol 15, No 2, 2018.

upon existing cleavages between them, Iran is reducing the capacity of diaspora members to mobilise against the government.

Iran's transnational repression activities abroad are inseparable from a deeper logic that guides the Iranian government's overall strategy: by maintaining a policy of 'forward defence' beyond its borders, the government can push conflict outside the country's territory¹²³. This strategy is under severe strain and its backbone – the 'Axis of Resistance' set of alliances with Bashar al-Assad in Syria, Hizbollah in Lebanon, Hamas in the Palestinian Territories and Ansarallah (Houthis) in Yemen – has suffered a series of defeats in recent years. However, Teheran has not abandoned its idea of projecting force abroad to protect the homeland, including through collaboration with non-state actors¹²⁴. Reinforcing these strategic choices is the Islamic Republic's limited ability to operate abroad officially, in no small part due to the government's practices of assassinations, sponsorship of terrorist organisations and commitment to revolutionary ideology. This creates a structural incentive to invest in grey-zone and illicit networks for activities such as arms procurement and money laundering, which when uncovered drive Iranian operations abroad further underground.

These networks in turn create natural channels for Iran to intersect and build relationships with organised crime groups¹²⁵. These relationships are not entirely new, but appear to be growing in importance within their extraterritorial operations and transnational repression¹²⁶. Two organised crime networks have become prominent in recent years in Europe: the Zindashti network, named after its leader Naji Sharifi Zindashti and the Foxtrot network, named after its leader Rawa Majid, a Swedish-Iranian crime figure nicknamed the Kurdish Fox¹²⁷. Official statements and journalistic accounts have identified both networks as being active in transnational repression. Zindashti has been identified as being behind plots to assassinate Iranian exiles, sometimes by hiring other organised crime groups active in Eastern Europe, the Caucasus and the USA¹²⁸. The Foxtrot network has been identified as being responsible for targeting dissidents in Sweden. The network directs transnational repression activities alongside other crimes such as vandalism, sabotage and threats, in a growing pattern of gig recruitment, including youths, directed by Iran¹²⁹. Both network leaders have been identified in official public documents as working closely with Iran's Ministry of Intelligence, either from within Iran or out of areas in northern Iraq where Iran has influence.

It is not unprecedented for Iran to cooperate with proxies abroad in trying to perpetrate transnational repression. In the theocratic government's initial decades, whilst still grounded in its revolutionary origins abroad, various far-left and national liberation movement proxies

¹²³ International Crisis Group, [Iran's Priorities in a Turbulent Middle East](#), 13 April 2018.

¹²⁴ V. Ali-Khan and T. Cambanis, [Down but not out: Reassessing the axis of resistance](#), *The Century Foundation*, 19 March 2025.

¹²⁵ Interview with Iranian activist, October 2025.

¹²⁶ For example, in 2011, USA investigators disrupted a plot to hire members of Mexico's Los Zetas cartel to assassinate the Saudi ambassador to Washington. However, no further collaboration with the Zetas or other Mexican organised crime groups has been publicly noted.

¹²⁷ US Department of State, ['Sanctioning the Foxtrot Network'](#), Press release, 12 March 2025.

¹²⁸ US Department of Treasury, ['The United States and United Kingdom Target Iranian Transnational Assassinations Network'](#), Press release, 29 January 2024; Council of the EU, ['Iran: Council sanctions eight individuals and one entity over serious human rights violations and transnational repression'](#), Press release, 15 July 2025.

¹²⁹ Säkerhetspolisen, ['Iran is using criminal networks in Sweden'](#), 30 May 2024.

appeared in accounts of Iranian extraterritorial operations¹³⁰. What appears to distinguish the present strategy is the use of online platforms to recruit youth in gig-like activities (see section 2) and the state's extremely close partnership with organised crime groups that are led from outside the host states but maintain networks within them.

As with other origin countries discussed in this study, Iran's transnational repression activities overlap with plots directed against individuals without a national connection to Iran. This includes: a number of reported plots against American officials; attacks on Jewish cultural institutions as well as Israeli officials and buildings; the attempted assassination of a Spanish Member of the European Parliament Alejo Vidal-Quadras Roca in 2023; and the hacking of European Parliament Member Hannah Neumann in 2025¹³¹. While transnational repression activities require some unique and dedicated efforts to combat, in order to identify and counter them operationally, policies must take advantage of insights and intelligence generated in other fields where the same threat actors are active.

Iran's use of transnational repression has also prompted significant response from EU institutions and Member States, including diplomatic expulsions and sanctions (on the Zindashti network). This has contributed to new policy initiatives within Member States, such as new Dutch policies discussed in section 5. These policies have reduced the space for operations being undertaken by official Iranian agents and led to the interruption of specific plots (such as the planned bombing in France). 'Everyday' forms of transnational repression continue to be significant problems and Iran's shift to proxy forms of transnational repression presents new problems for policy responses.

4.3 China

According to Freedom House, China's government is responsible for 'the most sophisticated, global, and comprehensive campaign of transnational repression in the world'¹³². Freedom House's dataset lists 272 recorded incidents of Chinese state transnational repression since 2014 – more than any other country – of which 10 have been recorded in five European host countries. However, this may be a drastic underrepresentation because of the way that China conducts transnational repression in democracies, particularly through its blend of formal and informal coercive tools and pressure through state-linked community organisations. Beyond the documented incidents are other tactics not included in the Freedom House dataset, such as long-distance threats (coercion-by-proxy, spyware and digital threats). In marked contrast to Russia and Iran, China has not assassinated opponents in Europe, preferring non-lethal forms of coercion which often intersect with broader foreign interference campaigns, including espionage activities and influence operations focused on Chinese diaspora communities.

¹³⁰ Iran International, '[Former IRGC minister details Iran's global assassination campaign](#)', 9 March 2025.

¹³¹ Reuters, '[Spanish court says attempt on former politician's life linked to opposition to Iran leadership](#)', 9 July 2025; A. Roussi and N. Ninocur, '[European Parliament's Iran delegation chair victim of Tehran-linked hacking](#)', *Politico*, 23 April 2025.

¹³² Freedom House, '[Case studies: China](#)' in *Out of Sight, Not Out of Reach: The Global Scale and Scope of Transnational Repression*, Freedom House, February 2021.

While Chinese government spokespeople have dismissed ‘the false narrative of “transnational repression”’¹³³, the Chinese government nevertheless has a well-documented record of using transnational repression to silence political dissent. Most available accounts date back to the fallout from the 1989 Tiananmen Square protests, when Chinese authorities revoked the travel documents of exiled dissidents or prevented them from returning to China¹³⁴. Throughout the 1990s and 2000s, Chinese authorities continued to pursue diaspora and exiles, by pressuring foreign governments to forcibly return asylum seekers¹³⁵ and rights advocates¹³⁶.

Under the administration of Xi Jinping (2012–present), transnational repression has increased in scope and intensity as a consequence of tightened political controls within China under Xi’s personalistic rule. As the Xi administration has waged multi-year campaigns of domestic repression against legal professionals, activists, Uyghurs and corruption suspects, Chinese authorities have become more aggressive in pursuing perceived opponents abroad. As in previous decades, targets of Chinese state transnational repression include HRDs together with members of persecuted ethnic and religious communities, as well as groups which earlier Chinese administrations largely ignored, such as Hong Kong pro-democracy activists.

China’s use of transnational repression involves numerous party-state organs, a reflection of the Xi administration’s ‘comprehensive’ view of national security, along with its abiding concern with internal and external challenges to the Communist Party’s power¹³⁷. Playing leading roles in transnational repression are the Ministry of Public Security and the Ministry of State Security – China’s national police and intelligence agencies respectively. While the Chinese government has denied that its law enforcement agencies participate in transnational repression¹³⁸, journalists and law enforcement agencies in democratic states have identified the roles that both the Ministry of Public Security and the Ministry of State Security play¹³⁹. By contrast, the Chinese government has openly acknowledged that the Ministry of Public Security, the Supreme People’s Court, the Supreme People’s Procuratorate, the People’s Bank of China and the Organisation Department of the Communist Party all participate in Operation Fox Hunt and Operation Sky Net, the official overseas arms of China’s war on corruption¹⁴⁰. These coercive campaigns, which began in the mid-2010s as part of Xi Jinping’s larger domestic anti-corruption campaign, have been a way for the Chinese government to penalise people accused of graft and general

¹³³ Ministry of Public Security of the People’s Republic of China, ‘[China Firmly Opposes the US’s Slanders and Smears](#)’, 25 April 2023.

¹³⁴ Human Rights Watch, [China: Enforced Exile of Dissidents](#), 6 January 1995.

¹³⁵ UN Office of the High Commissioner for Human Rights, ‘[UN expert on torture seriously concerned about forcible return of ethnic Uyghurs from Cambodia to China](#)’, Press Release, 22 December 2009.

¹³⁶ A. Ang, ‘[Court jails Chinese activist for life](#)’, *The Guardian*, 10 February 2003; Amnesty International, ‘[Huseyin Celil](#)’, webpage, nd.

¹³⁷ K. Drinhausen and H. Legarda, ‘[Comprehensive National Security](#)’ unleashed: How Xi’s approach shapes China’s policies at home and abroad, *MERICCS*, 15 September 2022.

¹³⁸ Ministry of Public Security of the People’s Republic of China, ‘[The US has Maliciously Concocted the So-called “Transnational Repression” Narrative, China Firmly Rejects This](#)’, 28 April 2023.

¹³⁹ N. Sadek, S. Alecci and D. Reuter, ‘[Frequently asked questions about the China Targets investigation](#)’, *International Consortium of Investigative Journalists*, 28 April 2025; United States Attorney’s Office, ‘[Seven Hackers Associated with Chinese Government Charged with Computer Intrusions Targeting Perceived Critics of China and U.S. Businesses and Politicians](#)’, Press release, 25 March 2024; US Department of Justice, ‘[40 Officers of China’s National Police Charged in Transnational Repression Schemes Targeting U.S. Residents](#)’, Press release, 17 April 2023.

¹⁴⁰ Global Times, ‘[China continues Sky Net anti-corruption campaign to pursue fugitives](#)’, 20 March 2024.

malfeasance, purge the party-state of Xi's opponents and in notable cases punish political critics¹⁴¹.

