

**Mandates of the Special Rapporteur on the promotion and protection of human rights and fundamental freedoms while countering terrorism; the Special Rapporteur on extrajudicial, summary or arbitrary executions; the Special Rapporteur on the promotion and protection of the right to freedom of opinion and expression; the Special Rapporteur on the rights to freedom of peaceful assembly and of association and the Special Rapporteur on the situation of human rights in the Islamic Republic of Iran**

Ref.: UA IRN 10/2024  
(Please use this reference in your reply)

23 May 2024

Excellency,

We have the honour to address you in our capacity as Special Rapporteur on the promotion and protection of human rights and fundamental freedoms while countering terrorism; Special Rapporteur on extrajudicial, summary or arbitrary executions; Special Rapporteur on the promotion and protection of the right to freedom of opinion and expression; Special Rapporteur on the rights to freedom of peaceful assembly and of association and Special Rapporteur on the situation of human rights in the Islamic Republic of Iran, pursuant to Human Rights Council resolutions 49/10, 53/4, 52/9, 50/17 and 49/24.

In this connection, we would like to bring to the attention of your Excellency's Government information we have received concerning alleged systematic measures of repression taken by the Islamic Republic of Iran against the Persian language news service Iran International, its owner Volant Media UK Limited, and journalists working for Iran International. These measures include: (1) harassment, intimidation and multiple, credible threats to the lives of Iran International personnel in London, the United Kingdom; (2) a violent attack causing injury to Iran International journalist Pouria Zeraati outside his home in London on 29 March 2024; and (3) the imposition of counter-terrorism sanctions on Volant Media and Iran International and its personnel in 2022, and an earlier assets freeze in 2019 directed at their family members in Iran.

Concerns about threats and harassment against staff working for overseas-based Persian language news outlets on the grounds of their affiliation with these networks were raised by several Special Procedures mandate holders in communication IRN 7/2024 sent on 24 April 2024; IRN 10/2022 sent on 26 May 2022; IRN 4/2020 sent on 5 March 2020; IRN 17/2019 sent on 18 December 2019; IRN 29/2017 sent on 24 October 2017; and IRN 4/2017 sent on 27 January 2017. We regret that, to date, we have not received responses to those communications. This issue has also been raised by the Special Rapporteur on the situation of human rights in the Islamic Republic of Iran in reports to the 40<sup>th</sup> and 49<sup>th</sup> Human Rights Council Sessions in 2019 (A/HRC/40/67) and 2022 (A/HRC/49/75), and a report to a General Assembly in 2019 (A/74/188). We further highlight that the targeting of Persian language journalists abroad and their families in Iran has been included in the 2019 Secretary General's report on reprisals (A/HRC/42/30).

According to the information received:

Iran International is an independent, international Persian language news channel headquartered in London, and broadcasting from London and Washington DC. It is managed by Volant Media UK Limited and is licensed to

operate by the United Kingdom (UK). It broadcasts free-to-air by satellite and reaches a substantial audience in Iran, as well as among the Persian diaspora worldwide and the wider public.

Since it was founded in 2017, Iran International and its staff have been subject to threats and intimidation, and prolific abuse on social media, by the Iranian authorities (including the Islamic Revolutionary Guard Corps ('IRGC')), apparently aimed at silencing critical reporting on Iran. These threats escalated after the death of a female Iranian student in custody in Tehran on 16 September 2022 and the 'Woman, Life, Freedom' protests that spread across Iran in 2022, with Persian language media abroad being falsely blamed for fueling violent unrest.

On 1 November 2022, the UK Metropolitan Police's Counter-Terrorism Unit, SO15, warned Iran International of imminent, credible and significant threats to the lives of two of the senior members of Iran International. On 1 November, the UK Metropolitan Police issued a 'Threat to Life Notice' form to Volant's General Manager, **Mahmoud Enayat**, and a person associated with him, who were forced to immediately leave their home and departed the UK within 48 hours in order to ensure their safety. British armed police vehicles were stationed outside Iran International's broadcasting premises in London and anti-vehicle security barriers were also installed. Other Iran International staff were also informed of threats by the UK Metropolitan Police. There was a plot to kill **Fardad Farahzad** and another Iran International television presenter in London in November 2023.

