LONDON CLIMATE ACTION WEEK

JUNE 2026

protecting civic space

REPORT

How Climate Advocacy is at Risk during UNFCCC Conferences

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How Climate Advocacy is at Risk during UNFCCC Conferences

London Climate Action Week
June 2026

Authorship and contributions

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Cover Image Credits to Marie Jacquemin.

Scan for the Digital version of the report.

All case data was collected and analysed under confidentiality and consent protocols. Identifying details have been anonymised or withheld to protect individuals. The underlying case records are not published.

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Acknowledgement

This report is dedicated to the Indigenous land defenders, environmental human rights defenders, climate justice activists, communities under occupation and civil society who know the solutions to climate collapse are not in institutional halls, but show up to defend their communities in spaces of global decision making in defense of life itself. Your struggles are not mere incidents for us; they are testament of dignified struggles building the post-extractive futures we know are possible and real, against a global architecture of extraction sustained by fossil capitalism and necropolitics.

We acknowledge those who continue to protect defenders and sustain movements under increasingly hostile conditions.

We especially recognise those whose names cannot be published for their own safety, yet whose testimonies shaped every page of this report. Protecting those who protect life is the core of our work, we hope this report can be a tool for that.

About the Authors

Climate Activist Defenders (CAD) is a non-governmental protection organisation operating globally. CAD provides holistic safety and security support to environmental human rights defenders, Indigenous land defenders, climate justice activists, and wider civil society. CAD led the COP Safety Hub from COP27 to COP30 and initiated this report to make its outcomes publicly available as a resource for advancing rights, freedoms, and protection in multilateral climate governance.
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Palestinian Institute for Climate Strategy (PICS) is a research and advocacy organisation working at the intersection of global climate justice, false solutions, geopolitics, and human rights. PICS developed the analytical framework and methodology for this report, led the quantitative and qualitative analysis of the Safety Hub dataset, and authored the findings and recommendations.
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About the COP Safety Hub

The COP Safety Hub was founded in 2022 emerging as a collaborative effort between several organisations, independent risk specialists and youth climate justice activists initially focusing on the challenges and needs of youth activists attending the conference. Coordinated by Climate Activist Defenders (CAD), it provides holistic safety and security support to Indigenous land defenders, environmental human rights defenders, climate justice activists and wider civil society attending UNFCCC conferences.

The Safety Hub's model is built around four phases of support. Before each conference, it conducts local risk assessments tailored to the host country context, produces safety guides for participants (available at ycmsafety.org), delivers online safety briefings, and runs capacity-building programmes for civil society organisations with limited safety infrastructure. During the conference, it operates a confidential emergency helpline, provides on-the-ground physical presence, manages individual cases, and coordinates with relevant actors where needed. After the conference, it provides follow-up support, documents residual risk for participants returning to restricted civic space contexts, and contributes to institutional learning for subsequent events.

The Safety Hub is staffed by holistic security professionals and operates on principles of confidentiality, solidarity, and care. It functions independently of any governmental or inter-governmental institutions and does not operate under the UNFCCC Secretariat and receives no institutional support from the conference process it serves.

Between COP27 and COP30, the Safety Hub documented 216 cases across five conference cycles. The Palestinian Institute for Climate Strategy (PICS) led the systematic analysis of that data, developing the codebook and analytical framework jointly with CAD that structure the findings in this report. This report is the first public analysis of the Safety Hub dataset and provides a structured evidence base for understanding the risks, barriers, and protection challenges experienced by civil society actors participating in UNFCCC processes. The report seeks to advance discussions on civic space, participation rights, and the enabling conditions necessary for meaningful engagement in multilateral climate governance.

01 EXECUTIVE SUMMARY

[1]

Over four years and five United Nations Framework Convention on Climate Change (UNFCCC) conferences, the Safety Hub – documented 216 cases of climate advocates and environmental defenders facing security incidents, safety breaches, and participation barriers at or around COP (Conference of the Parties) and SB (Subsidiary Bodies meetings) venues: COP27 in Sharm el-Sheikh, COP28 in Dubai, COP29 in Baku, SB62 in Bonn, and COP30 in Belém.

TABLE [1] KEY FIGURES AT A GLANCE:

TOTAL CASES ANALYSED ACROSS COP27, COP28, COP29, SB62, AND COP30	216
SECURITY INCIDENTS DOCUMENTED (TYPE A)	122 (56%)
OF WHICH: PREPAREDNESS AND ADVISORY REQUESTS DOCUMENTED (TYPE B–D)	94 (44%)
CONFERENCE CYCLES COVERED	5
RECOMMENDATIONS DIRECTED ACROSS 5 INSTITUTIONS	21

This report, produced jointly by PICS and CAD, is the first systematic public analysis of that record.

The report finds that the risks documented here are not isolated incidents but reflect systemic governance gaps and institutional failures within the UNFCCC process. These failures not only undermine the protection of civil society participants, but in some cases actively place them at risk, despite civil society being widely recognised as crucial to the process itself. Drawing on incident data, practitioner testimony and first-hand accounts from affected activists, the report demonstrates how these failures operate across borders, regardless of the conference location, venue arrangements, security systems, or institutional procedures.[01]

Each of the 216 cases is an instance in which civil society had to divert time, resources, and capacity from climate advocacy to crisis response. The cost of operating in an environment that does not protect the people is the loss of strategic and directed advocacy to change the very conditions that have caused climate change.

All case data was collected and analysed under rigorous confidentiality and consent protocols. Identifying details have been anonymised or withheld to protect individuals. This report's quantitative analysis focuses on the 122 Type A cases. The full 216-case dataset is referenced where it illustrates broader patterns of anticipatory risk, self-censorship, and barriers to participation.

Key findings:

- Harassment was the most prevalent incident type across all conferences with 44 documented incidents recorded across COP27, COP28, COP29, SB62 in Bonn, and COP30. These incidents occurred across conference spaces, including within the Blue Zone, and were documented at every conference cycle. Perpetrators include host-state security actors, UN Department of Safety and Security (UNDSS) officers, and government delegation members with government representatives accounting for a significant proportion of incidents that are often overlooked in analyses focused solely on host-country restrictions.

- Border instrumentalisation — the use of visa systems, travel bans, and entry controls to prevent activists from reaching the conference location — was the most frequently coded mechanisms of exclusion identified in the dataset, with 42 documented occurrences across COP27-COP30. The findings suggest that mobility and migration infrastructures are increasingly being used as tools to regulate access to international climate governance spaces and shape who is able to participate in negotiations.

- UN institutional actors appear in 28 percent of all documented Type A incidents: when UNDSS personnel and UNFCCC Secretariat staff are combined, actors operating within the UN system account for 34 occurrences. This is comparable to host-state actors as a whole (host-state security forces and government officials combined, 39 occurrences, 32 percent) and exceeds any single host-state code on its own. It challenges the assumption that civic-space restrictions originate solely from host governments and underscores the need for accountability within UN governance structures.

- Human rights-related advocacy (including solidarity with Palestine), messaging around political prisoners, and environmental defenders actions, were among the most consistently targeted forms of expression in the dataset, appearing across all conference cycles on freedom of expression, peaceful assembly, and political advocacy.

[01] Process to strengthen observer engagement in the UNFCCC, 25 May 2022, Briefing notes

This includes debadging, harassment by government delegations, and censorship of specific terms and symbols.

- Post-conference reprisals: Several cases were documented across multiple conference cycles, extending harm well beyond the venue perimeter, including border detention on return, secondary screening at airports, passport confiscation, surveillance by home-country authorities, and travel bans affecting subsequent conference participation.

- No effective and transparent complaints mechanism exists within the UNFCCC framework: While the UNFCCC has codes of conduct and event-based reporting channels for certain forms of harassment, the analysis shows the absence of an independent, comprehensive, participant-centred accountability mechanism capable of addressing the wider range of civic-space harms documented in this report, including surveillance, arbitrary or unjustified debadging, border obstruction, and post-conference reprisals. The reprisals policy is not publicly available, leaving open questions around the effectiveness and confidentiality of any reported incidents. UNDSS operates without formal civil society oversight, while Host Country Agreements are not publicly available for civil society to be aware of the responsibility of the host country and contain no enforceable civic-space or human-rights safeguards. The UNFCCC Secretariat also does not systematically document, publish, or analyse data on safety incidents affecting civil society participants.

This report puts forward recommendations addressed to at least six audiences: the UNFCCC Secretariat, previous and future host governments, Parties to the UNFCCC, UNDSS, civil society organisations, and philanthropic actors. For the UNFCCC Secretariat: establish a transparent, accessible and comprehensive civil society safety mechanism within the UNFCCC framework based on civil society and Indigenous Peoples consultation and inputs second, and begin systematic collection and publication of participant safety data.

For host governments: ensure that Host Country Agreements include enforceable participant-protection provisions, and commit explicitly to freedom of expression and assembly for all persons in the conference vicinity. For civil society: embed collective duty of care into conference organising, including pre-conference safety protocols and post-conference wellbeing support, particularly for delegations from restricted civic space contexts. For funders: provide multi-year core funding for civil society safety infrastructure rather than conference-cycle grants. Full recommendations are set out in Section 13.

There continues to be no systematic data on civil society safety incidents collected or published by the Secretariat.

02 INTRODUCTION

Since the first UNFCCC Conference of Parties (COP) in 1995, the UNFCCC and international climate diplomacy have been strengthened and publicly legitimised by civil society participation. Observers, NGO delegates, Indigenous Peoples',(02) youth activists, and frontline community advocates have attended COPs and other UNFCCC meetings in growing delegations, providing expertise, bearing witness, and holding governments to account.

Civil society groups, including movements, NGOs, children, youth, farmers, workers, women, gender-diverse people, and Indigenous Peoples, are crucial actors in increasing the political ambition of multilateral climate negotiations, particularly those who bear the brunt of climate collapse and interconnected crises. Through years of involvement in socio-environmental movements and safety response, the Safety Hub has witnessed the systematic occurrence of incidents that endanger climate advocacy by putting climate defenders at risk.

A portion of the increase in documented incidents reflects the Safety Hub's growing reach and the trust it has built over five conference cycles — meaning more incidents are being reported, not necessarily that more are occurring. Both effects are likely real. Host country selection has brought climate negotiations repeatedly to jurisdictions where freedom of expression, assembly, and association are systematically restricted. Notably, the report finds similar patterns in host countries rated higher on civic space indices. The data indicates that security architectures designed for high-level diplomatic gatherings have been applied to civil society spaces in ways that are disproportionate, discriminatory, and in documented cases, targeted. The UNFCCC Secretariat lacks systematic mechanisms to receive, investigate, or act on complaints from civil society participants who face harm. In some cases, the UNFCCC has perpetuated mechanisms that result in harm. While the UN system maintains a reprisals mechanism for cases where individuals face harm for engaging with UN processes, this mechanism does not cover the full range of incidents documented here — in particular, those involving UNDSS conduct, host-country restrictions, or non-host government delegation activity.

[3]

(02) The authors of this report acknowledge Indigenous Peoples as more than civil society. The report and analysis is based on the UNFCCC framework under which Indigenous Peoples are not institutionally recognised as rights holders but part of civil society constituencies. When referring to civil society under the UNFCCC this includes Indigenous Peoples.

A notable example is the letter published at COP30 in Brazil, in which Simon Stiell, Executive Secretary of the UNFCCC, called for increased securitisation and restrictions on civic space within the COP premises.[03]

[03] UNFCCC Executive Secretary Simon Stiell (2025). Letter to the COP30 Presidency (EC-2025-263), November 2025.

[04] CIVICUS Monitor (monitor.civicus.org), a global civil society monitoring project that rates civic space conditions worldwide on a five-point scale from Open to Closed. Germany was rated 'Narrowed' at the time of SB62 (June 2025) and subsequently downgraded to 'Obstructed' in 2025.

The host-country pattern is not the sole structural finding: incidents documented at Bonn (Germany, rated 'Narrowed' by CIVICUS at the time of the conference)[04] and in Belém (Brazil, rated Obstructed) demonstrate that civic space restrictions are not reducible to the selection of more restrictive host states. They are embedded in the UNFCCC's own governance and safeguarding architecture.

During COP30, civil society actors across different regions and contexts faced significant restrictions on civic space, shaped by heightened securitisation measures and the deployment of law enforcement by the host government as well as UNDSS personnel surrounding the conference venue. These restrictions disproportionately affected local and regional civil society: local Brazilian activists and Amazonian Indigenous groups encountered a markedly more restrictive enforcement environment than many internationally accredited delegations. In comparison, pre-conference requests decreased for COP30, which corresponds to a lesser risk perception of the host country environment.

These developments raised serious concerns regarding equitable participation and protection within climate multilateral processes and contributed to the compilation of this report. Safeguarding civil society participation in multilateral spaces remains essential to ensuring that the most affected communities have a meaningful voice in decisions that determine their futures.

This report examines patterns of systematic exclusion and harassment experienced by civil society groups. It is addressed to multiple audiences: UNFCCC Secretariat officials responsible for observer engagement and conference logistics; state parties negotiating or considering Host Country Agreements; civil society organisations supporting the safety of their delegations; and philanthropic actors supporting civil society participation in climate governance. It serves as a tool for the movement and impacted communities, to defend their presence in a process that determines their very existence and future.

03 METHODOLOGY

3.1 Data Source and Collection

The primary data source is the Safety Hub case management database. Cases are documented through three channels: direct intake from activists facing security incidents, and NGO staff members who reach out to the Safety Hub team on-site; referrals from organisations whose members have experienced incidents; and proactive outreach by trained Safety Hub members who witness or become aware of incidents. Each case record captures the conference context, the nature of the incident or safety support needed, the participant's profile (gender, nationality, constituency, historically marginalised background), the actors involved, the timeline, and the incident response provided.

[4]

For this analysis, the dataset was cleaned and standardised to produce a final analytical set of 216 cases across five conference cycles - COP27, COP28, SB62, COP29, and COP30. Cases from non-UNFCCC contexts were excluded.

All case data was collected through the Safety Hub case management system under a consent-based framework. Participants who sought support were informed that anonymised data might be used for research and advocacy purposes. Cases are de-identified in this report; no names, locations, or details that could identify individuals are published without explicit consent. Interview participants were given the opportunity to review relevant sections of the report prior to publication.

For this analysis, the dataset was cleaned and standardised to produce a final analytical set of 216 cases across five conference cycles — COP27, COP28, SB62, COP29, and COP30. Cases from non-UNFCCC contexts were excluded.

The dataset records incident type, actor, severity, and mechanism, but does not disaggregate the type of response provided. Safety Hub interventions frequently extend beyond incident documentation to include psychosocial support, legal referrals, emergency documentation, digital security assistance, and in some cases physical relocation support. This dimension of CAD's work is not captured in the quantitative analysis and should be read alongside the qualitative testimony throughout this report.