A notable development under Xi's administration is the Hong Kong Special Administrative Region (HKSAR) government's involvement in transnational repression. This participation of HKSAR authorities, which includes the targeting of individuals in Europe, is a direct result of the government's attack on civil liberties and the 'one country, two systems' principle in the wake of the 2019 protest movement. Following the National People's Congress' imposition of the National Security Law on Hong Kong in 2020 and the Hong Kong Legislative Council's passage of the Safeguarding National Security Ordinance in 2024, HKSAR authorities have charged exiled Hong Kong activists with 'subversion', 'incitement to secession' and 'collusion with a foreign country'. The Hong Kong Police Authorities have offered rewards of up to HKD 1 million (EUR 111 361) for information leading to their arrest. In June 2025, the EU condemned the use of extraterritorial arrest warrants against overseas Hong Kong activists, including an EU citizen¹⁴², a statement which the HKSAR government dismissed as 'slandorous'¹⁴³.

Legal threats against diaspora members in Europe have also taken the form of Interpol red notices and attempts by China to co-opt other countries' legal systems. As with other countries that engage in transnational repression, China attempts through bilateral cooperation requests and information-sharing mechanisms to locate people abroad and have them detained or returned, even where there is no extradition treaty. It has also sought to use Interpol notices to locate individuals. Freedom House's most recent dataset lists eight instances where Interpol was used to request host states to arrest and deport Chinese or even Taiwanese nationals, who Chinese authorities accuse of committing economic crimes¹⁴⁴. This number is probably an underestimate due to the lack of public information about Interpol's notices. It is not always clear if China has pursued these individuals primarily due to their political activities or religious beliefs, though in one notable instance, a Swedish individual wanted by China for involvement in economic crimes was also a prominent Falun Gong practitioner¹⁴⁵. The high risk of human rights violations and lack of procedural fairness in China has led courts in Italy and Poland, as well as the European Court of Human Rights, to reject Chinese government extradition requests¹⁴⁶.

Even more than formal extraditions, Chinese authorities have used a blend of formal and informal coercive methods to secure the involuntary return of individuals. Publicly available accounts indicate that, as part of Operations Fox Hunt and Sky Net, authorities have threatened family members in China, harassed targets in host countries and kidnapped individuals with and without host state cooperation¹⁴⁷. To pressurise overseas individuals into surrendering,

¹⁴¹ L. Harth and Y. Chen, [Chasing Fox Hunt: Tracing the PRC's Forced Return Operations around the Globe](#), *Safeguard Defenders*, 15 April 2024.

¹⁴² EEAS, ['Hong Kong: Statement by the Spokesperson on extraterritorial arrest warrants'](#), Press Release, 31 July 2025.

¹⁴³ The Government of the Hong Kong Special Administrative Region, ['HKSAR Government opposes smears by EU against Police's lawful enforcement actions'](#), 1 August 2025.

¹⁴⁴ The People's Republic of China has claimed authority over Taiwanese nationals abroad in accordance with its 'One China' principle, through which it asserts that Taiwan is an inalienable part of China.

¹⁴⁵ Safeguard Defenders, ['Poland blocks extradition to China'](#), 4 March 2021.

¹⁴⁶ Decode 39, ['Italian court refused extradition request from China'](#), 13 May 2024; Safeguard Defenders, ['Poland blocks extradition to China'](#), 4 March 2021; European Court of Human Rights, [Liu v. Poland](#), Case 37610/18, Legal summary, 6 October 2022.

¹⁴⁷ Safeguard Defenders, [Involuntary Returns: China's covert operation to force 'fugitives' overseas back home](#), 17 January 2022.

authorities have placed years-long exit bans on their non-Chinese relatives in China¹⁴⁸. Police officers have also travelled to confront individuals in host countries directly and demand their return to China. Where police cannot operate abroad, authorities have instead enlisted proxies to threaten targeted individuals at their homes, measures which have led to notable criminal convictions in American courts¹⁴⁹. Most chillingly, the Communist Party's Central Commission for Discipline Inspection has permitted the use of 'irregular measures' against overseas corruption suspects, which include both kidnapping and luring individuals back to China, third countries, international waters or airspace where they can be apprehended¹⁵⁰. China announced in March 2025 that it had returned 14 048 'overseas fugitives' since the launch of the anti-corruption Operation Sky Net in 2015¹⁵¹, a staggering figure albeit one which is difficult to verify.

In at least one case, the Chinese authorities have used irregular measures against an EU citizen. In 2015, Chinese agents abducted Gui Minhai, a Chinese-born Swedish publisher of anti-Communist Party books, from his home in Thailand and forcibly returned him to China, where he was forced to confess on television to unrelated crimes¹⁵². Released in 2017, authorities re-detained Gui in China in 2018 and convicted him in 2020 of 'illegally providing intelligence overseas'. While in detention, authorities claimed Gui reapplied for Chinese citizenship, a move which prevented Swedish officials from providing him with consular support¹⁵³. In October 2025, the European Parliament issued a statement on the tenth anniversary of his kidnapping, condemning Gui's detention and calling for his unconditional release¹⁵⁴.

Beyond legal threats, Chinese authorities have intimidated diaspora activists via coercion-by-proxy, using long-distance threats against the family members of EU residents. During Xi Jinping's state visit to France in May 2024, Chinese and Uyghur activists reported Chinese police intimidation of family members in China, aimed at demobilising upcoming public demonstrations in Paris against Xi and the Communist Party¹⁵⁵. Chinese authorities have called Uyghur activists

¹⁴⁸ BBC, '[China lets US siblings return home after three years](#)', 28 September 2021; Y. Chen, [Trapped - China's Expanding Use of Exit Bans](#), *Safeguard Defenders*, 1 May 2023.

¹⁴⁹ Office of Public Affairs US Department of Justice, '[Leader of Multi-Year 'Operation Fox Hunt' Repatriation Campaign Directed by the People's Republic of China Sentenced to 20 Months in Prison](#)', Press release, 19 March 2025; Office of Public Affairs U.S. Department of Justice, '[Private Investigator Sentenced to Prison for Interstate Stalking and Harassment of Chinese Nationals on Behalf of the People's Republic of China](#)', Press release, 16 April 2025.

¹⁵⁰ Central Commission for Discipline Inspection '[《中华人民共和国监察法》释义:第六章反腐败国际合作第五十二条](#)' ['Interpretation of the Supervision Law of the People's Republic of China: Chapter 6 International Cooperation Against Corruption Article 52'], 4 July 2018; Safeguard Defenders, [Involuntary Returns: China's covert operation to force 'fugitives' overseas back home](#), 17 January 2022.

¹⁵¹ Nanjing Municipal Commission for Discipline Inspection, '[写在“天网行动”启动十周年之际 有逃必追 一追到底](#)' ['On the 10th anniversary of the launch of "Operation Sky Net": Those who flee must be pursued to the very end'], 27 March 2025

¹⁵² O. Holmes and T. Phillips, '[Gui Minhai: the strange disappearance of a publisher who riled China's elite](#)', *The Guardian*, 8 December 2015; BBC, '[Missing Hong Kong publisher Gui Minhai paraded on China TV](#)', 18 January 2016.

¹⁵³ L. Kuo, '[Gui Minhai's daughter says China "buried" his sentence amid coronavirus outbreak](#)', *The Guardian*, 27 February 2020.

¹⁵⁴ European Parliament, [Resolution of 9 October 2025 on the 10th anniversary of the detention of jailed Swedish publisher Gui Minhai in China](#), 2025/2906(RSP), 9 October 2025.

¹⁵⁵ K. Marton, '[We Investigated China's Foreign Intimidation Operations. It Led Us to the Leader of a Hungary-based Organization](#)', *Direkt36*, 28 April 2025; S. Alecci and International Consortium of Investigative Journalists, '[Inside China's machinery of repression — and how it crushes dissent around the world](#)', *International Consortium of*

in Europe, warning them that their family's safety depended on their silence abroad¹⁵⁶ and have reportedly retaliated against activists who refuse to cooperate by repeatedly detaining family members¹⁵⁷. Uyghurs are particularly vulnerable to these forms of coercion-by-proxy, given that family members in Xinjiang are frequently subject to detention already or at risk of being detained as part of a state campaign of systematic repression in Xinjiang which the European Parliament has recognised as amounting to crimes against humanity¹⁵⁸.

Coercion-by-proxy can overlap with spyware and digital threats, also known as digital transnational repression, whereby Chinese authorities weaponise digital tools for long-distance surveillance. China has leveraged the country's domestic information controls to restrict free communication among diaspora members. The Chinese government's strict censorship regime blocks platforms such as Facebook and WhatsApp, compelling many Chinese, Uyghurs or Tibetans abroad to rely on China-based platforms like WeChat to connect with relatives inside China or contact fellow diaspora members. Activity on these platforms, though, is subject to pervasive state-mandated censorship and surveillance, even among users abroad¹⁵⁹. Platform surveillance can have a chilling effect on communication among diaspora members engaged in political activism, with Chinese students at European and North American universities reporting that they suspect Chinese authorities of monitoring their online activities¹⁶⁰.

Digital transnational repression has also taken the form of spyware attacks directed at specific individuals living in EU Member States. Between 2024 and 2025, senior members of the Germany-based World Uyghur Congress were targeted by a 'spear phishing' campaign, which Citizen Lab researchers believe was probably linked to the Chinese government. Using a 'trojanised' version of a Uyghur language word processor, attackers sought to gain backdoor access to a target's device which would allow them to download files or upload additional files¹⁶¹. Spyware attacks against the World Uyghur Congress in Europe are part of long-standing Chinese government efforts to undermine political organising among political exiles, including cyber espionage operations against the Tibet government-in-exile dating back to the late 2000s¹⁶² and more recent operations by a Chinese private security contractor, i-Soon, to surveil the Chinese government's overseas opponents¹⁶³.

The use of malware to surveil prominent diaspora activists marks the intersection of transnational repression and foreign interference or hybrid threats, such as Chinese state

Investigative Journalists, 28 April 2025; A. Gheni Uyghur, '[A Uyghur Father Persecuted to Death: His Son Remembers Him](#)', *Bitter Winter*, 10 March 2024.

¹⁵⁶ B. Haas, '["Think of your family": China threatens European citizens over Xinjiang protests](#)', *The Guardian*, 16 October 2019.

¹⁵⁷ Article 19, [GOING GLOBAL: China's transnational repression of protesters worldwide](#), June 2025.

¹⁵⁸ European Parliament, [Parliamentary question: Follow-up on the human rights situation in Xinjiang](#), E-002223/2022, 21 June 2022.

¹⁵⁹ J. Knockel et al., '[We Chat, They Watch: How International Users Unwittingly Build up WeChat's Chinese Censorship Apparatus](#)', *Citizen Lab*, 7 May 2020.