On 11 February 2023 [REDACTED], was detected outside Iran International's facility in London, arrested by the Metropolitan Police Counter Terrorism Command, and charged under Section 58 of the Terrorism Act 2000 with collecting information likely to be useful for committing or preparing an act of terrorism. Investigation of his mobile phone by the police revealed that he had researched the Iran International building before he arrived in the UK on the same morning as his arrest. He was later prosecuted and found guilty of that offence in December 2023, and sentenced to three and a half years in prison.

Iran International temporarily closed its London studios on 18 February 2023 on the advice of the UK Metropolitan Police, after the UK authorities indicated it could not ensure their safety, and moved its broadcasting operations to Washington DC. Iran International resumed broadcasting in London from late September 2023, with new security measures and in cooperation with the UK police.

In response to the threats to Iran International staff and other Persian language journalists outside Iran, on 29 January 2024 the UK and United States imposed coordinated sanctions on IRGC Unit 840 and seven individuals – the IRGC officer in command of killings outside Iran, [REDACTED], [REDACTED] and five others, including organized crime figures and persons suspected of killing Iranian dissidents in Turkey. Iran appears to be engaging criminal gangs to conduct killings abroad on its behalf. The sanctioned individuals are subject to UK travel bans and asset freezes, while IRGC Unit 840 is subject to asset freezes.

The threats against Iran International are part of a pattern of attacks against Persian language media, and other dissidents, outside Iran, including threats against BBC News Persian, Deutsche Welle, Voice of America, IranWire and Radio Farda. Reportedly, there have been at least 15 credible Iranian plots to kill or kidnap British nationals or residents since January 2022. On 20 September 2023, Iran International journalist, **Kian Amani**, was physically and verbally assaulted by a member of Iran's delegation to the United Nations at its hotel in New York, requiring security guards to intervene to protect him. The assault was condemned by the US Office of the Special Envoy for Iran. Iran's threats and intimidation against journalists and dissidents abroad have been internationally condemned by the UK, US, Germany, France, European Union, United Nations independent experts, the United Nations Fact-Finding Mission on the Islamic Republic of Iran (A/HRC/55/67, paras. 83-84), International Federation of Journalists and National Union of Journalists, among others.

Most recently, on 29 March 2024 Iran International journalist, **Pouria Zeraati**, was violently stabbed in the backs of his legs by two unknown assailants outside his home in Wimbledon, London. The assailants fled in a waiting car driven by a third person. The car was found abandoned at Heathrow Airport and the UK Metropolitan Police believe the three suspects fled the UK by aircraft, which may suggest that Iran is engaging foreign criminal gangs to undertake attacks on its behalf. The UK Metropolitan Police launched a counter-terrorism investigation. Before the attack Mr. Zeraati had filed three reports with the UK Metropolitan Police over threats to his safety: in October 2022 (general security concerns), November 2022 (a verbal death threat), and October 2023 (death threats on X that mentioned his home address). The UK Metropolitan Police only issued a 'Threat to Life Notice' to Mr. Zeraati after the stabbing attack. Since the attack, Mr. Zeraati has faced intensified online social media attacks from Government agents, including accusations that he is 'a supporter of a terrorist war' and thus 'if someone is stabbed in the street, he should not expect anything else.' There was also an increase in threats to him after Iran International reported Iran's attack on Israel on 13 April 2024.

On 19 October 2022, Iran's Foreign Ministry imposed sanctions on **Volant Media and Iran International** on the basis that they were 'deliberately supporting terrorism and terrorist groups, promoting and instigating terrorism, violence and hate-mongering and violation of human rights'.<sup>1</sup> The sanctions include a travel ban, preventing the persons sanctioned from entering Iran, the seizure of property and assets in territory under Iran's jurisdiction, and the closure of any bank accounts held by them in the financial and banking system of Iran. Earlier on 30 November 2019, a letter from Iran's Intelligence Ministry stated that it had summoned 15 family members of Iran International employees abroad and barred 71 dissenting voices, including Iran International employees, from being able to carry out financial transactions, in order to seek to quash those dissenting voices.

