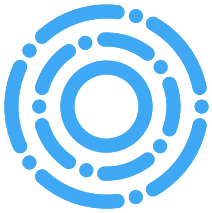
Transnational Repression:

Trends, Tactics, and Policy Recommendations



Orion Policy Institute

Research Report 7
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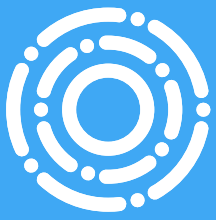

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The Orion Policy Institute organized two webinar series on Transnational Repression on September 28th and October 3rd, 2022. We extend our sincere gratitude to all the participants, whose names are listed below. The authors of this report greatly benefited from these webinars, particularly in developing policy recommendations.

The list of webinar panelists:

- Dana Moss, Associate Professor of Sociology at the University of Notre Dame
- Yana Gorokhovskaia, Research Director at Freedom House
- Marcus Michaelsen, Researcher at the Vrije Universiteit Brussels
- Mathieu Deflem, Professor of Sociology at the University of South Carolina
- Edward Lemon, Professor at The Bush School DC
- Noura Aljizawi, Research Officer, CitizenLab, University of Toronto
- Siena Anstis, Senior Legal Advisor, CitizenLab, University of Toronto
- Natalie Hall, Harriman Institute, Columbia University
- Jing-Jie CHEN, Safeguard Defenders

Research Report Series 7

Transnational Repression: Trends, Tactics, and Policy Recommendations

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Executive Summary

In one decade alone, 854 incidents of transnational repression[i] were reported worldwide, according to a recent Freedom House tally. This is a conservative number because majority of such incidents go unreported, leaving victims in fear, despair, and uncertainty. Today, at least 38 countries employ tactics of transnational repression in as many as 91 host states.

Targeting political exiles and dissidents has long been a practice of authoritarian regimes. As these regimes have become increasingly embedded in the global system, their censorship and propaganda activities and their repressive tactics have spread beyond their borders to invade the sovereignty of other nations. The most frequent perpetrators include the governments of China, Russia, Iran, Turkey, Egypt, and Tajikistan.

In what can be called the "toolkit" of authoritarian control, the hydra heads of transnational repression encompass tactics ranging from surveillance to harassment and intimidation, use of state media, assassinations, spyware, physical violence, abduction, rendition, forcible return, conspiracy, and collaboration with actors in the host country.

A pattern of cooperation with the host country's government emerges with most of the disappearances, extraditions, renditions, and forcible returns. These tactics may take advantage of the absence of rule of law and political rights or lack of awareness about the extent of the problem in the host country.

While an authoritarian regime may be intent on imposing its own standards on its citizens, few countries do this on their own. Collaboration and collusion between the state of origin and the so-called host country are uppermost in the toolkit of transnational repression.

Corruption, whether domestic or transnational, is also a significant factor that fosters the menace of authoritarianism beyond national boundaries. It leads not only to low public accountability in autocratic regimes but also to strong incentives for authoritarian rulers to build coalitions with different states and utilize these for transnational repression.

Bilateral relations between authoritarian regimes solidify silencing campaigns and therefore lead to further human rights abuses. Critics exposing state-sponsored

[i] The term transnational repression describes attempts by regimes to punish, deter, undermine, and silence activism in the diaspora.

corruption and state officials involved in this corruption are often targeted. These governments also collaborate with non-state actors such as organized crime networks and insurgent groups to silence dissents through physical assaults.

Surveillance and threats are among the aggressive tactics used by authoritarian regimes, and it is no surprise that dissidents and outspoken critics of those regimes such as human rights activists and journalists are prime targets. In some cases where the person in exile is difficult to reach, relatives at home are subjected to intimidation, criminal charges, surveillance, and other forms of harassment that impact their daily lives.

In this dark game of collusion, authoritarian regimes are quick to find alternative ways to suppress dissidents beyond their borders. These tactics and many others highlight the critical need for increased international understanding, collaboration, and safeguards to protect the vulnerable.

Manipulation via targeting family members, relatives, or loved ones who still reside within the repressive state's jurisdiction ranks high in the toolbox of repression. Such practices have been described as "coercion by proxy." With coercion by proxy making up around 15% of the known incidents of transnational repression between 1991 and 2019, authoritarian practices at home and abroad present yet more disconcerting challenges for policymakers and international jurisdiction. [1]

As yet another hydra-head of transnational repression, authoritarian regimes make use of the intergovernmental organizations and mechanisms originally established to improve international cooperation and collaboration in areas including security, economy, and regional development. INTERPOL, the intergovernmental organization for cooperation in law enforcement, offers a prime example of how autocratic regimes abuse international organizations through transnational legitimation. Intended to bring criminals to justice and counter threats to national and global security, it is nevertheless open to abuse among authoritarian states for transnational repression.

The digital dimension of transnational repression, designed to surveil, threaten and harass activists and dissidents living abroad, is rapidly becoming a more sophisticated part of everyday transnational repression. Its spread is facilitated by enhancing the mechanisms available to authoritarian states to undertake repressive activities through cooperating in cross-border security, deploying digital surveillance technologies and hacking attacks. Furthermore, the digital form of transnational repression makes adept use of online harassment, disinformation campaigns, and informal networks composed of security agents and non-state actors.

Ongoing efforts to reshape cyberspace into the pattern of authoritarian preferences are only part of larger efforts to influence the global media space. Through digital transnational repression, autocrats erode public trust in democratic institutions, increase their own control, and undermine civil liberties.

Transnational repression is often difficult to detect or determine with certainty. A massive blind spot hides the recognition of transnational repression. The lack of a universally recognized legal framework and principles on transnational repression provides authoritarian states with an opportunity to extend their reach beyond borders, often using the pretext of counter-terrorism or fighting corruption to target and silence their critics abroad.

Traditional national security frameworks focus on threats posed by foreign states against territorial integrity, sovereignty, and international human rights norms, such as the responsibility to protect. While every country has its laws governing defined jurisdictions, a few of them have begun to consider ways to better integrate measures against transnational repression into their national security framework.

Although the issue of transnational repression has gained more traction among the US and European policymakers, the scope of such policies is rather limited and there are gaps in implementing these policies more effectively. There needs to be more international cooperation and collaboration, for domestic responses can provide only partial solutions to the rising threat of transnational repression due to the global spread of authoritarian control.

Our report provides policy recommendations and steps to address the gaps and improve policy practices and

research. These recommendations are organized under six sections: legal framework, international cooperation, law enforcement, victim support, civil society, and research. Some of the key recommendations from the report are provided here:

- International law should prioritize countering transnational repression and hold authoritarian regimes accountable for their human rights violations abroad. Economic sanctions empowered by international agreements could have deterrent effects on such regimes.

- Host countries must change how they perceive transnational repression and the activities of authoritarian regimes. The host countries need to view these activities not only as another state's challenge to their sovereignty and national security but also as violations of democracy, human rights, and the rule of law. This change will require enacting new laws, using counterintelligence measures, and enhancing international cooperation against transnational repression.

- A common language across democratic states and international organizations needs to be developed to track transnational repression activities, raise awareness, and form the basis for developing a unified policy response.

- More effective and targeted sanctions need to be imposed on governments engaging in transnational repression.

- Law enforcement agencies should share information about transnational repression cases and collaborate in investigating these cases more closely.

- Barriers to report the incidents to law enforcement should be removed or mitigated through raising awareness and enhancing the ways for the victims to access support.

- The intimidation tactics, threats, or other transnational repression tactics are often difficult to detect or prove, which may prevent the victims from reporting the incident. Law enforcement agencies must be proactive and facilitate reporting, assisting victims and conducting a thorough investigation.

- First-aid helplines should be created for victims of transnational repression so that they can find already existing services, including police, physical and mental health facilities, and legal services.

- Commitment and strong social capital in the diaspora could help dissidents cope with the trauma and silencing effects of transnational repression. Social, economic, and institutional support should be provided to diaspora communities to enhance their resilience.

- Beyond government policies, public support of vulnerable communities, dissemination of information about available resources, strengthening the resilience of diaspora and exiles, cooperation with the media and civil society organizations, and increasing awareness and preparedness among law enforcement agencies are essential for countering transnational repression.

Introduction

> **Today, at least 38 countries employ tactics of transnational repression in as many as 91 host states and the true dimensions of human rights begin to emerge.**

When asked the meaning of "transnational repression," most people would respond with a blank or confused stare; a small number would suggest that it sounds like something stemming from legal jargon. Upon learning that the term refers to the experiences of emigrants or refugees who leave their authoritarian homelands to seek safety in a more democratic environment, most are likely to visualize a tale of triumph, to think of the happy few with the good fortune to be alive and free.

This picture, however, is far from the truth. As many political immigrants discover, crossing borders does not mean that they are free or safe. Borders are no more than geographical demarcations. Oppressors do not stop their pursuit and harassment. Just as fugitives carry their bags filled with the flotsam and jetsam of their previous lives, so also, in a sense, they carry the abuses of their homelands with them—or rather, the abuses pursue them.

A further problem lies in the term itself, in the very incapacity of words to transmit their multiple meanings and connotations. "Transnational repression" serves to obfuscate and even sanitize the myriad of causes and effects that it denotes. Only by understanding the hydra-like faces of this term can modern states, organizations, and individuals take action to combat this growing threat to human rights.

In one decade alone, 854 incidents of transnational repression[ii] were reported worldwide, according to a recent Freedom House tally. This is a conservative number because majority of such incidents go unreported, leaving victims in fear, despair, and uncertainty. Today, at least 38 countries employ tactics of transnational repression in as many as 91 host states.

At the core of this problem is a new breed of authoritarian states whose leaders do not hesitate to transgress

[ii] Variously called extraterritorial repression or global authoritarianism, the term transnational repression describes "attempts by regimes to punish, deter, undermine, and silence activism in the diaspora" (Moss 2021, 71). With the need for a more systematic and strategic approach, extra-state repressive activities are now commonly called 'transnational repression'.

international laws that have long served as foundations of global governance. Their objective is the consolidation of power, and their methods are to harass and silence dissident voices abroad. Examples of these abuses abound, from China's persecution of the Uyghur diaspora to Iran's and Russia's kidnapping and execution of political exiles to Turkey's attempts at the rendition, abduction, and forcible return of dissidents. The list continues. Borders are indeed fluid as autocracies target their dissidents abroad.

In this growing area of research,[2345] cross-national datasets on transnational repressive actions have now emerged; other notable advances have also been made in illuminating this shadowy world by laying out its patterns, illustrating its intersection with other transnational issues, providing policy recommendations,[6] and even offering toolkits and training on its mitigation.