¹⁶⁰ Amnesty International, '[On My Campus, I Am Afraid](#)': China's Targeting of Overseas Students Stifles Rights, 13 May 2024

¹⁶¹ R. Brown et al., '[Weaponized Words: Uyghur Language Software Hijacked to Deliver Malware](#)', *Citizen Lab*, 28 April 2025.

¹⁶² Jane, '[Tracking GhostNet: Investigating a Cyber Espionage Network](#)', *Citizen Lab*, 28 March 2009.

¹⁶³ F. Bajak and D. Kang, '[An online dump of Chinese hacking documents offers a rare window into pervasive state surveillance](#)', *Associated Press*, 22 February 2024.

espionage in EU Member States. China's Ministry of State Security has recruited diaspora members from Chinese, Uyghur and Tibetan diaspora communities in Europe to spy on their own communities and collect information about diaspora political activism. In 2018, a Tibetan living in Sweden was found guilty of 'gross illegal intelligence activity' due to his work spying on Sweden's Tibetan diaspora community and Tibetan freedom movement activities in the EU Member States of Denmark and Poland, as well as Norway¹⁶⁴. Chinese intelligence agents have spied on both European political bodies and diaspora members. In April 2024, a German national of Chinese descent, who was an aide to a member of the European Parliament, was arrested by German police and convicted the following September of spying on European politicians and pro-democracy dissidents on behalf of China¹⁶⁵.

The overlap of transnational repression with foreign interference is also evident in the European operations of the 'united front' system, a network of Chinese party-state organs that advance China's interests by expanding party-state influence among key constituencies of non-Party members¹⁶⁶. The work of United in Europe has involved cultivating proxies within Chinese diaspora communities, who drum up support for the Chinese government via print and online media or via community activities¹⁶⁷. United front networks are often linked and even guided through consulates and People's Republic of China officials abroad, albeit the united front actors are not themselves official state representatives – a feature that makes addressing their influence harder. In some cases, united front-linked proxies have reportedly played the secondary role of intimidating regime opponents. During Xi Jinping's state visit to Hungary in May 2024, Tibetan activists reported that local supporters of the Chinese state followed and harassed them as they attempted to unfurl flags and banners in support of the Tibetan freedom movement¹⁶⁸. When Xi visited San Francisco in 2023 for a summit with American President Joseph Biden, united front activists intimidated, followed and beat up anti-Chinese Communist Party protesters¹⁶⁹.

The role of united front actors in transnational repression is also apparent in China's so-called 'overseas police service stations', which by late 2022 were reportedly located in 14 EU Member States, according to Safeguard Defenders¹⁷⁰. Operating out of existing private businesses and diaspora community associations, these service stations were allegedly linked to both the united front system and four local Public Security Bureaus in eastern China. While Chinese police officers were not physically present at these stations, diaspora proxies managing the sites facilitated contact with Chinese police for the purpose of renewing driving licences, according

¹⁶⁴ Safeguard Defenders, '[The Tibetan refugee who turned spy for China in Sweden](#)', 17 November 2020; Associated Press, '[Sweden expels a Chinese journalist, calling her a threat to national security, report says](#)', *NY1*, 8 April 2024.

¹⁶⁵ S. Alecci, '[China uses dissidents-turned-spies to infiltrate overseas activist groups, as authorities flounder](#)', *International Consortium of Investigative Journalists*, 23 June 2025; R. Connor and M. Moore, '[Germany: Ex-AfD aide convicted of spying for China](#)', *DW*, 30 September 2025.

¹⁶⁶ Australian Strategic Policy Institute, '[The party speaks for you](#)', 9 June 2020.

¹⁶⁷ F. Jirouš and P. Ševčíková, '[Covert propaganda operations in plain sight: The CCP united front system's media network in Europe](#)', *Sinopsis*, 30 July 2021; P. Nyrén, '[The CCP's United Front Network in Sweden](#)', *China Brief*, Vol 20, No 16, 2020.

¹⁶⁸ Tibetan Review, '[Chinese volunteers joined Hungarian security to harass Tibet protesters during Xi Jinping visit](#)', 10 May 2024; K. Marton, '[How the Chinese Communist Party's United Front extends its influence to Hungarian Associations](#)', *Telex*, 3 October 2024.

¹⁶⁹ Hong Kong Democracy Council and Students for a Free Tibet, '[Exporting Repression: Attacks on Protesters During Xi Jinping's Visit to San Francisco in November 2023](#)', July 2024.

¹⁷⁰ Safeguard Defenders, '[Patrol and Persuade: A follow-up investigation to 110 Overseas](#)', 4 December 2022.

to a spokesperson for China's Foreign Ministry¹⁷¹. While evidence concerning these stations' direct involvement in transnational repression is limited, Chinese media have reported instances of service stations in Europe collaborating with Chinese police and prosecutors, compelling Chinese citizens to return to China to face trial. These 'persuasion to return' operations have included a Paris service station which cooperated with police in the city of Wenzhou to target a Chinese man in France accused of unspecified crimes¹⁷² and a Chinese hometown association in Spain which worked with police and prosecutors in Qingtian county to target a man suspected of environmental pollution-related offences¹⁷³. A Chinese Foreign Ministry spokesperson claimed in May 2023 that these stations were now closed¹⁷⁴. The Safeguard Defenders organisation maintains that these stations are themselves part of a broader network comprising semi-formalised liaison stations that are run through individuals and operations affiliated with the united front system¹⁷⁵.

Reports of Chinese state surveillance and transnational repression have had a chilling effect on diaspora communities. Among Hong Kong diaspora members, the extraterritorial reach of the National Security Law and the Safeguarding National Security Ordinance has dissuaded many from taking part in cultural or social activities organised by groups affiliated with the pro-democracy movement¹⁷⁶. Uyghur rights advocates have reported that diaspora members, fearing transnational repression and concerned about the safety of family members in the home country, have deliberately avoided contact with Uyghur activist organisations¹⁷⁷. Tibet's diaspora members have restricted their political activities in host countries believing that doing so will help them obtain Chinese visas to visit Tibet to see family members, according to Tibetan activists¹⁷⁸.

Compared to the actions taken against Russia and Iran, European responses to China's use of transnational repression appear to have been weaker. The revelation of overseas police stations prompted considerable public outcry and some pressure on China to close the stations. Other responses, though, such as sanctions and coordinated expulsion of diplomats, have not occurred. Whereas in other jurisdictions, particularly in the USA, there have been multiple investigations and prosecutions for Chinese transnational repression activities, comparatively few in the EU¹⁷⁹.

¹⁷¹ Embassy of the People's Republic of China in the Kingdom of Denmark, '[Foreign Ministry Spokesperson Zhao Lijian's Regular Press Conference on November 2, 2022](#)', Press release, 2 November 2022.

¹⁷² Safeguard Defenders, '[Patrol and Persuade: A follow-up investigation to 110 Overseas](#)', 4 December 2022.

¹⁷³ Safeguard Defenders, '[110 Overseas: Chinese Transnational Policing Gone Wild](#)', 12 September 2022.

¹⁷⁴ Embassy of the People's Republic of China in Canada, '[Foreign Ministry Spokesperson Wang Wenbin's Regular Press Conference on May 15, 2023](#)', webpage, 15 May 2023.

¹⁷⁵ Author correspondence with Safeguard Defenders, October 2025.

¹⁷⁶ Interview with Hong Kong activist, September 2025; Interview with Hong Kong activist, October 2025

¹⁷⁷ Interview with Uyghur activist, October 2025.

¹⁷⁸ Interview with Tibetan activist, October 2025.

¹⁷⁹ See for example, US Department of Justice, '[40 Officers of China's National Police Charged in Transnational Repression Schemes Targeting U.S. Residents](#)', Press release, 17 April 2023; US Department of Justice, '[New York Resident Pleads Guilty to Operating Secret Police Station of the Chinese Government in Lower Manhattan](#)', Press release, 18 December 2024.

5 Legal frameworks and policy responses

Many issues that are grouped under transnational repression have previously been the subject of policymaking in democracies. However, only in the last five years has there begun to be an effort to address 'transnational repression' as a coherent policy problem. This makes it a fertile area for policy experimentation and development. It also means that there is no conclusive answer to what constitutes the 'best' policy in transnational repression.

This section will review existing responses in democratic contexts outside the EU, in certain Member States within the EU and from the EU itself. It will use this review to identify gaps in enforcement and coordination among Member States and in EU policies.

5.1 Summary of responses in democratic contexts outside of the EU

5.1.1 The USA

The current global policy push to address transnational repression began with the USA and so a review of American policies is important for accurately capturing the emerging policy agenda. Because much of this policy push has now been reversed under the second Trump administration, there are also useful lessons for policy stability to draw from the USA's example.

Starting in February 2021, the new Biden administration embraced a 'whole-of-government' strategy for countering transnational repression. This means that work on this issue had full White House backing and hence all government agencies were directed to respond. Over subsequent years, the administration rolled out a number of new policy steps to address transnational repression outside of the USA and within its borders. At the same time, it placed heavy emphasis on transnational repression in multilateral fora and engagement with allies, which helped increase its prominence on the policy agenda of partner countries.

The Biden administration first rolled out a set of new foreign policy initiatives. A so-called 'Khashoggi Ban' was introduced to deny American visas to people responsible for 'serious, extraterritorial counter-dissident activities'¹⁸⁰. Other initiatives included: providing grants to civil society organisations researching and advocating to prevent transnational repression; dedicating more resources to covering transnational repression within the annual American State Department Country Reports on Human Rights Practices; providing training for State Department staff (both based out of Washington, DC as well as in embassies and consulates overseas); and proactively coordinating with partners in third countries to address cases of transnational repression. This final initiative has been especially important in preventing the unlawful transfer of detained individuals into origin-state custody in emergency situations.

Moreover, the USA pushed international cooperation on countering transnational repression in multilateral fora, whilst supporting side events on transnational repression at the UN Human Rights Council in Geneva and organising a joint statement among 45 countries on transnational

¹⁸⁰ A. J. Blinken, '[Accountability for the murder of Jamal Khashoggi](#)', Press release, 26 February 2021.

repression at the Council¹⁸¹. The USA brought transnational repression to the fore through the Summit for Democracy and took the lead in forming a working group on transnational repression within the G7 Rapid Response Mechanism on Foreign Interference.