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<sup>1</sup> Islamic Republic of Iran Ministry of Foreign Affairs, 'Iranian Foreign Ministry's statement on sanctions against British institutions and individuals', 19 March 2022. <https://en.mfa.ir/portal/NewsView/697020>

In sum, on 2 February 2024, the United Nations Fact-Finding Mission on the Islamic Republic of Iran stated that: “the State authorities harassed, threatened and intimidated journalists and other media employees working outside the country, including those working at the BBC Persian service, Iran International television, Voice of America, IranWire and Deutsche Welle. The Iranian authorities summoned, threatened and in some cases arrested, detained and charged the family members of those journalists and media workers in an apparent effort to exert pressure on them and prevent them from reporting on the country... Journalists also received serious threats, including to their lives and personal safety, leading to the involvement of the police in some countries. Journalists, in particular women journalists, faced heightened online vilification, harassment and attacks (A/HRC/55/67, paras. 83-84).

Without prejudging the accuracy of these allegations, if the allegations prove to be true, they may constitute violations of the right to life (International Covenant on Civil and Political Rights (‘ICCPR’), ratified by Iran on 24 June 1975, article 6); the right to security of person, including bodily and mental integrity (ICCPR, article 9); freedom from cruel, inhuman or degrading treatment or punishment (ICCPR, article 7); freedom of expression (ICCPR, article 19); the requirement of legality (ICCPR, article 15); due process and judicial protection (ICCPR, article 14); freedom from unlawful attacks on their honour and reputation (ICCPR, article 17); and freedom from arbitrary or unlawful interference in the family (ICCPR, article 17).

*Freedoms of opinion, expression, peaceful assembly and association and the media*

We express our grave concern at the continuing, systematic attacks by the Iranian authorities on Iran International, its staff and family members, including private and public harassment and intimidation, threats of violence and death, physical attacks, asset freezing and counter-terrorism sanctions. This campaign is not taken to protect a legitimate purpose but appears to be aimed at preventing them from continuing their legitimate journalistic activities, including criticism of the Iranian Government, and at impairing the legitimate exercise of the right to freedom of expression in the performance of their professional duties. We are further concerned that such attacks may have a ‘chilling effect’ on the work of other journalists in Iran and elsewhere reporting on the country and may deter them from reporting on issues of public interest. It also deprives the public, both in Iran and around the world, from receiving information in the public interest. These measures appear to constitute an attempt to silence and censor critical reporting.

We appeal to your Excellency’s Government to take all measures to guarantee the right to freedom of opinion and expression, as provided in article 19 of the ICCPR. This right entails that ‘everyone shall have the right to hold opinions without interference’ as well as that “everyone shall have the right to freedom of expression; this right shall include freedom to seek, receive and impart information and ideas of all kinds, regardless of frontiers, either orally, in writing or in print, in the form of art, or through any other media of his choice.” This right includes not only the exchange of information that is favorable, but also that which may shock or offend. The right to freedom of expression may be restricted only if the restriction is provided by law and necessary and proportionate to protect a legitimate objective, as established under article 19(3).

In this regard, we would like to highlight that the Human Rights Committee in general comment No. 34 has stated that under no circumstance can an attack on a person because of the exercise of his freedom of opinion or expression be compatible with article 19. The Committee furthermore states that as journalists are frequently subjected to threats, intimidation and attacks because of their activities, all such attacks should be vigorously investigated in a timely fashion, and the perpetrators prosecuted (CCPR/C/GC/34). As underlined by the Special Rapporteur on freedom of expression, an attack against a journalist is not only a violation of his or her right to impart information, but also undermines the right of individuals and society at large to seek and receive information under article 19 of the ICCPR. An attack against a journalist is therefore an attack against the principles of transparency and accountability, as well as the right to hold opinions and to participate in public debates, which are essential for democracy (A/HRC/20/17). We express our strong concern that Iranian journalists in exile and other journalists reporting on Iran abroad continue to face threats and harassment in relation to their work. We urge your Excellency's Government to refrain from committing, co-opting or condoning acts of transnational repression, online and offline, and to ensure that all such acts are investigated and promptly, fully and effectively prosecuted.