From COP27 to COP29, the Safety Hub was established with the technical support of the Climate Emergency Collaboration Group (CECG). For COP30, the project was resourced through CAD's internal budget.

3.2 Qualitative Data and Expert Interviews

The quantitative analysis is supplemented by fifteen semi-structured expert interviews conducted in April and May 2026. Interviewees were selected through purposive sampling to include civil society participants with direct, multi-year experience across the COP cycles covered by the dataset. Subjects represent a range of roles — constituency coordination, frontline activism, and NGO-embedded advocacy — and span different geographic and identity positions within the UNFCCC civil society community. The sample includes representatives from CAN International Secretariat, the Centre for International Environmental Law (CIEL), the Human Rights and Climate Change Working Group (HRCC), and independent climate defenders with direct experience of the incidents documented in this report.

Interviews were conducted by members of the PICS and CAD research team via secure recorded video call. All interviewees were informed of the research purpose and the report's intended use, and were offered the choice to be named, identified by first name only, or remain anonymous. Direct quotations are used only where the subject has given informed consent; testimonies from interviewees who chose anonymisation are paraphrased, with no identifying detail beyond basic role description retained. Interview findings are integrated throughout Sections 5 to 12 where they corroborate, contextualise, or extend the quantitative data.

3.3 Case Typology

Cases are classified into four types according to the nature of the report and the primary need it presents:

TABLE [2] CASE TYPOLOGY (FULL DATASET, N=216)

TYPE	DESCRIPTION	CASES(N)	SHARE
TYPE A - SECURITY INCIDENT	DIRECT OR CREDIBLE SECURITY THREAT, HARM, OR RIGHTS VIOLATION AGAINST A CIVIL SOCIETY PARTICIPANT FROM A HOLISTIC PERSPECTIVE. (A CREDIBLE THREAT IS ONE THAT, BASED ON AVAILABLE INFORMATION, A REASONABLE PERSON WITH KNOWLEDGE OF THE CONTEXT WOULD ASSESS AS LIKELY TO MATERIALISE OR TO HAVE A CHILLING EFFECT ON PARTICIPATION.)	122	57%
TYPE B - PREVENTATIVE RISK DETECTION	PROACTIVE REQUEST FOR SAFETY ADVICE, RISK ASSESSMENT, OR CONTINGENCY PLANNING SUPPORT BEFORE OR DURING A CONFERENCE.	50	23%
TYPE C - LOGISTICAL/ WELFAR	PRACTICAL DIFFICULTY WITHOUT A DIRECT, IDENTIFIABLE SECURITY TRIGGER – LOST DOCUMENTS, WELFARE CONCERNS, LOGISTICS SUPPORT. CASES IN THIS CATEGORY MAY STILL ARISE WITHIN A BROADER CONFERENCE SECURITY ENVIRONMENT.	37	17%
TYPE D - HUB PROGRAMMATIC	OPERATIONAL RECORD OF SAFETY HUB ACTIVITY – COORDINATION MEETINGS, INTERNAL PROTOCOLS, PARTNER COMMUNICATIONS – RATHER THAN AN INDIVIDUAL PARTICIPANT CASE. INCLUDED IN THE TOTAL DATASET COUNT FOR COMPLETENESS BUT EXCLUDED FROM ALL ANALYTICAL FINDINGS	7	3%
TOTAL		216	100%

The table shows the classification of all 216 analysed cases. More than half of all recorded cases are confirmed security incidents (Type A), while nearly one quarter are preventative risk detection (Type B). The volume of Type B cases suggests a growing awareness of the risks associated with attending UNFCCC confer-

ences among civil society networks. This pattern was most pronounced ahead of COP28 and COP29, where the Safety Hub received a higher volume of pre-conference requests.

An overview of the distribution of case types across the conference can be found in the Annex Figure 1.

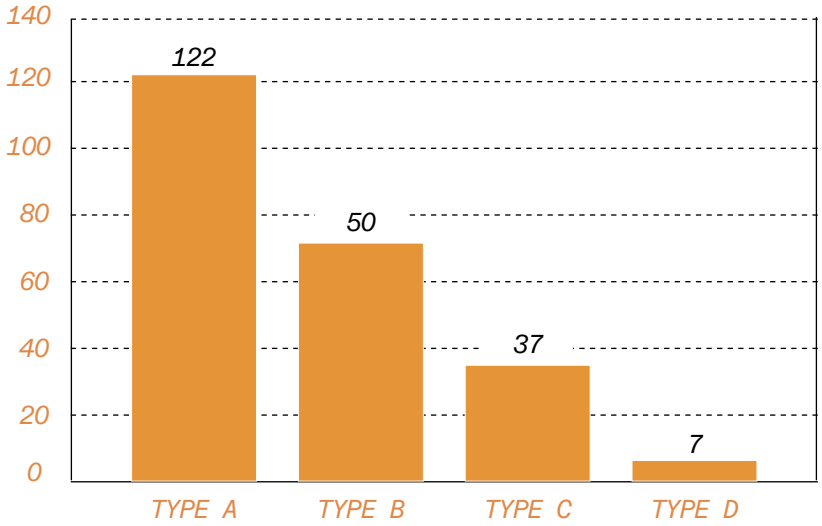


FIG [1] CASE TYPE DISTRIBUTION, FULL DATASET (N=216) MORE THAN HALF OF ALL CASES ARE CONFIRMED SECURITY INCIDENTS; NEARLY A QUARTER ARE PREPAREDNESS REQUESTS.

3.4 Coding Framework

Type A security incidents were coded across three dimensions. The coding was developed inductively from the dataset and applied by a single analyst with a review pass for consistency. Codes are not mutually exclusive: cases may carry a primary and secondary code, reflecting the compound nature of harm in this dataset.

TYPE	INCIDENT TYPE	OCCURR-ENCES	% OF TYPE A	PRESENT AT
INC-HARAS	HARASSMENT AND INTIMIDATION	44	36%	ALL 5 CONFERENCES
INC-SURV	SURVEILLANCE AND MONITORING	30	25%	ALL 5 CONFERENCES
INC-TRAVEL	TRAVEL RESTRICTION / BORDER DENIAL	18	15%	COP28, 29, 30, SB62
INC-ACCESS	ACCESS DENIAL / DEBADGING	10	8%	COP27, 28, 29, 30
INC-REPRISAL	POST-CONFERENCE REPRISAL	10	8%	ALL 5 CONFERENCES
INC- RESTRICT-SPEECH	SPEECH RESTRICTION	9	7%	COP28, 29
INC- PROPERTY	PROPERTY INCIDENT (CONFISCATION, DAMAGE)	7	6%	COP27, 28, 29 30
INC-DIGITAL	DIGITAL SECURITY INCIDENT	7	6%	COP27, 28, 29
INC- VIOLENCE	PHYSICAL VIOLENCE	7	6%	COP28, COP30
INC- RESTRICT-ASSEMBLY	ASSEMBLY RESTRICTION	5	4%	COP30 ONLY
INC-GBV	GENDER-BASED VIOLENCE	2	2%	COP29, COP30
INC-CSO	CIVIL SOCIETY/ WELLBEING INCIDENT	8	7%	COP29, COP30

TABLE [3] INCIDENT TYPE CODES (TYPE A CASES, N=122)

05 Note: occurrences exceed 122 because cases may carry two or more codes.

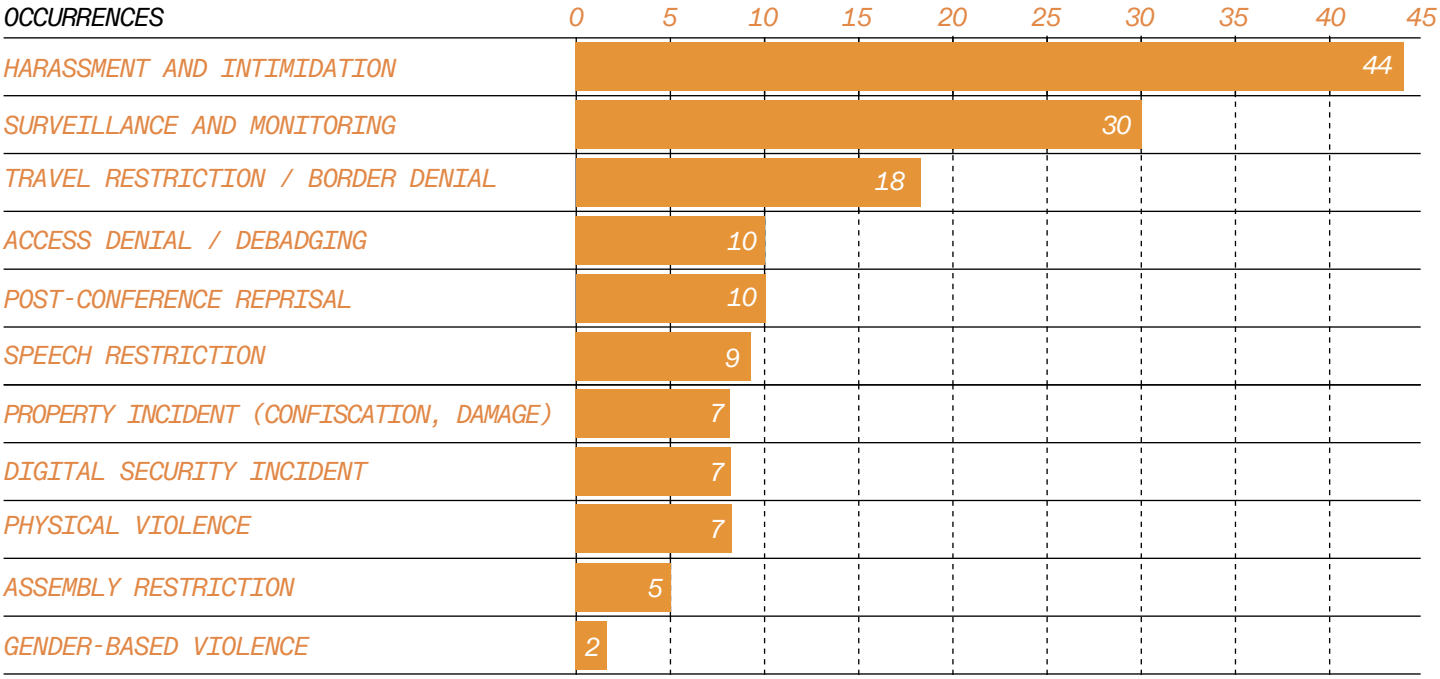


FIG [2] INCIDENT TYPE FREQUENCY, TYPE A CASES (N=122)

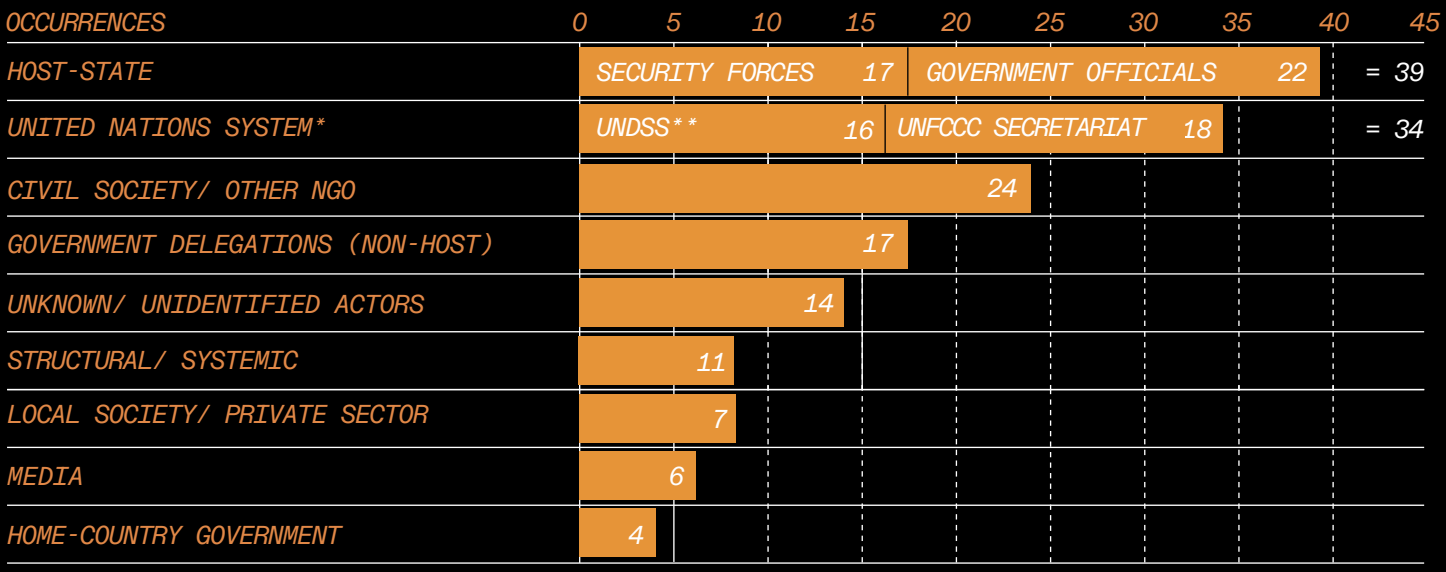
CODE	ACTOR CATEGORY	OCCURRENCES	% OF TYPE A	KEY CONFERENCES
ACT-HOST-SECURITY	HOST-STATE SECURITY FORCES	22	18%	ACROSS ALL
ACT-GOV-DELEG	GOVERNMENT DELEGATIONS (NON-HOST) PAKISTAN, EGYPT, ISRAEL, GERMANY, AZERBAIJAN, INDONESIA (AMONG OTHERS)	17	14%	COP27, 28, 29
ACT- UNKNOWN	UNKNOWN / UNIDENTIFIED ACTORS	14	11%	ACROSS ALL
ACT-HOST- GOV	HOST-STATE GOVERNMENT OFFICIALS	17	14%	COP28, 29, 30
ACT-UNDSS	UNDSS (UNITED NATIONS DEPARTMENT FOR SAFETY AND SECURITY)	16	13%	COP28, 30, SB62
ACT-UNFCCC	UNFCCC SECRETARIAT	18	15%	COP28, 29, 30
ACT-CSO	CIVIL SOCIETY / OTHER NGO	24	20%	COP28, 30
ACT-MEDIA	MEDIA	6	5%	COP27, 28
ACT-LOCAL-SOCIETY	LOCAL SOCIETY / PRIVATE SECTOR	7	6%	COP27, 29
ACT-HOME-GOV	HOME-COUNTRY GOVERNMENT	4	3%	COP27, SB62
ACT- STRUCTURAL	STRUCTURAL / SYSTEMIC	11	9%	COP29
-	UN INSTITUTIONAL (UNFCCC + UNDSS COMBINED)	34	28%	COP28–COP30

TABLE [4] ACTOR TYPE CODES (TYPE A CASES, N=122 - ALL 11 CODES)

Note: UNDSS carries the highest mean severity score of any actor category in the dataset. The UNDSS + UNFCCC Secretariat combined figure (28 percent) reflects the interconnected operational and institutional responsibilities of UNDSS and the UNFCCC Secretariat within the broader UN conference governance framework.