Any enterprise of this sort is, however, fraught with challenges. For instance, in dealing with authoritarian states where secrecy abounds, how reliable are the gathered data? And how to expose the ploys of powerful secret service systems fed by informants both in the homeland and the host country without endangering the safety of the victims of repression, alongside that of the family and friends they have left behind? These are among the questions the current study seeks to answer.

Global Scope of Transnational Repression

> **Autocracies are founded on the control of individuals and the masses. While some of their methods– surveillance, intimidation, manipulation, threats, false confessions, coerced returns, enforced disappearances, lies blended with wisps of truth, and many more—have been staples of authoritarian power throughout the ages.**

Targeting political exiles and dissidents has long been a practice of authoritarian regimes. As these regimes have become increasingly embedded in the global system, their censorship and propaganda activities and their repressive tactics have spread beyond their borders to invade the sovereignty of other nations. Based on the data provided by Freedom House, the most frequent perpetrators include the governments of China, Russia, Iran, Turkey, Egypt, and Tajikistan. (See Figure 1.)

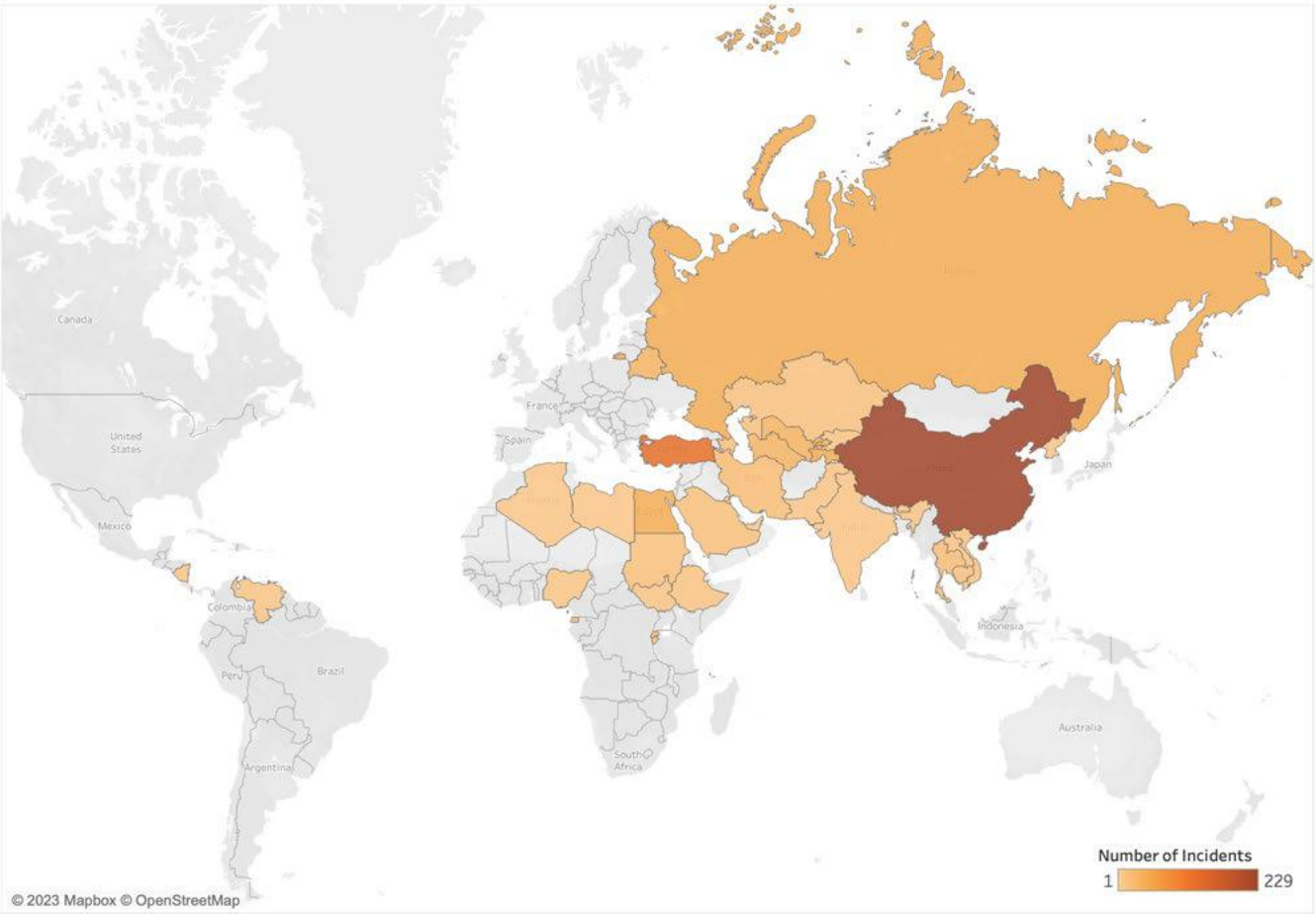

Figure 1. Origin Countries of Transnational Repression (2013-2022) Source: Freedom House

Mapping the Tactics of Transnational Repression

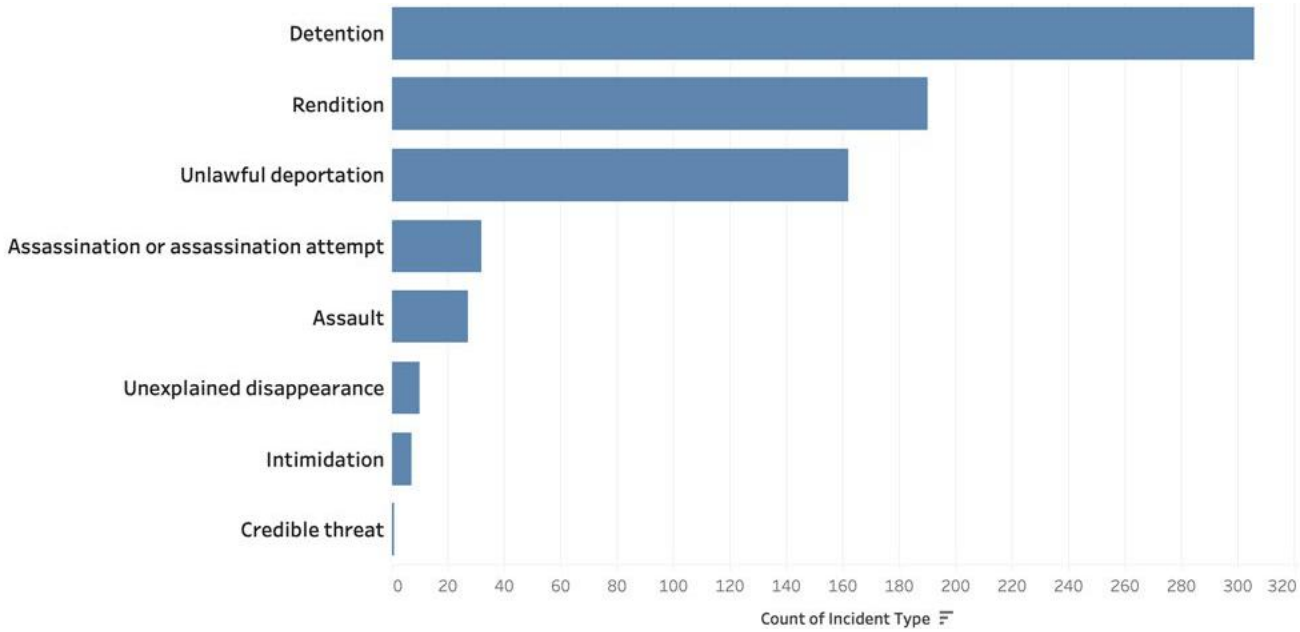

Figure 2. Tactics of Transnational Repression (2013-2022) Source: Freedom House

In what can be called the "toolkit" of authoritarian control, the hydra heads of transnational repression encompass tactics ranging from surveillance to harassment and intimidation, use of state media, assassinations, spyware, physical violence, abduction, rendition, forcible return, conspiracy, and collaboration with actors in the host country. (See Figure 2 for a list of the most common tactics of transnational repression based on Freedom House data.)

Even though efforts to document incidents of transnational repression have increased in recent years,[iii] current records fall short in capturing the full scale and significance of the threat. With the global rise of authoritarian regimes, it is increasingly crucial to understand the extent and methods whereby these regimes carry out repressive actions against their own citizens abroad. Furthermore, it is essential to identify and implement safeguards to prevent transnational repression. Understanding and action are the tools to combat these infringements of basic human rights.

Consequently, this policy report delves into the intricacies of transnational repression, exploring instances where governments are the perpetrators of such repression and how their activities are manifest abroad. This report provides policymakers, decisionmakers, academics, and the public at large with a comprehensive understanding of the perpetrators, goals, strategies, and impacts of transnational repression, its effects on individuals within the diaspora, and the challenges faced by host countries. Ultimately, this analysis aims to inform policy discussions and promote robust measures to safeguard human rights and protect vulnerable populations.

Autocracies are founded on the control of individuals and masses. While some of their methods– surveillance, intimidation, manipulation, threats, false confessions, coerced returns, enforced disappearances, lies blended with wisps of truth, and many more—have been staples of authoritarian power throughout the ages, modern dictatorships have developed an astute ability to learn, develop, and adapt old and new methods of repression, both at home and abroad. Today, authoritarian states employ an extensive number of repressive tactics aimed at silencing dissidents abroad, and the repertoire is ever-expanding. Alongside the “classic” methods listed above, the focus now is increasingly on conspiring with host

[iii] Some examples of the datasets on cases of transnational repression are the Authoritarian Actions Abroad Database (AAAD), Central Asian Political Exiles Database (CAPE), China's Transnational Repression of Uyghurs (CTRU), Freedom House

countries, as well as the co-option of national corporations and state-backed policy institutions. Such actions are carried out within patterns of international mobility and finance and with the use of digital technology.

The following section sheds light on these tactics with several cases demonstrating how authoritarian states utilize them.[iv]

[iv] In this report, we used a slightly different categorization of transnational repression tactics from those of the Freedom House, which has a typology based on the tactics involving state actions such as retention, rendition, and assault. Instead, we categorized the direct tactics based on national and international instruments and indirect tactics to facilitate transnational repression.

