

An update on developments regarding civic space in the EU and an overview of the possibilities for human rights defenders to enter EU territory

The Netherlands

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1. Civic space developments in 2022

1.1. Right to demonstrate under pressure

Area	Freedom of peaceful assembly
Topics	Organisation of assemblies / policing practices
Impact	Major

In the Netherlands, the Dutch section of Amnesty International concluded in a report that the right to assemble and demonstrate is coming under increasing pressure.¹ The report was published on 11 November 2022. This work is based, on the one hand, on extensive case histories, such as experiences gained by Amnesty International during its own demonstrations and as an observer at externally organised demonstrations, supplemented by inputs from numerous activists and demonstrators from other organisations. On the other hand, the text also draws upon analyses of policy documents and reports from authorities and media coverage, and on consultations with experts and lawyers. An overall lack of knowledge among municipalities and police about what the right to demonstrate entails emerged from the report. It states that mayors are too quick to reach for the law to curb or ban a protest, for example, if it is not registered or because it would impede traffic. The police also tends to intervene too quickly. Especially at large, peaceful demonstrations and blockades, police officers act rapidly to start arresting people and confiscating placards or banners. Demonstrations are too often seen by the police as a security risk rather than a human right that should be facilitated as much as possible. Amnesty International wants the Netherlands to amend the Public Assemblies Act (*Wet Openbare*

¹ Amnesty International Netherlands (2022), Right to demonstrate under pressure. Rules and practice in Netherlands must improve ([Demonstratierecht onder druk. Regels en praktijk moeten beter](#)).

Manifestaties) and municipal regulations. These should be in line with human rights and not imposed out of concern for all possible risks and problems.

1.2. Aggression and intimidation threaten safe public debate

Area	Safe space & protection
Topics	Intimidation; Verbal attacks and harassment ; Strategic Lawsuits Against Public Participation ; Data Protection
Impact	Major

In its annual report, the Netherlands Institute for Human Rights focused on the increasing aggression and intimidation of people who express themselves in the media, putting pressure on the right to freedom of expression.² The report is based on studies and on an analysis of the public debate, social developments and the media coverage of incidents that took place in 2021. The report has been further deepened through interviews with various experts. The Institute made several recommendations for the government to protect journalists and other media actors. Some of these relate to policy initiatives already under way. For example, the Institute recommended a prohibition on doxing, namely the use of personal data for intimidating purposes. On 8 July 2022, the Minister of Justice and Security submitted to the House of Representatives a Bill to criminalise doxing.³ Another recommendation is to allow people to shield their personal data in the Business Register of the Netherlands Chamber of Commerce. On 15 December 2022, a regulation took effect which enables businesses and self-employed people to shield their visiting addresses.⁴ Another

² The Netherlands Institute for Human Rights (*College voor de Rechten van de Mens*) (2022), Human Rights in the Netherlands 2021. A safe public debate ([Mensenrechten in Nederland 2021. Een veilig publiek debat](#)).

³ The Netherlands, Minister of Justice and Security (*Minister van Justitie en Veiligheid*) (2022), Bill to criminalise use of personal data for intimidating purposes ([Wetsvoorstel strafbaarstelling gebruik persoonsgegevens voor intimiderende doeleinden](#)).

⁴ The Netherlands, Minister of Economic Affairs and Climate Policy (*Minister van Economische Zaken en Klimaat*) (2022), Decision 24 November 2022 amending the Trade Register Decree 2008 providing a basis for shielding visiting addresses on request ([Besluit van 24 november](#)

recommendation urged the government to reconsider its decision not to initiate specific legislation against Strategic Lawsuits Against Public Participation (SLAPPs).