The other major aspect of the USA's approach was law enforcement. The Department of Justice (DOJ) and the FBI released various new policies to counter transnational repression. These included a new 'hotline' for people to call to report transnational repression and new public-facing communications about the issue in various languages intended to reach affected communities¹⁸². As with foreign policy initiatives, the most effective steps were implemented behind the scenes. These included training for personnel on the issue, increased resources for investigating and prosecuting cases, together with the creation of an FBI 'fusion cell' to draw in intelligence about potential transnational repression cases from across the many streams of information that the USA's law enforcement collects. The result was a substantial increase in the number of cases related to transnational repression being investigated, prosecuted and convicted in American courts¹⁸³. Many of those cases were prosecuted under the Foreign Agents Registration Act (FARA), a pre-Second World War-era law seldom used in the USA until the last 10 years. The DOJ used that provision repeatedly in cases related to transnational repression to hold accountable individuals acting as agents of coercion on behalf of a foreign government¹⁸⁴. FARA also inspired new laws in the UK, Canada and Australia, as discussed below.

The USA also sought cooperation at an operational level with partner country law enforcement agencies. For example, in October 2024, the American DOJ and UK Home Office chaired a multilateral meeting in London on this issue¹⁸⁵. The USA shared its own intelligence and operational practices with trusted partners in closed-door meetings¹⁸⁶. Key intelligence relating to transnational repression plots in their countries was also shared with allies¹⁸⁷.

Where the USA made little progress was in addressing the risk of transnational repression within its own migration system and in developing a coherent plan for outreach to affected communities in order to build trust and encourage reporting. However, there were some small steps, such as the tightening of guidance on how Interpol notices could be used within immigration proceedings or law enforcement¹⁸⁸. Furthermore, the Department of Homeland Security conducted a number of expert and civil society consultations about the problem, as well as a limited number of closed-door roundtables with diaspora organisations, though these did not result in any significant policy changes. Regrettably, outreach was never systematically addressed. Affected communities' fears of immigration enforcement were and are a constant

¹⁸¹ U.S. Mission to International Organizations in Geneva, '[Joint Statement on Transnational Repression: As Delivered by Ambassador Michèle Taylor](#)', webpage, 26 June 2024.

¹⁸² As will be discussed further in section 6, hotlines have had limited impact and in some cases have increased rather than resolved frustrations, because of the lack of adequate or timely response to people who use them.

¹⁸³ National Security Division US Department of Justice, '[Transnational Repression \(TNR\): Recent Cases and Related Press Releases](#)', webpage, nd. This page has cases through October 2024 but appears to be no longer updated.

¹⁸⁴ US Department of Justice, '[Foreign Agents Registration Act: Recent Cases](#)', webpage, nd.

¹⁸⁵ US Department of Justice, '[Joint Statement of the U.S. Department of Justice and the United Kingdom Home Office on a Multilateral Meeting to Address State-Sponsored High-Harm Physical Threats and Other Forms of Transnational Repression](#)', Press release, 30 October 2024.

¹⁸⁶ Author observations from participation in the Department of Justice briefings.

¹⁸⁷ H. Honderich, '[What US agents knew before a Sikh separatist was killed in Canada](#)', BBC, 1 December 2023.

¹⁸⁸ U.S. Immigration and Customs Enforcement, '[ICE updates guidance for use of INTERPOL Red Notices during law enforcement actions](#)', Press release, 29 September 2023.

obstacle to increasing cooperation¹⁸⁹. Additionally, the Biden administration did not take steps to build safeguards against refoulement that would have prevented mass deportation as a policy¹⁹⁰.

Following the return of Trump to the White House in 2025, most of these policies were effectively dismantled, indirect casualties of the federal government's broader purge¹⁹¹. Trump's prioritisation of mass deportations and attack on institutional independence within the federal government led to changes in nearly every aspect of policy. While transnational repression officially remains a priority for the State Department¹⁹², many grants for work on the topic were cancelled and nearly all personnel working on the issue were fired, leading to an enormous loss of expertise and policy direction. After a period without any multilateral engagement on the issue, the State Department is reportedly back at the G7 table, but the USA has withdrawn from the UN Human Rights Council and so cannot lead or provide support there¹⁹³. At the DOJ, ongoing purges of the National Security Division and the FBI, as well as the 'deprioritisation' of FARA enforcement have made it much less likely that efforts to counter transnational repression will be carried forward¹⁹⁴. The USA's partners must reckon with the likelihood that America itself is proactively engaging in transnational repression as a host state by engaging in mass deportations that have included dissidents¹⁹⁵.

5.1.2 Australia, the UK and Canada

Responses to transnational repression by the UK, Canada and Australia share a family resemblance. Hence, it is meaningful to group them together. These three countries have openly adapted their approach based on certain elements taken from the USA, but with a potentially higher level of resourcing and increased focus on outreach that positions them as potential leaders in this policy space going forward, particularly as the USA has, at least for the moment, abandoned its efforts. They have each passed new laws and adopted significant new policies in the last eight years.

Australia was the group's first mover, with its response, dating back to 2017, linked to a series of scandals about coercion and electoral interference among China's diaspora communities, which led to the adoption of major new national security legislation in the years that followed¹⁹⁶. The UK was second to act, adopting a wide-ranging National Security Bill in 2023¹⁹⁷. Canada

¹⁸⁹ Author observations from engagement with Department of Homeland Security, Department of Justice and State Department officials.

¹⁹⁰ N. Schenkan, '[Trump is Supporting Transnational Repression](#)', *Foreign Policy*, 8 October 2025.

¹⁹¹ N. Schenkan, '[Trump is undermining policies against transnational repression](#)', *Lawfare*, 2 July 2025.

¹⁹² Author observations from briefing senior State Department officials.

¹⁹³ The White House, '[Withdrawing the United States from and Ending Funding to Certain United Nations Organizations and Reviewing United States Support to All International Organizations](#)', webpage, 4 February 2025.

¹⁹⁴ S. Monyak, '[Justice Department Loses a Third of Career Leaders Under Trump](#)', *Bloomberg Law*, 29 September 2025; K.P. Hong et al., '[Attorney General announces shift in Foreign Agents Registration Act Enforcement Priorities](#)', *Skadden Publication*, 6 February 2025.

¹⁹⁵ M. Mackinnon, '[Russian dissidents in the U.S. warn of deportation unless Canada intervenes](#)', *The Globe and Mail*, 8 September 2025; F. Fassihi and H. Aleaziz, '[US Deports Pload of Iranians After Deal with Tehran, Officials Say](#)', *The New York Times*, 30 September 2025.

¹⁹⁶ Australian Government Federal Register of Legislation, '[Foreign Influence Transparency Scheme Act 2018](#)', C2024C00466 C05, 14 October 2024; Australian Government Federal Register of Legislation, '[National Security Legislation Amendment \(Foreign Interference and Espionage\) Act 2018](#)', C2018C00506 C01, 10 December 2018.

¹⁹⁷ Home Office Government of the UK, '[National Security Bill Act: Factsheets](#)', 6 June 2025.

followed quickly by adopting its new legislation in 2024, spurred by the murder of a Canadian Sikh activist in British Columbia during 2023 and a scandal over Chinese interference in local electoral races to select party candidates¹⁹⁸. Regarding the level of policy implementation, therefore, Australia is furthest along, followed by the UK and Canada.

These countries' responses begin by including transnational repression as a form of 'foreign interference'. This approach provides certain benefits. Firstly, it allows for potentially criminalising the full spectrum of transnational repression activities as foreign interference with the exercise of democratic rights. Secondly, including transnational repression within foreign interference positions it within a broader framework of legal and policy responses, which allows for more consistent deployment of resources, integration into other policy efforts and full accountability. One drawback raised by critics is that transnational repression may be deprioritised within the broader foreign interference picture because it targets individuals and communities rather than democratic institutions. This was a common response to how transnational repression was treated in the recent public inquiry into foreign interference in Canada (the Hogue report)¹⁹⁹. Another drawback may be that communities are seen as 'threat vectors' themselves and subject to additional scrutiny because the risk of foreign interference is perceived as coming from within them²⁰⁰. However, as discussed elsewhere in this study, the benefits of inclusion in foreign interference outweigh the drawbacks.

This approach includes the following elements:

- **Criminal penalties for foreign interference with democratic rights.** Definitions vary based on the country, but in each of these three countries, new criminal penalties are included for actions that are intended to influence the exercise of democratic rights and are directed by a foreign power. While none of these bills use the term 'transnational repression', all cover the full spectrum of transnational repression activities. Notably for this study, as a party to the European Convention on Human Rights, the UK's National Security Act makes explicit reference to the European Convention on Human Rights' definition of such rights, as enacted into UK law through the Human Rights Act of 1998.
- **Foreign influence registries.** These are all inspired by the USA's FARA, but have sought to learn from the old definitions and structures of that law to create modern versions that are more nuanced, practical and accurate²⁰¹. Each country has created a new registration system for foreign entities that seek to influence political processes, mandating them or their contracted 'agents' to register. This is to facilitate transparency amongst the public and policymakers as to who is influencing public policy and how. In terms of transnational repression, the relevance of such registries is to draw a sharper distinction between overt

¹⁹⁸ Government of Canada, [Foreign Influence Transparency and Accountability Act](#), S.C. 2024, c. 16, s. 113, 20 June 2024; Parliament of Canada, [An Act Respecting Countering Foreign Interference](#), Bill C-70, 20 June 2024.

¹⁹⁹ Foreign Interference Commission, [Public Inquiry Into Foreign Interference in Federal Electoral Processes and Democratic Institutions, Volume 1: Report Summary](#), 28 January 2025. For critiques, see Y. Gorokhovskaia and G. Vaughan, [Engaging the Community: Combating Transnational Repression in Canada](#), *Freedom House*, September 2025.

²⁰⁰ A. Chubb and K. Roberts Lyer, ['Transnational Human Rights Violations: Addressing the Evolution of Globalized Repression through National Human Rights Institutions'](#), *Journal of Human Rights Practice*, Vol 16, No 3, 2024, pp. 770–793.

²⁰¹ For a detailed discussion of the dangerous open-endedness of FARA for US civil liberties, see International Center for Not-For-Profit Law, ['Foreign Agents Registration Act'](#), webpage, nd.

activities (which, when registered, are permitted so long as they do not violate other laws) and covert activities (which by definition will not be registered and therefore fall foul of the law). This may provide some benefit to prosecutors seeking to make cases for transnational repression, as it has in the USA²⁰², but it is unlikely to have much of a deterrent effect on origin states. Perpetrators of transnational repression already know that they may be breaking host-state laws but carry on regardless.