Conspiring and Collaborating with Actors in the Host Country

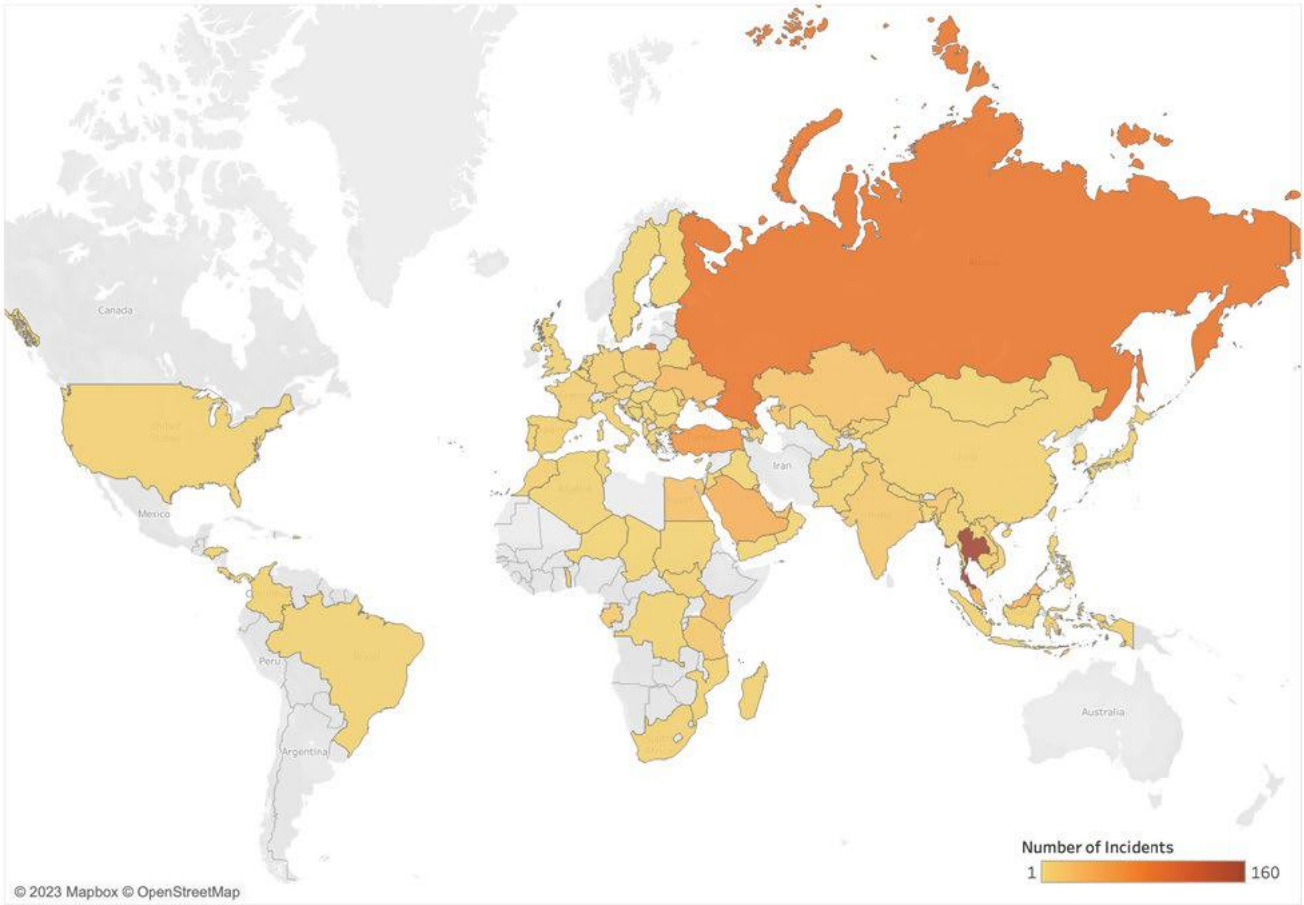

Figure 3. Host Countries Where Transnational Repression Took Place (2013-2022) Source: Freedom House

> **Whether through naivety or lack of further opportunities, many political exiles are caught in the net of fleeing to a host country that has similar autocratic norms and interests to the one they are leaving, and there they find themselves subject to persecution, arrest, or forcible return.**

A pattern of cooperation with the host country's government emerges with most of the disappearances, extraditions, renditions, and forcible returns. These tactics may take advantage of the absence of rule of law and political rights or lack of awareness about the extent of the problem in the host country. The host countries that appear most in the Freedom House data on transnational repression cases are Thailand, Russia, Turkey, Saudi Arabia, and Malaysia. (See Figure 3).

While an authoritarian regime may be intent on imposing its own standards on its citizens, few countries do this on their own. Collaboration and collusion between the state of origin and the so-called host country are uppermost in the toolkit of transnational repression. Whether through naivety or lack of further opportunities, many political exiles are caught in the net of fleeing to a host country that has similar autocratic norms and interests to the one they are leaving, and there they find themselves subject to persecution, arrest, or forcible return.

This collaboration is often carried out with the assistance of local law enforcement or intelligence agencies and plays a significant role in locating and targeting the victims. With the chain-of-command structure in the process of following orders from autocratic leaders, the security and intelligence agencies of the host country frequently collaborate with their counterparts abroad. It is appropriate that the Latin origins of "collusion" mean "to play together." In short, countries that play the same abusive "games" are often in collusion.

There is no shortage of examples. Among cases that made international headlines are the 2018 Khashoggi murder by

Saudi authorities in Istanbul and the poisoning of former military officer Sergei Skripal by Russian agents in Britain in 2018. Others remain relatively obscure for a variety of reasons, such as the host country's common foreign policy interests with the repressive government, inadequate documentation and awareness, and the inability of the targeted diaspora to voice these incidents due to fear of further victimizations.

Few people, for instance, are aware of the plight of Azerbaijani activists and journalists who fled to neighboring Georgia in the wake of the 2014 crackdown on civil rights in their own country. The close relationship between Azerbaijan and Georgia, however, put them at renewed risk. In 2017, for example, journalist Afgan Mukhtarli was abducted in Tbilisi and handed over to Azerbaijani officials after having been beaten and transported by Georgian-speaking agents wearing police uniforms.

Furthermore, few media outlets have reported the deportation of Uyghur and Turkmen nationals from Tajikistan and Turkey since late 2018. In 2019, four Uyghur nationals, including a woman named Zinnetgul Tursun with two little children, were deported from Turkey to Tajikistan, and then ended up in China. Likewise, not many have learned about the surveillance of Carine Kanimba, daughter of the Rwandan politician Paul Rusesabagina, who was abducted by Rwandan authorities in 2020. After Carine publicly appealed for her father's release, she found herself under surveillance–even though she was living in Belgium.

Particularly notorious in this context, Iran has been widely criticized for its extensive acts of transnational repression, particularly against political dissidents, human rights activists, and ethnic and religious minority groups. The Iranian government often conspires with host countries to monitor and harass its diaspora, using tactics such as intimidation, blackmail, and threats against individuals and their families. Often, other Middle Eastern countries are willing collaborators. In 2011, for instance, the Iraqi government handed over to Iran some members of the Mujahedin-e Khalq (MEK), a group known to oppose the Iranian government. In a second instance, after Turkey and Iran strengthened their bilateral relations, many Iranian dissidents were deported from Turkey to Iran between 2017 and the end of 2022. Notably, in December 2019, the Turkish government returned a dissident group of 33 Iranians, some of whom were subsequently sentenced to death.

Surprisingly, such collaboration is not limited to authoritarian regimes. In 2019, for example, Sweden came under scrutiny by human rights organizations for allegations of secretly cooperating with Iranian authorities to return and deport Iranian asylum seekers to Iran despite the risk of persecution.

Apart from Iran, China is another prime offender in this context, particularly in its persecution of its Uyghur minority, who have never been safe even when they flee abroad. Using a wide range of tactics, the Chinese government finds ways to intimidate them, even pressuring the host countries for their return. Among many examples of the Chinese transnational reach is the kidnapping of the Swedish publisher Gui Minhai, a Hong Kong-based bookseller, by Chinese security forces while on vacation in Thailand in 2015. He was subsequently incarcerated in China for having published books critical of the Chinese government (see Figure 4).

Furthermore, Belarusians who sought refuge in Russia after the violence unleashed following Lukashenka's reelection as president were among the most vulnerable to transnational repression in 2021. Russian law enforcement authorities repeatedly facilitated Lukashenka's political persecution campaign by detaining and deporting Belarusian opposition leaders and activists. Since the outbreak of war between Russia and Ukraine, however, Belarus has allegedly returned the favor by assisting in the deportation of 19,000 children from Russian-occupied areas of Ukraine, even providing some of their housing facilities.

Apart from Belarus, Tajikistan also received aid from Russian authorities in the expulsion of human rights defenders such as Izzat Amon, who operated an NGO in Moscow for 20 years but was deported in 2021. Numerous other Central Asian diaspora members who engaged in political activism were similarly extradited by Russia even without formal requests from their states of origin.

Corruption, whether domestic or transnational, is also a significant factor that fosters the menace of authoritarianism beyond national boundaries. It leads

