



Women
Journalists
Without
Chains

Iran's 2025 Espionage Bill:

Institutionalizing the Death Penalty for Dissent



Executive Summary

Iran's newly introduced 2025 bill titled "Strengthening the Punishment of Spies and Collaborators with the Zionist Regime and Hostile States" is a direct legislative response to the ongoing military confrontation with Israel. Far from being a narrow national security measure, the bill represents a sweeping expansion of state repression at home, tightening the regime's control under the pretext of external threats. At the core of the legislation is the unprecedented extension of the charge of "corruption on earth" (efsad-e fel-arz)—a crime punishable by death. The bill broadens this charge to cover civil, media, and political activities that previously carried no such extreme penalties. In practice, ordinary acts of expression or dissent can now be reclassified as capital offenses. The bill employs deliberately vague language, using terms such as "collaboration" or "spreading false news" to hand sweeping powers to judicial and security authorities. Such ambiguity violates the principle of legality, erodes basic guarantees of freedom of expression, and breaches Iran's obligations under the International Covenant on Civil and Political Rights (ICCPR). If enforced, the law will accelerate the deterioration of Iran's already dire human rights situation. Journalists, civil society actors, political opponents, and ethnic and religious minorities will face heightened risk of execution on fabricated or politically motivated charges. The legislation further entrenches the death penalty as an instrument of intimidation, designed to silence dissent and even the mildest criticism. Particularly alarming is its stipulation that trials be conducted swiftly in Revolutionary Courts, which are notorious for denying due process and fair trial standards. Women Journalists Without Chains (WJWC) strongly warns that the adoption of this bill institutionalizes repression at a new level and must be withdrawn immediately. The organization urges the international community and human rights bodies to publicly condemn the legislation as a violation of international law, to take urgent steps to mobilize protection for Iranian journalists, activists, and minorities now at greater risk, and to activate accountability mechanisms against Iranian officials responsible for implementing such repressive measures.

Key Findings

The proposed 2025 espionage bill marks a decisive escalation in Iran's use of law as an instrument of political repression. The following findings emerge from the analysis of its provisions and implications:

- **Exploitation of the Crisis:** The bill is framed as a response to the military confrontation with Israel, underscoring how the regime instrumentalizes external threats to justify domestic repression under the guise of national security.
- **Expansion of Capital Punishment:** By unprecedentedly broadening the charge of "corruption on earth", the draft law introduces the death penalty for civil, journalistic, and media-related activities that were never previously subject to such extreme punishment.
- **Deliberate Legal Ambiguity:** The text employs vague and undefined terminology, such as "collaboration" or "spreading false news," thereby granting judicial and security bodies sweeping discretion to criminalize dissent and silence critics under the pretext of espionage or association with hostile parties.
- **Violation of International Obligations:** The bill is in direct conflict with Iran's commitments under the International Covenant on Civil and Political Rights (ICCPR), particularly concerning freedom of expression and the right to a fair trial. It also contradicts Iran's own legal and jurisprudential traditions, which require precision and clarity in criminal legislation.
- **Dual Strategy of Repression:** The regime is consolidating a two-pronged approach to control both traditional and modern spheres of opposition. While the espionage bill targets perceived security threats, the cyberspace bill extends censorship and surveillance to digital activities. Together, these measures empower authorities to impose the death penalty on a wide spectrum of dissenting voices.
- **Institutionalized Repression:** Repression in Iran is no longer exercised through loosely defined provisions but has been codified and legalized. The bill explicitly transfers absolute power to security and judicial authorities, embedding authoritarian control into the legal system.



- **Sharp Deterioration of Human Rights:** The adoption of this bill would accelerate the already worsening human rights crisis in Iran. Coupled with the surge in executions since June 2025, the law exposes journalists, activists, and minority communities to imminent risk of execution on vague, politically motivated charges.

Introduction

Iran's 2025 espionage bill represents one of the most repressive legal measures introduced in the country in recent decades, institutionalizing the death penalty as a political weapon under the guise of national security. By expanding the charge of "corruption on earth" to encompass peaceful civic, media, and political activity, the law provides the state with unprecedented authority to criminalize dissent and execute its critics.

The legislation emerged directly from the 12-day military confrontation with Israel in June 2025, during which Iranian authorities carried out mass arrests of more than 21,000 people, accusing them of collaborating with Israel and the United States.¹ Amid this atmosphere of heightened crisis, the head of the judiciary ordered expedited trials for suspected collaborators, paving the way for the parliament (Majlis) to pass the bill on June 23, 2025, just one day before the ceasefire took effect.