Additional Coding Dimensions

Each case was also coded for temporal location (pre-conference, during, or post-conference). Type A cases were additionally coded for severity on a 1–5 scale. UNDSS carries the highest mean severity score of any actor category in the dataset — a finding that bears on the accountability analysis in Section 7.2. Coding confidence (high/medium/low) is recorded in the dataset but not analysed further in the body of this report.



*UN SYSTEM: 34 OCCURENCES (28% OF TYPE A) - THE SECOND LARGEST ACTOR GROUP

**UNITED NATIONS DEPARTMENT OF SAFETY AND SECURITY

FIG [3] ACTOR CATEGORY FREQUENCY, TYPE A CASES (N=122)

3.5 Analytical Approach

This report adopts a mixed-methods approach, combining incident-based documentation with qualitative research and desk-based secondary analysis.

The quantitative component draws on the Safety Hub case management database, populated through the three intake channels described in Section 2.1. Cases are documented using a structured incident reporting format and coded inductively across the dimensions set out in Sections 2.3 and 2.4. Data collection, safeguarding, and consent protocols are described in Section 2.1. The qualitative component comprises the fifteen semi-structured expert interviews described in Section 2.2.

The contextual analysis in Section 4 draws on desk research and document analysis, including CIVICUS Monitor ratings, UNFCCC procedural documents, Host Country Agreements, media monitoring, and open-source reporting on conference-related incidents.

[5]

The analysis combines quantitative mapping of incident frequencies, actor distributions, and participant profiles with qualitative interpretation of case descriptions and practitioner testimony. Cross-conference comparisons are treated with caution given variation in Safety Hub capacity across cycles; relative patterns and qualitative shifts are more analytically significant than raw counts. The dataset's growth from COP27 (21 cases) to COP30 (97 cases) reflects both a genuine increase in documented incidents and the deepening reach and trust of the Safety Hub — more activists now know the support exists and feel safe reporting to it.

Interview findings are integrated throughout Sections 5 to 12 where they corroborate, contextualise, or extend the quantitative data.

3.6 Limitations

The dataset reflects cases that reached the Safety Hub - not a census of all safety incidents at UNFCCC conferences. Under-reporting is structural: activists facing transnational reprisal may not report because doing so compounds their risk; survivors of gender-based violence face stigma; those with no knowledge that the Safety Hub exists cannot report to it. COP30's 97 cases are as much a measure of what an adequately resourced Safety Hub can document as they are a measure of incident frequency. Cross-conference comparisons of raw counts should be treated as indicative rather than definitive.

04 THE UNFCCC CONFERENCE LANDSCAPE

The five conference cycles covered by this dataset span a period of growing ambition and growing contestation in international climate politics. Each took place in a distinct geopolitical and civic space context.

TYPE	LOCATION	DATE	CIVICUS RATING	HUB CASES
COP27	SHARM EL- SHEIKH, EGYPT	NOV 2022	CLOSED	21
COP28	DUBAI, UAE	NOV-DEC 2023	CLOSED	39
COP29	BAKU, AZERBAIJAN	NOV 2024	CLOSED	41
SB62	BONN, GERMANY	JUN 2025	NARROWED	18
COP30	BELÉM, BRAZIL	NOV 2025	OBSTRUCTED	97
TOTAL				216

TABLE [5] CIVICUS MONITOR RATINGS: 'CLOSED' = MOST SEVERE RESTRICTION ON CIVIL SOCIETY;' OBSTRUCTED' = STATE SEVERELY UNDERMINES CIVIL SOCIETY THROUGH SURVEILLANCE, HARASSMENT AND USE OF EXCESSIVE FORCE; 'OPEN' = BROADLY PERMISSIVE ENVIRONMENT.

Three of the five conferences covered in this report were held in countries rated 'Closed' by the CIVICUS Monitor - the most restrictive category in the global civic space index. Bonn offered a different risk profile: an apparent democratic host-state setting with stronger rule-of-law protections and an established civil society tradition than the other conferences in this dataset. Germany was rated 'Narrowed' by CIVICUS at the time of SB62, which is a significant downgrade from its long-standing 'Open' status following the criminalisation of Palestine solidarity activism in 2022-2023. It has since been further downgraded to 'Obstructed' (2025), the third most restrictive category.

4.1 COP27

Sharm el-Sheikh,Egypt (November 2022)

COP27 was held in a purpose-built resort complex under Egyptian security architecture. Egypt governs under emergency law and is rated 'Closed' by the CIVICUS Monitor. Civil society organisations raised pre-conference concerns about visa restrictions, surveillance risk, and freedom of assembly before the conference began.

[6]

The Safety Hub deployed for its first full conference cycle, recording 21 cases. The venue's physical configuration - remote, enclosed, with minimal public space outside the conference perimeter - made surveillance ambient and pervasive. The 21-case total reflects the limits of the Safety Hub's initial deployment as much as the limits of harm. COP27 cases were concentrated in the 'during' phase: on-site incidents dominated.

4.2 COP28

Dubai, UAE (November 2023)

[7]

COP28 drew the largest civil society registration in COP history - into a country where expression critical of the government and government owned companies is criminalised, LGBTQIA+ individuals are criminalised and accredited participants who held a refugee document or stateless passport were not allowed to enter the country.

For LGBTQIA+ participants in particular, the UAE's criminalisation of same-sex relationships and limitations in gender expression presented a direct threat that the UNFCCC's accreditation framework did not acknowledge or address. For participants with refugee or stateless status, the UAE presented an additional barrier: the country does not recognise the 1951 Refugee Convention or its 1967 Protocol, meaning refugees holding UNHCR-issued travel documents had no legal pathway to enter, an exclusion that the UNFCCC's accreditation process did not account for. The Safety Hub documented 39 cases, with a distinct concentration of access restriction and speech suppression. Palestine solidarity expression - keffiyehs, armbands, pins, verbal statements - became a focal point of enforcement, with multiple cases of activists being approached, questioned, and in some instances removed from the venue. This occurred in the context of the escalation of the genocide in Gaza. COP28 is examined in detail as a critical case study in Section 8.

4.3 COP29

Baku, Azerbaijan (November 2024)

[8]

Azerbaijan presents one of the most restricted civil society environments of any UNFCCC host country in the dataset period. Based on reports by several international human rights organisations. The government has systematically suppressed domestic civil society, imprisoned political opponents, and curtailed press freedom.

The Safety Hub documented 41 cases, including travel restriction, harassment of activists with family ties to Azerbaijan, systematic and overt surveillance of protesters inside the Blue Zone, and accreditation irregularities. Several civil society organisations chose not to attend, citing perceived risk - a deterrence effect not captured in the dataset but widely reported by practitioners. Participation of civil society with Armenian passports was impossible due to Azerbaijan's restrictive policies.

4.4 SB62

Bonn, Germany (June 2025)

Bonn offered a nominally different risk profile from the preceding conferences. Germany's civic space rating of 'Narrowed' at the time of SB62 — and its subsequent downgrade to 'Obstructed' — reflects a documented pattern of repression of Palestine solidarity activism that predates the conference. The criminalisation of protest, bans on demonstrations, and surveillance of Palestinian diaspora communities establish a baseline that is distinct from Germany's formal rule-of-law institutions. The Safety Hub documented 18 cases, consistent with lower participant numbers at subsidiary body sessions. Nevertheless, Bonn produced surveillance incidents and digital security cases. The five SB62 Palestine-solidarity preventative risk detection requests — all centred on the legality of protest under German law — illustrate how a formally permissive legal context can generate its own specific forms of activist anxiety..

The Bonn Climate Camp, an annual gathering of climate activists held parallel to the conference, was an active site of organising during SB62 and several Safety Hub incidents are connected to activities at or around the Camp. The Camp itself faced restrictions during SB62, including limitations on protest formats and, in some documented instances, restrictions on language use.

Moreover, six weeks before SB62 opened, German police forcibly shut down the Palestine Congress in Berlin, arresting speakers, banning entry to international participants, and deploying hundreds of officers against a lawful political gathering.(06) The crackdown was part of a broader pattern of criminalising Palestine solidarity activism in Germany that had intensified since October 2023, including bans on demonstrations, criminal charges for the use of terms like 'intifada,' and monitoring of Palestinian diaspora communities.(07)

[9]

(06) Defender a Quien Defiende (2025). Repression of Palestine Solidarity in Germany.

(07) Solanki, J. (2025). Solidarity Under Siege. Transnational Institute.

4.5 COP30

Belém, Brazil (November 2025)

While Brazil's formal democratic setting differs from Egypt, the UAE, and Azerbaijan, this did not amount to an unrestricted civic-space baseline. The COP30 cases point instead to a complex and contested environment marked by significant securitisation of the conference venue, restrictions on local civil society access, and the militarised response to the Indigenous-led protest in the first days of the conference.(08) Brazil has consistently ranked among the world's top five deadliest countries for land and environmental defenders for over five consecutive years.(09) While legal frameworks for civic space exist, inconsistent enforcement allows police brutality against marginalised groups and corporate profiling leading to criminalisation and murder to persist. Brazil maintains varying levels of armed forces, some of which are legacies of the military dictatorship.

During COP30, participants noted an unprecedented military presence, which aligned with the UNFCCC Secretariat requirements to manage civic space. Furthermore, the conference exposed uncertainties within the Host Country Agreement regarding safety jurisdiction in between local and UN security personnel. The data suggests these ambiguities contributed to the sudden shutdown of civil society demonstrations on multiple occasions.

[10]

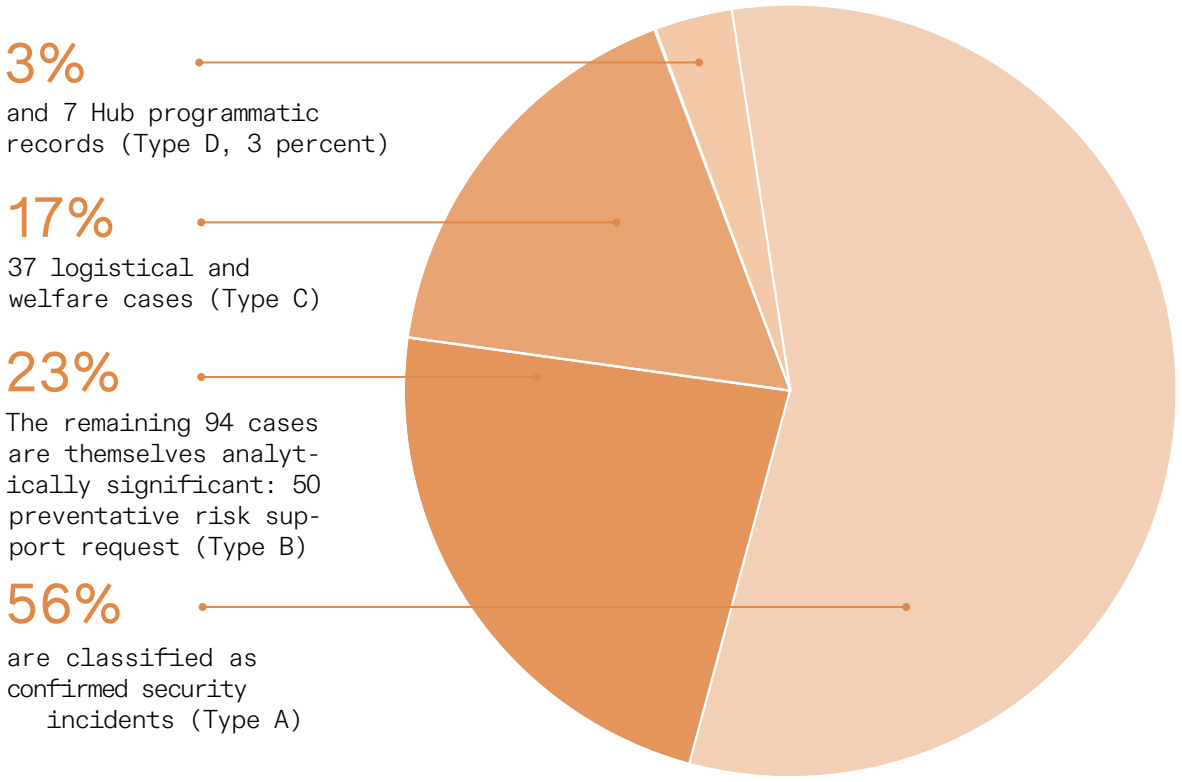
(08) Climate Action Network International (2025). Solidarity with the Indigenous Peoples of the Amazon.; Earth Journalism Network (2025). After Protest, Army and Military Police Enter COP30 Venue.

(09) Global Witness. (2025). At Least 146 Land and Environmental Defenders Killed or Disappeared Globally in 2024

05 PATTERNS OF RISK

The 216 cases documented across COP27 to COP30 reveal a consistent, cross-conference pattern of risk for civil society actors in UNFCCC processes. These are reported cases, not a representative sample — they do not allow prevalence claims, but a characterisation of the kinds of risks that arise, who bears them, and where they concentrate. The analysis in this section is grounded primarily in the 122 Type A security incidents.

5.1 What the Hub Recorded



A dataset in which nearly one in four contacts involves someone seeking preventative advice rather than reporting an incident signals a participation environment experienced as inherently risky — a condition that precedes and shapes what activists decide to say and do at the conference itself.

The distribution across conference cycles is uneven and must be treated with caution. COP30 accounts for 97 cases (45 percent of the total dataset), against 21 at COP27. This does not straightforwardly indicate COP30 was more dangerous. The Safety Hub grew from one staff member at COP27 to three at COP30, with substantially broader civil society networks. Raw case counts are not directly comparable across years. The more defensible reading is that COP30 represents what a better-resourced Safety Hub can document, while COP27 is a partial record from a smaller, less-networked

deployment. COP30's expanded civil society organising outside the official venue also broadened the scope of support cases: previously, Safety Hub efforts focused on the Blue Zone, due to stricter external restrictions on civic space at prior host countries.

5.2 Incident Types: What Happened

Peaceful assembly and protest are protected civic activities and a long-standing, recognised part of UNFCCC participation; treating them as security events, rather than as expression to be facilitated, is itself the shift this report documents.

Across 122 Type A incidents, several risk types predominate. Incidents were coded using 11 categories derived inductively from the data. Thirty-six cases (30 percent) carried two or more co-occurring incident codes, reflecting the compound nature of harm in this dataset.