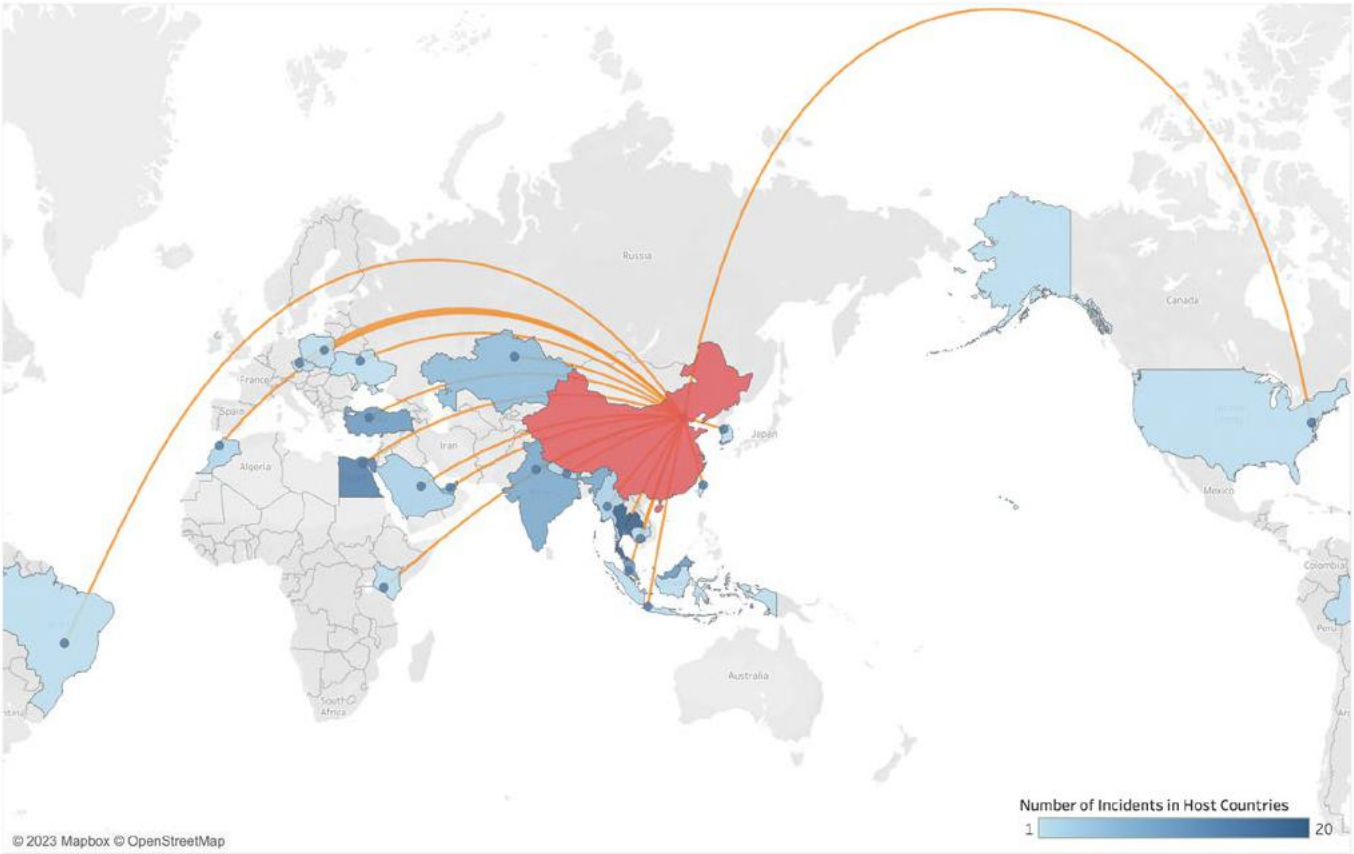

Figure 4. China as an Origin Country of Transnational Repression and Host Nations (2013-2022) Source: Freedom House

not only to low public accountability in autocratic regimes but also to strong incentives for authoritarian rulers to build coalitions with different states and utilize these for transnational repression. Bilateral relations between authoritarian regimes solidify silencing campaigns and therefore lead to further human rights abuses.

Critics exposing state-sponsored corruption and state officials involved in this corruption are often targeted. For example, it has been reported that the Turkish government bribed local officials in many developing countries to abduct Erdogan critics and forcibly return them to Turkey. In one of the most prominent examples, Sergei Magnitsky, the lawyer for Kremlin critic Bill Browder, was murdered in 2009 by Russian authorities for helping Mr. Browder expose Putin's misrule. Mr. Browder emerged as a champion of accountability; however, Russia embarked on more than a decade-long campaign to silence him in response.

Sergei Magnitsky was only one victim among many. Similar cases stem from Central and Southeast Asian countries. Following the 2014 military coup d'état, many Thai political dissidents have disappeared in Laos since they went into exile. In 2021, Thai authorities deported activists to Cambodia even though they were recognized as refugees by the UNHCR. The Defense Ministry reported that over 30,000 were deported during the first 10 months of 2021.

In a similar case, Namunjon Sharipov, a senior leader of the Islamic Revival Party of Tajikistan (IRPT), was forced to return to Tajikistan from Turkey—the Tajik government characterized it as voluntary return—even though he faced terrorism charges in his country. In 2018, with the help of the Turkish police, Tajik officials took custody of Sharipov from a detention center in Istanbul and forced him on a plane to Tajikistan. Shortly after, Sharipov stated in Radio Liberty's Tajik service that he had 'returned voluntarily' to Tajikistan[7]. Several other opposition members have since been forced to make similar public statements, illustrating a tactic used to mask forcible return.

The position of Turkey in this collisional "game" of transnational repression is foremost because it has

been considered concurrently a country of origin, the perpetrator of transnational repression, and a host country where the repressive activities of other authoritarian states take place. Apart from cooperating with other authoritarian states, Turkish authorities have increasingly engaged in rendition, abduction, and the forcible return of political dissidents since the abortive coup in July 2016 (see Figure 5). To this day, dozens of victims have been forcibly returned by the government, and the whereabouts and fate of many remain unknown. Some families have applied to the European Court of Human Rights and the Office of the United Nations High Commissioner for Human Rights for Justice against these transgressions. However, the Turkish authorities have yet to effectively investigate any of the cases.

The State Department's 2022 Country Reports on Human Rights Practices in Turkey reported that the Turkish government increasingly coordinated with other authoritarian states to forcibly transfer more than 100 Turkish nationals to Turkey since the 2016 coup, and more than 40 individuals were subjected to abduction, rendition, and forcible return. A letter sent to the Turkish government in 2020 by the responsible UN Special Rapporteur condemned "the systematic practice of state-sponsored extraterritorial abduction and forcible return of Turkish citizens from many countries."

In this letter, UN representatives stated that victims were first spied upon in the host country and then abducted: "Victims remain missing or incommunicado for weeks before being deported. During this time, they are often subjected to pressure, torture, and humiliation to coerce them into consenting to be taken to Turkey or to extract confessions for trial in Turkey. They are denied access to medical care and legal aid, and their families are not informed. Victims report repeated torture by intelligence officers, mainly sleep deprivation, beatings, waterboarding, and electric shocks." While Turkish government neither denies nor hides the abductions, these acts are publicly promoted and glorified by government-led media, and the victims are presented in handcuffs before disappearing.

Yet another country, Saudi Arabia, encourages its citizens to visit embassies or consulates abroad, where they have been duly apprehended. In 2018, the Saudi Embassy in Cairo contacted Prince Khaled bin Farhan al-Saud, a critic of the regime's human rights violations, ostensibly to "mend relations" by offering him $5.5 million. He was told that he could "collect the payment only if he came to a Saudi embassy or consulate in person." [8]

These governments also collaborate with non-state actors such as organized crime networks and insurgent groups to silence dissents through physical assaults (e.g., Tamil Alam in Sri Lanka) [9]. Journalists and opposition figures abroad have been frequent targets of the Turkish government. Can Dundar, Cevheri Guven, Erk Acasrer, and other journalists living in exile in Europe and the United States have been on trial in absentia in Turkey for alleged terrorist links. For example, since going into exile, Can Dundar and Cevheri Guven have faced numerous threats, and the Turkish government initiated the seizure of their assets in Turkey. Another journalist, Erk Acarer, was attacked by three individuals who beat him outside his apartment in Berlin.

Surveillance and Targeting of Dissidents in their Host Countries

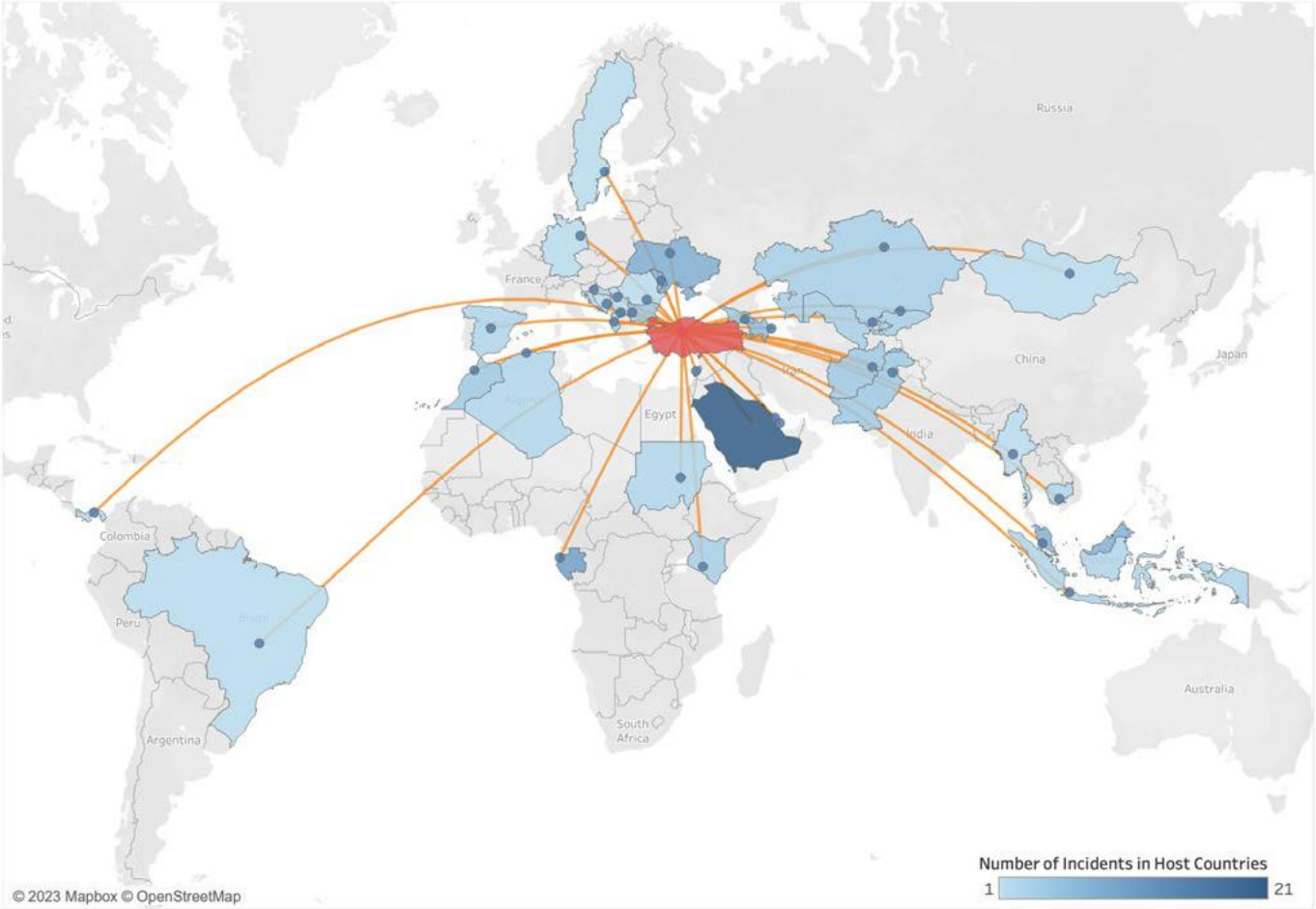

Figure 5. Turkey as an Origin Country of Transnational Repression and Host Nations (2013-2022) Source: Freedom House

> **“Diaspora activists have the potential to make meaningful changes. By speaking out against oppressive regimes, organizing protests, countering propaganda, and raising awareness of human rights abuses, they can draw global attention to crises and spur humanitarian efforts. Therefore, the control of these “troublemakers” in the diaspora is critical for the survival and legitimacy of authoritarian regimes.”**

Surveillance and threats are among the aggressive tactics used by authoritarian regimes, and it is no surprise that dissidents and outspoken critics of those regimes such as human rights activists and journalists are prime targets.