Framed as a response to "current security conditions," the law dramatically broadens the definition of collaboration to include political, financial, and media activities. By linking such acts to the death penalty, it blurs the line between legitimate security concerns and ordinary civic engagement. Although initially rejected by the Guardian Council, the law could still be enacted if amended²—an outcome that would mark a dangerous turning point in Iran's judicial and security practices.

This legislation reflects a dual strategy of repression. On the one hand, it is presented as a safeguard against espionage and external threats; on the other, it is deliberately

¹ Iran Reports 21,000 Arrests During June War With Israel <https://www.rferl.org/a/iran-mass-arrests-suspects-israel-war-spying/33501172.html>.

² بازگشت دوباره طرح «تشدید مجازات جاسوسی و همکاری با رژیم صهیونیستی» به مجلس <https://www.sharghdaily.com/fa/tiny/news-1036598>.

designed to suppress social and political dissent at home.³ By codifying vague offenses and granting absolute discretion to security and judicial authorities, the bill transforms repression from a practice into an explicit legal doctrine.

This report offers an in-depth legal and human rights analysis of the **2025** espionage bill. It examines the provisions of the law, assesses its potential impact on the rights of Iranian citizens, evaluates its compliance with international human rights standards, and highlights both domestic and international criticism it has generated.

I. Analysis of the Draft Law

The draft law, introduced during the June **2025** confrontation with Israel and disclosed publicly on June **30**, represents one of the most far-reaching expansions of state authority in Iran's recent history. Its provisions are exceptionally broad, framed in deliberately vague and elastic terminology, and prescribe some of the harshest penalties available in the Iranian legal system—including the death penalty under the charge of "corruption on earth".

This framework directly contravenes Iran's obligations under international human rights law, most notably the International Covenant on Civil and Political Rights (ICCPR). At the domestic level, it has triggered rare and outspoken criticism from Iranian legal scholars themselves. In a joint statement, **57** university professors, lawyers, and legal experts condemned the law as "hasty, ambiguous, and reliant on imprecise terminology," warning that it authorizes arbitrary punishments without legal justification, ignores the basic requirements of due process, and undermines the rights of defendants to a fair defense. According to the signatories, the legislation not only violates international standards but also contradicts Iran's Constitution and Islamic legal principles.

Rather than closing genuine security gaps, the draft law shifts suspicion onto the population itself, placing ordinary citizens under constant risk of being accused of "spying" or "collaborating with hostile states." In effect, it reframes civic, political, and

³ Three more men executed in Iran for spying for Israel
<https://asiaplustj.info/en/node/350249>.

even journalistic activity as potential threats to national security, thereby institutionalizing repression under the cover of legality.

1. The Legislative Framework

The draft law, comprising nine articles, constructs a sweeping legal framework to prosecute what it broadly defines as "espionage" and "cooperation with hostile states." While presented as a measure to protect national security, its scope and terminology introduce radical expansions to the existing penal code, particularly by linking a wide range of political, civic, and technological activities to the capital crime of "corruption on earth" under Article 286 of the 2013 Islamic Penal Code.

- Article 1 criminalizes "any intelligence, espionage, or operational activity" on behalf of Israel or other hostile states, with the United States explicitly named. Such acts are automatically treated as "corruption on earth," punishable by death. This framing collapses the distinction between conventional espionage and loosely defined activities, placing thousands of potential behaviors within reach of the death penalty.
- Article 2 further expands liability by penalizing any "direct or indirect assistance" to Israel in security, military, economic, financial, or technological fields. Crucially, the provision does not require proof of actual harm or measurable impact: even symbolic or minor actions may trigger the death penalty. This article effectively transforms political expression, humanitarian aid, or financial transactions into capital offenses.
- Article 3 enumerates specific activities considered cooperation with hostile states. These include weapons dealings (conventional and non-conventional), use of drones or autonomous systems for military or sabotage purposes, cyberattacks, sabotage of critical infrastructure, and even the receipt of funds or property from foreign intelligence actors. Notably, the article criminalizes such receipt even in the absence of any subsequent criminal act, broadening liability to the mere act of contact.
- Article 4 extends the law into the civil and media spheres. It criminalizes actions such as sending films or images to foreign media, disseminating "false news," or producing content that "causes fear, division, or harms

national security." Penalties include up to three years' imprisonment and permanent dismissal from public service. By targeting journalistic and civic expression, this provision blurs the line between espionage and free speech.

