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# INTRODUCTION

How does the transnational security architecture and the use of “the security playbook” manifest in key national contexts? What evidence is there of the role of transnational security architecture (such as the UN Global Counter Terrorism Strategy; Financial Action Task Force; UN Security Council Resolutions and others) in facilitating restrictions on civic space in Nigeria? What links exist between transnational and domestic entities promoting and implementing a hard security paradigm and measures? What regional or bilateral security partnerships does Nigeria have with other countries and how do they influence the development and implementation of national security measures that limit fundamental freedoms and civil society?

Indeed, Nigeria is struggling to rein in organized criminal activities in several theaters of insecurity in the country. The military and non-military measures—mostly copied from abroad—deployed to combat these security threats create opportunities for the use and abuse of counter terrorism and security laws, and this is potentially becoming the dominant driver of closing civic space in Nigeria. Accordingly, this paper establishes the links between the transnational and national drivers of closing civic space in Nigeria built on the rhetoric of countering terrorism and defending national security. The enquiry starts by tracing the transnational origins and sources where national counterterrorism initiatives draw inspiration from. This is done by examining the international norms and standards that countries like Nigeria are under pressure to comply with, the global networks the country is required to join, and the consequences attached to non-compliance. The trends and patterns of governmental restrictions arising from the implementation of international counterterrorism norms at the local level illuminate whether the way Nigeria is following these standards is problematic or not. The findings build evidence of the government's accelerated use of a security playbook to stifle dissent in the name of counterterrorism and deepen understanding of the unintended consequences of global security measures in Nigeria. Based on the collective intelligence and diagnosis of this security playbook, the paper concludes by highlighting the opportunities that exist in short-term and long-term for civic actors to push back, to disrupt, to reform, and over long-term to transform the influence of security on civic space in Nigeria and beyond.

## SUMMARY OF KEY FINDINGS

**1. A Nation Besieged by Insecurity:** The country's security landscape has radically transformed over the past five years, with the six geographical regions overwhelmed by varying degrees of internal security challenges. The northern region is the epicenter of violent crimes such as banditry, farmer-herder conflicts, illegal gold mining, insurgency and terrorism. In the North-West region, numerous armed groups working independently of each other—collectively identified as “bandits” by the Nigerian government—have emerged.<sup>1</sup> These groups are responsible for kidnappings along highways, mass abductions and indiscriminate attacks on communities. Historically entrenched injustices against the Igbo of south-east Nigeria are fuelling the separatist agitations in that zone. The secessionist campaigners, Indigenous Peoples of Biafra (IPOB), have been proscribed and designated a terrorist organization, with hundreds of members killed by security forces and their leader, Nnamdi Kanu, still in custody and facing

1 TheCable, Over 150 groups of bandits operate in the forests, says Masari, September 21, 2021, Accessed via <https://www.thecable.ng/there-are-over-150-groups-of-bandits-in-the-forests-says-masari>

terrorism charges. In the oil-rich south-south region, irresponsible oil exploration activities by multinational corporations, environmental degradation, underdevelopment, poverty, youth restiveness and unemployment lie at the root of the protracted violent conflicts in the area. The south-west's determination to take charge of their own economic independence and regional security to curtail the deadly invasion and land encroachments by herdsmen is igniting fresh demands for secession.

**2. National Security Measures Regurgitate Global Security Norms:** Combating the mounting insecurity in different parts of the country necessitated the introduction of numerous security and counter-terrorism (CT) initiatives such as the National Counter-terrorism Strategy (NACTEST), the National Action Plan for Preventing and Countering Violent Extremism (PCVE) policy 2017, the Counterterrorism Center (CTC) and the deradicalization, rehabilitation, and reintegration (DRR) programs. Because most of these security initiatives draw inspiration from abroad, local implementation is fraught with numerous challenges and tensions, fueling calls for reforms. Insecurity, including counter-terrorism laws and measures in Nigeria are essentially a copy and paste of some global norms, and confer maximum power on state actors. Findings show that the climate of insecurity is accelerating the government's use of its national security playbook—mostly copied from global security initiatives—to suppress dissent.