Harassment and intimidation is the most prevalent incident type by a substantial margin, present at every conference and coded in 44 cases (36 percent of Type A incidents). It takes multiple forms: verbal

[11]

confrontation at pavilions and plenaries, hostile photography intended to identify or intimidate, systematic following by security personnel, and online abuse following high-profile advocacy.

Surveillance and monitoring is the second most prevalent type, coded in 30 cases (25 percent of Type A incidents), present across all five conferences. Its character changed substantially across the dataset. At COP27 it appeared primarily as individual incidents. At COP29 it became systematic and overt: 13 of the 30 coded surveillance cases describe the same operational pattern across consecutive days, with security personnel photographing activists during protests inside the Blue Zone, in some cases photographing identification documents. Activists describe choosing not to participate in advocacy actions or leaving spaces when security cameras were directed at them. Under

the UNFCCC, advocacy actions are an alternative method for communicating civil society demands, being COPs and SBs the only UN conference where demonstrations are allowed as a way of advocacy within the code of conduct. This has allowed increased possibilities for advocacy when the conferences have been hosted under jurisdictions with no right to peaceful assembly.

A Latin American activist interviewed for this report described the experience at COP28: activists from her organisation working on Palestine solidarity found themselves unable to communicate normally inside the venue. “At some points it has been such the case that we could not mention things in the way that they were. We had to be speaking in terms of chocolates and pies, just because we didn’t know how the surveillance was in the corridors.” She also described witnessing a woman who appeared at one of their internal meetings with accreditation from one organisation, then the next day with a different accreditation photographing people inside the space. The surveillance, the self-censorship it produced, and the uncertainty about who was watching combined into a single operational condition that shaped every conversation and decision inside the venue.

Travel restriction and border denial was recorded in 18 cases (15 percent), present at COP28, SB62, COP29, and COP30. It is the most geographically distributed risk type — occurring in the activist’s home country, in transit states, or in the host country, before, during, or after the conference. Three of the five highest-severity cases involving this code resulted in activists being unable to return home or being held at borders without legal recourse.

Post-conference reprisal was coded in 10 cases (8 percent), present across all five conferences — a finding that underscores that documented harm extends well beyond the conference perimeter. Access denial and debadging was coded in 10 cases (8 percent), present at COP27, COP28, COP29, and COP30. Speech restriction appeared in 9 cases (7 percent), concentrated at COP28 and COP29.

Physical violence was coded in 7 cases (6 percent). Six of the seven cases are at COP30; one is at COP28 (severity 3, during-conference). Of the six COP30 violence cases, three are severity 4, making physical violence the incident type with the highest concentration of high-severity cases at a single conference. Assembly restriction was coded in 5 cases (4 percent), all at COP30. Gender-based violence was coded in 2 cases (2 percent), at COP29 and COP30.

5.3 By Actor: Who Creates Risk

The actor analysis establishes that the risks documented are not exclusively a function of host-state authoritarianism — they emerge from a multi-layered governance architecture in which the UNFCCC's own institutional structures play a consistent and documented role.

Host-state security forces are the second most frequently identified named actor category, coded in 22 cases (18 percent of Type A incidents), driven particularly by the COP29 and COP30 data. But the more striking finding concerns the UN system: when UNFCCC Secretariat and UNDSS codes are combined, UN institutional actors appear in 34 cases (28 percent of Type A incidents), placing the UN system on par with host-state actors as a whole (host-state security and government combined, 39 occurrences, 32 percent) and ahead of any single host-state code. The analytically significant point is not which grouping ranks first, but that the UN's own institutions are implicated at a scale comparable to host states, a pattern largely invisible in analyses focused only on host-country governance.

UNDSS alone carries the highest mean severity score among all named actor categories (mean 3.31, n=16), and the UNFCCC Secretariat the third highest (mean 3.11, n=18). Home-country governments, while less frequent (4 cases, 3 percent), carry the highest mean severity of all (mean 4.00), reflecting cases where home-state action against returning activists produces the most severe long-term harm.

> *Dylan Hamilton, a Scottish activist who has attended COPs since COP25, described the structural position of UNDSS in terms that illuminate why no individual encounter is truly separable from the system behind it: "They will always have power over us in a similar way as police do, in a similar way as the military do. Obviously, they can't put us in prison, but they can hurt us, and they can bar us from our work, and bar our colleagues from work in the form of collective punishment - which is a crazy amount of power." The point about collective punishment refers to the UNFCCC's accreditation structure, under which an activist's debadging can extend consequences to the entire organisation that nominated them. Hamilton noted that the uncertainty about whether UNDSS personnel acted on instruction or individual initiative made accountability harder to locate, not easier: "I don't know if it was individuals acting out, or if it was a specific person in charge who decided... The training for those people is fully on the shoulders of the Secretariat, and they have been violent in the past, which should never be the case."*

Government delegations from non-host countries appear in 17 cases (14 percent), a pattern largely invisible in existing analyses, which focus on host-country governance. The data shows that delegations can and do use COP spaces to monitor, photograph, and intimidate their own nationals. Several of the most serious COP27 cases — activists receiving threatening messages on return, facing difficulties at home-country borders — are coded against government delegations, not the host state. This raises significant concerns about long-term profiling and targeting extending beyond the conference.

Incidents within civil society organisations, such as delegation organisers and individual activists, also become apparent in the data set. Most of these incidents revolve around duty of care failure of delegation organisers, missing resources and interpersonal conflict between civil society members.

5.4 Who Bears the Burden

The distribution of harm in this dataset follows identifiable patterns of structural vulnerability.

PARTICIPANT GROUP	KEY RISK PROFILE	CASES IN TYPE A (N=122)
RACIALISED PEOPLES	ACROSS INCIDENT TYPES; DISPROPORTIONATELY REPRESENTED IN HIGH-SEVERITY CASES	53 (43%)
INDIGENOUS PEOPLES	ACCESS DENIAL, TRAVEL RESTRICTION, HARASSMENT WITH CULTURAL SUPPRESSION DIMENSION, PHYSICAL VIOLENCE	27 (22%)
GLOBAL SOUTH / CLIMATE-AFFECTED REGIONS (CONTINENT PROXY)	POST-CONFERENCE REPRISALS, HOME-COUNTRY SURVEILLANCE, LIMITED CONSULAR PROTECTION	65 (53%)
REFUGEES / STATELESS PERSONS	ALL TYPE A, ALL SEVERITY 3 OR ABOVE; NO STATE TO ADVOCATE; NO CONSULAR PROTECTION	5 (4%)
WOMEN AND GENDER DIVERSE PEOPLE	ALL TYPE A, 36 OF THESE CASES RANK SEVERITY 3 OR ABOVE; HEIGHTENED VULNERABILITY	61 (50%)

TABLE [6] WHO BEARS THE BURDEN (TYPE A, N=122) (10)

Indigenous Peoples. 27 of 122 Type A incidents (22 percent) involve Indigenous peoples or groups, making them the most disproportionately represented marginalised identity category in the dataset. The Mesoamerican Caravan at COP30 — denied crossing at Nicaragua and Honduras (two separate Type A incidents), with several Caravan participants subsequently facing harassment, surveillance, and property confiscation on arrival — is the dataset's sharpest concentration of compounded risk. Two cases document the same individual debadged at COP28 and denied reaccreditation at COP30: a two-conference targeting pattern that illustrates how exclusion accumulates across cycles.

Global South and Climate-Vulnerable Regions. 51 Type A cases (42 percent) involve participants from Africa, the Americas outside North America, and Asia. The pattern of post-conference reprisals, threatening messages, home-border difficulties, employment consequences, is concentrated among participants from regions with restricted civic space and is almost entirely absent from European or North American participant profiles.

LGBTQIA+ activists. 10 cases across the full dataset involve LGBTQIA+ participants: two are Type A security incidents (2 percent of Type A), six are Type B preparedness requests, and two are logistical or welfare cases. Type B requests predominate, concentrated at COP28 in Dubai and COP29 in Baku, both countries where LGBTQIA+ identity is criminalised. This preponderance may reflect effective Safety Hub outreach before incidents occur, or under-reporting by those most fearful of exposure.

Refugees and Stateless Persons. 5 cases (4 percent of Type A), all severity 3 or above. The most severe case in the dataset (severity 5, COP29) involves a refugee left in a bureaucratic void — refused re-entry to her country of residence and unable to remain in Azerbaijan — resolved only through emergency visa arrangements to a third country. The UNFCCC Secretariat provided no assistance in any of these cases, neither facilitating entry nor acknowledging the structural gap in its accreditation framework that leaves refugee and stateless participants without recourse. The stateless or refugee condition converts a travel complication into a life-threatening situation because there is no home state to provide consular protection or advocacy leverage.

(10) Categories are not mutually exclusive; an individual may be counted in more than one (for example, an Indigenous participant from the Global South).

(11) It is worth noting that many recorded incidents were not part of only one of the above mentioned categories but fell into several marginalised categories.

Women and Gender-diverse People. Out of 61 cases (50 percent of Type A), 53 women and gender-diverse people were also part of other marginalised groups, including the only 2 cases with highest severity in the dataset (severity 5, COP29) involve a female refugee (mentioned above) and a case of gender-based violence. In addition, 15 cases involved other forms of harassment demonstrating the overall need for stronger safeguarding mechanisms to protect women and gender-diverse peoples.[11]

5.5 The Temporal Dimension: Before, During, After

Of 122 documented Type A incidents, 96 (79 percent) occurred during the conference itself. The 26 pre- or post-conference incidents (21 percent) are disproportionately severe: 10 of the 27 high-severity cases (severity 4 or 5), or 37 percent, occurred before or after the event, compared with 17 of the 96 during-conference cases (18 percent). (See Annex Table 2 and Figure 4 for severity distribution by temporal phase.)

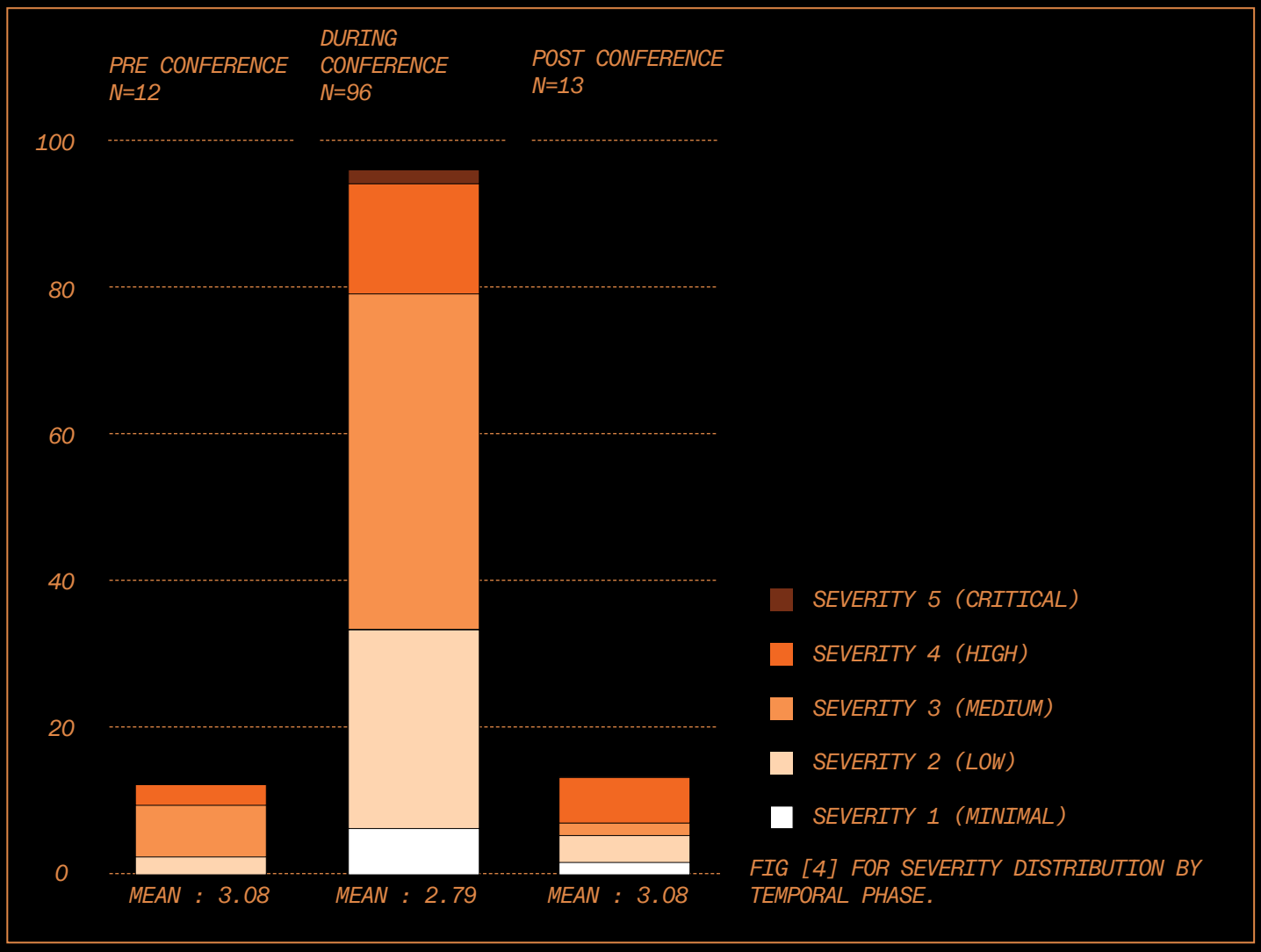


FIG [4] FOR SEVERITY DISTRIBUTION BY TEMPORAL PHASE.

Pre-conference risks cluster around three mechanisms: visa denial and travel restriction (the most common), digital threats and surveillance preceding travel, and advance monitoring of activists known to be planning attendance. Post-conference risks include online defamation, threats received at home, border difficulties on return, and in one COP30 case a sustained media smear campaign following a high-profile role in the Mesoamerican Caravan.

[12]

A Latin American activist interviewed for this report described what pre-conference risk assessment looks like for someone holding a passport that carries its own structural vulnerability. "If you are vocal in a place and holding such a passport," she said, referring to her travel documentation, "then there is a higher probability that you're going to be stopped." She spoke of the multiple layers of calculation involved in planning COP travel: not just whether to attend, but what to say before leaving, what not to put in writing, what to do if held at a border. An Irish activist described the particular anxiety generated by COP28's visa structure - the fact that for most participants, visas were issued as conference-specific documentation: "Nobody really knew what would happen to the visa if you got debadged."

The uncertainty was not abstract. It meant that activists who spoke publicly on Palestine at the start of the conference spent the remainder of it uncertain whether their visa remained valid - and in at least one case, unsure whether a colleague who had been debadged would be able to leave the UAE. Planning travel to a COP under those conditions is a risk assessment of what to say, and to whom, and at what point, before crossing a border from which one might not be permitted to return.