- Article 5 explicitly addresses electronic communications, with a focus on emerging technologies. It criminalizes the use, purchase, sale, or import of unlicensed communication devices, specifically naming "Starlink." Penalties range from six months to two years' imprisonment, along with confiscation of equipment. If more than ten devices are imported, or if intent to "confront the regime" is established, penalties are doubled. This provision underscores the regime's intent to obstruct alternative channels of information access.
- Articles 6 and 7 empower the Supreme National Security Council to escalate penalties by up to three degrees during wartime or emergency conditions. Article 7 further stipulates that such cases may be tried outside normal judicial proceedings in special Revolutionary Court branches, consolidating extraordinary power in security-linked institutions.
- Articles 8 and 9 provide the law with retroactive application, a stark violation of international and domestic legal principles. Offenses committed before its passage are prosecutable unless the accused voluntarily surrender within three days. Article 8 claims legitimacy from a 2018 directive by the Supreme Leader, effectively bypassing constitutional safeguards.

2. Vague Terms and the Principle of Legality

One of the most troubling features of the draft law is its use of vague and undefined terminology, including phrases such as "any assistance," "strengthening," "legitimizing," "false news," "undermining national security," and references to "hostile states and entities." These elastic concepts lack precise legal definition, leaving their interpretation entirely at the discretion of judicial and security authorities.

This approach runs directly counter to the principle of legality—the foundational doctrine that "there is no crime nor punishment without law." Under this principle, criminal laws must be clear, specific, and foreseeable, allowing individuals to understand what conduct is prohibited. By contrast, the draft law enables arbitrary



and selective enforcement, since nearly any form of dissent, association, or expression could be construed as "assistance" or "legitimization" of a hostile entity.

The vagueness not only undermines Iran's own constitutional and legal framework but also violates international human rights obligations. Article 15 of the International Covenant on Civil and Political Rights (ICCPR), to which Iran is a party, enshrines the principle of legality and prohibits the retroactive application of criminal law. Moreover, the overly broad criminalization of undefined acts directly threatens rights guaranteed under the ICCPR, including Article 19, which protects the right to freedom of opinion and expression, and Article 21, which safeguards the right to peaceful assembly.

3. Expansion of the Death Penalty for the Crime of "Corruption on Earth"

Articles (1), (2), and (3) of the draft law impose the charge of "*corruption on earth*", which under Article 286 of Iran's 2013 Islamic Penal Code carries a **mandatory death penalty**. This provision has long been one of the most controversial aspects of Iranian penal law, widely criticized for its vagueness and its use against political opponents. Although its application has historically been limited, the draft bill dramatically broadens its scope, making it a central instrument of repression.

Under the 2013 Penal Code, "*corruption on earth*" is defined as the "**widespread**" commission of acts such as crimes against national security, spreading falsehoods, or sabotage that result in **serious disruption of public order or significant harm**.⁴ As a *hudud* offense, its punishment—death—is fixed and cannot be reduced by the court.⁵ The new bill, however, dispenses with the requirement of "widespread" impact or demonstrable harm. Instead, it directly equates a wide range of activities—many of them nonviolent—with "corruption on earth."

This expansion means that actions such as "*economic cooperation*," "*media activity*," or even "*receiving funds*" from actors labeled as hostile by Tehran can

⁴ <https://www.beytoote.com/scientific/laws/who-corruption-earth.html> افساد فی الارض کیست و چه مجازاتی دارد ؟

⁵ An Investigation on the Assistance in Corruption on Earth: The Subject of Article 286 of the Islamic Penal Code (1392 S.H.) https://qjrl.parliran.ir/article_192_41629e3ec83a38d8f9afefed4d5e5118.pdf?lang=en.

trigger the death penalty, even where no violence or significant disruption occurs. Such provisions represent a **radical departure from the principle of proportionality in punishment** and amount to a blatant violation of **Article 6 of the International Covenant on Civil and Political Rights (ICCPR)**, which restricts the death penalty to "the most serious crimes," typically cases involving intentional killing.

The consequences are far-reaching. Individuals accused of mere communication with opposition groups or foreign governments could now face execution. Given the **systemic flaws of Iran's judiciary**—including heavy reliance on coerced confessions, the absence of fair trial guarantees, and the Revolutionary Court's summary procedures—this expansion creates a serious risk of death sentences being imposed following **torture-tainted confessions and unfair trials**.