**3. Universalism of Counter-Terrorism Norms:** Terrorism is widely considered as a global problem requiring every nation state and territory to support and commit to waging war against terrorists. As a threat to the comity of nations, there are certain rules, policies, principles and measures to combat terrorism that are applicable to every country and persons, irrespective of their origins, colour and race. Norms developed at the international level are passed down for compliance by states. Compliance often requires states to make laws and establish institutions that enforce international norms within their territories. While states are allowed to develop their own rules and regulations against terrorism, whatever norms that exist within states are viewed as complementary to the international norms.

**4. International CT Norm-forming Entities are broadly classified into four categories:** (a) state actors and groups of powerful governments—the G-20s, G-8s, G-7s etc. (b) international political and intergovernmental organizations such as the United Nations, African Union, Economic Community of West African States (ECOWAS), the Council of Europe, the European Union, the League of Arab States, the Organization for Security and Co-operation in Europe, the Organization of American States, the Organization of the Islamic Conference, the South Asian Association for Regional Cooperation; (c) financial, trade and customs organisations such as the Organization for Economic Corporation and Development (OECD), Bretton Woods institutions like the World Bank and the International Monetary Fund (IMF); and (d) informal forums of states<sup>2</sup> such as the Financial Action Task Force (FATF) and the Global Counter Terrorism Forum.

**5. Realizing Cross-Border Application of International CT Norms:** State actors popularly use broad sanctions programme—which usually take the form of arms embargoes, foreign assistance reductions and cut-offs, export and import limitations, asset freezes, tariff increases, revocation of most favored nation (MFN) trade status, negative votes in international financial institutions, withdrawal of diplomatic relations, visa denials, cancellation of air links, and

<sup>2</sup> These forums are informal partnerships between influential states which do not have the structures of international organisations and formal paraphernalia like secretariats, treaties, etc. Such forums include the FATF and the GCTF.

prohibitions on credit, financing, and investment—to extract compliance from other states. International political organizations like the United Nations Security Council pass resolutions setting out specific obligations of states to prevent and suppress financing of terrorism in national contexts. Financial and trade international organizations like the World Bank and the IMF include counterterrorism-related conditions in funding agreements with developing countries benefitting from their financing, policy advice, and technical assistance. Informal forum of states like the FATF can gray list countries or give ratings of a country which affect its ability to get international loans or influence the price of the stocks or bonds issued by corporate entities in that country. Securities issued by countries or corporate bodies in a company which have low compliance level with FATF standards would most likely be rated as risky.

**6. Influence of Universal CT Norms in Nigeria:** A clear and direct connection exists between international CT norms and Nigeria's legal regimes on anti-money laundering and countering the financing of terrorism (AML/CFT). Most of the existing policy and legislative responses to combat terrorism in Nigeria derive inspiration from the country's bid to extricate itself from the consequences of non-compliance with international CT, AML/CFT standards. There are five major ways through which universal CT norms influence national counterterrorism measures. They include compliance/regulatory actions, establishment of complementary structures, copycat-ism, domestication or adaptation of international legislative initiatives and transborder political influences. The first notable regulatory action against Nigeria was recorded in 2002 when FATF included Nigeria in its list of non-cooperative countries and territories (NCCT) prompting the enactment of the Money Laundering (Prohibition) Act 2004 and the Economic and Financial Crimes Commission (Establishment) Act.<sup>3</sup> These legislative measures culminated in the removal of the country from the NCCT list. Another major international regulatory action that propelled changes to the Nigerian AML/CFT landscape is the suspension of Nigeria from the Egmont Group<sup>4</sup> in 2017 “following repeated failures on the part of the Nigerian Financial Intelligence Unit (NFIU) to address concerns regarding the NFIU's independence from the Economic and Financial Crimes Commission (EFCC).”<sup>5</sup> Again, this led to the enactment of the Nigerian Financial Intelligence Unit Act 2018 which established the NFIU as a separate unit from EFCC.<sup>6</sup>