(12) Many activists at risk of post-conference reprisals are already connected to local human rights protection organisations and may not engage the Safety Hub, meaning this segment of the dataset reflects Safety Hub reach rather than the full scope of post-conference harm.

The post-conference dimension is the least represented in the dataset but arguably the most consequential for long-term civil society participation.(12) An activist who faces reprisals at home, such as surveillance, questioning, detention, as a consequence of their UNFCCC participation has no pathway to report or seek remedy within the conference's own governance structures. The harm occurs outside the Blue Zone and after the conference ends, rendering it invisible to any institutional accountability process. In several documented cases, severe threats from home countries have forced civil society members to delay or forgo their return. The UNFCCC cannot treat post-conference harm as outside its jurisdiction simply because it occurs after the Blue Zone closes. This makes post-conference accountability a prospective governance imperative.

06 MECHANISMS OF RESTRICTION

Behind the statistical distribution of incident types and actor categories lie the operational mechanisms through which civil society participation is restricted. Understanding the mechanism identifies where in the governance architecture accountability lies, and therefore where reform must be directed.

Six primary mechanisms are documented in the dataset. They are not mutually exclusive - a single case may involve border instrumentalisation, surveillance, and a chilling effect simultaneously - but each has a distinct operational logic and implicates different actors and accountability frameworks.

By frequency, border instrumentalisation is the most prevalent mechanism (42 cases), followed closely by chilling effects (39 cases), surveillance and monitoring (32 cases), exclusion and access restriction (26 cases), duty-of-care failure (18 cases), and militarisation (5 cases, unique to COP30).

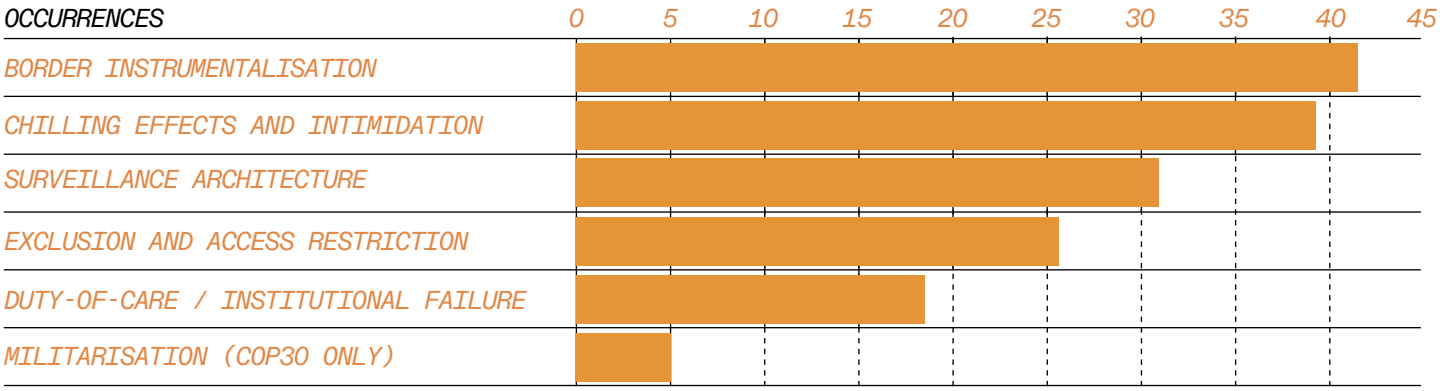


FIG [5] MECHANISM FREQUENCY, FULL DATASET (N=216)

6.1 Border Instrumentalisation (MECH-BORDER, n=42)

Border control is the most prevalent mechanism in the full dataset — 42 cases across all case types, the highest of any mechanism. The volume of preventative risk detection cases within this total (15 of the 42) reflects the specific structure of COP participation: activists must cross an international border to attend, and states understand this. Border control operates as the primary point at which participation is determined, before activists reach the conference venue.

The mechanism operates in several modes: visa denial, airport detention and questioning, confiscation or loss of travel documents, and denial of right of return to country of residence. It is present across all five conferences, concentrated at COP28 (12 cases) and SB62 (10 cases). The SB62 figure is notable: despite Germany's formal rule-of-law context, border-related cases

were the second highest in the dataset at that conference, reflecting activist anxiety about Germany's broader crackdown on Palestine solidarity travel and expression in that period.

At COP28, this mechanism appeared through categorical exclusion: participants holding refugee or stateless travel documents were denied entry because the UAE did not recognise UNHCR-issued documents. At COP29, the same mechanism reached its most severe form when an accredited participant was left unable either to re-enter her country of residence or remain in Azerbaijan. In addition, COP29 also limited participation by excluding specific nationalities. These cases show how border control can convert accreditation into a hollow guarantee: participants may be formally admitted to the UNFCCC process while being materially unable to reach or safely leave it.

Many border-related incidents affecting Indigenous participants reflect a structural position that predates the conference itself. Nine Indigenous participants across all five conferences appear in border mechanism cases, all at severity 4 — the highest concentration of high-severity border cases in any participant group. The UNFCCC's accreditation framework does not account for the structural relationship between Indigenous peoples and state borders. The conference becomes the context in which a pre-existing exclusion materialises.

A veteran activist with more than a decade of experience across multiple UNFCCC conferences described the post-conference consequences of advocacy extending beyond the COP. After co-authoring a formal report documenting disruption at a parallel UN forum — a report submitted to and endorsed by a UN Special Rapporteur — he and all co-authors were barred from entering Germany for the subsequent UN human rights conference at which the report was to be presented. "All of us who were named on that were banned," he said. "I'm still banned from Indonesia because of that." He noted that the UN Special Rapporteur himself, holding a UN laissez-passer, was also denied entry. "That shows you that it is within their systems of oppressing us."

The UNFCCC governance framework contains no provisions addressing what happens to accredited conference observers at international borders.

An accredited observer denied a visa or detained at an airport has no UNFCCC-based recourse mechanism to invoke.

"Azerbaijani officials were saying that Armenians are welcome at COP, they were basically inviting Armenians publicly and saying it's safe to go there." Arshak Makichyan, an Armenian environmental human rights defender shared. He further shared: "I have sent all the required information, and then I did not get reply in 3 days, and, I waited almost to a month. I have already booked the hostel to stay, I got the reply. […] that I did not get the visa without any kind of explanation why." Arshak was seeking support from the UNFCCC, and shared: " I have sent an email, and I asked what should I do, and I did not receive any reply."

6.2 Surveillance and Monitoring (MECH-SURVEIL, n=32)

Surveillance appears in 32 of the 216 cases — 30 Type A and 2 Type B — and is the third most frequently documented mechanism. Its character changed substantially across the dataset. At COP27, it appeared primarily as individual incidents (6 cases). At COP29, it became systematic and overt, accounting for 16 of the 32 total cases: security personnel photographed activists during protests inside the Blue Zone across consecutive days, in some cases photographing identification documents directly.

The effect of overt surveillance differs from covert monitoring. Overt surveillance — cameras directed at activists' faces during protests — produces immediate behavioural modification. Activists in the COP29 dataset describe choosing not to participate in actions, removing identifying materials, or leaving spaces when security cameras were turned toward them.

The Latin American activist quoted in Section 5.2 described a similar surveillance environment at COP28. The knowledge that surveillance was operating — regardless of where specifically it was coming from — became itself a mechanism of restriction. It produced self-censorship not simply as a response to a known threat, but as the only viable operational choice when the threat's scope was unknown. Her account of speaking in code about organising plans reflected a collective judgment by her delegation that open communication carried unspecified but credible risk. In these cases, behaviour modification had already occurred before any direct confrontation happened. This is how surveillance functions as a mechanism of restriction: it narrows what activists feel able to say, where they feel able to gather, and whether they participate at all.

6.3 Exclusion and Access Restriction (MECH-RESTRICT, n=26)

Access restriction operates at the intersection of UNFCCC governance and host-state authority. Of the 26 cases, 20 are Type A and 6 are Type B preventative requests. The mechanism is most concentrated at COP28 (10 cases) and COP30 (8 cases), with a notable presence at SB62 (6 cases).

Debadging, or the removal of accreditation, appears in the most severe access restriction incidents. Its distinctive feature is formal legality: the UNFCCC accreditation system grants the authority to remove accreditation, and this authority has been exercised against activists engaged in protest, cultural expression, and solidarity advocacy. In one documented case, an individual debadged at COP28 was subsequently excluded from all future UNFCCC conferences — a decision upheld without the affected party being given access to the evidence cited, which remains in the possession of UAE authorities.

COP 28

Debadging for smudging ceremony (cultural practice) PRIMARY ACTOR: UNDSS / UNFCCC	Partially resolved after Safety Hub intervention, provided well-being support
Removal from high level event badge suspended	Badge suspension - resolution unclear (see case COP30)
Debading for alleged physical violence PRIMARY ACTOR: UNFCCC	Preventative landing plan created and monitoring several weeks after conference; digital threats followed

COP 29

Individual blocked from speaking after ongoing harassment PRIMARY ACTOR UNFCCC	Reported to Safety Hub; intervention ensured no debadging or other consequences; provided well-being support

COP 30

Persistent non-reaccreditation of activist debadged at COP28 PRIMARY ACTOR: UNFCCC / UNDSS	Intervention by Safety Hub with UNFCCC during COP30, resolution currently not possible, due to missing UNFCCC processes; provided well-being
Three Indigenous participants denied access to specific zones PRIMARY ACTOR: UNFCCC	Safety Hub intervened; partial

TABLE [7] DOCUMENTED ACCESS RESTRICTION CASES BY CONFERENCE

Access restriction does not require a formal debadging act. Activists in the dataset report being blocked from entering zones, being followed to deter attendance at events, and being told to leave spaces without formal procedure. These informal exclusions do not trigger the accreditation review process but produce the same practical effect.

6.4 Militarisation (MECH-MILITARISE, n=5)

Militarisation is unique to the COP30 dataset and represents a qualitative shift in conference governance. Five cases involve this mechanism directly: three incidents of protests being stopped by host-state security forces (with assembly restriction and harassment coded alongside), and two incidents of physical violence by security personnel. All five cases identify host-state security forces as the primary actor; all are severity 3 or above, with two reaching severity 4.

The deployment of armed military forces in response to civil society protests at a UNFCCC conference marks a threshold no prior conference had crossed in the Safety Hub's operational record.[13] The immediate trigger was an Indigenous-led march that entered the venue's Blue Zone perimeter. Following the incident, UNFCCC Executive Secretary Simon Stiell wrote to the Brazilian government urging an increase in uniformed security presence at the conference perimeter. The Human Rights and Climate Change Working Group condemned the letter directly:[14]

> *"Following a "security incident" at the COP30 venue last week, this letter urges the Brazilian Presidency to step up the presence of uniformed security forces around the COP30 venue and to intervene to disperse protests. In doing so, the letter contributes to an increasing global trend towards the silencing of dissent, militarised response to protest, and marginalisation of those defending land and the environment, including the Indigenous Peoples of the Brazilian Amazon. The consequence of the letter has been a massive escalation of security force presence in and around COP30, creating a chilling effect and a feeling of unsafety for Indigenous Peoples, Environmental and other Human Rights Defenders, civil society, and activists standing up for their rights."*

Following the increased securitisation, Safety Hub data and testimonies collected for this report indicate a significant decline in conference accessibility and a sharp increase in psychosocial support requests. The right to peaceful assembly was effectively suspended outside the Blue Zone. A compounding factor was ambiguity in the Host Country Agreement regarding jurisdiction between UN security personnel and local authorities over the grounds surrounding the venue. That ambiguity allowed for high-level UN interference to override local dynamics without a clear accountability pathway, causing direct and indirect harm to most observers.

13 UN Special Rapporteurs (2025). Statement on Civic Participation at COP30.

14 World Organisation Against Torture (OMCT) (2025). COP30: Defend Indigenous Peoples' Protest Rights.

6.5 Chilling Effects (MECH-CHILL, n=39)

Chilling effect is coded in 39 cases — the second most common mechanism in the full dataset, present across all five conferences. It differs from the others in being indirect: rather than enacting a prohibition, it produces behavioural change through the anticipation of consequences. An activist who moderates their language after being photographed, or who decides not to join a protest after a colleague was debadged, has experienced a chilling effect — even though no direct action was taken against them personally.

Of the 39 cases, 29 are Type A and 10 are Type B preventative risk detection requests — the latter illustrating how the anticipation of restriction shapes engagement before the conference even begins. Chilling effects are distributed across all conferences, with the highest concentration at COP29 (11 cases) and COP30 (13 cases combined A and B).

[13]

The mechanism is systematically undercounted in the dataset. By definition, it generates no reportable incident in many cases, where the activist simply does less and says less, and never contacts the Safety Hub. The real scale of chilling effects across five conferences is unknowable from this data. What the data establishes is the conditions most associated with chilling: post-conference reprisals, debadgings, and overt surveillance all generate chilling effects in bystanders as well as direct targets.

Dylan Hamilton captured the dynamic directly: "We've been lured more into these kind of... filibustering, almost, of negotiations with us, where they spend hours with us arguing about banners, and telling us if we do this, this will happen, and if we do that, that will happen, and it's more mental games now... Mental is worse in a lot of ways, because now we police ourselves. They don't have to do it for us." A veteran activist with more than a decade of experience framed the shift similarly: actions that in earlier years would simply happen - "we would decide ourselves what we would do. We would just notify the UNFCCC, and we would just do it" - now require extended pre-negotiation with the COOL team (the UNFCCC's Conference Operations and On-site Logistics team) that itself produces a compliance orientation. The process of seeking permission has become part of the chilling mechanism.

6.6 Duty-of-Care Failure (MECH-DELEG-FAIL, n=18)

Duty-of-care failure is coded in 18 Type A cases — all concentrated at COP28 (4 cases), COP29 (4 cases), and COP30 (10 cases). The mechanism captures two analytically distinct failure modes that the data now reflects at scale.

The first is institutional silence in response to reported incidents. The most severe example is the COP29 reading-of-names incident — activists harassed on a near-daily basis during the recitation of Palestinian victims' names, formally reported to the UNFCCC, and met with no institutional response. One of the other extreme cases in the full dataset (severity 5, COP29) involves a badge provider — a CSO that had agreed to accredit an activist — subsequently demanding sexual favours as a condition of continued accreditation. No formal UNFCCC review process was triggered.

The second is organisational failure by civil society bodies themselves. The COP28 and COP30 data contain multiple cases in which the ACT-CSO code and MECH-DELEG-FAIL are coded together — cases where civil society organisations failed to protect their own members from surveillance, harassment, or travel difficulties, either through inadequate safety planning or an underestimation of conference-associated risk.