- **Greater outreach to communities.** All three countries aim to increase their efforts by investing more in outreach to communities affected by transnational repression. Australia, as the first adopter in this space, has so far gone the furthest in terms of institutionalising its response. There, direct engagement is the Counter Foreign Interference Coordination Centre's responsibility, working with Australian law enforcement. These parties conduct outreach activities and hold meetings with affected communities²⁰³. Public Safety Canada has led its own 'roadshows' alongside other relevant government agencies to meet with diasporas and a foreign interference commissioner is soon to be established²⁰⁴. Canada and Australia have adopted hotlines as means of collecting reports of transnational repression and designated points of contact for collecting information, while the UK has received a recommendation to set up a similar programme from a recent joint parliamentary commission on the matter²⁰⁵. All have created new public material in a number of languages that are intended to reach the relevant communities and inform them of their rights.

It is important to recognise that although all three countries in this section have undertaken robust new initiatives to address transnational repression as part of the challenge of foreign interference, none have 'solved' the problem as yet. In the UK and Canada, recent parliamentary inquiries have documented a slew of issues that need to be addressed and the relatively new legislation in both countries so far remains mostly untested. Prosecutions for transnational repression activities are still rare and in some cases controversial, although there is a growing body of investigations in each country. Additionally, there remain challenges for all countries around training and education of officials on transnational repression and the sharing of relevant information between all interested parties, particularly at local levels. In most instances of transnational repression, the target's first point of contact with the state will be through a local official, most likely a local law enforcement or immigration officer. Yet, without adequate training and information-sharing, the local official is likely to be dismissive of the threat and/or unprepared to share information with relevant authorities. This inadequate responsiveness can generate frustration and alienation on the part of affected communities. It may also contribute to successful transnational repression by leading to decreased reporting and self-censorship from affected individuals who feel they do not receive support from officials. A lack of adequate

²⁰² US Department of Justice, '[New York Resident Pleads Guilty to Operating Secret Police Station of the Chinese Government in Lower Manhattan](#)', Press release, 18 December 2024.

²⁰³ Y. Gorokhovskaia and G. Vaughan, '[More Action Needed to Ensure Safety: Combating Transnational Repression in Australia](#)', *Freedom House*, October 2025.

²⁰⁴ Y. Gorokhovskaia and G. Vaughan, '[Engaging the Community: Combating Transnational Repression in Canada](#)', *Freedom House*, September 2025.

²⁰⁵ House of Commons and House of Lords Joint Committee on Human Rights, '[Transnational Repression in the UK: Seventh Report of Session 2024–25 HC 681 / HL Paper 160](#)', 2025.

information-sharing between levels of the state also makes it harder to respond to acute threats in a timely fashion.

As also noted in the USA section, these countries have not yet taken significant steps to address transnational repression threats within their migration systems. There remain gaps around how to vet applicants against whom accusations of terrorism and extremism have been lodged by other countries or are unearthed during asylum and other status applications. Interpol abuse also remains an issue so long as abusive notices manage to go through the system and relevant personnel lack adequate training.

5.2 Existing responses in the EU

Within the EU, there is a growing set of responses to transnational repression taking shape in individual Member States and, to a lesser extent, at the EU level. This section will discuss some of those responses and the gaps within them.

5.2.1 Member State responses

Much of what is required to address transnational repression effectively falls within the competences of Member States. Looked at across the Union, it is clear that there is growing awareness of the problem, particularly within larger countries that have experienced acute incidents in recent years. To the extent that such information is publicly available, it is clear that some Member State intelligence services, and to some degree national/federal law enforcement, recognise and are keen to address the problem. There are gaps, though, in understanding how origin states can enact transnational repression strategies. These feature, *inter alia*: using diverse tactics; instituting systemic policies for outreach to the diverse communities affected; providing training for the different state representatives who may encounter transnational repression and ensuring that judicial systems understand the threats that people may face from other countries.

Due to the EU's size and diversity, this section cannot cover all individual Member States' responses. Hence, it will focus on three countries that have more developed public responses, looking at how they are grappling with transnational repression: Germany, Sweden and the Netherlands.

Transnational repression is an issue of growing concern in Germany, where there have been a number of acute incidents in recent years, including the assassination of Selimkhan Khangoshvili by a Russian agent in 2019 (discussed within the Russia case study in section 4). A further example was the abduction and rendition of former Vietnamese Communist Party insider Trinh Xuan Thanh in 2017. After his abduction in Berlin, he was transported from Germany to Slovakia and then flown to Moscow on a plane provided to an official Vietnamese delegation by Slovakia. The kidnapping underscores the risk of foreign states co-opting or manipulating EU governments to engage in transnational repression²⁰⁶.

²⁰⁶ China-CEE Institute, '[Slovakia Political Briefing: The abduction of the Vietnamese businessman Trinh Xuan Thanh, an international scandal](#)', Vol 10, No 1, 2018; Radio Free Asia, '[German court sentences second person in Vietnam kidnapping case](#)', 31 January 2023.

Additionally, some of the larger diasporas in Germany have been subjected to heavy surveillance and intimidation. In particular, threats against the Turkish–German community escalated rapidly after the coup attempt in July 2016. Deportations of Tajikistani political activists, where they were immediately imprisoned on political charges, have also underlined gaps in awareness regarding transnational repression tactics and protection against *refoulement*²⁰⁷. As a result, there has been growing political and policy interest, with Germany undertaking responses in a number of areas.

Diplomats were expelled following the Russian and Vietnamese plots, indicating a high degree of awareness that they were state-sponsored incidents. The Bundestag has also held hearings on transnational repression and the Foreign Ministry has condemned it by name²⁰⁸. The Foreign Intelligence Service and Federal Office for the Protection of the Constitution (BfV) have shown that they are aware of the threat and recently started referring to the problem as ‘transnational repression’²⁰⁹. The BfV has consistently identified the main threat actors in this space as Russia, China, Iran and Türkiye. In its 2024 report, the BfV also named Syria, Egypt, Morocco, Pakistan, Vietnam and India as carrying out transnational repression activities in the country²¹⁰. Certain exiles facing acute threats receive warnings and sometimes protection from law enforcement authorities and the state has shown itself capable of undertaking these efforts in response to major new developments, such as threats from Türkiye following the 2016 coup attempt.

Momentum for a more systematic policy approach is growing after the governing coalition that was formed in 2025 mentioned countering transnational repression in its coalition agreement²¹¹. In April, the federal government’s human rights commission rebuked Egypt for threats against an Egyptian journalist in Germany, in an unusually clear statement²¹². The Ministry of Foreign Affairs has formed a transnational repression unit to work on the issue and the Ministry of Interior has also assigned limited personnel²¹³. The Ministry of Foreign Affairs, the Ministry of Interior, the BfV and the Federal Criminal Police Office recently held roundtable talks with civil society experts and affected diaspora to announce federal policies and seek cooperation²¹⁴.

However, experts, civil society activists and diaspora representatives say that the state still lacks a coherent, systematic approach to the issue²¹⁵. The main approach appears to be treating transnational repression as a narrow problem within the larger frameworks of security threats

²⁰⁷ Human Rights Watch, ‘[Combatting Transnational Repression in Germany: Comments by Hugh Williamson, Human Rights Watch at a hearing in the German parliament, 17 December 2024](#)’, 18 December 2024.

²⁰⁸ Federal Foreign Office, ‘[Human Rights Commissioner Amtsberg on the report concerning alleged transnational repression against Egyptian human rights defender and journalist Basma Mostafa in Germany](#)’, Press release, 16 April 2025.

²⁰⁹ Y. Gorokhovskaia and I. Linzer, ‘[Case Study: Germany](#)’ in *Defending Democracy in Exile: Policy Responses to Transnational Repression*, Freedom House, June 2022.

²¹⁰ Federal Ministry of the Interior, [Brief summary: 2024 Report on the Protection of the Constitution: Facts and Trends](#), 2025.

²¹¹ Christian Democratic Union, Christian Social Union and Social Democrats, [Verantwortung für Deutschland: Koalitionsvertrag zwischen CDU, CSU und SPD](#) [Responsibility for Germany: Coalition agreement between CDU, CSU und SPD] 2025, p.134.

²¹² Reporters without borders, ‘[Transnational repression: the German federal government must protect Egyptian journalist Basma Mostafa](#)’, 7 July 2025.

²¹³ Interview with activists in Germany, October 2025.

²¹⁴ Author correspondence with German experts, November 2025.

²¹⁵ M. Michaelsen, [Restricting Freedom from Afar: Transnational repression and the authoritarian targeting of human rights in Europe](#), Friedrich Naumann Foundation For Freedom, December 2024.

and espionage, using existing legal and policy tools that often fail to address transnational repression below the criminal threshold. Despite there being a hotline within Germany's larger counter-espionage framework, there is a lack of support for targets of transnational repression, inadequate awareness of the threat among immigration and law enforcement officials, especially at local levels, and a lack of coordination within the federal government²¹⁶.

Sweden is another country within the EU where transnational repression has been a longstanding issue, albeit threats have grown more significantly in recent years. There have been acute incidents originating from Türkiye, Uzbekistan, Iran and Russia over the last 15 years that have driven home the scale of this problem. Most recently, threats from Iran connected to the Foxtrot network (see the Iran case study) have raised alarms about the risk of Iran-sponsored proxy activities in Sweden²¹⁷.

Sweden's approach to what is now called transnational repression dates back decades. Sweden is among a small number of countries in which there have been longstanding criminal statutes for 'refugee espionage'. Swedish law was widened through legal reforms in 2014 to encompass 'unlawful intelligence acts against an individual', an important distinction because most legal definitions of espionage encompass only acts against the state²¹⁸. Prosecutions and convictions under the law occur periodically and have recently addressed such activities against the Uyghur, Tibetan and Ahvazi Arab (from Iran) communities²¹⁹.

The fact that this law has been used in prosecutions and cases publicly reported on over many years by the Swedish Security Service has helped build basic awareness of the problem. However, as in other countries, exiles and diasporas lack clear mechanisms for reporting and engaging with Swedish authorities. Hence, outside security services' work, responses appear *ad hoc* rather than institutionalised. Particularly where a reported threat does not reach the criminal threshold, as is the case with coercion-by-proxy or digital transnational repression, authorities are reluctant to engage further, and as a result, targets of transnational repression can grow frustrated by the lack of response. Sometimes, the point of contact provided appears to be the Ministry of Foreign Affairs, even though it has no authority or responsibility for threats within Sweden²²⁰. Recently, Sweden came under political pressure from Türkiye to return journalists and dissidents to Ankara in exchange for Ankara dropping its block on Sweden's North Atlantic Treaty Organization admission. Sweden rejected some of Türkiye's highest-profile requests for extradition, but did return several individuals as a concession²²¹.