**7. Establishment of Complementary Structures, Copycatism and Transborder Political Influences:** The Counter Terrorism Centre (Nigerian CTC) established pursuant to the Terrorism Prevention Act not only mirrors the country's obligations to the UN but also domesticates the United Nations CT programmes through the National Counter-terrorism Strategy and the Preventing and Countering Violent Extremism Policy Framework and National Action Plan.<sup>7</sup> Lately, Nigeria has scaled up its investments in surveillance technologies,<sup>8</sup> ostensibly imitating the elaborate surveillance programmes in countries like the United States,<sup>9</sup> the United Kingdom,<sup>10</sup> China<sup>11</sup> and Russia.<sup>12</sup> Suppressing terrorism is the official justification advanced for the heightened surveillance agendas.<sup>13</sup> Inspired by repressive laws copied from Singapore, Nigeria has used national security as an excuse to initiate legislative proposals designed to curtail internet freedoms, arguing that such legislations will help to draw a line between protecting national security and the freedom of expression online.<sup>14</sup> Colonial ties, simple imitation and global interconnections motivate countries like Nigeria to copy and paste laws and practices from other countries, which they consider as significant or a strategic ally. Buzzwords like

<sup>3</sup> Babajide Komolafe “Inside NFIU and the new regime stopping states from messing with local govt funds.” Available at <https://www.vanguardngr.com/2019/05/inside-nfiu-and-the-new-regime-stopping-states-from-messing-with-local-govt-funds/>, accessed 26 September 2021

<sup>4</sup> The Egmont Group is a united body of 167 Financial Intelligence Units (FIUs). The Egmont Group provides a platform for the secure exchange of expertise and financial intelligence to combat money laundering and terrorist financing. See <https://egmontgroup.org/content/about>

<sup>5</sup> See Egmont Group “Co-Chairs’ Statement - 24th Plenary of the Egmont Group of Financial Intelligence Units.” Available at <https://www.egmontgroup.org/en/content/co-chairs%E2%80%99-statement-24th-plenary-egmont-group-financial-intelligence-units>, accessed 26 September 2021

<sup>6</sup> The Guardian Nigeria News “Nigeria back as an active member of Egmont Group.” Available at <https://guardian.ng/news/nigeria-back-active-member-of-egmont-group/>, accessed 26 September 2021

<sup>7</sup> See <https://ctc.gov.ng/about-ctc/>, accessed 26 September 2021

<sup>8</sup> —Nigeria, Kenya use Israeli surveillance tool to listen to calls Quartz Africa (qz.com): Nigerian govt moves to control media, allocates N4.8bn to monitor WhatsApp, phone calls (premiumtimesng.com)

<sup>9</sup> America spying on its citizens Surveillance of Citizens by Government - The New York Times (nytimes.com)

<sup>10</sup> Surveillance - All you need to know - Politics.co.uk

<sup>11</sup> Xxx “A Surveillance Net Blankets China's Cities, Giving Police Vast Powers - The New York Times (nytimes.com); What China's Surveillance Means for the Rest of the World | Time: How China harnesses data fusion to make sense of surveillance data (brookings.edu)

<sup>12</sup> Russia is growing its surveillance state but not everyone is monitored equally - The Washington Post; Moscow Silently Expands Surveillance of Citizens | Human Rights Watch (hrw.org)

<sup>13</sup> See Action Group on Free Civic Space, Security Playbook of Digital Authoritarianism in Nigeria (December 2021); [www.closingpaces.org](http://www.closingpaces.org)

<sup>14</sup> Vanguard, Anti-social Media Bill: Senator defends alleged Plagiarism of Singapore Statute (2019) Accessed via <https://www.vanguardngr.com/2019/11/anti-social-media-bill-senator-defends-alleged-plagiarism-of-singapore-statute/>

“International Best Practices” or “international standards” are commonplace justifications for the importation of foreign norms into local policy development.