1.3. Bill for the Transparency Civil Society Organisations Act contested

Area	Freedom of association
Topic	Transparency
Impact	Major

In the Netherlands, the bill for the Transparency Civil Society Organisations Act is still pending before the House of Representatives.⁵ The bill was submitted to the House of Representatives in November 2020. The bill consists of two parts: an information obligation that will apply to all civil society organisations, and a filing obligation for foundations. The bill aims at preventing undesired foreign influence via donations to Civil Society Organisations (CSOs). From 8 June 2021 to 29 June 2022 a redrafted version of this bill was opened for public consultation, but this redrafted bill has not been submitted to the House of Representatives yet.⁶ In March 2022 a coalition of CSOs commented on the bill as part of its contribution to the 4th Universal Periodic Review of the Kingdom of the Netherlands.⁷ They expressed concerns about the discriminatory and stigmatizing effect of the bill against CSOs receiving funding from abroad. Concern was also manifested about the lack of clear criteria on what may constitute an indication of risk or disruption of ‘public order’ by an organisation, as

[2022, houdende wijziging van het Handelsregisterbesluit 2008 inzake een grondslag voor het afschermen van bezoekadressen op verzoek\).](#)

⁵ The Netherlands, Minister for Legal Protection (*Minister voor Rechtsbescherming*) (2020), Bill for Transparency Civil Society Organisations Act ([Wetsvoorstel Wet transparantie maatschappelijke organisaties](#)), 20 November 2020.

⁶ The Netherlands, Minister for Legal Protection (*Minister voor Rechtsbescherming*) (2021), Memorandum of amendment. Draft Bill for Transparency Civil Society Organisations Act (*Nota van wijziging. Concept Wetsvoorstel transparantie maatschappelijke organisaties*).

⁷ Dutch Section of the International Commission of Jurists (NJCM) (2022), [Contribution of the Dutch Section of the International Commission of Jurists \(NJCM\) and other stakeholders to the fourth Universal Periodic Review of the Kingdom of Netherlands](#).

well as about the additional administrative requirements, supervision and potential restrictions of their activities. The above may lead to legal uncertainty and self-censorship. In its contribution, the coalition of CSOs recommended the Dutch government to either reconsider and amend or withdraw the bill for the Transparency Civil Society Organisations Act.

2. Promising practice in 2022

2.1. Legal action by CSO compels State of the Netherlands to conform to international norms on reception of asylum applicants

Court decision to uphold fundamental rights and the rule of law in Netherlands brought about by legal action of CSO	
Deciding body (in original language)	Rechtbank Den Haag
Deciding body (in English)	District Court
Case number / European Case Law Identifier	Case no. C/09/633760 KG ZA 22-733 / ECLI:NL:RBDHA:2022:10210
Parties	Dutch Refugee Council (<i>VluchtelingenWerk Nederland</i>) vs Ministry of Justice and Security (<i>Ministerie van Justitie en Veiligheid</i>) and Central Agency for the Reception of Asylum Seekers (Centraal Orgaan opvang Asielzoekers)
Decision date	6 October 2022
Web link to the decision	https://deeplink.rechtspraak.nl/uitspraak?id=ECLI:NL:RBDHA:2022:10210
Key facts of the case also situating the fundamental rights dimension (max. 250 words)	The case was brought about by a legal action of the Dutch Refugee Council (VluchtelingenWerk Nederland). Since September 2021 a large group of asylum applicants live in degrading circumstances at the Dutch application centres and emergency facilities. The Dutch Refugee Council argues that the Ministry of Justice and Security and the Central Agency for the Reception of Asylum Seekers (COA) have failed to meet the obligations to receive asylum applicants in a humane manner, in conformity with the minimum norms laid down in EU regulations and international treaties. By taking legal action, the Dutch Refugee Council is standing up for the interests of all asylum applicants and status holders who find themselves in reception facilities that do not meet the minimum standards. The