We also draw the Government's attention to paragraphs 75(a) to (i) of the 2018 report of the Special Rapporteur on the promotion and protection of human rights and fundamental freedoms while countering terrorism (A/HRC/40/52) on the impact of terrorism measures on civic spaces and human rights defenders. Any restriction on expression or information that a government seeks to justify on grounds of national security and counterterrorism must have the genuine purpose and demonstrable effect of protecting a legitimate national security interest (CCPR/C/GC/34).

We note that attacks on freedom of expression and the media contributes to the hostile environment in Iran not only for the exercise of freedom of opinion and expression, but consequently also for peaceful assembly and association in Iran. article 21 of the ICCPR guarantees the right to freedom of peaceful assembly: 'The right of peaceful assembly shall be recognized. No restrictions may be placed on the exercise of this right other than those imposed in conformity with the law, and which are necessary in a democratic society in the interests of national security or public safety, public order (ordre public), the protection of public health or morals or the protection of the rights and freedoms of others'. Article 22 of the ICCPR protects the right to freedom of association with others.

We wish to stress that the obligation to respect and to ensure respect of the human rights of journalists, media professionals and all human rights defenders rests on the State. It encompasses a positive duty of States to ensure that persons are protected from any act that would impair the enjoyment of their rights, including by taking effective measures or exercising due diligence to prevent any harm caused by private persons or entities (see e.g. A/HRC/17/27, para. 66 and A/HRC/29/25/Add.1). In this regard, we also note that the obligation to protect is particularly important in the case of threats and attacks made against journalists by non-State actors.

#### *Right to life and security of person*

We are particularly alarmed by the alleged threats of violence or death against the journalists and their families, and the physical stabbing of Mr. Zeraati, which

violate their fundamental rights to life (ICCPR, article 6) and to security of person (ICCPR, article 9(1)), including physical and psychological integrity. The obligation to refrain from arbitrarily depriving a person of their right to life applies to all activities ‘having a direct and reasonably foreseeable impact on the right to life of individuals outside their territory’ (general comment No. 36, para. 22). The intentional taking of life is permissible only if it is strictly necessary to protect life from an imminent threat (general comment No. 36, para. 12). A state that kills a journalist in another country, where there is no basis in self-defence, commits an arbitrary deprivation of life and an extrajudicial killing. The state is internationally responsible for such killing whether it is committed directly state officials, or by private actors instructed, directed or controlled by the state.<sup>2</sup>

The right to security of person protects individuals against intentional infliction of bodily or mental injury even if it is not life-threatening (general comment No. 35, para. 55), again whether an attack is committed by state officials or carried out by other actors on behalf of the state, and including where the state acts extraterritorially. It obliges states to prevent and suppress threats to life or bodily integrity from any government or private actor, including against patterns of violence or intimidation against journalists, and to redress unjustifiable use of force by law enforcement (general comment No. 35, para. 9). We also refer your Excellency’s Government to paragraph 4 of the Principles on the Effective Prevention and Investigation of Extra-Legal, Arbitrary and Summary Executions, adopted by the Economic and Social Council resolution 1989/65, according to which States must provide ‘effective protection through judicial or other means to individuals and groups who are in danger of extra-legal, arbitrary or summary executions, including those who receive death threats’.

We highlight that the right to life requires states to investigate potentially unlawful deprivations of life and, where appropriate, prosecute the perpetrators (general comment No. 36, para. 27). Investigations must always be independent, impartial, prompt, thorough, effective, and transparent (general comment No. 36, para. 28), and must be undertaken in accordance with relevant international standards, including the Minnesota Protocol on the Investigation of Potentially Unlawful Death. Investigations must also be aimed at ensuring that those responsible are brought to justice, at promoting accountability and preventing impunity, at avoiding denial of and at drawing necessary lessons for revising practices and policies with a view to avoiding repeated violations, and at ensuring the responsibility of superior officials with regard to violations committed by their subordinates (general comment No. 36, para. 27). Where a violation is found, full reparation must be provided, including adequate compensation, rehabilitation and satisfaction; as well as steps to prevent re-occurrence in future.