**8. Domestication and Global CT Norms:** Presently, the legal, institutional, and operational frameworks for combating terrorism and financing of terrorism in Nigeria are inspired or adapted from those that exist at the international CT levels. From the National Counter-terrorism Strategy (NACTEST) to the Money Laundering (Prohibition) Act 2004, currently 2011 ML (Prohibition) Act to the Terrorism Prevention Act (TPA) Act in 2011 (as amended) to the Cybercrime laws up to the banking regulations, all their provisions are modelled after those laid down in international CT standards. The recommendations and guidance documents of the FATF Standards on AML/CFT and the GCTS specifically informed the following legislative, regulatory and institutional mechanisms: Enactment of the Terrorism Prevention Act (TPA) Act in 2011 as amended, the Money Laundering (Prohibition) Act 2004, currently 2011 ML (Prohibition) Act and the Central Bank of Nigeria Anti-Money Laundering/Combating the Financing of Terrorism Regulations, 2013 (“CBN CT Regulation”); establishment of the Special Control Unit against Money Laundering and the Nigerian Financial Intelligence Unit (NFIU); review of the Companies and Allied Matters Act (CAMA) 2020; conducting the National Risk Assessment (2016) and the NPO Risk Assessment 2021 and drafting of the Nigerian FIU Trends and Typology report (2013) and the National Counter-terrorism Strategy (NACTEST) and the Policy Framework and National Action Plan for Preventing and Countering Violent Extremism (PCVE).

**9. Misuse of CT Norms to Narrow the Civic Space:** Numerous studies find that countries use legal or quasi-legal, bureaucratic, financial, political, and security related methods to contract the civic space.<sup>15</sup> The most popular legal frameworks invoked by state agents to justify the suppression of civil rights and freedom under the pretext of counterterrorism or protecting national security include the constitutional derogation of certain human rights guarantees in the interest of defence, public safety, public order, public morality or public health. While the basis for these restrictions is understandable, national security agencies have often latched onto these vague terminologies to restrict civic activities under the banner of defending national security. Examples include using 'defence' and 'national security' to justify several attempts to introduce bills for the regulation of the social media and non-profit organizations (NPOs) in Nigeria. Similarly, the Terrorism Prevention Act does not clearly define what amounts to terrorism. The definitional uncertainty opened the doorway to brand dissenters and protesters as 'terrorists' and then visit the consequences prescribed under the law upon them. Most forms of organized dissent in the country—whether religious (Islamic Movement of Nigeria),<sup>16</sup> regional agitations (IPOB),<sup>17</sup> political and social justice<sup>18</sup>—have been met with stiff resistance and their organizers have become frequent targets of crackdowns branded as countering terrorism.

Section 35 of the Terrorism Prohibition Act (TPA) is also a clear footprint of Recommendation 8 of the FATF Standards within the Nigerian legal system targeted at charities and non-profits. Although Recommendation 8 has been rephrased,<sup>19</sup> the nasty stains endure. This section of the TPA allows the government agency responsible for registration of organisations to refuse to register, or to deregister any charity “based on security or criminal intelligence reports, or suspicions of direct or indirect association with a terrorist group”.<sup>20</sup> The Cybercrimes Act is popularly used to justify criminal charges brought against vocal critics, journalists, bloggers and

15 Siân Herbert “Restricting space for civil society.” Available at [www.gsdrc.org/wp-content/uploads/2016/03/HDQ1266.pdf](http://www.gsdrc.org/wp-content/uploads/2016/03/HDQ1266.pdf), accessed 26 September 2021, p. 3  
Punch, Why we proscribed IMN —Presidency, <https://punchng.com/why-we-proscribed-imn-presidency/>

16 Anthony Ogbonna, Vanguard, IPOB not a terrorist organisation – US govt (2017) Accessed via <https://www.vanguardngr.com/2017/09/ipob-not-a-terrorist-organisation-us-govt/>

17 #EndSARS: Police Brutality, Protests and Shrinking Civic Space In Nigeria, Action Group on Free Civic Space (2021) <https://closingspaces.org/endsars-police-brutality-protests-and-shrinking-civic-space-in-nigeria/>

19 The current iteration of Recommendation 8 prescribes a risk-based approach of regulating NPOs requiring states to assess the TF risks to which NPOs are exposed and then apply commensurate measures aimed at countering the identified risks.