	<p>Dutch Refugee Council demanded that the Ministry and COA provide reception facilities that meet the minimum standards as per 1 October 2022. On 6 October 2022, the preliminary injunction judge of the District Court decided that the Netherlands was not meeting international standards and ordered the Ministry and COA to provide humane asylum reception to asylum seekers and status holders in accordance with legal standards. The Ministry of Justice and Security and COA filed an appeal against this ruling at the Court of Appeal in The Hague.</p>
<p>Result of the case in terms of factual outcome, and in terms of assessment of the legal question raised</p>	<p>The preliminary injunction judge specifically ordered the Ministry of Justice and Security and the Central Agency for the Reception of Asylum Seekers, among other things:</p> <ul style="list-style-type: none"> - to provide immediately every foreign national who reports to one of the applicationcentres for registration as an asylum applicant with a safe covered sleeping place, food, water and access to hygienic sanitary facilities; -with immediate effect, not to place vulnerable asylum applicants and status holders in emergency crisis shelters; -to provide immediately asylum applicants and status holders in the emergency and crisis emergency shelters with access to drinking water, sufficient and appropriate food and any necessary health care - within two weeks provide additional shelter for unaccompanied children; - to provide play facilitiesand access to education for children. -with effect from two weeks after judgment, to medically screen all asylum applicants’ seekers and status holders before placing them in crisis emergency shelters; -no later than nine months after judgment, to design reception facilities for asylum applicants and status holders in accordance with the minimum requirements for housing and access to sanitation.
<p>Give interesting quotes where the Court deals with civic space</p>	<p>"De Staat en het COA hebben zich primair op het standpunt gesteld dat VWN in haar vordering niet-ontvankelijk moet worden verklaard omdat (i) voor iedere asielzoeker en statushouder een met voldoende waarborgen omklede bestuursrechtelijke rechtsgang openstaat en (ii) de bij vordering van VWN betrokken belangen zich niet voor bundeling lenen. De voorzieningenrechter volgt de Staat en het COA in dit verweer niet."</p> <p>"Nu – naar niet ter discussie staat – aan de overige wettelijke vereisten voor het instellen van een collectieve actie is voldaan (VWN is een stichting met volledige rechtsbevoegdheid, VWN komt op voor een belang dat zij krachtens haar statuten behartigt, VWN heeft voldaan aan de vereisten gericht op transparantie en een goede governance, VWN heeft geen winstoogmerk, de collectieve vordering heeft een voldoende nauwe band met de Nederlandse rechtssfeer en VWN heeft voldaan aan haar overlegverplichting), is de conclusie dat VWN in haar collectieve vordering vordering kan worden ontvangen."</p>
<p>Give full English translation of these quotes</p>	<p>"The State and the Central Agency for the Reception of Asylum Seekers (COA) take the primary position that the Dutch Refugee Council should be Declared inadmissible in its claim because (i) every asylum applicant and status holder has access to an administrative legal remedy with sufficient guarantees and (ii) the interests involved in Refugee Council's claim do not lend themselves to bundling.The preliminary injunction judge does not follow the State and COA in this defence."</p>

	<p>"Now - as is not in dispute - the other legal requirements for bringing a collective action have been met (the Dutch Refugee Council is a foundation with full legal capacity, the Council stands up for an interest which it promotes under its articles of association, the Council has complied with the requirements aimed at transparency and good governance, the Council has no profit motive, the collective claim has a sufficiently close link with the Dutch legal sphere and the Council has fulfilled its consultation obligation), it is concluded that the Council in its collective action claim can be admitted."</p>
<p>Provide your analysis of the legal and factual relevance of the judgment</p>	<p>The importance of this ruling is that it compelled the State of the Netherlands to meet the obligations to receive asylum applicants in a humane manner, in conformity with the minimum norms laid down in EU regulation and international treaties. This ruling was brought about by the legal action of the CSO Dutch Refugee Council (<i>VluchtelingenWerk Nederland</i>). In this way, the effect of a decision put forth by a CSO led to upholding fundamental rights and the rule of law in Netherlands.</p>

<p>Court decision to uphold fundamental rights and the rule of law in Netherlands brought about by legal action of a CSO</p>	
<p>Deciding body (in original language)</p>	<p>Gerechtshof Den Haag</p>
<p>Deciding body (in English)</p>	<p>Court of Appeal, The Hague</p>
<p>Case number / European Case Law Identifier</p>	<p>Case no. 200.317.231/01 / ECLI:NL:GHDHA:2022:2429</p>
<p>Parties</p>	<p>Ministry of Justice and Security (<i>Ministerie van Justitie en Veiligheid</i>) and Central Agency for the Reception of Asylum Seekers (Centraal Orgaan opvang Asielzoekers) vs Dutch Refugee Council (<i>VluchtelingenWerk Nederland</i>)</p>
<p>Decision date</p>	<p>20 December 2022</p>
<p>Web link to the decision</p>	<p>https://deeplink.rechtspraak.nl/uitspraak?id=ECLI:NL:GHDHA:2022:2429</p>
<p>Key facts of the case also situating the fundamental rights dimension (max. 250 words)</p>	<p>Judgement by the Court of Appeal rendered on the appeal in the summary proceedings brought by the Dutch Council for Refugees (<i>VluchtelingenWerk Nederland</i>) against the Ministry of Justice and Security and the Central Agency for the Reception of Asylum Seekers (COA) concerning insufficient and inadequate asylum reception locations in the Netherlands. The Court of Appeal upheld the core of the previous ruling (but not the whole ruling), holding that the asylum reception currently does not meet the legal standards</p>