A Latin American activist with experience across multiple conference cycles described the institutional gap: "I don't think that they have at all... no idea on that [what happens to activists at borders and at home]. And even though with the incidents that have happened, still there is no structure or guarantees that have been put in place." She described a single instance in Egypt where informal personal support was offered - a Secretariat staff member who helped arrange an escort after repeated profiling - but emphasised that this was personal rather than institutional: "It was more like this kind of personal support... but perhaps not the whole institutional support, or the whole institutional metrics that one would expect from a UNFCCC process."

The only effective response mechanism documented in this data is a workaround that depends on personal relationships and individual goodwill, and disappears with personnel changes.

6.7 Cross-Mechanism Patterns

The mechanisms documented here do not operate in isolation. The most severely affected activists typically experience multiple mechanisms in sequence: surveillance precedes border control; access restriction is accompanied by chilling; reprisals follow public advocacy. This sequencing reveals a participation-chain attack, specifically a structurally reinforcing series of restrictions that collectively degrades the conditions for meaningful civil society engagement.

The cross-mechanism pattern also reveals a structural asymmetry in accountability. Mechanisms inside the Blue Zone – debadging, UNDSS confrontations, session exclusions – are formally subject to UNFCCC institutional authority. Mechanisms at borders and in home countries are subject to host-state and home-state authority respectively, and are currently entirely outside the UNFCCC's accountability reach. Institutional reform confined to the venue will address a minority of the mechanisms documented in this data.

07 STRUCTURAL CONDITIONS

The patterns documented in Sections 5 and 6 are produced by identifiable structural conditions that shape the civic space environment at UNFCCC conferences before a single activist arrives.

7.1 Host-State Governance Environments

As detailed in Section 4, three of the five conferences in this dataset were held in countries rated 'Closed' by the CIVICUS Monitor, the most restrictive category in the global civic space index. Brazil, the host of COP30, presents a formally democratic profile, but with a documented record of high violence against environmental and Indigenous defenders and one of the highest rates of murdered environmental defenders globally.

The UNFCCC's process for selecting conference hosts contains no formal human rights or civic space assessment of candidate states. The dataset's distribution of incident types broadly reflects host-state governance profiles: Egypt produced surveillance and government-delegation harassment; the UAE produced access denial and identity-based harassment; Azerbaijan produced overt and systematic surveillance; COP30 produced heavy militarisation and physical violence. Notably, the volume of pre-conference preventative requests ahead of COP30 was lower than for COP28 and COP29, consistent with Brazil's comparatively open civic space rating. This underscores that activists are making real-time risk assessments based on host-country context, and that the location of the COP meaningfully shapes who participates and how.

7.2 UNFCCC Institutional Gaps

The UNFCCC is not a passive observer of civic space conditions at its conferences; it is an active participant in their governance. Three structural gaps in its institutional design are the conditions under which the incidents documented in this report become possible.

- **The Accreditation Accountability Gap.** The UNFCCC's Rules of Procedure grant the Secretariat broad discretion to suspend or withdraw accreditation without defining what conduct warrants such action, establishing an independent appeals mechanism, or requiring transparency. There is no time limit on continuing exclusion. On several occasions, organisational debadging on the basis of individual behaviour has been used as a threat of collective punishment. The COP28 cases illustrate the gap precisely: activists were debadged without review, without challenge, and in one case remained non-reaccredited at COP30, two years later.
- **The UNDSS Accountability Gap.** UNDSS provides security services under arrangements that leave its accountability to conference participants undefined. UNDSS personnel are not UNFCCC employees and are not directly subject to UNFCCC complaints procedures. Several cases in the dataset involve UNDSS personnel described as 'extremely aggressive' or physically intimidating, with no recorded institutional response.
- **The Host Country Agreement Gap.** Although the UNFCCC has recently begun publishing Host Country Agreements with greater transparency, these agreements still do not provide sufficiently robust, enforceable participant-protection provisions, particularly for participants from occupied territories, stateless communities, or countries with restricted civic space.

The gap is one of implementation, not recognition: at SB62 (June 2025) the SBI itself affirmed that host country agreements should reflect obligations under international human rights law, protect all participants against abuses "including harassment and sexual harassment," facilitate inclusive participation, and "be made publicly available." (15)

7.3 Privatised Security and Logistics

The use of private security companies, private accommodation contractors, and private badge providers at UNFCCC conferences creates accountability diffusion. When an activist is harassed by a private security guard, the guard is an employee of a company contracted by the host country or the conference facilities manager, which has a contract with the UNFCCC, which has a Host Country Agreement with the host state. Each link provides an opportunity for accountability to dissipate. The badge provider dynamic illustrates this most sharply.

[15]

The worst case documented in this dataset - sexual exploitation conditioned on continued accreditation - emerges directly from the structural arrangement in which some activists access conferences through accreditation holders who hold leverage over their continued presence.

7.4 Geopolitical Pressures

For activists from countries where advocacy is itself criminalised, the UNFCCC conference does not represent a suspension of domestic repression - it represents a new arena in which that repression continues internationally. Government delegations from such states attend the same conference, share the same spaces, and operate under no obligation to leave their domestic security practices at the door. The UNFCCC's observer framework provides no protective barrier between civil society participants and the governments that persecute them

15 SBI conclusions on Arrangements for Intergovernmental Meetings (AIM), SB62, Bonn, June 2025, paras 21, 23 and 25 (FCCC/SBI/2025/L.7).

08 PALESTINE SOLIDARITY AS A CRITICAL CASE

Palestine solidarity advocacy at UNFCCC generated a distinct pattern of documented cases across three conference cycles, with wider solidarity activity visible beyond the cases coded in the dataset. Though the solidarity with Palestine was very present during COP30, the majority of the actions took place outside of the UNFCCC space. Actions within the UN spaces showed the same pattern.

The chilling effect documented earlier at COP29 carried forward, where the public reading of Palestinian victims' names, a form of witness practice with precedent at prior conferences, did not occur at COP30. Activists interviewed for this report indicated that the near-daily harassment at COP29 had effectively deterred the practice, illustrating how intimidation produces self-censorship without requiring explicit prohibition.

Thirteen cases in the dataset are coded as Palestine-related: five are Type A security incidents, eight are Type B preventative requests.

PALESTINE-RELATED CASES TOTAL	13
TYPE A (SECURITY INCIDENTS)	5
TYPE B (PREPAREDNESS REQUESTS)	8
CONFERENCE CYCLES AFFECTED	4

The majority of Type A incidents involve speech restriction, surveillance by government delegations, and identity-based harassment connected to visible symbols of solidarity. The majority of preventative risk requests involve legal advice about the right to wear keffiyehs or display solidarity materials, and risk assessments for advocacy referencing Gaza.

8.1 The Incident Pattern

The five documented Type A incidents follow a consistent typology. Activists wearing keffiyehs, armbands, or carrying solidarity materials were approached by security personnel or conference officials, questioned about their materials, and in some cases required to remove them or leave the space. In several cases, government delegation officials photographed activists during solidarity expressions inside the Blue Zone. The systematic

rather than incidental character of the photography is notable: the same activist or group was photographed on multiple consecutive days, suggesting a coordinated monitoring operation.

A COP28 press conference incident illustrates the escalatory dynamic. When civil society participants used a scheduled press conference to speak about Palestine, a practice with precedent at prior COPs, the UNFCCC declared the event an unauthorised protest and threatened mass debadging. Because COP28 visas were issued as conference-specific documentation linked to badge status, the threat of debadging carried an immigration consequence that had not existed at prior conferences.

Multiple activists interviewed for this report described sitting through overnight negotiations, uncertain whether colleagues who had spoken at the press conference would be detained or deported.

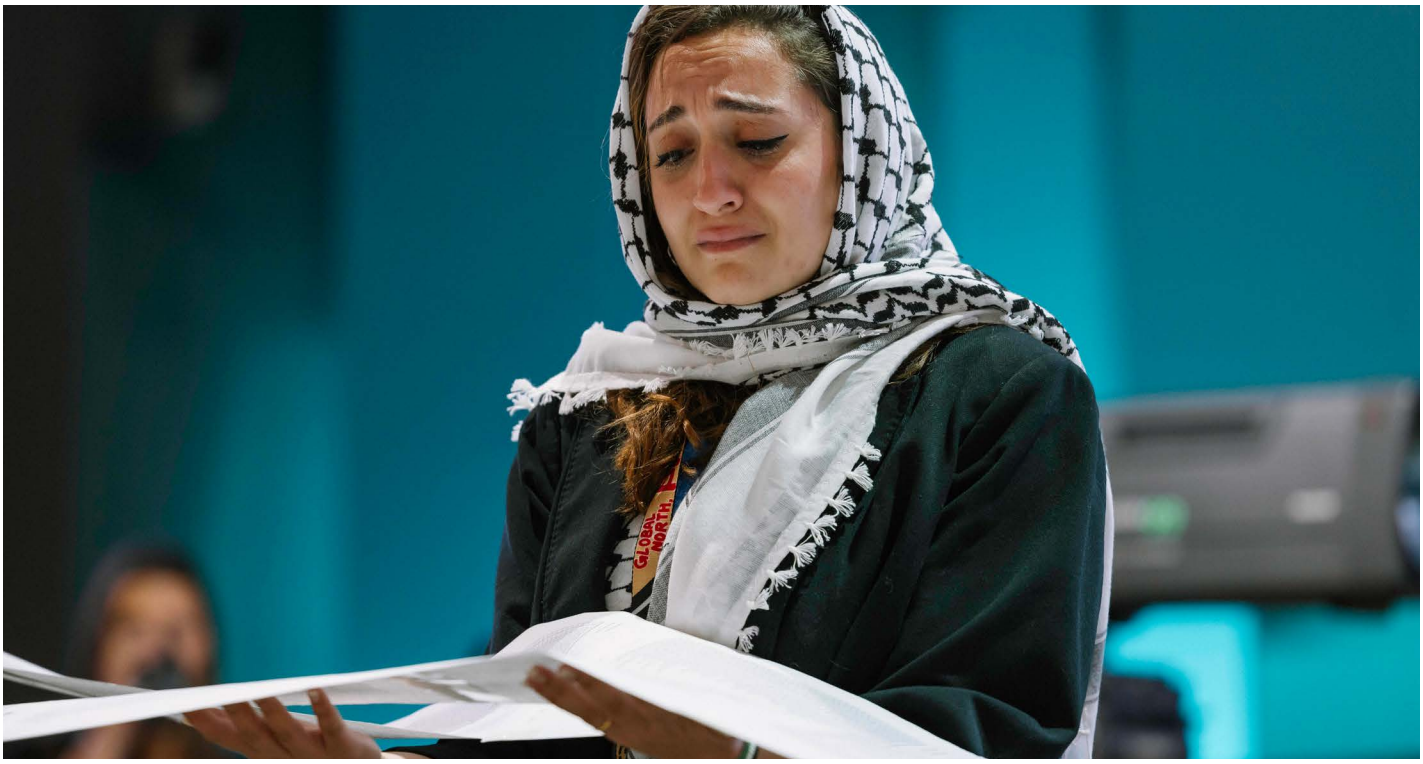
The incident also triggered a broader restriction on language. Several phrases that had been used without objection at prior COPs were subsequently banned from use inside the conference perimeter. According to multiple interviewees, the bans were attributed to complaints from unnamed state parties, with the UNFCCC characterising the terms as security concerns at the request of those parties rather than on its own institutional initiative. The effect was a conference-specific speech code, applied not through published rules but through ad hoc enforcement, in which language used routinely in UN human rights documentation became impermissible inside a UN climate forum.

An Irish activist who was present at the press conference described what followed:

"There were issues with them potentially being debadged for quote-unquote turning a press conference into a rally, which of course they did do, but people have also been doing since the beginning of time in the UNFCCC, and this suddenly became an issue because they were speaking about Palestine." They described sitting with a colleague calculating whether his visa would remain valid if debadged:

"We were dealing with this issue of people going to be debadged and then potentially deported.

The internal UNFCCC consequences were kind of becoming external UNFCCC consequences in a way that hadn't been true for us as people in an extremely privileged position before."



[17]

8.2 The Preparedness Dimension

Eight Palestine-related cases in the dataset are Type B preventative requests. These cases document anticipatory suppression - the restriction that precedes any incident. Activists sought advice about whether wearing keffiyehs was safe at COP28, about their legal rights during Palestine solidarity protests under German law (SB62, five separate requests representing what appears to be a coordinated outreach by a single activist group), and about managing digital security in connection with their Palestine-related advocacy.

The volume of Palestine-specific preventative requests illustrates how the conference context shapes anticipatory behaviour. When activists arrive at a UN conference needing legal advice about whether a culturally significant garment might get them removed from the space – even without violating official regulations – the conference has already functioned as a site of restriction of expression - before any direct incident occurs.

8.3 What This Case Reveals

This report does not position Palestine solidarity as the central finding of the Safety Hub analysis: 5 Type A incidents out of 122 is a significant but not dominant pattern. What the Palestine solidarity cases provide is a high-visibility illustration of dynamics the broader dataset establishes more extensively: the use of government delegations as instruments of political surveillance; the treatment of advocacy expression as a security threat; the absence of institutional accountability for harassment within the conference space; and the chilling effects that follow from visible repression of one advocacy position;

the intensified repression of Human Rights related content.

These dynamics are present in the data for fossil fuel lobbying restrictions, Indigenous cultural expression, and advocacy related to the human rights and environmental impact of the East African Crude Oil Pipeline (EACOP). In stark contrast to repression against civil society working against fossil fuel lobbying are especially the practices that lobbyists only need to declare their conflicts of interest on a voluntary basis. They are concentrated and visible in the Palestine solidarity cases because the political stakes are high and the actors most visible. This makes Palestine solidarity a critical case in the methodological sense - a case whose specificity illuminates the structure of the general phenomenon, rather than constituting an exception to it.

[18]

8.4 What the Pattern Reveals

First, as the actor analysis in Section 5.3 establishes, government delegations use COP spaces to monitor and intimidate civil society actors whose advocacy positions they oppose. The Palestine solidarity cases make this dynamic most visible, but it is present across the dataset for anti-fossil fuel advocacy, EACOP-related activism, and Indigenous rights advocacy. The Palestine cases are a high-visibility instance of a general pattern, not an exception to it.

Second, visible symbols of identity and political solidarity are treated as security risks within the institutional logic of the conference space. The keffiyeh cases illustrate how a cultural garment becomes a site of institutional enforcement. If expression associated with a political conflict can be treated as a venue security risk, the boundary between ‘safety’ and ‘speech suppression’ becomes administratively permeable.