20 Section 35(1) of TPA

campaigners actively using the social media to demand political and corporate accountability. the Closing Spaces Database has tracked over 50 incidents involving civic actors currently facing criminal charges, including terrorism on account of critical commentary posted on Facebook or Twitter.<sup>21</sup>

**10. Impacts of War against Terror and P/CVE Programming on the Civic Space:** Tensions have often arisen between state agents and humanitarian organizations, with accusations and counteraccusations of affiliation with terrorist groups often renting the air. Local media is awash with narratives suggesting that international aid as well as UN agencies are engaged in aiding and abetting terrorist groups and misusing funds meant for refugees. The sudden declaration of INGOs as persona non-grata (PNG) based on allegations of providing support to non-state armed groups remains a serious concern. Two INGOs, Action Against Hunger (AAH) and Mercy Corps, on the 18 September and 25 September respectively, were ordered to suspend operations in the northeast by the Nigerian Armed Forces (NAF).<sup>22</sup> The sanctions not only included closure of offices and suspension of operations, staff were also declared persona non-grata and asked to leave the country. Suspension and closure of activities threatens to deprive thousands of people from life-saving assistance in devastated communities in critical need of humanitarian assistance, especially in the three most affected states of Borno, Adamawa and Yobe.

In light of the above developments, the Nigerian federal legislature has revisited the topic of legislation for NGOs, hinting at the possibility of reintroducing the draft NGO Regulatory Commission Bill.<sup>23</sup> Not only that, the Nigerian government implemented the Civil Security Cooperation (CiSEC) framework recommendations and established the National Humanitarian Coordination Council (NHCC) to oversee humanitarian operations.<sup>24</sup> A 27-man National Humanitarian Co-ordination Technical Working Group (NHCTWG)<sup>25</sup> was constituted to provide technical support to the NHCC. In sum, the forced closures and the tide of legislative and regulatory proposals/initiatives reflect the increasingly restrictive operating environment for implementing humanitarian assistance in crisis-affected areas, where humanitarian aid workers continue to face challenges as they strive to deliver urgent, life-saving assistance to populations in need.

**11. Drivers of Misuse of International CT Architecture to Narrow Civic Space in Nigeria:** First, the absence of a clear definition of terrorism is a fatal flaw emanating from the founding CT instruments. This uncertainty is routinely exploited by governments to adopt overbroad definitions that allows them to widen the dragnet to clamp down on real and perceived opposition and stifle dissent. Secondly, the consequences of non-compliance to international CT norms are dire, such as blacklisting, economic sanctions, low ratings during Mutual Evaluation and peer reviews exercises. In 2017, the Egmont Group suspended Nigeria citing concerns about the autonomy of the NFIU. The suspension was lifted only after a hurriedly-enacted legal framework making the NFIU independent of government's control met the expectations of the Egmont Group. Thirdly, International CT standards pay lip service to the tenets of human rights, and neither do the routine use of cosmetic phrases like “in compliance with international law, including human rights, humanitarian and refugee law”<sup>26</sup> translate into positive obligations for states. The UN Security Council Resolution 1373 does not contain any functional provision on human rights.<sup>27</sup> This set the tone for the proliferation of extreme CT

<sup>21</sup> <https://closingspaces.org/category/freedom-of-expression/>

<sup>22</sup> Action Against Hunger, Nigeria: Following Forced Closure Of Offices in Borno and Yobe States, Action Against Hunger Strongly Rejects Accusations of Supporting Terrorist Groups: <https://www.actionagainsthunger.org/story/nigeria-borno-yobe-action-against-hunger-strongly-rejects-accusations-of-supporting-terrorist-groups>