The Netherlands has recently adopted notable policies intended to address growing transnational repression in response to a series of threats, particularly emanating from Iran, China and Türkiye. This policy response falls under a broader effort to protect against 'unwanted

²¹⁶ Interview with activist in Germany, October 2025; Coalition Against Transnational Repression in Germany, [Policy Paper: Tackling Transnational Repression in Germany](#), April 2025. For more recommendations, see Coalition Against Transnational Repression in Germany, [website](#), nd.

²¹⁷ Sveriges Radio, '[Report: Iran tasking gangs with carrying out attacks](#)', 18 June 2025.

²¹⁸ A. Wackenhut, '[Tracing Shifting Host Country Problematicization\(s\) of Transnational Repression: The Evolution of Swedish Efforts to Counter 'Refugee Espionage'](#)', *Democracy and Security*, Vol 20, No 4, 2024, pp. 347-364.

²¹⁹ Y. Gorokhovskaia and I. Linzer, '[Case Study: Sweden](#)' in *Defending Democracy in Exile: Policy Responses to Transnational Repression*, Freedom House, June 2022.

²²⁰ Interview with Russian activist, September 2025.

²²¹ Euractiv, '[Sweden agrees to extradite man to Turkey in wake of NATO deal](#)', 12 August 2022.

foreign interference', which encompasses a range of other tactics, including transnational repression. In March 2025, the Dutch Parliament passed a new law criminalising 'diaspora espionage' and 'digital espionage'²²². A reporting point for threats has reportedly been piloted, though not fully established at the time of writing²²³. This follows the establishment of a 'table' among ministries, police and intelligence services for sharing information about 'unwanted foreign interference' and establishing response standards²²⁴. At the same time, the state is proactively communicating about this issue with the Dutch public.

A major report by the General Intelligence and Security Service, together with the National Coordinator for Security and Counterterrorism, addresses 'state-sponsored interference in diaspora communities', reflecting language similar to that in the UK, Australia and Canada²²⁵. The report discusses transnational repression as one amongst three elements of such interference, though the other two ('undermining influence through diaspora communities' and 'intelligence activities targeting diaspora communities') could both be included within a broader definition of transnational repression. The Security Service and National Coordinator for Security and Counterterrorism's 2025 Threat Assessment includes transnational repression as one of its named threats, focusing particularly on Iran²²⁶. Although the Dutch response is still quite fresh and comes after a number of serious acts of violence committed on Dutch soil, it represents a potentially promising set of responses adopting practices from other democratic states and pioneering a European approach.

The above responses are some of the more developed Member State efforts to address transnational repression. There are other, even more *ad hoc* responses showing that broad engagement exists across many different countries in the Union, albeit still shallowly institutionalised. France has established a new informational webpage and hotline for transnational repression under the General Directorate for Internal Security and defines the problem as a form of foreign interference²²⁷. In October 2025, French authorities arrested four men from Russia on suspicion of surveillance and plotting to attack an exiled Russian human rights activist²²⁸. Other elements of the country's response are not public, though some exiled activists are known to receive protection from French security services in acute cases. Danish politicians have called for a parliamentary investigation into China's use of transnational repression²²⁹. Although it is a prominent host state, Poland has not yet adopted detailed policies

²²² Government of the Netherlands, '[Legislation to be broadened to make more forms of espionage a criminal offence](#)', webpage, Press release, 18 March 2025.

²²³ Government of the Netherlands, '[Ongewenste buitenlandse inmenging \(OBI\)](#)' [Unwanted Foreign Interference (UFI)], webpage, nd.

²²⁴ L. van der Pol, M. Salomons and Y. Sharhani, '[We weten waar je woont](#)' [We know where you live], *Der Groene Amsterdammer*, 11 December 2024.

²²⁵ The General Intelligence and Security Service and the National Coordinator for Counterterrorism and Security, '[Crossing borders: state-sponsored interference in diaspora communities in the Netherlands](#)', 25 March 2025.

²²⁶ The General Intelligence and Security Service, the Defence Intelligence and Security Service and the National Coordinator for Counterterrorism and Security, '[Threat Assessment of State Actors 2025: Ongoing threats at a time of growing uncertainty](#)', 25 September 2025.

²²⁷ Ministre de l'Intérieur Direction Générale de la Sécurité Intérieure, '[Fight against transnational repression](#)', Press release, 26 December 2024.

²²⁸ Reuters, '[France's police arrest men suspected of plot against Russian dissident](#)', 17 October 2025.

²²⁹ S. Alecci, '[Danish politicians call for government inquiry into transnational repression following China Targets investigation](#)', *International Consortium of Investigative Journalists*, 7 May 2025. Switzerland has also commissioned research on the issue, see News Service Bund, '[Le Conseil fédéral adopte un rapport sur la situation des diasporas](#)'

explicitly addressing transnational repression domestically, though it has sponsored side events at the UN Human Rights Council and signed on to joint statements addressing the issue²³⁰.

At the level of foreign policy, a large number of Member States have acknowledged transnational repression and made commitments to address the problem, for instance by signing on to the 2024 joint statement at the UN Human Rights Council or a statement of principles for the 2023 Summit for Democracy organised by Freedom House²³¹. However, despite these different efforts, in most cases across the EU, Member States do not yet have well-defined or cohesive plans for addressing and preventing transnational repression²³².

5.2.2 European Union-level responses

It is clear that responses to transnational repression at EU level are still at an early stage of development. While Union bodies have undertaken some responses and Commission officials in different areas of responsibility are aware of the concept, there remains a significant gap in understanding and addressing the issue, especially as a problem within the EU (as opposed to its dimension as a matter of external policy).

The most active institution in terms of responding to transnational repression so far has been the European External Action Service (EEAS). Because the issue gained prominence through the work of global human rights organisations, Human Rights Division staff within the EEAS who frequently collaborate with such organisations were the first to take up this issue and press for engagement²³³. Starting some years ago, they escalated the issue within the EEAS and pushed for *ad hoc* responses to transnational repression, incorporating transnational repression into human rights dialogues. These include: raising acts of transnational repression against people within the EU with third countries; engagement with third countries in an effort not to extradite or unlawfully deport individuals; trial observation; multilateral coordination at G7 and UN levels; and public statements on instances of transnational repression. Additionally, the EEAS has engaged in a limited fashion with Member States about transnational repression on their soil, essentially relaying concerns that arise through the EEAS's regular work about the risk of certain origin states targeting specific individuals or communities in Member States. However, this process is also *ad hoc* and depends on information going from the EEAS to the Member State ministry of foreign affairs and from there to the Member State ministries in charge of immigration and home affairs, a burdensome communication sequence with uncertain results.

An additional area of activity has been EEAS's work on countering FIMI. Although this is a different problem from transnational repression, experts working on FIMI within the EEAS are also closely attuned to emerging human rights issues through their work with global civil society and expert communities studying authoritarianism. In terms of subject matter, there is also

[tibétaine et ouïghoure en Suisse](#) [The Federal Council adopts a report on the situation of the Tibetan and Uyghur diasporas in Switzerland], 12 February 2025.

²³⁰ Government of Poland, ['Human Rights Council concluded its 51st session in Geneva'](#), 10 October 2022.

²³¹ U.S Mission to International Organizations in Geneva, ['Joint Statement on Transnational Repression: As Delivered by Ambassador Michèle Taylor'](#), webpage, 26 June 2024; Freedom House, ['Declaration of Principles to Combat Transnational Repression'](#), webpage, nd.

²³² S. Alecci, ['Poor coordination, information gaps hamstring EU efforts to combat China's repression of overseas dissidents'](#), *International Consortium of Investigative Journalists*, 16 June 2025.

²³³ Interview with EEAS official, August 2025.

overlap between transnational repression and FIMI: the same networks that engage in FIMI are sometimes also responsible for transnational repression, which aims in part to suppress unfavourable information²³⁴.

In summary, the EEAS has begun adopting an institutional response to transnational repression within its work, albeit one that emerged bottom-up within the service. In early 2025, the EEAS prepared a non-paper for EU delegations around the world about transnational repression. This was followed by training for approximately 40 delegations in partnership with Human Rights Watch and the Office of the High Commissioner for Human Rights. The EEAS has also briefed on transnational repression issues at different working parties at the Council of the European Union²³⁵.

As far as the Commission and the Council are concerned, there are indications of awareness regarding this problem, but only in a limited capacity, without dedicated resources or personnel, and without dedicated strategic direction. The European Commission's Directorate General (DG) for International Partnerships deals with transnational repression through its Protect Defenders platform to support HRDs outside the EU and has increasingly had to address such cases²³⁶. Similarly, personnel working in the European Commission's DG for Justice and Consumers supporting civil society actors are familiar with transnational repression and see it within the scope of their work²³⁷. Separately, the Fundamental Rights Agency has included transnational repression in its analysis of challenges facing HRDs who enter and stay in the EU²³⁸. The Council has made clear that it condemns transnational repression, citing it in July 2025 as one of the reasons for sanctions being placed on the Zindashti Network and associated individuals (see section 4.2. Iran)²³⁹. The Council cited repression 'both in Nicaragua and abroad' as a reason to continue restrictive measures on the country in September 2025²⁴⁰. Furthermore, transnational repression was included as one of the EEAS's approved priorities at the UN Human Rights Council for 2023, 2024 and 2025²⁴¹.

However, there is as yet no coherent and directed policy on addressing this problem, particularly in areas intersecting with internal affairs within the EU. Other DGs not mentioned above but whose portfolio logically touches on transnational repression (such as DG for Maritime Affairs and Fisheries and DG for Migration and Home Affairs) do not appear to have dedicated workstreams related to the topic. The European Democracy Shield released in November 2025 included no mention of transnational repression and did not incorporate the issue into analysis and policy responses. The Civil Society Strategy, released at the same time, included references to the issue but focused, understandably, on HRDs. This indicates that the problem is not yet

²³⁴ Interview with EEAS official, September 2025.

²³⁵ Interview with EEAS official, August 2025.

²³⁶ Interview with European Commission official, September 2025.

²³⁷ Interview with European Commission official, October 2025.