The need for controlling diasporas furthermore goes beyond the outspoken critics, and entire diaspora communities can be subjected to surveillance.

Here again, Iran is one of the prime offenders. The extent of Iran's repressive tactics can be seen in its activities in Europe and the United States. Recently, for instance, Iran has pressed Turkey to extradite political dissidents and opponents of the Iranian government. These situations have sparked worries about the deterioration of democratic values and possible state cooperation in repressing dissent. Over the past few years, Iranians and Kurdish Iranians have vanished, with some of them later turning up dead while the whereabouts of many are still unknown. After the deportation of 33 Iranian Kurdish activists to Iran

[v] The incidents depicted on the map above, pertaining to transnational repression incidents originated from Turkey and took place in Germany and Sweden, are derived from additional data that is not included in the Freedom House Database. These incidents were collected from publicly available sources and should be considered as supplementary information to the Freedom House Transnational Repression database.

by Turkey, nobody could obtain any information about the well-being of these people. State-affiliated media outlets in Iran accused the deported activists of working together with the opposition Komala Party from Iranian Kurdistan, which Tehran views as a terrorist and separatist organization. In another murder that has been carried out recently in Turkey, Masoud Molavi was shot eleven times and killed in Istanbul in November 2019. Three months prior to his death, Molavi—a dissident of the Iranian regime— had posted a message on social media criticizing the Islamic Revolutionary Guard Corps (IRGC).

As above, Russia plays a menacing role in pursuing dissidents beyond its borders (see Figure 6). In a widely publicized example, Sergei Skripal, a former Russian military intelligence officer, and his daughter Yulia were poisoned in 2018 with a nerve agent in Salisbury, UK. The UK government claimed that the attack was carried out by Russian operatives. Similarly, Alexander Litvinenko, a former Russian intelligence officer and outspoken critic of the Russian government, was poisoned with the radioactive substance polonium-210 in London, UK, in 2006. An investigation by British authorities concluded that the assassination was carried out by two Russians with ties to the Russian security services. In a more recent case, Imran Aliev, a Chechen dissident and blogger critical of the Russian government, was found murdered in a hotel room in Lille, France, in 2020. These cases highlight the reach of Russia's transnational repression in monitoring and targeting dissidents in host countries.

In this context, China again is at the forefront. One notable case is that of Dolkun Isa, a prominent Uyghur activist and president of the World Uyghur Congress. Dolgun Isa is the author of "The China Freedom Trap," detailing his experiences as a Uyghur activist and political figure in the West and the subsequent obstacles he faced from China's global influence. In 2017, as a result of the abuse of an INTERPOL Red Notice by Chinese authorities, Isa was detained but subsequently released in Italy.

These instruments are utilized systematically by the Uzbek government, which "designed a system where surveillance and the expectation of surveillance [abroad] is not the exception, but the norm." Journalists, government critics, and human rights defenders who have fled to Europe are often "too afraid to contact their loved ones at home due to the terrible risk it can expose them to." Uzbekistani surveillance systems provide the government with direct access to telecoms data and ensure that hundreds of dissidents are monitored and their contact with the people inside the country is limited.

In other instances, surveillance and threats are targeted toward dissidents. In 2017, the Turkish government requested assistance from German authorities in its surveillance of hundreds of Turks living in Germany. Turkish intelligence services shared detailed personal information about targeted individuals with their German counterparts, including addresses, phone numbers, and photographs. This long-distance surveillance mostly included members of Kurdish opposition, journalists, and members of the Gulen movement. The Turkish government even developed a smartphone application for its diaspora community in Germany to report potentially targeted individuals to Ankara.

Such unlawful surveillance tactics keep families apart and continue to harm freedom of expression around the world. For example, the Chechen community in Germany, around 50,000 people, has been the target of threats by the Kremlin-backed regime of Ramzan Kadyrov in the autonomous Russian republic of Chechnya. Movsar Eskarkhanov, the first gay Chechen to publicly criticize Kadyrov, was warned of repercussions unless he renounced his views in an interview with a Chechen state broadcaster.

In some instances, the host country's indifference enables abuse, as in the case of Mahammad Mirzali, a political exile from Azerbaijan who was stabbed in France in 2021. Before the attack, he had received numerous text messages with threats that he would have his tongue cut out. In spite of reports to police that he was being followed, the response was slow and inadequate. His supporters later claimed that the French police were reluctant to investigate the attack. Thus, the host country's lack of concern and response compounds transnational repression, further putting the lives of dissidents at risk and infringing upon universal human rights laws and standards. Most cases remain out of the public eye due to the host country's foreign policy concerns with the repressive government, lack of interest, inadequate documentation and awareness, and the target population's inability or lack of resources to voice their victimization.

In this dark game of collusion, authoritarian regimes are quick to find alternative ways to suppress dissidents beyond their borders. For example, Turkey's ruling AKP, according to German authorities, utilizes AKP-affiliated journalists to involve themselves in the "dangerous" dissemination of other journalists' personal data. In other words, it is alleged that the Turkish government uses journalists working for AKP-affiliated media outlets to collect intelligence about journalists in exile. These tactics and many others highlight the critical need for increased international understanding, collaboration, and safeguards to protect the vulnerable.

Proxy Punishment or Coercion by Proxy

> **Manipulation via targeting family members, relatives, or loved ones who still reside within the repressive state's jurisdiction ranks high in the toolbox of repression.**

As noted above, crossing borders does not mean that political exiles truly leave behind the repression in their states of origin. Manipulation via targeting family members, relatives, or loved ones who still reside within the repressive state's jurisdiction ranks high in the toolbox of repression. Such practices have been described as "coercion by proxy."

Here again, a host of examples serves to illustrate the practice. The Iranian regime very often uses coercion by proxy, whereby family members in Iran are threatened or detained to silence dissidents or force them to return. Mansoureh Shojaee, a women's rights activist, once noted that people are held hostage in Iran to restrict the activities of political activists abroad and prevent them from protesting human rights abuses in Iran. For instance, the sister of journalist and activist Masih Alinejad was forced to disown her on state television, and in 2020, her brother was arrested and sentenced to eight years in prison. In another case, Farangis Mazloom, the mother of imprisoned journalist Soheil Arabi, who was awarded the RSF Press Freedom Award in the citizen-journalist category in 2017, was sentenced to six years in prison in 2020 by the Tehran revolutionary court on charges of plotting against state and anti-government propaganda. In another form of punishment by proxy, Iranian authorities often confiscate the passports of the loved ones of exiled dissidents, thereby preventing them from travel. Again, activist journalists and dissidents who appear in influential news organizations or in international media are a favorite target, and proxy punishment serves to constrain and retaliate against them via threats against their families and friends.

The current Burundian government demonstrates how far punishment by proxy can go. Burundi has a historical record of intimidation, assassinations, and coercion by proxy incidents, as in the case of Pierre Claver Mbonimpa, a human rights activist who fled to Belgium after an assassination attempt in 2015. As a punitive measure, Burundian security forces killed his son and son-in-law. Apart from Mbonimpa, some of the families and relatives of over 300,000 dissidents who fled the country in 2016 were threatened, attacked, or killed through government-controlled youth militia that operate beyond Burundi's border in Rwanda, Tanzania, Kenya, Sudan, and the Democratic Republic of Congo.

Furthermore, coercion-by-proxy practices have become commonplace in Egypt following the 2013 reconsolidation of the military regime. Between 2016 and 2019, the family members of 29 journalists, media workers, and activists who were living abroad were targeted by the government. The homes of their relatives were raided, some were banned from travel or had their passports confiscated, and in 11 cases, relatives were arrested or unlawfully prosecuted. Similarly, political dissidents in Turkey "become targets of state-led coercion-by-proxy strategies" through travel bans imposed by the Turkish government against their relatives.

With coercion by proxy making up around 15% of the known incidents of transnational repression between 1991 and 2019, authoritarian practices at home and abroad present yet more disconcerting challenges for policymakers and international jurisdiction. [1]

The Abuse of Intergovernmental Organizations and Mechanisms

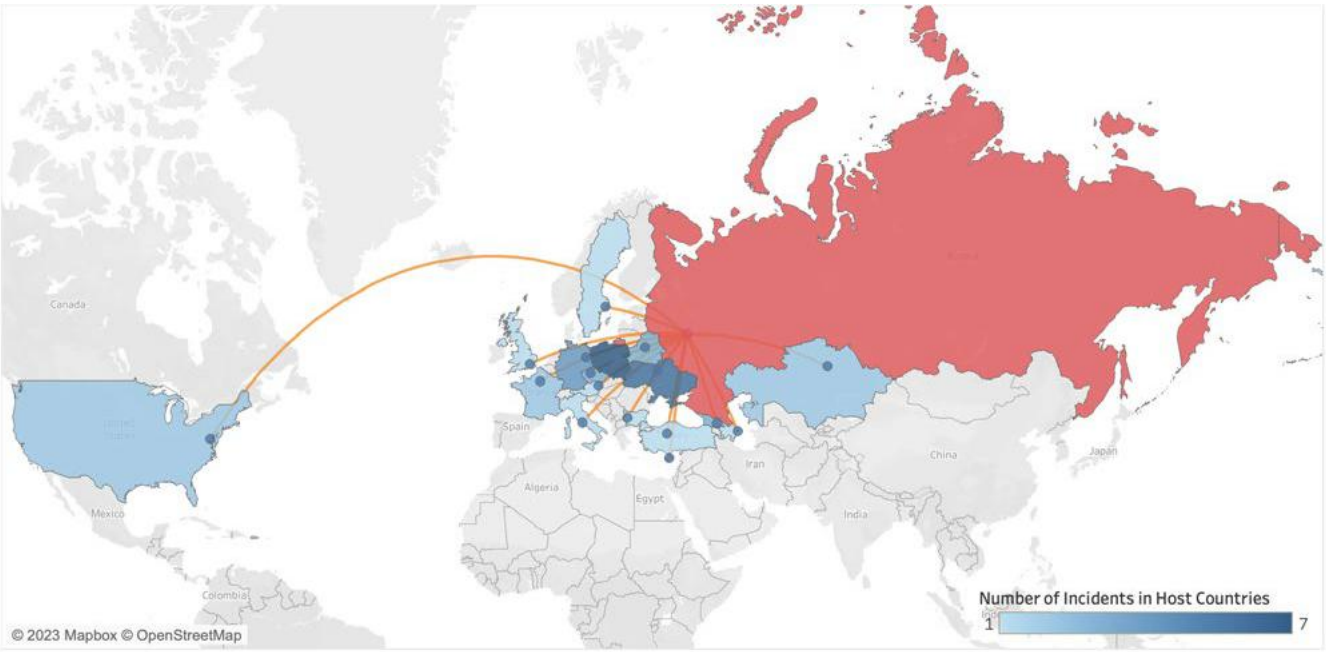

Figure 6. Russia as an Origin Country of Transnational Repression and Host Nations (2013-2022) Source: Freedom House

> **Red Notices, lost and stolen passports, and diffusions are among the most frequently abused instruments at INTERPOL, as they constitute international requests for detention, extradition, or ban on travel.**

As yet another hydra-head of transnational repression, authoritarian regimes make use of the intergovernmental organizations and mechanisms originally established to improve international cooperation and collaboration in areas including security, economy, and regional development.