<sup>23</sup> Nasir Ayitogo, Premium Times, Updated: Nigerian Lawmakers To Revisit NGO Regulatory Bill – Speaker, <https://www.premiumtimesng.com/news/headlines/354099-just-in-nigerian-lawmakers-to-revisit-ngo-regulatory-bill-speaker.html>

<sup>24</sup> Blueprint Newspaper, FG sets up technical group to coordinate humanitarian activities(2020); <https://www.blueprint.ng/fq-sets-up-technical-group-to-coordinate-humanitarian-activities/>

<sup>25</sup> The group comprises commissioners in charge of humanitarian issues in Borno, Adamawa and Yobe; heads of NEMA, NEDC and NCFRMI; representatives of Operations of the Armed Forces, the European Union Commission, United States Agency for International Development and United Nations Office for the Coordination of Humanitarian Affairs

<sup>26</sup> Ibid., p. 9

<sup>27</sup> The only mention of Human Rights is in resolution 3(f) which calls upon states to “Take appropriate measures in conformity with the relevant provisions of national and international law, including international standards of human rights, before granting refugee status, for the purpose of ensuring that the asylum-seeker has not planned, facilitated or participated in the commission of terrorist acts.”

measures resulting in massive contractions of the civic space across jurisdictions. Fourthly, international CT norms have provided a legal impetus for the proliferation of local laws targeted at NPOs. FATF's Recommendation 8, as initially drafted, ostensibly heightened preexisting tensions between governments and NPOs which seemed to allow for governments' suppression of NPOs.

**12. Specific Burdens Global CT Norms Place on NPOs:** The first is blanket generation. The major legislative burden imposed on NPOs in the wake of Recommendation 8 is the 2004 Anti-Money Laundering Act (MLA) which introduced the term, 'Designated Financial Institutions and Designated Non-Financial Institutions, (DNFIs) which substantially shares similar definition and characteristics with designated non-financial businesses and professions (DNFBPs). A ministerial regulation made pursuant to the 2004 law, included NPOs in the list of Designated Non-Financial Institutions (DNFIs). That designation lumped NPOs together with other businesses as DNFBPs, subjecting NPOs to FATF's onerous requirements for DNFBPs. Secondly, NPOs face the challenge of submitting to over 9 (nine) registration controls in over 9 different entities. These controls were established because of the particularly vulnerable classification that FATF introduced. Thirdly, the NPO community has faced a barrage of attempts by the government to make laws regulating NPOs in Nigeria and interfering with their funding in the form of NGO Bills.<sup>28</sup> Although Nigeria conducted a national risk assessment of money laundering and terrorism financial risks in the country in 2016, no risk assessment of the NPO sector was undertaken, and the tide of regulatory proposals advanced for the regulation of the non-profit sector have therefore crafted blanket legislation aimed at the entire NPO sector (which is not in line with Recommendation 8 or other FATF recommendations). Nigerian NPOs consider the recently-scheduled risk assessment of the NPO sector as a major victory. Fourthly, despite the revision of Recommendation 8 few years ago, GIABA specifically singles out NPOs for rigorous surveillance". This directive emboldens governments to enforce this provision in ways that offend privacy rights. Many groups—like Amnesty International—Nigeria have reported aggressive surveillance of their financial transactions, including numerous raids on their offices by state agents demanding to look into their books of accounts.

**13. Forward Looking Approaches:** We identified some of the core issues NPOs should challenge to resist the misuse of CT norms and security narratives for the suppression of civic freedoms. First is to push for an acceptable definition of terrorism. Definitions of terrorism and of violent extremism in national laws must not be overly-broad and vague. They must be precise and sufficiently clear to avoid including members of civil society, or non-violent acts carried out in the exercise of fundamental freedoms. Secondly, another way to ensure that human rights are kept at the forefront of CT efforts is to hardwire human rights in country compliance ratings such as the Universal Peer Review and Mutual Evaluations. This would mean including human rights conditions as a parameter for the assessments, thereby placing the onus on countries to demonstrate how they have (both in design and in action) met each CT requirements while respecting human rights. Thirdly, countries should be required to set up and maintain an adequate reparation programme for compensation of persons inadvertently affected by CT measures. Thirdly, national risk assessments offer a window of opportunity to conduct an assessment that will yield risk-based analysis for identifying the subsets of NPOs at risk and the development of a proportionate terrorism financing response to identified threats.