	<p>and is therefore harmful to thousands of asylum applicants. In addition - and contrary to the preliminary relief judge - the Court of Appeal held that there is no justification for the unequal treatment between asylum seekers from Ukraine and other asylum seekers.</p> <p>The Court of Appeal has not upheld the order to provide – within nine months – adequate reception locations and sanitary facilities nor did it uphold the order to provide additional shelter for unaccompanied children.</p>
<p>Result of the case in terms of factual outcome, and in terms of assessment of the legal question raised</p>	<p>The Court of Appeal prohibits the Ministry of Justice and Security and the Central Agency for the Reception of Asylum Seekers (COA) from placing vulnerable asylum applicants in emergency- or crisis emergency reception locations, unless their special reception needs can be provided there.</p> <p>They are also ordered to make every effort to provide all asylum seekers with a medical screening as much as possible before they are transferred from the application centre to another reception location, especially if that other location is an emergency- or crisis emergency reception location, or, in any case, as soon as possible thereafter.</p> <p>The State and COA are also ordered to provide reception conditions for all current and future asylum applicants, in such manner that:</p> <ul style="list-style-type: none"> -asylum seekers in crisis emergency reception locations are provided with a weekly stipend; children are provided with access to play facilities and education, which must be offered no later than three months following the date on which they applied for asylum; -access is provided to any form of necessary healthcare, which shall in any case include emergency treatment and the essential treatment of illnesses and serious mental disorders. <p>These orders had already been imposed by the preliminary relief judge. Since the terms set by the preliminary relief judge for this have now expired, the Ministry and the COA must comply with these obligations immediately.</p> <p>Furthermore, the Court ordered the Ministry and the COA to immediately provide every migrant who reports to an application centre in the Netherlands to register as an asylum seeker with a safe indoor sleeping place, food, water and access to hygienic sanitary facilities.</p>
<p>Give interesting quotes where the Court deals with civic space</p>	<p>“Het hof is van oordeel dat de belangen van de personen voor wie VWN in dit geding opkomt zich voor bundeling lenen. Het is juist dat VWN opkomt voor personen die niet steeds in (precies) dezelfde situatie verkeren, die niet steeds dezelfde belangen hebben en voor wie verschillende vorderingen met verschillende argumenten worden aangevoerd. De vraag of de belangen waarvoor VWN opkomt zich lenen voor bundeling moet echter niet worden beantwoord voor alle vorderingen van VWN tezamen, maar per deelvordering en per deelgroep waarop de desbetreffende (deel)vordering betrekking heeft. VWN heeft in dit geding verschillende vorderingen voor (deels) verschillende (deelgroepen van) belanghebbenden gecombineerd en steeds per vordering duidelijk gemaakt voor welke groep asielzoekers of statushouders zij daarmee opkomt en met welke argumenten. Overigens vormen de personen voor wiens belangen VWN opkomt (asielzoekers en statushouders) een voldoende homogene en van andere personen te onderscheiden groep, alleen de omstandigheden waaronder zij worden opgevangen kunnen verschillen. Het gaat bovendien steeds om vorderingen die erop gericht zijn de omstandigheden waaronder alle tot deze</p>