Third, the COP29 reading-of-names incident - in which activists were harassed on a near-daily basis during the recitation of Palestinian victims’ names, formally reported to the UNFCCC, and met with institutional silence - is the clearest illustration of institutional indifference in the dataset. The activists were not engaging in disruptive conduct. The harassment they faced was conducted by other conference participants. The UNFCCC had both the knowledge and the institutional authority to act but did not.

Fourth, the pattern across all conference cycles - with increasing volume of preventative requests as each COP approached - suggests that activists are themselves updating their expectations of what the UNFCCC space will permit. Censorship extended to language itself: activists reported that use of the word ‘siege’ to describe conditions in Gaza, terminology employed by multiple UN agencies, including UNRWA and UNOCHA, was challenged or suppressed within the UNFCCC space, creating an asymmetry in which UN human rights documentation could not be cited within a UN climate forum.

09 IMPACTS ON CIVIL SOCIETY PARTICIPATION

The incidents documented in the preceding sections do not occur in isolation from the broader civil society presence at UNFCCC conferences. They have consequences that extend far beyond the individuals directly affected, shaping the composition, character, and quality of civil society engagement across conference cycles.

9.1 Chilling Effects on Advocacy

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The most pervasive and least measurable impact of the patterns documented in this report is the suppression of advocacy that does not take place. An activist who was debadged at one conference and did not return to the next. A group that decided not to conduct an action because a colleague was photographed at the last one. A speaker who self-censored on Gaza because she witnessed what happened to someone who wore a keffiyeh at a pavilion. All of these are examples of successful suppression.

The chilling effect mechanism is the primary pathway through which localised incidents become structural conditions. A debadging that affects one person creates a precedent that shapes the behaviour of hundreds. Overt surveillance that targets one group creates risk calculations across an entire movement. The Safety Hub's preventative request data - 50 cases of activists seeking advice about potential risks rather than reporting harms - provides a partial window into this dynamic: each preventative request is evidence that a person has assessed the conference environment as risky enough to warrant professional safety advice before attending.

Muhammed Lamin Saidykhan, CAN International's representative and a veteran of multiple UNFCCC cycles, described how collective punishment transforms individual incidents into organisational self-regulation: "Organisations are limited to control their people, what they say, how they behave in those spaces, because when one activist or member of your team is debadged, it affects the organisation's participation. That, for me, is the most serious substance in itself." The mechanism he describes operates without direct enforcement. The threat of collective consequence is sufficient.

Saidykhan also described the chilling effect from the organiser's side, where pre-negotiating actions with the COOL[16] team channels protest into spaces where it cannot be seen. Activists, he noted, are assigned action locations in advance, often in corridors where no delegates pass: "You do actions in certain locations, nobody's passing through those locations. You're not heard, you're not seen, you're not reaching anybody. It's a waste of time and resources, and energy, and even intellectual capacity." The process of seeking permission, and the terms on which it is granted, has itself become part of the chilling mechanism

The cumulative effect is not only harmful to individuals: it erodes the legitimacy and impact of the UNFCCC itself, by hollowing out the civil-society participation on which the process depends for its credibility.

9.2 Participation Inequity

The risk distribution documented in this dataset is not equitable. Indigenous Peoples, activists from climate-affected and Global South countries, LGBTQIA+ participants, Palestinian solidarity advocates, and refugee and stateless individuals bear a disproportionate share of the incidents recorded. These are, in many cases, also the communities with the greatest material stake in UNFCCC negotiations - the people for whom climate change is an immediate survival

[20]

question.

The structural effect of differential risk is a systematic skewing of civil society presence at UNFCCC conferences towards those who can participate safely. European and North American civil society organisations appear less frequently in the incident data because the host-country governance environments, the government delegation dynamics, and the border instrumentalisation mechanisms that generate the most serious risks bear less heavily on them. Not all Global North civil society operates from the same position: groups whose advocacy poses no challenge to host-state or economic interests, including some European climate youth movements and technology-focused advocacy, operate with significantly lower personal risk than organisations focused on political prisoners, Palestine solidarity, or Indigenous land rights. Differential risk is not simply North/South; it tracks the political threat posed by the content of activism.

The identity of participants is frequently connected to their advocacy content. The dataset reflects this clearly where activists from high-income, Open-rated countries account for a disproportionately small share of Type A incidents relative to their registration numbers. As a result, those critical of systemic oppression, extractivism, and human rights abuses face a higher risk of targeting compared to advocates whose agendas align with state and corporate driven interests. A participation environment in which safety risk correlates with marginalisation reinforces existing power asymmetries in the climate governance space.

(16) Within the UNFCCC, civil society "actions" (demonstrations and advocacy activities held inside the conference venue) must be arranged in advance with the Secretariat team that coordinates them, known to participants as the COOL team, which approves the timing, location, and format of each action.

A Latin American activist interviewed for this report identified this dynamic in terms of what it may mean to hold a Global South passport at a COP: "If you are vocal in a place and holding such a passport, then there is a higher probability that you're going to be stopped." The structural vulnerability is not primarily about the conference. It is about what the conference reveals about who is protected and who is not in the broader governance architecture.

9.3 Burden on Informal Support Systems

The Safety Hub exists because the formal governance institutions of UNFCCC conferences do not provide adequate protection to civil society participants, and civil society groups often lack the capacity and infrastructure to respond to safety incidents. Its 216 cases represent 216 instances in which activists had to seek help from an unofficial, under-resourced support structure because no official institutional mechanism was available or adequate. The Safety Hub's growth from one on-ground staff member at COP27 to three on-ground staff members at COP30 reflects the expansion of need, not the resolution of the underlying problem, while continuing to be under resourced.

The burden this places on civil society is substantial. Every case in the dataset is a case in which an organisation or movement had to divert time, money, and capacity from climate advocacy to crisis response.

Border interventions, accreditation appeals, digital security emergencies, temporary relocation, and wellbeing support are not climate advocacy activities - they are the cost of operating in an environment that does not protect the people most affected by the climate crisis when they try to participate in the institutions that are supposed to address it.


CIVIC SPACE FOR CLIMATE ACTION

10 THE ACCOUNTABILITY LANDSCAPE

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The UNFCCC is an active participant in their conferences' civic space governance. The accountability gap documented here is a structural condition: a multilateral process that has never been required to account for what happens to the civil society participants on whose legitimating presence it relies.

10.1 No Independent Complaints Mechanism

While the UNFCCC has conduct rules and event-based reporting channels for some forms of harassment, it still lacks an independent, comprehensive, participant-centred accountability mechanism for the wider range of civic-space harms documented in this report, including surveillance, debadging, governmental harassment, border obstruction, and post-conference reprisals. The Observer Status guidelines establish conduct standards but contain no enforcement procedures accessible to civil society complainants. UNDSS operates a general complaint system within the UN framework, but it is not designed for conference participants and provides no timely redress. The host-country legal systems of Egypt, the UAE, and Azerbaijan offer no realistic accountability pathway for activists harassed inside a UNFCCC venue.

In practice, civil society participants who experience harassment, intimidation, or access denial at UNFCCC conferences have no institutional channel through which to seek redress. The Safety Hub has served as an informal triage and documentation function by default - but its case records carry no formal standing in any UNFCCC process. There have been incidents in which UN Staff members have referred cases to the Safety Hub.

10.2 HCA Opacity and the Absence of Participant Protections

Host Country Agreements are negotiated bilaterally between the UNFCCC Secretariat and the host government. They are not routinely made public.[17] Analysis of partially disclosed HCAs from COP28 and COP29 identifies no provisions addressing host-state security forces' conduct towards participants, no provisions on border access for accredited observers, no clear jurisdiction over conference premises and protest regulations, and no complaints mechanisms applicable to civil society.

This opacity has direct consequences. When accredited participants are denied entry at the border, when their badges are suspended without explanation, when they are subjected to surveillance or harassment by host-state security forces, or when regulations for demonstrations are shifted overnight, the agreement that governs the conference contains no applicable protections and no recourse.

[17] The COP30 Host Country Agreement was made public; see Amnesty International (Oct 2025)

10.3 UNDSS Without Civil Society Accountability

UNDSS personnel appear as an actor in 16 of the 122 Type A incidents - making UNDSS one of the five most frequently coded actors in the dataset. UNDSS carries the highest mean severity score of any actor category in the dataset. It operates without civil society oversight, without publicly available standard operating procedures for its conduct towards NGO participants, and without an accessible complaint mechanism for those who experience its enforcement.

UNDSS personnel are not UNFCCC employees and are not directly subject to UNFCCC complaints procedures. Several cases in the dataset involve UNDSS personnel described as 'extremely aggressive' or physically intimidating - with no recorded institutional response.

10.4 No Data Collection Mandate

The UNFCCC Secretariat does not collect systematic data on incidents affecting civil society participants. No aggregated incident reporting is published. No disaggregated analysis of access denial, harassment, or surveillance is incorporated into conference evaluations or post-COP reviews. No mechanism exists within the UNFCCC framework to hold state delegations accountable for the conduct of their members towards civil society participants. Delegates who engage in surveillance, intimidation, or harassment of observers face no formal sanction under UNFCCC Rules of Procedure, a structural impunity that the incidents documented in this report make concrete.[18]

This absence is itself a policy choice. It means that the pattern of incidents documented in this report - 216 cases across five conference cycles - exists

[18] Visual documentation of the security response at COP30, including the conduct of UNDSS and Brazilian federal police, is on file with CAD and PICS.

only because a civil society-funded Safety Hub chose to record it. The institutional architecture of UNFCCC conferences generates no comparable record.

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10.5 Post-Conference Accountability Absence

The accountability gap extends beyond the conference period. No accountability exists for incidents that emerge after the conference ends: responsibility falls between jurisdictions, and no protection is offered to participants who face risk on returning home. Post-COP follow-up on incidents is not systematic. There is no formal mechanism through which the UNFCCC reviews incidents from one conference cycle in preparation for the next. Incident data from COP27 did not visibly inform the security architecture at COP28. The pattern documented in this report, rising severity, narrowing civic space, entrenched actor dynamics, has continued across four conferences without institutional interruption.

10.6 The Preparedness Infrastructure

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The most detailed picture the dataset provides of accountability in practice comes from the 50 Type B preventative cases. That it falls to a civil society-run Safety Hub to manage the safety risk of civil society participation at a UN conference reflects a governance gap the UNFCCC has never formally acknowledged. The preparedness function should not be an emergency workaround. It should be a formal, institutionally supported part of how the UNFCCC manages its observer programme.

11 EMERGING RISKS AND RISK HORIZON

Digital threats: Seven INC-DIGITAL cases in the dataset represent a significant under-count and are potentially under-reported. Though many activists and defenders are starting to strengthen their digital security skills, some threats might stay undetected for a longer period of time, or even indefinitely, exposing civil society to uncertain degrees of risk levels. Digital threats in this context include device seizure or inspection at borders, targeted phishing campaigns directed at activists, compromise of communications, and covert monitoring of digital activity at or around conference venues.

As surveillance infrastructure becomes more sophisticated, digital risk at UNFCCC conferences will grow. Hosting conferences in countries with a high capability of digital surveillance remains a continuous threat towards defenders. Climate advocates and environmental defenders are becoming increasingly vulnerable, especially in contexts where the host country has a geopolitical interest towards a defender's country of residency, providing room to share access and data through digital surveillance. Given the complexity of its characteristics, more resources are needed to approach this threat systematically rather than individually.

Some digital threats may never be detected at all, leaving participants uncertain about their exposure indefinitely, even after the conference ends, which makes this the hardest risk to prepare for.

Post-conference reprisals and long-tail harm: Ten Type A incidents are coded as reprisals. The dataset likely reflects significant under-reporting: activists experiencing reprisals may not reconnect with the Safety Hub after the conference ends or they may receive on-ground support from a local protection organisation. This harm often materialises already during the conference, through active monitoring and direct threats by officials of repressive countries of residency governments. This harm amounts to threats on return, border difficulties, or employment consequences establishing that conference participation can have lasting adverse consequences. With shrinking civil society spaces across the globe, the number of incidents of post-conference reprisals are anticipated to rise.

Expanded participant communities: As the UNFCCC civil society space grows and diversifies - attracting participants from sectors, geographies, and identities not traditionally part of the COP ecosystem - the risk landscape expands. Youth activists, frontline community representatives, and participants from deeply restricted environments bring new risk profiles that existing Safety Hub protocols may not fully address.

Long-term psychosocial risks: Climate advocates and environmental defenders face significant mental-health impacts from the high-paced conference environment, the continuous monitoring of civil society, the recurrent obstacles to participation, and the outcomes of the negotiations. These impacts, including anxiety, depression, and burnout, are compounded by the near-absence of dedicated mental-health support and accessibility within the conference framework. The Safety Hub responded to 85 incidents by providing psychosocial support, on-site during the conference or through referral to online resources, but this is a civil-society stopgap, not an institutional provision.

FreeDariaEgereva


[25]

Daria Egereva, a Selkup Indigenous leader and Co-Chair of the International Indigenous Peoples' Forum on Climate Change (IIPFCC), coordinated the Forum's work at COP30.

Weeks later, on 17 December 2025, Russian Federal Security Service (FSB) officers raided her home and arrested her on terrorism charges under Article 205.5 of the Criminal Code, based on alleged association with the Indigenous rights network Aborigen Forum, which the authorities had arbitrarily designated first "extremist" and then "terrorist." Human rights defender Natalia Leongardt, who worked alongside her, was detained in the same operation, part of a coordinated wave targeting at least 17 Indigenous leaders. Their pre-trial detention has been extended to June 2026; if convicted, they face up to 20 years' imprisonment. Several Indigenous-rights organisations have assessed the timing as a direct reprisal for Egereva's work at COP30. More than 100 organisations, including CAD, have called for their immediate and unconditional release.[19]

This case falls outside the Safety Hub dataset, but it illustrates, in its most severe form, the post-conference reprisal pattern this report documents: harm that follows participation across borders and into jurisdictions far beyond the UNFCCC's reach.

[19] Human Rights and Climate Change Working Group and others (2026). Daria Egereva and Natalia Leongardt's Arbitrary Detention in Russia, joint civil-society statement, 20 April 2026.

See also the Free Daria Egereva campaign.

Underfunded support structures: The Safety Hub is a civil-society-run initiative created to safeguard participants and their advocacy. Climate Activist Defenders has operated it without sustainable or predictable funding, which means that each year the deployment of Safety Hub services is delayed and constrained by whatever funding can be secured. Without the Safety Hub, there is no other independent avenue for direct holistic incident response, which makes the fragility of its funding a horizon risk in its own right.

12 THE HOLISTIC SAFETY APPROACH

[26]

With a continuous rise in the repression of civil society across countries globally, holistic safety and security is becoming increasingly vital for climate advocates and environmental defenders. For the Safety Hub, holistic safety and security encompasses physical safety, digital security, legal protection, media strategy, psychosocial wellbeing, and financial security. In practice, all these elements are deeply interconnected; when one dimension is compromised, the others are inevitably affected as well. Being able to categorise both risks and responses into these distinct categories allows organisations to coordinate more effectively when incidents occur. Specific yet differentiated resources are often combined to support a request.

