Mandates of the Special Rapporteur on the promotion and protection of human rights and fundamental freedoms while countering terrorism; the Working Group on the issue of human rights and transnational corporations and other business enterprises; 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; the Special Rapporteur on the situation of human rights defenders and the Special Rapporteur on the situation of human rights in the Palestinian territory occupied since 1967

Ref.: AL OTH 108/2025
(Please use this reference in your reply)

8 September 2025

Mr. Zuckerberg,

We have the honour to address you in our capacities as Special Rapporteur on the promotion and protection of human rights and fundamental freedoms while countering terrorism; Working Group on the issue of human rights and transnational corporations and other business enterprises; 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; Special Rapporteur on the situation of human rights defenders and Special Rapporteur on the situation of human rights in the Palestinian territory occupied since 1967, pursuant to Human Rights Council resolutions 58/14, 53/3, 52/9, 59/4, 52/4 and 1993/2A.

We are independent human rights experts appointed and mandated by the United Nations Human Rights Council to report and advise on human rights issues from a thematic or country-specific perspective. We are part of the special procedures system of the United Nations, which has 60 thematic and country mandates on a broad range of human rights issues. We are sending this letter under the communications procedure of the Special Procedures of the United Nations Human Rights Council to seek clarification on information we have received. Special Procedures mechanisms can intervene directly with Governments and other stakeholders (including companies) on allegations of abuses of human rights that come within their mandates by means of letters, which include urgent appeals, allegation letters, and other communications. The intervention may relate to a human rights violation that has already occurred, is ongoing, or has a high risk of occurring. The process involves sending a letter to the concerned actors identifying the facts of the allegation, applicable international human rights norms and standards, the concerns and questions of the mandate-holder(s), and a request for follow-up action. Communications may deal with individual cases, general patterns and trends of human rights violations, cases affecting a particular group or community, or the content of draft or existing legislation, policy or practice considered not to be fully compatible with international human rights standards.

In this context, we would like to bring to your attention information received regarding the disruption of Addameer's digital operations, following its designation by the United States as a terrorist organization and the subsequent application of sanctions. The organization's website (www.addameer.org) has been suspended by its hosting provider; Microsoft has terminated its cloud account, resulting in the loss of all documentation and data stored since 1 January 2025; and Meta has deactivated

its Facebook and Instagram accounts, cutting off key channels for communication, advocacy, and mobilization.

We recall that our mandates have previously expressed concern regarding Meta's restriction of content and accounts related to Palestinian human rights advocacy, including during the September 2021 conflict (OTH 212/2021), on 29 December 2022 (OTH 126/2022), and more recently on 18 April 2024 (OTH 20/2024). We regret that Meta did not respond to these communications.

According to the information received:

On 10 June 2025, the United States Department of the Treasury's Office of Foreign Assets Control (OFAC) under Executive Order 13224,[1] added Addameer to its Specially Designated Nationals (SDN) list. The designation was made based on the allegation that Addameer was "owned, controlled, or directed by, or acted or purported to act for or on behalf of, directly or indirectly" the Popular Front for the Liberation of Palestine (PFLP), which has been designated as a Foreign Terrorist Organisation by the United States since 8 October 1997. OFAC described Addameer as a "fraudulent charity linked to" the PFLP and stated that it "has long supported and is affiliated with the PFLP." It also claimed that "in the spring of 2022, an alleged leader of the PFLP, coordinated with the PFLP to send funds to Addameer and to arrange meetings between Addameer and another Palestinian organisation. Both the leader of the PFLP and the other pro-Palestinian organisation were sanctioned by the United States on 15 October 2024.

The sanctions follow earlier measures taken against Addameer by the Government of Israel and are alleged to form part of a broader transnational campaign to criminalize and delegitimize Palestinian civil society and suppress civic space and human rights advocacy in the occupied Palestinian territories. On 19 October 2021, the Israeli Minister of Defence designated six Palestinian civil society organisations, including Addameer, as "terrorist organisations" on the basis of undisclosed information. This designation enabled Israeli authorities to close the organisations, seize their assets, and charge their leadership and staff under counter-terrorism legislation.