	<p>verschillende (deel)groepen behorende personen worden opgevangen structureel te verbeteren. Omdat het bij de vorderingen van VWN steeds gaat om tot specifieke deelgroepen behorende personen die in dezelfde omstandigheden verkeren lenen de belangen van de tot deze deelgroepen behorende personen zich wel degelijk voor bundeling. Omdat het telkens gaat om groepen van personen die in dezelfde omstandigheden verkeren of kunnen komen te verkeren is het efficiënter dat over deze vorderingen in een collectieve actie wordt geoordeeld. Ook het feit dat de samenstelling van deze groepen voortdurend wisselt, bijvoorbeeld als asielzoekers die in de (crisis)noodopvang verblijven naar een azc worden overgeplaatst, maakt dat het efficiënter is als over de hier aan de orde zijnde geschilpunten niet wordt geoordeeld in door individuele asielzoekers aanhangig te maken procedures maar door middel van een collectieve actie.”</p>
<p>Give full English translation of these quotes</p>	<p>“The Court is of the opinion that the interests of the persons defended by the Dutch Refugee Council in these proceedings lend themselves to bundling. It is true that the Dutch Refugee Council represents persons who do not always find themselves in (exactly) the same situation, who do not always have the same interests and for whom different claims are put forward with different arguments. However, the question of whether the interests for which the Dutch Refugee Council stands up lend themselves to bundling must not be answered for all the Council's claims taken together, but for each partial claim and for each subset to which the relevant (partial) claim relates. In these proceedings, the Dutch Refugee Council has combined various claims for (partly) different (subgroups of) interested parties and has always made it clear for each claim which group of asylum applicants or holders of residence permits it is defending and with which arguments. Incidentally, the persons whose interests the Dutch Refugee Council represents (asylum applicants and status holders) form a sufficiently homogeneous group that can be distinguished from other persons, only the circumstances under which they are accommodated may differ. Moreover, these are always claims aimed at structurally improving the conditions under which all persons belonging to these different (sub)groups are received. Because the Dutch Refugee Council's claims always involve persons belonging to specific subgroups who are in the same circumstances, the interests of the persons belonging to these subgroups do lend themselves to bundling. The fact that these claims always concern groups of persons who are or may be in the same circumstances makes it more efficient for them to be adjudicated in a collective action. The fact that the composition of these groups constantly changes, for example when asylum applicants staying in the (crisis) emergency reception facilities are transferred to a reception centre, also makes it more efficient if the points of dispute at issue here are not decided in proceedings brought by individual asylum applicants, but by means of a collective action.”</p>
<p>Provide your analysis of the legal and factual relevance of the judgment</p>	<p>The importance of this ruling is that it compelled the State of the Netherlands to meet the obligations to receive asylum applicants in a humane manner, in conformity with the minimum norms laid down in EU regulations and international treaties. This ruling was brought about by the legal action of the CSO Dutch Refugee Council (<i>VluchtelingenWerk Nederland</i>). In this way, the effect of a decision put forth by a CSO led to upholding fundamental rights and the rule of law in Netherlands.</p>

3. Visa for human rights defenders

3.1. Entry and stay for human rights defenders (HRDs) at risk

Dedicated visa scheme for HRDs at risk available in your country	No
Other type of visa or alternative legal entitlement or derogation clause applied to HRDs	Yes

In the Netherlands no special visa procedures apply for human right defenders. In a policy letter⁸ submitted to parliament and in answers⁹ to questions by members of parliament the government states that for this group (human rights defenders) the EU Visa code applies. Article 25¹⁰ of the EU Visa Code, allows the Netherlands to issue territorially limited 'short-stay' visas for up to 90 days in a 180-day period on humanitarian grounds. Article 33 of the EU Visa Code allows the Netherlands to extend the validity of a Schengen visa to a stay of up to 180 days if the visa holder can demonstrate that that due to changed circumstances he or she is unable to return due to humanitarian reasons. If a human rights defender is in need of a longer stay he or she can apply for asylum under the regular asylum procedure. Application is only

⁸ The Netherlands, Minister of Foreign Affairs (*Minister van Buitenlandse Zaken*) (2021), Motion members Dassen and Van der Lee on facilitating the issuance of emergency visua for journalists ([Motie van de leden Dassen en Van der Lee m.b.t. het vergemakkelijken van de afgifte van noodvisa aan journalisten](#)), Letter to House of Representatives, 23 August 2021.

⁹ The Netherlands, Minister of Foreign Affairs (*Minister van Buitenlandse Zaken*) (2022), Answers on question from members Koekoek and Van der Lee about emergency visums for journalists ([Beantwoording vragen van de leden Koekoek en Van der Lee over noodvisa voor journalisten](#)), 8 July 2022.