INTERPOL, the intergovernmental organization for cooperation in law enforcement, offers a prime example of how autocratic regimes abuse international organizations through transnational legitimation. As the world's largest legitimate instrument to facilitate cooperation and collaboration through worldwide law enforcement, INTERPOL is the global communications and database network linking the police agencies of its 194 member countries. Intended to bring criminals to justice and counter threats to national and global security, it is nevertheless open to abuse among authoritarian states for transnational repression.

In theory, INTERPOL remains politically neutral as it is committed to working "in the spirit of the 'Universal Declaration of Human Rights.'" Article 3 of the INTERPOL Constitution articulates that member states are "strictly prohibited" from using the system to pursue criminals facing charges of a "political, racial, religious or military character." However, Red Notices,[vi] lost and stolen passports, and diffusions [vii] are among the most frequently abused instruments at INTERPOL, as they constitute international requests for detention, extradition, or ban on travel. INTERPOL is subject to manipulation for the organization does not always issue Red Notices itself but does so at the request of individual EU member states.

INTERPOL's lack of sufficient oversight of the data transmission through its system and its dissemination of information to member states has made Red Notices and other data a cheap and easy way for authoritarian

[vi] Red Notice is a request from INTERPOL members states to law enforcement worldwide to locate and arrest a person pending extradition, surrender, or similar legal action.

[vii] Diffusion is an alert system utilized by INTERPOL, in which a National Central Bureau publishes and circulates the alert to one or more NCBs without the General Secretariat being informed.

states to reach exiles. Each year, around 13,000-14,000 new Red Notices and about 50,000 new diffusions are issued. Although INTERPOL's non-transparent statistics make it difficult to quantify the transnational repression cases, Russia alone is responsible for a staggering 38% of all public Red Notices in the world [9]. With around 60,000 Red Notice issues since the abortive coup in 2016—more than four times the total number of other notices issued by INTERPOL in 2016—Turkey has reportedly been executing its dubious demands for arrest around the world.[10] Even though most of these targeted people are recognized refugees or asylees in European countries, INTERPOL is still unable to prevent the diffusion of Red Notices due to its insufficient oversight of the data[11].

In 2021 alone, authorities in Russia, China, Turkey, and Bahrain were able to detain individuals in Poland, Morocco, Kenya, Serbia, and Italy on INTERPOL's Red Notices. In most cases, individuals accused of terrorism were engaged in political and civic activism. In January 2022, labor activist Ahmed Jaafar Mohamed Ali was detained on terrorism charges by Bahraini officials at an airport in Serbia due to a Red Notice issued by INTERPOL. One Uyghur human rights activist, Idris Hasan, was arrested at the airport in Casablanca in 2021 based on an INTERPOL notice issued by Chinese authorities.

The Stolen and Lost Travel Document (SLTD) database of INTERPOL is another instrument abused by authoritarian regimes. Created to safeguard the identity documents that have been reported by the member states as stolen, lost, revoked, or invalid, the SLTD database has been increasingly used as a tool for transnational repression by authoritarian regimes.

Since July 2016, the Turkish government arbitrarily revoked the passports of tens of thousands of people, filed these passports on the SLTD database, and submitted Red Notices. This facilitated detentions and renditions of the dissidents in exile and prevented many people from going abroad to flee from persecution or traveling to another country even if the person was not residing in Turkey.

The European Court of Human Rights found that Section 22 of the Turkish Passports Act (Law No. 5682), which has allowed the authorities to refuse to issue a passport to a person whose departure from the country would be considered objectionable and register them "invalid" on the SLTD database, breaches the Convention. The lack of vetting mechanisms for the information added to the SLTD database or its illegitimate use by the Turkish government and other authoritarian states facilitates unlawful arrest and extradition, therefore contributing to transnational repression incidents worldwide.

Alongside the potent tools of intergovernmental organizations, various international organizations cooperate with authoritarian regimes to facilitate and further transnational repression. The Shanghai Cooperation Organization (SCO), led by China and Russia and including most Central Asian countries, has been a key instrument for the extradition of refugees and asylum seekers. Its charter mandates members to accept any terrorism charges made against their citizens by a member state based on a shared blacklist of individuals and organizations under the auspices of its regional anti-terrorism structure (RATS). The SCO has an official designation list of organizations and individuals accused of terrorism, separatism, and extremism. Approximately 2,500 individuals and 769 different groups are listed, including political opposition parties and religious groups.

The Gulf Cooperation Council (GCC), which includes Bahrain, Oman, Saudi Arabia, Qatar, Kuwait, and the UAE, also seeks to institutionalize authoritarian measures; its member states have long aimed to tackle the perceived threat of the Islamist political and religious organization Muslim Brotherhood [12]. The Commonwealth of Independent States (CIS), established in 1992 by Russia to hold the former Soviet countries together, is another international body that has been abused to facilitate transnational repression. For example, the CIS enacted a series of conventions to facilitate the extradition of individuals between the member states, which has increasingly been used to extradite dissenters who run the risk of probable torture in the home country. The CIS member states also use counterterrorism as an excuse in their intelligence sharing, extradition practices, and extraterritorial policing against political dissidents. Having standardized their definition of terrorism and legislation to guard against to counterterrorism, the member states find common grounds in tracking the activities of dissent abroad.

Digital Transnational Repression

> **The digital dimension of transnational repression's spread is facilitated by enhancing the mechanisms available to authoritarian states to undertake repressive activities through cooperating in cross-border security, deploying digital surveillance technologies, and hacking attacks.**

The digital dimension of transnational repression, designed to surveil, threaten and harass activists and dissidents living abroad, is rapidly becoming a more sophisticated part of everyday transnational repression. Its spread is facilitated by enhancing the mechanisms available to authoritarian states to undertake repressive activities through cooperating in cross-border security, deploying digital surveillance technologies and hacking attacks.

Furthermore, the digital form of transnational repression makes adept use of online harassment, disinformation campaigns, and informal networks composed of security agents and non-state actors. Such methods impact the freedom of speech and expression, autonomy, and privacy of dissidents by encouraging self-censorship and crippling their ties and networks. Exiles' contacts with friends, family, and colleagues inside the home country create an additional opportunity for states to spy on confidential communications and track the work and life of journalists and activists' media appearances. The lack of response from law enforcement and intelligence agencies and the inadequate resources from NGOs and the private sector for addressing and tackling digital transnational repression further leave dissidents vulnerable to digital threats.

Some digital repression threats may come from regime supporters, including individuals, non-state actors, and scholarly bodies abroad, who are offered benefits for providing intelligence in the form of micro-espionage aimed at helping their homeland state. However, most digital efforts are government-coordinated. Chinese government officials, for instance, have been targeting Uyghur populations around the world, an estimated 1–1.6 million Uyghurs outside China, through extensive digital campaigns since as far back as 2013 and continuing to this day. The Uyghur Human Rights Project (UHRP) found evidence of China's harassment and intimidation of Uyghurs via digital repression in at least 28 countries across the world in the past 24 years, most notably in much of the Middle East and North Africa with 647 cases and in South Asia with 665.

The campaigns often include invisible mobile hacking efforts to pull data from people's smartphones using malicious software. One type of Chinese malware, known as GoldenEagle, was used as early as 2011 but picked up again in 2015 and 2016. More than 650 versions of GoldenEagle and a multitude of fake Uyghur apps were uncovered, all of which function as a spy on the users' mobile communications. Once downloaded, these apps give Chinese officials a real-time tracking opportunity to follow the targets' phone activity. These surveillance campaigns follow Uyghurs everywhere they go, reaching as far as the US, Canada, Turkey, Indonesia, Laos, and Syria —signaling the scope and evolution of the Chinese government's efforts to control and repress Uyghurs across sovereign boundaries.

In addition to spyware, Chinese authorities engage in smear campaigns to silence the Uyghur diaspora, issue instructions, and compel compliance. The consequent online harassment and intimidation often target human rights lawyers, activists, journalists, and even students who post critical tweets about Chinese government policies. Canadian activists of Uyghur origin have been among the victims of such campaigns in which they receive threats of rape or death via texts or video calls if they continue speaking out against China's human rights violations.

Thousands of Uyghurs have reported receiving frequent calls urging them to pick up important documents from Chinese embassies and consulates, while incidents of embassy and consulate staff kidnapping individuals and sending them back to "re-education camps" in Xinjiang have also increased. However, Canada's passive rhetoric on China's human rights, trade, and hostage diplomacy has allowed such campaigns to slowly escalate over the years.

China's digital transnational repression activities have increased in several countries, including Turkey, Kazakhstan, India, Thailand, Pakistan, and Malaysia, where Chinese companies have created surveillance systems to monitor and silence the Uyghur diaspora via facial recognition technology, malware, cyberattacks, and digital harassment. For example, in Pakistan, China-affiliated associations have been engaging in digital transnational repression It was alleged that the Chinese Islamic Association in Pakistan has been involved in controversies for planting tracking devices on pilgrims, ostensibly for their safety. Such measures are common across target countries around the world, yet the full spectrum of Beijing's global repression campaign is much larger.