At that time, several Special Procedures mandate holders condemned the designations as a "manifestly egregious misuse" of counter-terrorism and security legislation and called for their immediate reversal.[2] They were concerned about the legal frameworks underpinning the designations and their impact on human rights, as well as the reported use of surveillance technologies such as Pegasus against the organizations (see communications ISR 11/2021 and ISR 6/2022). They further noted that "the information presented by Israel

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[1] According to section 1(b) of Executive Order 13224, as amended by Executive Order 13886, introduced in September 2019, "the Secretary of the Treasury is hereby authorized to prohibit the opening, and prohibit or impose strict conditions on the maintaining, in the United States, of a correspondent account or payable-through account of any foreign financial institution that the Secretary of the Treasury, in consultation with the Secretary of State, has determined, on or after the effective date of this order, has knowingly conducted or facilitated any significant transaction on behalf of any person whose property and interests in property are blocked pursuant to this order

[2] https://www.ohchr.org/en/press-releases/2021/10/un-experts-condemn-israels-designation-palestinian-human-rights-defenders.

has also failed to convince a number of governments and international organisations that have traditionally provided funding for the indispensable work of these six organisations." [3] In August 2022, the Israeli military raided the offices of Addameer and the other designated organisations, causing extensive damage to property and issuing military closure orders.

Addameer's online and digital operations have been significantly disrupted. Its domain, www.addameer.org, has been suspended by the hosting provider; Microsoft has terminated Addameer's cloud account, resulting in the loss of all documentation and data stored since 1 January 2025; and Meta has deactivated Addameer's Facebook and Instagram accounts, eliminating important communication, advocacy and mobilisation channels. While Addameer has retained some backup systems, the loss of recent data and the shutdown of its online platforms have substantially impaired its capacity to operate.

As of the date of writing, Addameer has not filed an appeal against the OFAC designation, as the organisation has not received the necessary information to enable it to adequately know the evidentiary basis of the designation and thus to effectively challenge the decision.

While we do not wish to prejudge the accuracy of the allegations received, Meta's deactivation of Addameer's Facebook and Instagram accounts—following its designation and the application of U.S. sanctions—raises serious concerns regarding the rights to freedom of expression, access to information, association, and participation in public affairs, as well as Addameer's work in enabling the right to legal representation and legal aid of Palestinian prisoners. As a human rights organization supporting Palestinian detainees, Addameer relies on digital platforms to communicate, advocate, and mobilize. The removal of these channels silences its voice, undermines the work of human rights defenders and journalists, and contributes to a chilling effect on civic engagement and political participation.

This disruption of Addameer's digital operations forms part of a broader pattern of criminalization and delegitimization of Palestinian civil society, which intensified following Israel's designation of six organizations, including Addameer, as "terrorist" entities in October 2021. These measures—based on undisclosed information—have included office raids, asset seizures, and legal actions against staff, and were condemned by UN experts as a "manifestly egregious misuse" of counter-terrorism legislation (see ISR 11/2021 and ISR 6/2022). It has broader implications for civil society in the occupied Palestinian territories. It restricts access to resources and impairs the ability of organizations to operate in an already coercive environment. As the Special Rapporteur on freedom of peaceful assembly and association has affirmed, the ability to seek, receive, and use resources is essential to the existence and effective functioning of any association (A/HRC/23/39).

Meta has a responsibility under the UN Guiding Principles on Business and Human Rights to respect internationally recognized human rights, including freedom of expression, access to information, freedom of association, the right to participate in public affairs, and the right to legal representation and legal aid of Palestinian prisoners.

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[3] Ibid.

Businesses must avoid causing or contributing to adverse human rights impacts and conduct human rights due diligence to identify, prevent, and mitigate such risks. We regret that there is no indication Meta assessed the human rights implications of deactivating Addameer's accounts, considered the impact on its advocacy and public engagement or considered mitigating measures.

Civil society plays a vital role in promoting human rights, democracy, and the rule of law. In the occupied Palestinian territories, where violations of international human rights law and international humanitarian law are widespread and systemic, the work of organizations like Addameer is indispensable. Disrupting their digital operations significantly limits their ability to carry out legitimate and protected activities, potentially violating the rights to freedom of peaceful assembly, association, and expression.

The right to freedom of association includes not only the ability to form and register organizations but also to carry out their legitimate activities, including soliciting and receiving financial and other contributions (A/HRC/RES/22/6). The inability to access digital platforms affects immediate operations and may jeopardize the organization's legal status and long-term viability.

We also highlight resolution A/HRC/55/L.30 on the human rights situation in the occupied Palestinian territories, which calls for an end to harassment, threats, intimidation, reprisals, detention, and expulsion of human rights defenders, journalists, and civil society actors. It emphasizes the need for accountability and effective remedies, and expresses concern over the spread of disinformation and propaganda—including online—that may incite violence, discrimination, and hostility. The resolution underscores the critical role of journalists in countering these trends.