We note that acts and threats of violence, and other measures of intimidation and harassment by the Iranian authorities or its proxies against persons in the United Kingdom or other states, may amount to violations of the sovereignty of those states.

#### *Counter-terrorism sanctions*

We are concerned at the misuse of counter-terrorism sanctions imposed in 2022. These appear to be based on overly broad criteria which lack legal certainty,

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<sup>2</sup> International Law Commission, Responsibility of States for Internationally Wrongful Acts 2001, article 8.

including as regards the concept of ‘terrorism’. They are thus prone to abuse and result in infringements upon freedom of expression and the media and upon freedom of association and assembly. We note that sanctioning Iran International for ‘supporting and instigating terrorism’ indicates that Iranian law abusively extends beyond acts that are truly of a terrorist nature according to international standards.<sup>3</sup>

In addition, the accusation that Iran International was ‘supporting and instigating’ terrorism as well as violence, ‘hate-mongering’ and ‘human rights abuse’ goes beyond the accepted scope of legitimate restrictions on freedom of expression and the media based on countering terrorism or hate speech, as set out in the six-part test on hate speech in the Rabat Plan of Action (A/HRC/22/17/Add.4) (referring to context; speaker; intent; content or form; extent of the speech; and likelihood of harm occurring, including imminence) and in the recommendations on incitement to terrorism of the Special Rapporteur on the promotion and protection of human rights and fundamental freedoms while countering terrorism (A/HRC/16/51, practice 8) (including requirements that incitement must: be precisely prescribed by law and avoid vague terms; be based on a precise underlying definition of terrorism; be strictly necessary and proportionate to counter terrorism; and include both an intent to incite terrorism and an objective risk that it will be committed).

We also emphasize that the sanctions do not appear to meet the requirements of due process and judicial protection under international human rights law, as set out by the Special Rapporteur on the promotion and protection of human rights and fundamental freedoms while countering terrorism (A/HRC/16/51, para. 35) (including as regards the standard of proof for listing, the definition of terrorism, notification and the right to effective judicial review of sanctions in a fair hearing, subsequent periodic review and time-limited expiry of sanctions, and compensation for persons wrongly listed).

The false classification and consequent public stigmatization of Iran International and its staff as ‘terrorist’, coupled with public statements by Iranian authorities condemning them as terrorists, further constitutes an unlawful attack on their honour and reputation, contrary to article 17 of the ICCPR. Article 17 provides that ‘[n]o one shall be subjected to ... unlawful attacks on his honour and reputation’ and that ‘[e]veryone has the right to the protection of the law against such interference or attacks’. We emphasize that the Human Rights Committee has found a violation of article 17 where a state is responsible for unjustly listing persons as terrorist in view of the ‘negative associations’ it publicly generates and the resulting public opprobrium (*Sayadi and Vinck v Belgium*, CCPR/C/94/D/1472/2006, paras. 10.13-10.14). Effective remedies must be available for such attacks (general comment No. 16, para. 11).

Travel sanctions may violate the right of Iranian nationals to not be arbitrarily deprived of the right to enter their own country under article 12(4) of the ICCPR.

We also wish to express our serious concern regarding the reported interrogation and harassment of the families of Iran International residing in Iran and

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<sup>3</sup> As defined by the 19 United Nations sectoral conventions on terrorist offences, Security Council resolution 1566 (2004) and the Declaration on Measures to Eliminate International Terrorism and the Declaration supplementing the 1994 Declaration on Measures to Eliminate International Terrorism, approved by the General Assembly in 1997, as well as the model definition of the Special Rapporteur on the Promotion and Protection of Human Rights and Fundamental Freedoms while Countering Terrorism (E/CN.4/2006/98, para. 72).

the impact of the earlier asset freezing affecting them in 2019. It is deeply troubling that these measures are employed as a form of collective punishment against the families with the apparent aim of exerting pressure on the journalists to leave their jobs. We are further concerned that the effects of the unjustified 2019 measures and the 2022 sanctions constitute an arbitrary or unlawful interference with the families of Iran International staff, contrary to article 17(1) of the ICCPR. We draw your attention to concerns about the adverse gendered effects of counter-terrorism sanctions identified by the Special Rapporteur on the promotion and protection of human rights and fundamental freedoms while countering terrorism (A/HRC/46/36, para. 16). Family members may also collaterally suffer attacks on their reputation, contrary to article 17, due to their association with Iran International relatives.