The reliance on digital surveillance is evident in the Iranian government's transnational repression measures targeting the diaspora and exiles abroad. Although Iran's actual technical capabilities remain obscure, the low-scale technical expertise of security agencies has been sufficient to expand the scope of potential threats against transnational activists and their networks around the world. Despite international sanctions, the Iranian government has been able to access the global market for surveillance technology and use web monitoring devices developed by Western companies. In a broader sense, a range of cyberattacks and online espionage and malware spearphishing campaigns in several countries in the Middle East, Europe, and North America in recent years have been attributed to the Iranian government or Iranian state-sponsored actors.

As the Iranian regime seeks to silence the voice of activists and the diaspora abroad, it regularly targets outspoken public figures, renowned human rights activists, influencers, and journalists working for foreign broadcasting agencies such as the BBC and VOA [13]. Thus, digital forms of transnational repression have been fundamental to the Iranian state in identifying targets and developing retaliatory or preemptive countermeasures. Moreover, Iranian exiles and diaspora members often face intrusion attempts against their social media and email accounts via malware files. Several US-based Iranian diaspora members received fake invitations to conferences in their area of expertise or fake notices about the expiry of their residence permits. Iranian journalist Negar Mortazavi has experienced multiple attempts to hack her email accounts by spies aiming to gather more information on diaspora activities in the US. Another journalist, Masih Alinejad, who runs a campaign for political prisoners and women's rights, reported that Iranian agents used a fake Facebook profile and phishing emails to reach out to her teenage son living in New York—signaling that surveillance poses a clear threat to the dynamics of transnational activism fostered by the internet and social media

Regime-affiliated hackers such as the Iranian Threat Actors have played a leading role in spamming opposition and diaspora activism websites with defacements and Distributed Denial of Service (DDoS) campaigns in Europe

and throughout North America. Some of the malware campaigns were reported to have compromised up to 800 victims over the course of a year. The cyber operations of Threat Actors or similar groups against dissidents have been broad, successful, and more frequent in recent years. Such digital espionage and cyber attacks have demonstrated that Iran's online activities and outreach have no boundaries. Moreover, millions of Iranian diaspora members and critics live in fear as the Iranian state's digital transnational repression has greatly altered the nature of state controls and severely diminished host countries' ability to develop countermeasures.

As another repressive regime, Syria has also used repressive tactics for the control of digital space. Hacking has been a common resource in the operations carried out by the Syrian Electronic Army, a group of regime-affiliated hackers. The group has dedicated its efforts to spear-phishing and compromising personal data of governments, international organizations, private sector entities, and activists and political dissidents. The hackers have stolen emails and hijacked social media accounts of civil society and diaspora members after flagging them in false reports of violating platform rules. Such efforts aim at providing support for the Assad regime, which has been trying to reshape its authoritarian image.

This pro-Assad digital presence and surveillance has pushed many Syrian activists to adopt different patterns of behavior, such as keeping a low online profile, limiting their communications with family members back home, and publishing content anonymously. Many Syrian activists living in the United States and the United Kingdom have reported digital harassment and tracking. They have also expressed concerns for the safety, privacy, and security of their community, friends, and other dissidents. One dissident in Canada described the feeling as "a surge of excitement and dread, not knowing what will follow when a new [malicious] email pings its arrival."

The proliferation of spyware came into the spotlight in 2021 with the launch of the Pegasus Project, an international investigation that documented the use of Israeli company NSO Group's Pegasus software to surveil journalists, opposition figures, and dissidents around the world. The Pegasus Project has found several examples of NSO Group's sophisticated tools using the "zero-click" method that infects targeted mobile phones without any interaction. An investigation into Pegasus found that more than 1,000 individuals across 50 countries were selected by NSO clients as surveillance targets since 2016. At least 85 human rights activists worldwide were among the targeted.

The media consortium reports stated that most of Pegasus's clients were clustered in 10 countries: Azerbaijan, Bahrain, Hungary, India, Kazakhstan, Mexico, Morocco, Rwanda, Saudi Arabia, and the United Arab Emirates. Although NSO has denied allegations of wrongdoing, lawsuits were filed in 2018 in Israel and Cyprus by Al Jazeera journalists, as well as other Qatari, Mexican, and Saudi journalists and activists who said Pegasus was used to hack their devices. In various instances, authoritarian regimes deployed Pegasus to spy on their nationals living in exile. Hungarian authorities have used Pegasus repeatedly to surveil journalists and lawyers abroad and the Polish security services have allegedly used it against members of the Polish opposition. While Pegasus is far from the only commercial spyware available, it is among the best-known tools deployed by autocracies.

Online harassment, smear campaigns, and trolling are other forms of digital transnational repression activity. Major targets of the disinformation campaigns launched by authoritarian governments are the political dissidents in the diaspora. The agents of such regimes use false and distorted information and verbal threats on social media platforms to intimidate dissent, put their victims under pressure, or smear their reputations. State-sponsored trolls portray dissidents, including those in the diaspora, as terrorists and incite and justify violence, cruelty, and injustice against them. These techniques are particularly effective when dissidents are accused of terrorism because those who are targeted fall under suspicion in the eyes of the security agencies and communities of the host countries.

The Orion Policy Institute's report on the Turkish government's political astroturfing campaigns on Twitter revealed how state-sponsored trolls have been used for this purpose. According to the research, in 2020, Twitter suspended and removed 7,340 troll accounts attributed to the youth wing of Turkey's ruling Justice and Development Party (AKP) party because of their veiled but organized and coordinated activities to promote the AKP's political agenda and target the opponents of the government at home and abroad.

During the same period, Twitter disclosed data it had accumulated on 23,750 Chinese and 1,152 Russian state-sponsored accounts as well. Most of the accounts released by Twitter were fake and compromised, created to disseminate political narratives favorable to authoritarian governments and denigrate opposition parties and groups.

These cases reveal that digital authoritarianism strives to corrupt the foundational principles of democratic societies, including freedom of expression, freedom of speech, and accountability. Ongoing efforts to reshape cyberspace into the pattern of authoritarian preferences are only part of larger efforts to influence the global media space. Through digital transnational repression, autocrats erode public trust in democratic institutions, increase their own control, and undermine civil liberties. However, legal, institutional, and policy shortcomings in addressing and responding to transnational repression, including digital spaces, further impact the rights and freedoms of communities living abroad.

Loopholes in Institutional and Legal Systems

> **The lack of a universally recognized legal framework and principles on transnational repression provides authoritarian states with an opportunity to extend their reach beyond borders, often using the pretext of counter-terrorism or fighting corruption to target and silence their critics abroad.**

Transnational repression is often difficult to detect or determine with certainty. A massive blind spot hides the recognition of transnational repression. The lack of a universally recognized legal framework and principles on transnational repression provides authoritarian states with an opportunity to extend their reach beyond borders, often using the pretext of counter-terrorism or fighting corruption to target and silence their critics abroad.

Moreover, the inadequacy in international humanitarian laws and regulations to combat transnational repression poses a challenge in distinguishing legitimate law-enforcement actions against criminal activities from the home country's deliberate persecution of dissidents . The guise of legality, therefore, raises the possibility that some transnational repression practices may even be legal although the underlying motivation is repression. The instruments of the international human rights framework establish legal and other mechanisms to hold governments accountable when they violate human rights.

Although certain violations fall within the scope of transnational repression practices, legal instruments are often abused by authoritarian regimes. The Convention against Torture and other Cruel, Inhuman or Degrading Treatment or Punishment, the International Convention for the Protection of All Persons from Enforced Disappearance, or principles such as non-refoulement fall short in identifying and addressing transnational repression. When legal institutions leave an open door for authoritarians to harass or detain dissidents anywhere in the world, the situation for the targets of transnational repression exacerbates, a sign that international mechanisms of deterrence against authoritarian behavior are losing force. Authoritarian regimes continue to expand their reach, often facing no more than rhetorical denunciations from democratic governments or international institutions. Poor regulations as well as a lack of coordinated and bold action against transnational repression give authoritarian leaders a veneer of legitimacy abroad.

As discussed earlier, autocratic alliances such as Shanghai Cooperation Organization (SCO) further spread new forms of transnational repression and push back democratic pressure. The broad mandates, diverse memberships, and large budgets of international organizations facilitate the alliances of authoritarian states that share techniques of political violence, exchange dissident "watchlists," and negotiate agreements for the forced return of exiles and asylees labeled as terrorists, traitors, or no longer citizens[14]. Such labels often tap into existing xenophobic biases in host countries and allow autocracies to act under the guise of transnational legitimation to sponsor sentiments of patriotism among dissidents and diaspora communities abroad. [15]

Transnational legitimation, therefore, enables autocracies to co-opt with other countries by exploiting the security concerns of the host states and persuading them to unjustly detain and deport targeted individuals. Consequently, the policies of intergovernmental organizations focused on combating terrorism may view dissidents as security threats rather than as potential victims of transnational repression. For example, transmission of data through INTERPOL's system may give some level of global credibility to the tactics of transnational repression.

Authoritarian regimes have been able to use INTERPOL Red Notices for international appeals to member law enforcement agencies to locate and seek provisional arrest of a dissident for extradition, surrender, or similar legal actions. The INTERPOL Red Notice has been used many times by these authoritarian regimes to label dissidents as criminals or terrorists. The threat of transnational repression is further aggravated when democratic host countries adopt anti-immigration attitudes and policies and end up detaining or deporting dissidents. Thus, incidents that could be categorized as transnational repression are often overlooked due to tightening immigration and adopting policing-based immigration control mechanisms, which is a relevant issue in EU member states.

Countries with established institutions and democratic principles may lack comprehensive understanding and a collective strategic approach to fight against transnational repression. Increasingly, the EU's focus has been on increasing security on its borders to restrict immigration. Some EU countries seek to maintain immigration restrictions for political and security reasons without considering the potential victims of transnational repression. Although the right to seek asylum is anchored in international law, member states and EU institutions sign agreements that back efforts to stop new arrivals and/or extradite the existing ones.

In the past, the United States has also used INTERPOL Red Notices to target and arrest immigrants. US Immigration and Customs Enforcement (ICE) agents have relied on accusations in Russian Red Notices to identify individuals to arrest, manufacture immigration violations by supplementing offenses like visa overstays for asylum seekers, and justify the prolonged detention and deportation of foreign nationals.

Policy Responses

The exploitation of existing tools/gaps in legal and institutional frameworks by authoritarian regimes threatens democracy, freedoms, and human rights principles everywhere. Moreover, countries, including democratic regimes, largely lack the means to respond to transnational repression to ensure proper protection for vulnerable dissidents and activists and enforce accountability for perpetrators. Authoritarian regimes, on the contrary, work together and collaborate to facilitate transnational repression. This includes abusing intergovernmental organizations and taking advantage of gaps in weakening rule-based frameworks.