In connection with the above alleged facts and concerns, please refer to the **Annex on Reference to international human rights law** attached to this letter which cites international human rights instruments and standards relevant to these allegations.

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 or comments you may have regarding the allegations outlined above, particularly in relation to the deactivation of Addameer's Facebook and Instagram accounts.

2. Please provide detailed justifications for the alleged refusal to maintain Addameer's accounts on Meta platforms, including the grounds for deactivation and any relevant internal policies or procedures applied.

3. Please provide information on the measures your company has taken, in line with the UN Guiding Principles on Business and Human Rights, to conduct human rights due diligence to identify, prevent, mitigate, and account for adverse human rights impacts linked to your products and services, including those arising from account or content restrictions. This also includes conducting heightened human rights due diligence in

conflict-affected regions (A/75/212).

4. Please clarify whether Meta informed Addameer or other affected individuals of the actions taken against their accounts or content, including notification in advance, and whether any avenues for appeal or review were provided.

5. Please describe the strategies and safeguards Meta has adopted to prevent or mitigate account or content removal requests that may be inconsistent with international human rights standards, particularly when such requests originate from State actors.

6. Please indicate the steps Addameer would need to take to restore access to its accounts, including any procedures for appeal or review, and whether Meta is open to reconsidering the deactivation in light of human rights concerns.

7. Please provide information on steps taken by your company to establish, or participate in effective operational-level grievance mechanisms, in line with the UN Guiding Principles on Business and Human Rights, to address adverse human rights impacts caused by your company throughout your operations globally.

This communication and any response received from your enterprise will be made public via the communications reporting website within 60 days. They will also subsequently be made available in the usual report to be presented to the Human Rights Council.

While awaiting a reply, we urge Meta to review its actions, restore Addameer's access to its platforms, and ensure that future decisions are guided by international human rights standards, including transparency, proportionality, and meaningful engagement with affected communities.

Please be informed that letters on this subject matter have also been sent to the Government of the United States of America and to Microsoft Corporation with regard to the allegations raised above.

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

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

Pichamon Yeophantong
Chair-Rapporteur of the Working Group on the issue of human rights and transnational corporations and other business enterprises

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

Gina Romero
Special Rapporteur on the rights to freedom of peaceful assembly and of association

Mary Lawlor
Special Rapporteur on the situation of human rights defenders

Francesca Albanese
Special Rapporteur on the situation of human rights in the Palestinian territory occupied since 1967

Annex

Reference to international human rights law

United Nations Guiding Principles on Business and Human Rights

In relation to the above allegations, we would like to draw your company's attention to the United Nations Guiding Principles on Business and Human Rights (A/HRC/17/31), which were unanimously approved by the Human Rights Council in June 2011 and are relevant to the impact of business activities on human rights. These guiding principles are based on the recognition of: (a) "The existing obligations of States to respect, protect and fulfill human rights and fundamental freedoms; (b) The role of business enterprises as specialized organs or societies with specialized functions, required to comply with all applicable laws and to respect human rights; (c) The need to provide appropriate and effective rights and remedies when rights are violated."

The guiding principles also specify that commercial enterprises have an independent responsibility to respect human rights. Principles 11 to 24 and 31 to 31 provide guidance to enterprises on how to fulfill their responsibility to respect human rights, including through human rights due diligence processes. As noted in the commentary to guiding principle 13 of the UN Guiding Principles on Business and Human Rights, companies may cause or contribute to adverse human rights impacts through their own activities or be directly linked to such impacts through their business relationships. 'Activities' include both actions and omissions, while 'business relationships' encompass relationships with business partners, entities in their value chain, and any other State or non-State entity directly linked to their operations, products, or services.

Principle 18 emphasizes the essential role of civil society and human rights defenders in helping to identify potential adverse impacts of business on human rights. We also note that in its recent guidance on ensuring respect for human rights defenders (A/HRC/47/39/Add.2), the Working Group on Business and Human Rights emphasized the urgent need to address the adverse impacts of business activities on human rights defenders in particular.

The commentary on principle 26 of the Guiding Principles on Business and Human Rights emphasizes that States, in order to guarantee access to remedy through judicial mechanisms, must ensure that the legitimate activities of human rights defenders are not impeded. Businesses have an independent responsibility to take the necessary measures to cease or prevent their contribution and to use their influence to mitigate to the maximum extent possible any remaining impact that contributes or may contribute to a negative impact on human rights (commentary on guiding principle 19) and should remedy any actual adverse impact that they cause or contribute to. Redress procedures should be impartial, protected from corruption, and free from political or other attempts to influence the outcome (comment on guiding principle 25).