#### 14. Mechanisms to Engage to Disrupt and Reform the International CT Architecture:

International CT frameworks are subjected to periodic review.<sup>29</sup> These are opportunities to carry out human rights audits of the CT strategies and to reinject learnings from across the globe into the frameworks. National Counter Terrorism Strategy 2016 (subject to review biennially), the National Cybersecurity Policy and Strategy 2021 (subject to review every 5 years), the Policy Framework and National Action Plan for Preventing and Countering Violent Extremism 2017 (to be reviewed after 3 years), the National Security Strategy 2019 (to be reviewed every 5-10 years). Secondly, Mutual Evaluations under the auspices of FATF or FATF-Styled Regional Bodies (such as GIABA for West Africa) present an opportunity for the civil society to engage with the representatives of these bodies. In February 2021, FATF launched a new project to study and mitigate the unintended consequences resulting from the incorrect implementation of the FATF Standards.<sup>31</sup> This is a positive development and provides the civil society with the opportunity to engage with a major CT norm actor on the issues highlighted in this research. Recently, the Special Rapporteur called for input to a Report on the Human Rights Dimensions of Technical Assistance and Capacity Building in the Counter Terrorism and Countering / Preventing Violent Extremism Arenas which would illuminate the human rights dimension of CT technical assistance and capacity building provided to States by regional and global entities.<sup>32</sup> This should be maximally utilized by the civil society. And lastly, the GCTF-inspired Initiative on Ensuring Implementation of Countering the Financing of Terrorism Measures While Safeguarding Civic Space provides a platform for stakeholders to discuss perspectives and experiences, share lessons learned and existing good practices, and develop a good practice memorandum on ways to achieve implementation of proportionate and risk-based CFT) measures that avoid negatively affecting civic space and humanitarian operations.

#### 15. What Can Be Done at the Sub-regional Level?

Civic actors in Nigeria and West African can leverage the platform of the GCTF Capacity-Building in the West Africa (WA) Region Working Group to share information on efforts made to counter terrorism financing, the results being achieved, and the lessons learned. Information shared can feed into the strengthening of institutional frameworks (including policy, legislation, etc.) and remodelling of best practices in financial intelligence and investigations across the subregion. Other platforms include the Ecowas Political Declaration and Common Position Against Terrorism was adopted in Yamoussoukro, Côte d'Ivoire, on 28 February 2013; the ECOWAS Counter-Terrorism Strategy. Member States are obligated to carry out a periodic evaluation and reporting on the measures taken and challenges encountered in the implementation of this Strategy, with civil society obligated to be consulted as well.

29 UN Global Counter-Terrorism Strategy is due for review every 2 years. See <https://www.un.org/counterterrorism/un-global-counter-terrorism-strategy>, accessed 26 September 2021

30 Based on documents available on CTC website – [ctc.gov.ng](https://ctc.gov.ng), accessed 26 September 2021

31 FATF "Mitigating the Unintended Consequences of the FATF Standards." Available at <https://www.fatf-gafi.org/publications/financialinclusionandnpoissues/documents/unintended-consequences-project.html>, accessed 26 September 2021

32 See OHCHR "Call for inputs: Report on the Human Rights Dimensions of Technical Assistance and Capacity Building in the Counter-Terrorism and Countering / Preventing Violent Extremism Arenas." Available at [https://www.ohchr.org/EN/Issues/Terrorism/Pages/HR\\_Technical\\_Assistance\\_Capacity\\_Building.aspx](https://www.ohchr.org/EN/Issues/Terrorism/Pages/HR_Technical_Assistance_Capacity_Building.aspx), accessed 26 September 2021

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