¹⁰ European Union (2009), [Article 25 Regulation No 810/2009 9 of the European Parliament and of the Council of 13 July 2009](#) (Visa Code).

possible in the Netherlands. The Aliens Circular (in which the policy rules on asylum and visa, among other things, are laid down) marks human rights defenders from a limited number of countries¹¹ as a group at risk.¹² For asylum applicants to a group at risk limited indications are enough to show that they run a risk of persecution and qualify for asylum.

In 2012, the CSO Justice & Peace Netherlands, with support of the Ministry of Foreign Affairs and the municipality of The Hague, founded the Shelter City programme.¹³ As part of this programme, human rights defenders at risk receive temporary relocation in the Netherlands or another safe place for 3 months. Justice & Peace Netherlands manages the programme, in which a total of 21 cities participate, 12 of which are located in the Netherlands.¹⁴ Shelter City in the Netherlands is open for applications for human rights defenders at risk twice a year, in May and November. In order to be eligible for Shelter City, human rights defenders should meet a number of conditions including a non-violent approach in their work; being threatened or under pressure due to their work; being able to be relocate for a period of maximum 3 months; they are willing and able to return to their country of origin after 3 months;; and being in possession of a valid passport or be willing to carry out the procedures for its issuance (Justice and Peace covers the costs of issuing a passport and / or visa). They must also not be subjected to any measure or judicial prohibition of leaving the country.¹⁵ The stay can be extended by 3 months but the human rights defender has to apply for a visa by the normal proceedings and it up to the Dutch authorities to decided whter to extend the visa.¹⁶

¹¹ Azerbeidzjan, Belarus, China, India, Lybia, Iran, Iraq, Mongolia, Morocco, Pakistan, Russian Federation, South and Central Somalia

¹² The Netherlands, Aliens Circular C (*Vreemdelingencirculaire C*), C1 Asylum (*C! Asiel algemeen*).

¹³ Justice for Peace Netherlands (2022), *Shelter City: Exploring the impact of a decade of temporary relocation experiences*. Impact study report by DBM research, The Hague, Justice for Peace Netherlands.

¹⁴ Justice for Peace Netherlands (2023), '*Shelter cities*', Web page.

¹⁵ Justice for Peace Netherlands (2022), '*Who can apply for the Shelter City initiative?*', Web page.

¹⁶ Based on information provided by a policy officer at Justice and Peace in a telephone interview held on 14 February 2023.

Between 2012 when the programme started as a pilot, and 2021, Shelter City in the Netherlands has received 2,381 applications.¹⁷ Out of the total number of applications, 136 human rights defenders were provided a temporary safe place in the country (the number who have accessed temporary relocation through the programme worldwide is over 400¹⁸). The Shelter City programme is funded by subsidies from the Ministry of Foreign Affairs and the municipalities of the cities involved. In 2021, Justice & Peace Netherlands received a subsidy of €456,438 from the Ministry of Foreign Affairs and a subsidy of €45,438 from the municipality of The Hague.¹⁹ As part of the programme, Justice and Peace Netherlands and the Dutch Ministry of Foreign Affairs and/or Dutch embassy perform several activities.²⁰ For the Dutch Ministry of Foreign Affairs and/or Dutch embassy, these activities include: facilitating the visa, identifying cases and providing information on cases. For Justice and Peace Netherlands, these activities include: screening of applications, dealing with requests, arranging travel to and from the Netherlands, supervising the stay and monitoring the security situation of HRDs.²¹

¹⁷ Justice for Peace Netherlands (2023), [Shelter City: Exploring the impact of a decade of temporary relocation experiences](#). Impact study report by DBM research, The Hague, Justice for Peace Netherlands.

¹⁸ The Netherlands, Ministry of Foreign Affairs (*Minister van Buitenlandse Zaken*) (2022), [Speech by Speech by Human Rights Ambassador Bahia Tahzi-Lieb on 10 years Shelter City](#) .

¹⁹ Justice for Peace Netherlands (2022), Financial Annual report 2021 ([Financial Jaarverslag 2021](#)).

²⁰ Justice for Peace Netherlands (2022), [Shelter City: Exploring the impact of a decade of temporary relocation experiences](#). Impact study report by DBM research, The Hague, Justice for Peace Netherlands.

²¹ Justice for Peace Netherlands (2022), [Shelter City: Exploring the impact of a decade of temporary relocation experiences](#). Impact study report by DBM research, The Hague, Justice for Peace Netherlands Ibid.