Freedom of opinion and expression

Article 19 of the ICCPR guarantees the right to hold opinions without interference and the right to freedom of expression, which includes the freedom to seek,

receive and impart information and ideas of all kinds. Under article 19(3), any restrictions on freedom of expression must be provided by law and necessary for respect of the rights or reputations of others, or for the protection of national security, public order, public health or morals. As clarified by the Human Rights Committee in general comment No. 34 (CCPR/C/GC/34), such restrictions must conform to the strict tests of necessity and proportionality and must not be applied in a manner that discriminates against specific ideas, beliefs or groups. The Human Rights Committee has also recognised that "the freedoms of opinion and expression constitute a basis for the full enjoyment of a wide range of other human rights" and are integral to the enjoyment of the rights to freedom of assembly and association, which, in essence, enable individuals "to express themselves collectively and to participate in building their society." Together, and in conjunction with other related rights, they constitute the cornerstone of societies based on democracy, human rights, the rule of law, and pluralism.

Freedom of association

Article 22 of the ICCPR protects the right to freedom of association. In this regard, paragraph 9 (b) of Human Rights Council resolution 22/6 callsupon States to "ensure that they do not impose restrictions arbitrarily on potential sources of funding intended to support the activities of human rights defenders, in accordance with the Declaration [on Human Rights Defenders], beyond the restrictions normally applied to any other non-human rights activity carried out in the country, which are intended to ensure transparency and accountability, and that no legislative provisions criminalize or discredit human rights activities on the grounds of the origin of their source of funding."

The right to freedom of association includes the right to form and operate organisations for the purpose of pursuing legitimate objectives such as human rights monitoring, legal advocacy, and humanitarian assistance. In its general comment No. 25 (CCPR/C/21/Rev.1/Add.7), the Human Rights Committee has underscored "the exercise of this right shall not be subject to any restrictions other than those prescribed by law and necessary in a democratic society in the interests of national security, public safety, public order (ordre public), the protection of public health or morals, or the protection of the rights and freedoms of others."

Right to participate in public affairs

Article 25 of the ICCPR guarantees the right of every citizen to take part in the conduct of public affairs, directly or through freely chosen representatives. This includes the right to engage in political advocacy, participate in public debate, and influence decision-making at the national and international level. The Human Rights Committee has affirmed that states must ensure the free participation of civil society in political and public life, and that measures which arbitrarily exclude certain voices or perspectives from the public sphere are inconsistent with article 25.

Right to legal representation and legal aid

Under article 9 of the ICCPR, as interpreted by the Human Rights Committee in its general comment No. 35, individuals deprived of liberty have the right to access legal counsel promptly following arrest or detention. This safeguard is essential to

prevent arbitrary detention and to ensure that detainees can effectively challenge the lawfulness of their detention. Similarly, article 14 guarantees the right to a fair trial, which includes access to legal representation and, where necessary, legal aid. The Human Rights Committee has emphasized that legal assistance must be provided in a manner that ensures equality of arms and the effective participation of the accused in the proceedings.

In addition, article 2(3) of the ICCPR affirms the right to an effective remedy for violations of rights recognized in the Covenant. This obligation is particularly critical when read in conjunction with article 7, which prohibits torture and cruel, inhuman or degrading treatment. States must ensure that victims of such violations have access to independent and impartial mechanisms capable of providing redress, in line with their obligations under both the ICCPR and the Convention Against Torture (CAT).

Human rights defenders

The Declaration on the Right and Responsibility of Individuals, Groups and Organs of Society to Promote and Protect Universally Recognized Human Rights and Fundamental freedoms, also known as the UN Declaration on Human Rights Defenders. Article 1 of the Declaration states that everyone has the right to promote and to strive for the protection and realization of human rights and fundamental freedoms at the national and international levels. This includes every person's right, individually and in association with others, to "form, join and participate in non-governmental organizations, associations or groups" and "to solicit, receive and utilize resources for the express purpose of promoting and protecting human rights and fundamental freedoms through peaceful means" (A/RES/53/144, arts. 5, 13).

Furthermore, article 6(b) and (c) provide that everyone has the right, individually and in association with others to freely publish, impart or disseminate to others views, information and knowledge on all human rights and fundamental freedoms; and to study, discuss and hold opinions on the observance, both in law and in practice, of all human rights and fundamental freedoms and to daw public attention to those matters.