²³⁸ Fundamental Rights Agency, [Protecting human rights defenders at risk: EU entry, stay and support](#), 11 July 2023.

²³⁹ Council of the EU, ['Iran: Council sanctions eight individuals and one entity over serious human rights violations and transnational repression'](#), Press release, 15 July 2025.

²⁴⁰ Council of the EU, ['Nicaragua: Council extends restrictive measures for another year'](#), Press release, 29 September 2025.

²⁴¹ Council of the EU, ['Council conclusions on EU priorities in UN human rights fora 2023'](#), Press release, 20 February 2023; Council of the EU, [Council Conclusions on EU Priorities in UN Human Rights Fora in 2024](#), 5311/24, 22 January 2024; EEAS, ['EU Priorities for UN Human Rights Fora in 2025'](#), Press release, 31 January 2025.

integrated into the Commission's broader thinking about how to respond to threats against democracy inside the EU²⁴². Interviews and outreach for this study found that while there was a willingness to engage in some discussion on the topic, many personnel lacked in-depth familiarity. They felt neither free nor qualified to enter into discussion without a mandate from the Commission. Hence, there is a cautious approach in terms of action from policy actors who are responsible for a wide range of issues and wary of adding another without clear direction, especially on a topic that spans different areas of competence.

The final section of the paper will now discuss this and other gaps in responses to transnational repression in the EU and provide recommendations for addressing them.

6 Conclusions and recommendations

As shown above, the EU has already demonstrated its awareness of the increasingly critical nature of transnational repression. This has been marked by the issuing of sanctions, the inclusion of transnational repression in the Council's annual conclusions on EU priorities in UN human rights forums and the co-signing of the G7 Leaders' Statement on Transnational Repression in June 2025. Members of the European Parliament have repeatedly raised this issue and various Commission officials interviewed for this report are familiar with the concept as well as its relevance in their areas of work. All Member States have also, at the very least, acknowledged awareness of the issue through participation in multilateral declarations and EU-level actions. A significant number of Member States have taken more substantive action domestically.

That said, there remains much more to do in formulating a European response to transnational repression. This is a threat to the rights of European residents, not only to citizens and non-citizens, but ultimately also to European democracy. It curtails the exercise of core freedoms of expression, association and assembly as well as undermining the rule of law within Europe. It merits a much more strategic, robust and coherent response than has yet been attempted.

Within a European response, the EU has an important role in a number of key areas, namely: officially defining the problem; collecting information and generating knowledge; setting best practices for responses; as well as ensuring that existing EU laws and policies are implemented in ways that incorporate awareness of transnational repression risks. Member States, meanwhile, are responsible for implementation within their own areas of competence, particularly when it comes to home affairs and immigration. Based on emerging policy responses in other democratic contexts, this study provides recommendations for both the EU and its Member States.

6.1 Developing an EU-wide response to transnational repression

The European Parliament and the Committee on Foreign Affairs (AFET) in particular can play an important role in setting the agenda for countering transnational repression in the EU and ensuring its fulfilment. Firstly, the European Parliament and AFET can ensure that the

²⁴² European Commission, '[EU Strategy for Civil Society](#)', '[European Democracy Shield](#)', 12 November 2025.

Commission does not continue to neglect this serious and increasing problem within the scope of its broader response to threats against democracy inside the EU. This can be achieved by holding hearings on transnational repression, including where appropriate in collaboration with other committees (such as the Special Committee on the European Democracy Shield, which has had its mandate extended). These hearings should invite targeted individuals who have experienced transnational repression inside the EU, particularly those who have sought support from European and Member State institutions and can provide insight into responses based on direct experience. The European Parliament and AFET can help highlight the practical obstacles to receiving support that individuals experience within Europe. Hearings should also draw on experts from the UN working on transnational repression, together with academics and civil society organisations, both inside the EU and in comparable contexts such as Canada, the UK and Australia. This is especially important as regards the issue of transnational repression through manipulation by origin states of asylum and migration processes, which crosses the responsibilities of multiple committees.

Secondly, the annual Common Foreign and Security Policy report and associated processes provide an opportunity to press for better responses from European institutions as a dimension of foreign and security policy. These can range from taking stronger diplomatic stances regarding perpetrators of transnational repression to collaboration with like-minded allies in coordinated responses at international forums.

6.1.1 EU-wide responses

Priority 1: Definition

For the EU to implement a strategy to address transnational repression effectively, the first priority EU-wide response should be **defining transnational repression**. This will help raise awareness of the problem, stimulate policy responses and provide a mark of commitment for action. However, such a definition is not a prerequisite for the other steps listed below. As discussed in section 5, even without adopting a formal definition of the term, given existing experience states can undertake extensive policies to address the issue. The adoption of a definition, though, will support all other goals, thereby improving their coordination and implementation.

The EU should adopt a definition of transnational repression containing the following components:

- It primarily targets people with a 'national connection' to the perpetrating state;
- It violates the rights of individuals who are being targeted;
- It is linked with foreign interference; and
- It should not seek to provide an exhaustive list of tactics, given that perpetrating states are continually evolving their approaches; hence, considering the approach taken by European institutions to hybrid threats, the definition should permit flexibility and adaptation over time.
- Additionally, the definition should stress Member States' obligations to support targets through proactive policy responses, as described further below in section 6.1.2.

For inspiration, this definition may draw upon the previously cited civic space brief from the UN Human Rights Office and the G7 Leaders' Statement on Transnational Repression²⁴³. Moreover, European and international civil society organisations leading on the issue should be consulted.

As a start, we recommend the following language: *Transnational repression occurs when states or their proxies act across borders to silence dissent. Transnational repression particularly targets people with a 'national connection' to the repressing state, among them nationals or former nationals as well as members of diasporas and those living in exile. Transnational repression seeks to interfere with the exercise of individuals' rights and should be understood as a form of foreign interference*²⁴⁴.

Such a definition may be adopted in a European Parliament resolution as a first step, calling on the European Commission, the Council and the EEAS to integrate this into its policies as well as day-to-day work, addressing transnational repression for the protection of democracy and rights within the EU. We recommend inclusion within the foreign interference spectrum in order to take advantage of synergies with policy responses to other foreign interference threats, although the adoption of the definition may also explicitly establish links with hybrid threats. However, unlike emerging models in Australia, Canada and the UK, we do not recommend that the EU adopt Union-level foreign interest transparency legislation. As discussed in section 5, such legislation should be seen as tangential to transnational repression, because it addresses only those activities that foreign principals choose to make overt, while covert activities by definition continue unabated²⁴⁵. Member States may continue to adopt their own programmes of foreign interest transparency regulation.

Priority 2: Institutional approach to information collection and knowledge generation

The second priority for the EU should be to create an institutional home for information collection and knowledge generation, which this study suggests should be called: a 'Knowledge Hub for Transnational Repression'. Although there are existing civil society and academic data projects dedicated to this problem and new studies are likely to emerge over the coming months and years, the EU can make an important contribution to transnational repression research and policy by developing and applying its own in-house data collection and expertise. Ensuring that there is ongoing, high-quality monitoring and research on this problem is essential to maintaining policy momentum within the EU and around the world. An institutional hub could become the source for direction on work responding to transnational repression across the different DGs and EEAS, ensuring that there is a cohesive response to the problem's many dimensions. It would also serve as the resource hub for Member States when they enact policies addressing the issue (see Member State recommendations below). A European hub could develop the

²⁴³ UN Office of the High Commissioner of Human Rights, [Transnational Repression: What is Transnational Repression?](#), 18 June 2025; A. Kananaskis, ['G7 Leaders' Statement on Transnational Repression'](#), *Prime Minister of Canada*, 17 June 2025.

²⁴⁴ Credit for some phrasing goes to Oxford Pro Bono Publico, [Transnational Repression of Human Rights Defenders: References, definitions and protections under international human rights law](#), September 2025.

²⁴⁵ This is setting aside other questions raised by European civil society groups regarding the legal authority and impact on freedom of association of the proposal for union-wide interest representation legislation, see: Civil Society Europe, ['Briefing Paper—Defence of Democracy Package'](#), April 2024.

personnel, training modules and expertise to support Member States with European solutions to the problem.

This report suggests two alternatives for where to house this hub. The first would be to build upon existing infrastructure at the EEAS that collects information on FIMI and add transnational repression to these responsibilities. Although FIMI is different from transnational repression, nevertheless, EEAS's Information Integrity & Countering FIMI Division has in place some of the most important elements for effective EU-wide data collection, *inter alia*: regional and country analysts with linguistic and cultural competency (including for some of the most important transnational repression perpetrators in the EU) procedures and personnel for establishing standardised classifications of open-source data²⁴⁶; connections with leading academics, civil society and human rights groups monitoring trends in global authoritarianism; as well as existing procedures for collecting, convening and sharing information among those tracking the issue, including Member State offices. Such a task would require an expansion of personnel and budget at EEAS to match these new responsibilities.

Another approach, either in addition or on its own, would be to place the Knowledge Hub within the planned European Centre for Democratic Resilience and specify transnational repression as part of the centre's mandate²⁴⁷. This would provide an institutional setting for generating new research on the issue, monitoring trends and presenting ongoing recommendations to policymakers. Because the centre has only just been announced, there is an opportunity to incorporate transnational repression into its portfolio from the start. If the centre receives sustained financial and political support for its mission, its mandate aligns well with the task of developing knowledge and policy-specific resources for countering the problem inside the EU²⁴⁸.

Whether it is through the EEAS or the European Centre for Democratic Resilience, the new Knowledge Hub should be responsible for producing an annual or semi-annual report on transnational repression within the EU. Such a report could, *inter alia*: document cases of transnational repression and trends in tactics; identify perpetrator countries in an actor-agnostic fashion; identify proxy activities; and analyse overlap between transnational repression plots and other foreign interference threats. This report could become a mechanism to support integration and coordination between EU internal and external policies for countering purposes.

Using knowledge generated by the hub, the EU can support funding opportunities for European and international civil society as well as researchers working on transnational repression. Especially following the foreign aid cuts in the USA, there is less support not only for civil society efforts to study and document the issue but also advocacy against the practice globally. Relatively small amounts of funding in this area through Horizon Europe for academic research

²⁴⁶ For an example of how FIMI-related coding could be applied to transnational repression, see M. Kolga et al., [Authoritarian reach and democratic response: A tactical framework to counter and prevent transnational repression](#), *Atlantic Council*, October 2025.