Traditional national security frameworks focus on threats posed by foreign states against territorial integrity, sovereignty, and international human rights norms, such as the responsibility to protect. While every country has its laws governing defined jurisdictions, a few of them have begun to consider ways to better integrate measures against transnational repression into their national security framework.

Canada and Sweden, for instance, recognize that diaspora communities are at risk of transnational repression that poses significant threats to the safety and security of their citizens. For example, the Canadian government has acknowledged that China and Russia engage in hostile actions to threaten particular communities and silence political dissent. Similarly, the Swedish government has also noted that targeting diaspora members hampers or removes their ability to exercise guaranteed rights and freedoms. Due to intensified digital transnational activities, espionage, and information-gathering from foreign powers, Sweden has incorporated a law criminalizing the collection of information about a person to benefit a foreign power either secretly or using fraudulent or covert means. This exemplifies an unusual example of a state integrating human security into national security policy.

In Germany, the Federal Intelligence Service (BND) started to alert relevant government offices such as the federal criminal police and the federal prosecutor general about the Turkish request to extradite dissidents and asylum seekers. State police frequently warned targeted individuals that they were being surveilled illegally and might face criminal charges if they traveled to Turkey. In short, when governments recognize threats of transnational repression as a matter of national security, they are better prepared to address and respond to them.

Other countries have taken further policy measures in tackling transnational repression. The United States Senate passed the Uyghur Human Rights Policy Act in 2020, which includes measures to protect the Chinese diaspora in the US. Relatedly, the Federal Bureau of Investigation (FBI), which is responsible for countering foreign intelligence operations inside the US, has initiated

processes to categorize records of certain reported crimes, such as harassment, assault, threats, and stalking, as incidents of transnational repression through its National Threat Operations Center. As part of this effort, the bureau has created new staff training about transnational repression to help those receiving reports properly identify and respond more effectively and increase the awareness of law enforcement agencies.

In both 2021 and 2022, the FBI published counterintelligence bulletins about the threat of transnational repression. The first was to inform the Uyghurs living in the United States about the Chinese government's targeting of individuals through direct and digital means. The second bulletin addressed the governments of Iran, Saudi Arabia, and Rwanda about their transnational repression activities in the US.

One of the most significant steps the United States has taken is that the US Congress passed the Transnational Repression Accountability and Prevention Act (TRAP) of 2021 to address concerns related to the misuse and attempted misuse of INTERPOL systems. Some progress is being made in reporting the misuse cases due to years of efforts by civil society groups such as Fair Trials. Although the US Department of Justice has a clear policy that a Red Notice itself does not meet minimum standards for arrests, the US immigration system often targets individuals because of red notices. However, the TRAP Act is a critical tool to defend human rights against misusing INTERPOL and to provide leadership that helps INTERPOL counter transnational repression.

Recent data published for the first time by INTERPOL revealed that the international police agency deletes or rejects an average of 1,000 Red Notices and Wanted Person diffusions each year, around half of them on human rights grounds or because they violate the institution's neutrality. This initiative reflects an important step in INTERPOL's path toward greater accountability. Nevertheless, the abuse of the INTERPOL system often outpaces its capacity to oversee and effectively address and prevent such misuse.

Meanwhile, INTERPOL has initiated certain oversight regulations over the past few years. An expert working group within the organization conducted an extensive study of INTERPOL's supervisory mechanisms in 2016. This led to recommending several measures such as the enhanced legal review of red notices and wanted person diffusions. INTERPOL also created the Notices and Diffusions Task Force (NDTF) and instituted a rigorous legal review process for all requests to protect individuals from potential misuse of its notice program. Although the NDTF aims to limit abuses of its mechanisms, understaffing and lack of proper funding limit its impact on assessing Red Notices and strengthening collective efforts to handle abuse of the system.

Moreover, in 2021, Interior and Security Ministers of G7 countries committed to playing a leading role in INTERPOL's governance and working groups to "deter the misuse of notices that improperly target and detain individuals for exercising their human rights and fundamental freedoms" and enhance the accountability and transparency of data processing and reviews.

Although the issue of transnational repression has gained more traction among the US and European policymakers, the scope of such policies is rather limited and there are gaps in implementing these policies more effectively. There needs to be more international cooperation and collaboration, for domestic responses can provide only partial solutions to the rising threat of transnational repression due to the global spread of authoritarian control.

Policy Recommendations

This section discusses policy recommendations and steps to address the gaps and improve policy practices and research. These recommendations are derived from existing studies and two webinars organized by the Orion Policy Institute in October and November 2022. The webinar series titled "Transnational Repression: The Long Arm of Authoritarianism" aimed to discuss the current trends and methods of transnational repression, including digital repression, country-specific case studies, impacts on diaspora communities, the role of INTERPOL, efforts of facilitation by international institutions, and policy recommendations for the host countries.

These recommendations are organized under six sections: legal framework, international cooperation, law enforcement, victim support, civil society, and research.

Legal Framework

- The enactment of the TRAP Act in the United States is an important step forward to prevent the abuse of INTERPOL mechanisms by authoritarian regimes. Other countries should follow a similar path and pass laws to sanction such regimes and prevent them from abusing intergovernmental organizations as well as their domestic legal frameworks and mechanisms.

- International law should prioritize countering transnational repression and hold authoritarian regimes accountable for their human rights violations abroad. Economic sanctions empowered by international agreements could have deterrent effects on such regimes.

- Asylum and immigration laws should address the problems of the victims of transnational repression and expedite their asylum process. The host countries should provide clarity to these victims about their asylum application status, expedite the application and approval process, and even give them a specially designated status.

- Host countries must change how they perceive transnational repression and the activities of authoritarian regimes. The host countries need to view these activities not only as another state's challenge to their sovereignty and national security but also as violations of democracy, human rights, and the rule of law. This change will require enacting new laws, using counterintelligence measures, and enhancing international cooperation against transnational repression.

- Social media platforms should embrace stronger and swifter measures against digital transnational repression.

International Cooperation

- A common language across democratic states and international organizations needs to be developed to track transnational repression activities, raise awareness, and form the basis for developing a unified policy response.

- More effective and targeted sanctions need to be imposed on governments engaging in transnational repression.

- INTERPOL should allocate more resources to prevent abusive requests from authoritarian regimes and the re-victimization of thousands of individuals by utilizing INTERPOL mechanisms.

- In addition to the internal review commission of INTERPOL, an external and transparent supervision model for INTERPOL mechanisms should be developed for independent investigations and oversight on the allegations of abuse.

- INTERPOL should disclose the number of Red Notices filed by member states, which will provide transparency about the states that abuse the organization's mechanisms. This move would enable member states to scrutinize requests from such countries.

- Once the abusive Red Notice requests from INTERPOL are documented and publicized, sanctions should be imposed on the member states that attempt to abuse the system, including their suspension from the organization.

- To further prevent the abuse of INTERPOL mechanisms, democratic member states may create a "democratic funders' caucus" to endorse the democratic, accountable, and transparent management of the organization.

- UN working groups on arbitrary detention and enforced disappearances should take a more active role in the prevention and investigation of acts of transnational repression.

Law Enforcement

- The FBI has started actively tracking incidents of transnational repression. Local police departments in the US and police agencies across democratic countries should adopt the same approach, creating a universal database for a better understanding of the global scope of the problem.

- Law enforcement agencies should share information about transnational repression cases and collaborate in investigating these cases more closely.

- Barriers to report the incidents to law enforcement should be removed or mitigated through raising awareness and enhancing the ways for the victims to access support.

- Actions need to be taken to develop positive relationships with at-risk communities to reduce their fear and facilitate ways of enabling victims to come forward and report the incident.

- Local police departments are largely unaware of the concept of transnational repression and its methods, including the digital dimensions. Awareness training programs for law enforcement and immigration officers should be developed and updated regularly.

- A dedicated tip line for the victims should be launched so that victims can directly report an incident to the relevant law enforcement agency.

- Translators who can speak the victim's language should be employed to facilitate the articulate reporting of a transnational repression incident. The translator should have background knowledge about why these individuals experience transnational repression.

- Dissidents in exile are usually unaware of which institution or department to approach in reporting any transnational repression incidents. The relevant agencies should clearly inform the public, particularly the at-risk communities, about the channels and procedures they can use.

- A special unit within the relevant law enforcement agencies should be established to coordinate with the relevant government agencies, communities at-risk, and other stakeholders.

- The intimidation tactics, threats, or other transnational repression tactics are often difficult to detect or prove,

which may prevent the victims from reporting the incident. Law enforcement agencies must be proactive and facilitate reporting, assisting victims and conducting a thorough investigation.

- The "covert overseas police stations" that the Chinese government establishes in democratic countries should be investigated thoroughly and sanctioned accordingly.

Victim Support

- First-aid helplines should be created for victims of transnational repression so that they can find already existing services, including police, physical and mental health facilities, and legal services.

- Legal aid should be provided to victims who need to defend their rights against transnational repression in the courts of the host countries. Also, if needed, the victims should be provided with legal support in their asylum applications. Special funds should be dedicated to support the legal costs.

- The mental health effects of transnational repression on victims are well documented. To cope with the trauma they experience, victims should be provided with mental health support, which unfortunately may not be affordable in many of the host countries.

Civil Society

- Commitment and strong social capital in the diaspora could help dissidents cope with the trauma and silencing effects of transnational repression. Social, economic, and institutional support should be provided to diaspora communities to enhance their resilience.

- The public should be made aware of transnational repression cases so that victims will gain support. Victims and victim advocates need to be encouraged to speak out against transnational repression and call for action from elected officials.

- Professional organizations and groups in the host countries, such as universities, media outlets, human rights organizations, and activists should support their colleagues in exile targeted by transnational repression.

- Journalists, activists, and researchers play a critical role in fighting transnational repression as they expose the states and companies involved in such activities. These groups should be financially and politically supported so that they can continue to uncover transnational repression activities.

- Beyond government policies, public support of vulnerable communities, dissemination of information about available resources, strengthening the resilience of diaspora and exiles, cooperation with the media and civil society organizations, and increasing awareness and preparedness among law enforcement agencies are essential for countering transnational repression.

Research

- Further academic studies are needed for the systematic or comparative examination of existing policies, their implementation, and efficacy. It is necessary to focus on the impacts of transnational repression on victims and ways to mitigate those adverse effects.

- Despite the efforts of human rights organizations like Freedom House, the extent of transnational repression is not well known. More standardized and structured data collection and analysis methods are needed to better understand the scope of the problem.

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