The full texts of the human rights instruments and standards recalled above are available on [www.ohchr.org](http://www.ohchr.org) or can be provided upon request.

In view of the urgency of the matter, we would appreciate a response on the initial steps taken by your Excellency's Government to prevent irreparable harm to the life and personal integrity of Iran International journalists and staff and to safeguard their rights in compliance with international instruments.

We are issuing this appeal in order to safeguard the rights of the above-mentioned individuals from irreparable harm and without prejudicing any eventual legal determination.

As it is our responsibility, under the mandates provided to us by the Human Rights Council, to seek to clarify all cases brought to our attention, we would be grateful for your observations on the following matters:

1. Please provide any additional information and/or comment(s) you may have on the above-mentioned allegations.
2. Please indicate what measures have been taken by your Excellency's Government to ensure that Iran International and other journalists reporting on the Islamic Republic of Iran are able to carry out their legitimate work in a safe and enabling environment without fear of threats or acts of violence, intimidation or harassment of any sort, both inside and outside of the Islamic Republic of Iran.
3. Please provide information on measures taken to protect the rights to life and security, including physical and mental integrity, of Iran International journalists and their family members, and to investigate credible allegations of threats to life or of violence against them. If no investigation has been opened or is envisaged, please explain why.
4. Please explain what steps have been taken to investigate the violent attack on Mr. Pouria Zeraati on 29 March 2024, to hold accountable any perpetrators, to provide reparation to Mr. Zeraati, and to prevent the reoccurrence of such attacks on any journalists.
5. Please explain the legal grounds and factual bases for the 2019 interrogation and assets freeze directed against the family members of Iran International journalists, and the 2022 counter-terrorism sanctions

listing of Iran International. Please clarify how these are compatible with the requirements of legal certainty, due process, judicial protection and other applicable human rights, including freedom from unlawful attacks on honour and reputation and arbitrary or unlawful interference in family life. Kindly indicate how counter-terrorism sanctions comply with a strict understanding of the definition of terrorism as elucidated by international law norms including, but not limited to, United Nations Security Council resolution 1566 (2004).

6. Please provide information whether your Excellency's Government has conducted, or is considering to conduct, any independent investigation of the allegations raised in the communications on the attacks against Iran International journalists, and what measures of accountability have been taken in response, including prosecutions of any perpetrators and reparation for the victims.
7. Please explain what administrative, legislative and judicial measures have been, or will be, taken to ensure that the violations detailed in this communication will not reoccur.

While awaiting a reply, we urge that all necessary interim measures be taken to halt the alleged violations and prevent their re-occurrence and in the event that the investigations support or suggest the allegations to be correct, to ensure the accountability of any person(s) responsible for the alleged violations.

We may publicly express our concerns in the near future as, in our view, the information upon which the press release will be based is sufficiently reliable to indicate a matter warranting immediate attention. We also believe that the wider public should be alerted to the potential implications of the above-mentioned allegations. The press release will indicate that we have been in contact with your Excellency's Government to clarify the issue/s in question.

We would appreciate receiving a response within 60 days. Past this delay, this communication and any response received from your Excellency's Government will be made public via the communications reporting [website](#). They will also subsequently be made available in the usual report to be presented to the Human Rights Council.

Please be informed that a copy of this letter has been also sent to the Permanent Mission of the United Kingdom of Great Britain and Northern Ireland.

Please accept, Excellency, the assurances of our highest consideration.

Ben Saul

Special Rapporteur on the promotion and protection of human rights and fundamental freedoms while countering terrorism

Morris Tidball-Binz

Special Rapporteur on extrajudicial, summary or arbitrary executions

Irene Khan

Special Rapporteur on the promotion and protection of the right to freedom of opinion and expression

Gina Romero  
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