²⁴⁷ European Commission, ['Remarks by Commissioner McGrath at the plenary debate on the European Democracy Shield'](#), Press release, 10 September 2025; 'European Democracy Shield'.

²⁴⁸ A third option would be to set up a new 'Centre of Excellence' specifically for the study of transnational repression. However, creating a new body (rather than building out from established institutions) would entail longer start-up time and 'growing pains' in responding to an urgent issue – therefore, we do not recommend this option.

and the Citizens, Equality, Rights and Values Programme for civil society would have a large impact.

Other areas for EU action

There are other areas in which the EU should take action regarding transnational repression. These are not dependent on adopting a definition or establishing an institutional knowledge response but will be more sustainable and better supported if those priority steps are taken.

- Ensure that Member States **implement appropriate safeguards against the misuse of data-sharing mechanisms provided by states known to engage in transnational repression**, including bilateral processes such as mutual legal assistance treaties as well as Interpol notices and diffusions. This can be supported by providing regularised training so that personnel in immigration enforcement, asylum processes and judicial proceedings are familiar with such threats and the potential for abuse by external actors who may seek to manipulate host state institutions by having individuals investigated, detained or deported.
- **Ensure that designation of 'safe countries of origin' and 'safe third countries' within the context of the Pact on Migration and Asylum take into account practices of transnational repression by origin states.** As part of this, ensure that implementation of the EU Pact on Migration and Asylum is in compliance with the Charter of Fundamental Rights and relevant international law and does not create new opportunities for transnational repression. Information on the different practices prepared by EEAS (or, if above recommendations are adopted, by a new transnational repression knowledge hub housed at EEAS or the European Centre for Democratic Resilience) could feed into this decision. In the UK, for example, country policy and information notes used for migration processes include information on transnational repression where relevant²⁴⁹.
- **Encourage information-sharing** between Member State law enforcement and intelligence agencies on violent transnational repression plots. Because such plots often operate across various host states, it is essential to build practices of communication about emerging threats among Member States, possibly undertaken as part of implementing intelligence-sharing recommendations envisioned in the Safer Together report of 2024²⁵⁰.
- **Specify that digital transnational repression should be incorporated within the scope of 'systemic risks' covered by the Digital Services Act (DSA)** for which regulated platforms are responsible; civil society organisations with digital expertise should be consulted on how to define, measure and address the risk. Digital transnational repression fits squarely under activities that have negative effects on 'fundamental rights' as defined by the

²⁴⁹ See for example, Government of the UK, '[Country policy and information note: Gülenist movement, Turkey, August 2025 \(accessible\)](#)', webpage, nd.

²⁵⁰ S. Niinistö, [Safer Together Strengthening Europe's Civilian and Military Preparedness and Readiness](#), European Commission, 20 March 2024.

DSA²⁵¹. Once included, robust enforcement of the DSA is needed to ensure that platforms take action to stop digital threats.

- **Raise the cost of transnational repression activities** inside and outside the EU through the use of existing sanctions regimes: the EU global human rights sanctions regimes and the hybrid threats sanctions regimes. Existing regimes have adequate flexibility to address the problem, but must be applied more quickly and more aggressively to have an impact. Sanctions should be applied to proxy organisations who engage in transnational repression, as seen already in designations for the Zindashti Network for its activities on behalf of Iran.
- **Institutionalise trainings by EEAS for Member States and EU delegations on transnational repression risks**, so that consular personnel are able to identify threats and mobilise action against them in a timely fashion. Moreover, to help law train law enforcement personnel and improve the sharing of best practices, the EU could consider establishing a Member State agency-EU Agency for Law Enforcement Training-EEAS triangle.
- **Revise the EU Action Plan on Human Rights and Democracy as well as the EU Guidelines on HRDs to include the growing threat of transnational repression against HRDs**, as well as provisions for the protection and safety of HRDs as well as their financial support. Furthermore, the EU and host countries should address existing gaps in available mechanisms²⁵².
- **Lead diplomatic initiatives to support multilateral efforts against transnational repression**, including within the G7 and at the UN. The EU should coordinate with its likeminded allies, including the UK, Canada and Australia, taking the diplomatic initiative on the issue with host countries where there is a large volume of transnational repression, such as Türkiye and Thailand. Especially with the abandonment of policies to counter the problem in the USA, there is an urgent need and this is an ideal moment for European leadership²⁵³.
- **Systematically integrate policies to counter transnational repression into the EU's engagement with third countries and candidate countries**. Incorporating such policies in the case of candidate countries could be part of the current 'fundamentals first' approach to enlargement, where the opening or closing of chapters would be dependent on the country not engaging or aiding and abetting in the problem. Progress on accession and gradual integration into new EU's policy areas could also be made dependent, and reversible, on refraining from actions that assist perpetrators. In the case of third countries, the mainstreaming of such policies could result in the updating of existing

²⁵¹ European Board for Digital Services, '[First report of the European Board for Digital Services in cooperation with the Commission pursuant to Article 35\(2\) DSA on the most prominent and recurrent systemic risks as well as mitigation measures](#)', 18 November 2025.

²⁵² For additional recommendations on the most pressing issues regarding protection of human rights defenders from transnational repression, see: S. Furstenberg, M. Michaelsen and S. Anstis, '[Transnational repression of human rights defenders: The impacts on civic space and the responsibility of host states](#)', PE 754.475, *European Parliament Directorate-General for External Policies of the Union*, 2025.

²⁵³ N. Schenkan, '[Trump is Supporting Transnational Repression](#)', *Foreign Policy*, 8 October 2025.

agreements with strong human rights clauses, stipulating suspension in case of transnational repression. The European Parliament, in particular, could request that the Commission and the EEAS incorporate transnational repression into engagement with EU neighbourhood and accession countries, and could use its consent powers on accession treaties and association agreements to insist on such clauses.

6.1.2 Member State responses

Member State responses are essential to countering transnational repression effectively. Many responsibilities fall within immigration and home affairs competences; implementation rests on commitment and policymaking at the national level. There is no perfect recipe for addressing the issue, but there are a number of better practices that states have begun implementing and which can already be adopted.

- Firstly, and in line with the adoption of an EU definition, **Member States should adopt official definitions of transnational repression or make clear how it fits under existing foreign interference laws and policies.** Where there are existing policies to address foreign interference, this definition can be included within them as an amendment or an additional method, if it is not already present. As demonstrated in the examples given in section 5, the issue can be included under foreign interference as ‘interference with a democratic right’ – in other words, it is not always necessary to use the specific term. As at Union level, adoption of a definition is not a prerequisite for action, but it will facilitate coordination and policy effectiveness.
- Secondly, Member States should **each create and resource a national hub for receiving information about and responding to transnational repression incidents.** This may be as part of a larger framework for reporting foreign interference, such as the unwanted foreign interference hub in the Netherlands²⁵⁴ or it may be a standalone. However it is constructed, it is essential that the hub is supported through adequate training and resources. In particular, any reporting point must have enough support so that the targeted people who contact them receive relevant information and follow-up. A consistent finding not only in countries that have implemented reporting points, but also in interviews with affected exiles for this paper, is that individuals and communities using reporting points grow understandably frustrated and alienated when adequate support is not forthcoming. All tactics, even those that fall below the criminal threshold, take a severe toll on the targets. The fear and trauma inflicted may drive individuals to isolate themselves from their communities and broader civic participation. Deploying a hub should be supported by a policy process that seeks to address more widely the impact of this problem, rather than merely providing a quick first step that is narrowly focused on criminal accountability.
- Thirdly, Member States should adopt **policies for outreach** to affected communities. Such an outreach unit should be housed within the transnational repression/foreign interference hub. Availability should be clearly announced in public communications translated into all relevant languages through in-person contacts in as many regions/municipalities as possible, which may be done by federal/national officials, by

²⁵⁴ Government of the Netherlands, [‘Buitenlandse inmenging en beïnvloeding in Nederland’](#) [Foreign interference and influence in the Netherlands], webpage, nd.

municipal officials that have received training, or ideally by both. Additionally, it must be conducted on an ongoing basis to be effective. The purpose of outreach is to build trust and create relationships that will help identify threats before they become acute (namely, resulting in violence). Outreach should not be considered to have been concluded after one or even a number of contacts with a community; it will need to be sustained across time in order to be effective. Here as well, it is crucial to keep in mind that criminal investigations constitute a single tool, suitable for addressing only some forms of transnational repression. A comprehensive approach to outreach requires devising solutions for forms of transnational repression that fall below the criminal threshold or cannot be prosecuted due to jurisdictional issues.

- Fourthly, Member States should **enact new policies for sharing information across ministries and between layers of the state** (federal/national and local) to ensure that acute transnational repression plots can be identified and interdicted, such as an inter-agency task force. Especially as the role of proxies and gig-recruitment grows more important, it is important to identify and share information from diverse sources in a timely fashion. To provide a concrete example of this, America's awareness of the alleged Indian government assassination plots against Sikh activists in Canada and the USA came initially from a Drug Enforcement Agency investigation²⁵⁵. Additionally, and in line with recommendations given above regarding information-sharing across the EU, Member States should **institutionalise mechanisms for participation in union-wide information-sharing and for information-sharing between EEAS and relevant Member State ministries on transnational repression risks** specific to the Member State.
- Fifthly, Member States should **implement the recommendations from the European Parliament's Committee of Inquiry to Investigate the Use of Pegasus and Equivalent Surveillance Spyware** to address the threat of proliferation and abuse. Spyware enables an especially malicious form of digital transnational repression and it will require concerted action by Member States to address and eradicate the problem.
- Sixthly, Member States should **act promptly to expel diplomats and impose visa bans on individuals who are responsible for transnational repression activities, especially on EU territory**. While these tools have been used in the past, for example regarding Russian diplomats after the Salisbury poisoning in 2018, they have typically been reactive rather than proactive, which limits their effectiveness.
- Finally, Member States **in their foreign policies should provide diplomatic support for targets of transnational repression in third countries and should press at multilateral forums for counter-measures to be taken**. Support at the UN Human Rights Council for continuing scrutiny of transnational repression and for the work of the UN Human Rights Office on this issue are crucial to sustaining progress. Engagement at the G7 is essential to maintaining progress within that forum given the USA's retreat. Leadership in this area from European states on an individual and coordinated basis is **essential to ensuring momentum against transnational repression internationally is not lost**.

²⁵⁵ US Department of Justice, '[Justice Department Announces Charges Against Indian Government Employee in Connection with Foiled Plot to Assassinate U.S. Citizen in New York City](#)', Press release, 17 October 2024.

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