UNFCCC conferences represent a critical moment where civil society concentrates efforts for advocacy to influence multilateral processes. Yet these gatherings also constitute periods of heightened exposure due to proximity to governments, corporate lobbying, international travel requirements, high-paced advocacy efforts and intensified media attention, among other risks. While these conferences offer valuable opportunities for raising political ambition and shaping climate conversations, they simultaneously concentrate threats against those seeking to hold power accountable.

Ultimately, the Safety Hub and Climate Activist Defenders recognise that longer-standing structures to build and facilitate collective safety, embedded within civil society groups and movements themselves, are what is needed to safeguard climate advocacy sustainably. While additional safety mechanisms are crucial to be implemented by the UNFCCC, the Safety Hub recognises that these changes are implemented rather slowly in comparison to the rising threats against defenders globally. Most civil society and grass roots groups do not

have the capacity to respond to their own risks during moments of emergency, whether due to lack of knowledge, insufficient resources, or the reality that threats put political objectives and advocacy work at risk. The Safety Hub was implemented to build capacity prior to attending a conference and to respond to urgent incidents so that civil society groups and movements can focus their capacities on advocacy and influencing conference outcomes.

In the past 4 years the Safety Hub contributed to building those longer-standing collective safety structures among civil society groups and is aiming to continue this crucial work. The Safety Hub involves key components beyond incident response, including conducting risk assessments with local experts which inform capacity building through open sessions, safety travel guides, and tailored programmes for youth delegations. Additionally, the Safety Hub provides support tailored to civil society-led mobilisations and spaces that occur in the lead-up to or alongside UNFCCC conferences, such as the Bonn Climate Camp, the Mesoamerican Caravan, and the Yaku Mama Flotilla.

Safety and Security are deeply personal, and the needs of individuals and movements vary greatly according to context and identity. However, when organising in collective spaces, it becomes essential to learn about each other's risks and risk perceptions.

By centering the wellbeing and security of those doing the work, the conditions, where meaningful climate justice organising can flourish without sacrificing the people who make it possible, are created.

13 RECOMMENDATIONS

The 22 recommendations below are addressed to specific institutional actors. They are grounded in the dataset, in the accountability analysis of Section 10, and in the recommendations of the UN Special Rapporteur on human rights and climate change. (20)

To the UNFCCC Secretariat

1. Uphold civic-space and human-rights obligations within the multilateral space. State parties carry obligations under international law both towards their own nationals and towards all participants in the processes they convene. Parties should refrain from surveilling, photographing, intimidating, or pursuing reprisals against civil society participants, including their own nationals, at UNFCCC conferences.

2. Adopt a zero-tolerance policy on reprisals, and appoint a dedicated focal point. Given the documented incidents of intimidation, harassment, surveillance, threats, and other forms of reprisals affecting civil society participants, the UNFCCC Secretariat should publicly affirm a zero-tolerance approach to reprisals and other acts that undermine safe and meaningful participation in climate governance. To operationalise this commitment, the Secretariat should designate a dedicated focal point responsible for receiving reports, monitoring incidents, collecting and analysing relevant data, facilitating appropriate referrals, and supporting mechanisms for accountability and remedies.

3. Mandatory human rights due diligence in host country selection. Integrate a formal civic space and human rights assessment of candidate host countries into the COP site selection process, using established methodologies such as the consultations among local and international civil society group, CIVICUS Monitor and other available tools. Publish the assessment findings.

4. Full transparency and human rights compliance of Host Country Agreements. The UNFCCC Secretariat should ensure the full public disclosure of Host Country Agreements for past, current, and future COPs as a matter of transparency and accountability in multilateral climate governance. In line with international human rights standards on participation, freedom of expression, and peaceful assembly, these agreements should include explicit and enforceable provisions guaranteeing the rights of accredited participants. This should include protections for freedom of expression and assembly within COP venues, clear and facilitative visa and border entry procedures for accredited observers, and defined standards of conduct and accountability for security personnel operating within the Blue Zone.

5. Reform the debadging process. The UNFCCC should establish clear, written, and publicly available criteria governing the suspension or withdrawal of accreditation. In line with international human rights standards on due process and the right to participate in public affairs, any decision to suspend or revoke accreditation should be subject to timely and accessible review. To this end, the Secretariat should create an independent review mechanism accessible to affected participants within 24 hours of a debadging decision. In addition, an annual public summary of accreditation suspensions, withdrawals, and related decisions should be published to enhance transparency and institutional accountability.

6. Publish clear, stable rules for advocacy actions, and end content-based restrictions on protected expression. The criteria governing permitted actions, including the recurring, ad hoc restrictions on naming individuals, on "climate-related only" messaging, and on Palestine-solidarity and political-prisoner advocacy, should be published in advance, applied consistently across conferences, and brought into line with international human-rights standards. Content-based restrictions on protected expression, and their use as grounds for debadging, should end.

To Host Governments

7. Commit to visa facilitation. Host countries should commit, within the Host Country Agreement, to a documented process for facilitating visas for all accredited observers, with clear timelines, an escalation mechanism for delays, and a process for emergency visa requests. Visa denial for accredited observers should require formal written explanation. This should include visa protection for accredited observers that get their badges removed without a formal process.

8. Guarantee freedom of expression and assembly. Host states should explicitly commit, within the UN HCA, to not applying speech or assembly restrictions outside or inside the conference Blue Zone or Green Zone for international and especially local civil society and Indigenous Peoples.

To Parties to the UNFCCC

9. Uphold civic-space and human-rights obligations within the multilateral space. State parties carry obligations under international law both towards their own nationals and towards all participants in the processes they convene. Parties should refrain from surveilling, photographing, intimidating, or pursuing reprisals against civil society participants, including their own nationals, at UNFCCC conferences, and should publicly support the establishment of an independent participant-safety mechanism.

10. Keep domestic security practices out of UNFCCC spaces. Delegation access should not be used to monitor or profile activists. Parties should ensure their delegations operate consistently with the civic-space standards the process depends on.

To UNDSS

11. Develop and publish civil society conduct standards. UNDSS should develop and/or publish standard operating procedures governing its interactions with civil society conference participants, addressing: use of photography and data collection and retention, grounds and procedures for participant questioning or

removal, escalation pathways, and participant rights during security interactions.; All procedures should be aligned with international human rights standards, including protections for freedom of expression, peaceful assembly, privacy, and non-discrimination.

12. Establish an independent and accessible complaints and accountability mechanism. UNDSS should establish a dedicated confidential and accessible complaints mechanism through which accredited participants can report misconduct, intimidation, discriminatory treatment, excessive security measures, or procedural violations by security personnel. The mechanism should include: clear timelines for response; protection against retaliation; independent review capacity; multilingual accessibility; and the publication of anonymised aggregate data on complaints received, actions taken, and outcomes.

13. Prohibit retaliatory or intelligence-style monitoring of civil society actors. UNDSS should adopt and publicly communicate safeguards prohibiting the monitoring, profiling, photographing, or documentation of civil society participants outside clearly justified security purposes and due process standards. Any collection of participant data should be necessary, proportionate, time-bound, and subject to oversight and transparency requirements.

14. Establish mandatory, culturally sensitive human rights and civic space training for conference security personnel. All UNDSS personnel and contracted security staff deployed to UNFCCC conferences should receive mandatory training on civic space protections, rights-based crowd management, engagement with environmental human rights defenders, de-escalation practices, cultural sensitivity, and protections for peaceful protest and political expression.

15. Publish post-conference transparency reporting on security-related incidents affecting civil society. Following each COP and SB session, UNDSS should publish a public transparency summary outlining the number and general categories of security incidents involving accredited civil society participants, including removals, badge deactivations, restrictions on protest activities, complaints received, and remedial actions taken, while respecting confidentiality and protection concerns.

To Civil Society Organisations & Movements

16. Prioritise safety planning for conference attendance. All groups sending representatives to UNFCCC conferences – and other spaces involving increased exposure - should include safety planning as a standard part of attendance preparation: pre-conference risk assessment, duty of care protocols (including escalation measures in case of incidents), holistic safety trainings, emergency budgets, on-ground check-ins with their delegates, landing plans, and post-conference debriefs. In addition, there should be a careful emphasis on psycho-social support for participants during and after the conference to ensure long-term advocacy is possible.

17. Report incidents. Organisations experiencing incidents should report them to the Safety Hub and, where appropriate, to the UNFCCC Secretariat, UNDSS, or host-country authorities. Under-reporting is the primary obstacle to building a public evidence base adequate to drive institutional change.

18. Build collective safety infrastructure. Civil society groups must go beyond conference planning by implementing collective assessments and practices tailored

to their specific contexts and capacities. While CAD & Safety Hub support can build capacity and respond during periods of heightened risk or limited resources, organisations, collectives and communities ultimately need self-driven processes to safeguard themselves. Collective care strategies that are non-westernised approaches for psycho-social support and conflict resolution are encouraged to be implemented.

To Funders

19. Include safety and security budget lines in delegation support grants. Ensuring that groups have emergency funds to support their delegations in case incidents arise. This should be paired with access to capacity building services so groups know how to operate the resources to meet their needs.

20. Multi-year core funding for civil society safety and wellbeing infrastructure. The Safety Hub has operated on short-term project funding. The evidence base in this report establishes a long-term, structural need. Funders should provide multi-year core funding sufficient to maintain Safety Hub capacity across conference cycles, including non-COP subsidiary sessions, capacity building, collective safety infrastructure among decentralised civil society groups, and sustained psychosocial and wellbeing support embedded within movements — available beyond moments of acute crisis, rather than only at the conference.

21. Fund post-conference reprisal monitoring. Designate resources specifically for tracking and documenting post-conference reprisals - the least visible component of the risk landscape and the one most in need of dedicated resources.

(20) UN Special Rapporteur on the promotion and protection of human rights in the context of climate change (2025). Report A/80/114. (includes a recommendation addressed to the UNFCCC).

14 CONCLUSION

The 216 cases in the Safety Hub dataset are 216 instances of activists, advocates, and Indigenous Peoples' representatives experiencing harm, restriction, or threat in the context of their participation in international climate governance. They span five conferences, four years, and every mechanism of restriction from a missed visa to a military confrontation.

The central finding of this report is structural. These risks are produced by a governance architecture that has consistently prioritised diplomatic convenience - in host-country selection, in HCA negotiation, in the institutional design of accreditation and security - over the protection of the civil society participants on whom the UNFCCC's claim to legitimacy depends.

An Irish activist who has attended COPs since COP25 described the trajectory from Madrid to the present in terms that capture both what has been lost and what the data in this report establishes: "The internal UNFCCC consequences were kind of becoming external UNFCCC consequences - in a way that hadn't been true for us as people in an extremely privileged position before." She was describing the moment at COP28 when visa conditions became linked to badge status - when the threat of debadging ceased to be a venue inconvenience and became a potential immigration emergency. "I was sitting with my colleague trying to figure out if we could get to his family in Qatar, because we weren't sure if his visa was going to be revoked." Dylan Hamilton, speaking of the shift from physical repression to systemic pressure, was more direct about the end state: "It definitely affected how nervous I was to do protests... now we police ourselves. They don't have to do it for us." What the five conferences in this dataset represent, cumulatively, is the construction of a participation environment in which meaningful civil society engagement is formally permitted and functionally inhibited. The recommendations in this report describe what it would take to reverse that.

PICS and CAD are publishing this report to provide the evidence base for institutional change. The real scale of restriction, deterrence, and harm in UNFCCC civil society spaces is larger than these 216 cases can capture. What this data establishes is sufficient: that the institutions with the power to solve it have, so far, chosen not to, and that it is solvable if they choose to act.

Image Credits

[1] Day 13 of COP29, Hold The Line
Marie Jacquemin

[2] Day 13 of COP29, Pay Up
Marie Jacquemin

[3] COP29, Civil Society Actions
David Tong

[4] Day 13 of COP29, Pay Up
Marie Jacquemin

[5] Kick Big Polluters Out, action at COP29
David Tong

[6] COP27, Opening Press Conference
UNclimatechange / Kiara Worth

[7] Global Day of Action for Climate Justice march by Jubilee South Asia Pacific Movement Inc. during COP28, Expo City Dubai
UNclimatechange / Christopher Pike

[8] Day 11 of COP29, Peoples Plenary
Marie Jacquemin

[9] SB62 June Climate Meetings, Around The Venue
UNclimatechange / Lara Murillo

[10] COP29, Defund Genocide Action
David Tong

[11] Military Barricade in Front of the COP30 Entrance
Oil Change International

[12] SB62, Around The Venue
UNclimatechange / Lara Murillo

[13] Day 13 of COP29, November Action
Marie Jacquemin

[14] Global Day of Action for Climate Justice march by Jubilee South Asia Pacific Movement Inc. during COP28, Expo City Dubai
UNclimatechange / Christopher Pike

[15] Day 13 of COP29, November Action
Marie Jacquemin

[16] Day 11 of COP29, Peoples Plenary
Marie Jacquemin

[17] Day 11 of COP29, Peoples Plenary
Marie Jacquemin

[18] Global Day of Action for Climate Justice march by Jubilee South Asia Pacific Movement Inc. during COP28, Expo City Dubai
UNclimatechange / Christopher Pike

[19] Global Day of Action for Climate Justice march by Jubilee South Asia Pacific Movement Inc. during COP28, Expo City Dubai
UNclimatechange / Christopher Pike

[20] COP29, Civil Society Actions
David Tong

[21] "End the siege. End the genocide" protest in front of WCC on June 2025, SB62
Marie Jacquemin

[22] "End the siege. End the genocide" protest in front of WCC on June 2025, SB62
Marie Jacquemin

[23] COP29, Defund Genocide Action
UNclimatechange / Kamran Guliyev

[24] COP29, Defund Genocide Action
UNclimatechange / Anar Bayramli

[25] **Denis Kostrov**

[26] Day 11 of COP29, Peoples Plenary
Marie Jacquemin

Appendix

All figures are generated from the COP Safety Hub dataset (n=216; 122 Type A security incidents). The underlying data table is shown beside each annex figure so every chart can be reproduced directly in a spreadsheet.

Find the Annex in the Digital Copy of the Report.

PICS

LCAW 2026

This report is the product of CAD's COP Safety Hub initiative, which has provided holistic safety and security response to climate justice activists, Indigenous land defenders, environmental human rights defenders, and wider civil society participating in UNFCCC processes.

Drawing on the Safety Hub dataset and the systematic analysis and methodological framework developed by PICS, the report provides the first public evidence base on the risks, restrictions, and protection gaps compromising climate advocacy in multilateral governance.