Even some Iranian legal experts, including figures close to the regime, have warned that the draft bill effectively transforms "*corruption on earth*" from a narrowly defined criminal offense into a **political weapon**, enabling arbitrary accusations and paving the way for potentially **large-scale executions** under the guise of national security.

Table (1): Comparison of Article 286 of the Penal Code (2013) and the 2025 draft bill.

Criterion	Article 286 of the Penal Code (2013)	Draft Bill on Espionage (2025)
Definition of the Crime	"Widespread" commission of crimes against security, spreading falsehoods, sabotage, etc.	Any activity deemed espionage or assistance (direct or indirect) to Israel or hostile states.
Main Condition	Actions must cause severe disruption of public order or significant damage.	No requirement of proven disruption or damage; link to "hostile" activity is sufficient.
Penalty	Fixed punishment of death (hudud).	Death penalty through automatic application of Article 286.
Scope of Application	Limited to acts with demonstrable, wide-ranging impact.	Expands to nonviolent or symbolic acts of "cooperation" or "assistance," regardless of outcome or intent.

4. The Right to Freedom of Expression and Opinion

Article (4) of the draft bill directly criminalizes a broad range of political, cultural, and media activities, including "spreading false news," engaging in "propaganda," or sending photos and videos to so-called "hostile networks." By framing these ordinary acts of communication as intelligence-related offenses, the provision effectively equates journalism, activism, and online expression with espionage.

The implications are severe. Any journalist, activist, or even ordinary citizen who communicates with a foreign media outlet, shares critical content on social media, or provides material documenting state abuses could be accused of "intelligence work" and prosecuted under the charge of "corruption on earth." Because this offense carries the mandatory death penalty under Article 286 of the Penal Code, the provision transforms the exercise of free expression into a potential capital crime. Even in cases where the death penalty is not imposed, the article stipulates a punishment of 10 to 15 years of imprisonment—an excessively harsh sanction for acts that fall squarely within the scope of protected speech.

This provision constitutes a direct assault on Article 19 of the International Covenant on Civil and Political Rights (ICCPR). Article 19 guarantees the right to "seek, receive and impart information and ideas of all kinds, regardless of frontiers." By criminalizing independent journalism, online communication, and even cultural expression, the draft bill seeks to silence dissent, restrict the free flow of information, and enforce a climate of fear and self-censorship across Iranian society.

Ultimately, Article (4) transforms freedom of expression from a constitutionally and internationally protected right into a high-risk activity punishable by death or lengthy imprisonment, thereby entrenching state control over public discourse and dismantling the remaining spaces for civil society.

5. The Right to a Fair Trial

Article (7) of the draft bill stipulates that alleged offenses will be adjudicated "out of term"⁶ and within special branches of the Revolutionary Court. In practice, this

⁶ The expression "out of term" refers to cases being processed outside the ordinary court schedule or session, often under exceptional procedures reserved for cases deemed politically sensitive or urgent.

framework signals that such trials will be conducted under expedited, irregular circumstances where defendants are denied adequate time and facilities to prepare their defense, thereby undermining due process guarantees.

The Revolutionary Court in Iran has long been associated with systematic violations of fair trial guarantees. Proceedings are frequently conducted in secrecy; defendants are denied the right to freely choose their legal counsel; and judges—often closely aligned with security agencies—fail to uphold even minimal standards of judicial independence and impartiality. These practices constitute a direct violation of Article 14 of the International Covenant on Civil and Political Rights (ICCPR), which guarantees the right to a fair and public hearing by a competent, independent, and impartial tribunal.

By combining the criminalization of civil and expressive acts under vague charges of "espionage" or "cooperation with hostile states" with adjudication in the Revolutionary Court system, the draft bill effectively transforms the judiciary into a political instrument of repression.

The case of Dr. Ahmadreza Jalali, the Swedish-Iranian academic sentenced to death on charges of "spying for Israel" after a grossly unfair trial and under confessions obtained through torture, illustrates the dangers of this framework. His case is emblematic of how the Revolutionary Court circumvents due process, silences dissent, and legitimizes political retaliation under the guise of judicial proceedings.⁷

Assigning these cases to the Revolutionary Court grants unchecked power to the security and judicial apparatus. In the tense post-war political climate, this guarantees that defendants—regardless of the nonviolent or expressive nature of their alleged "crimes"—will be systematically denied a fair hearing and face a high risk of arbitrary death sentences.

⁷ Ahmad Jalali has been unaccounted for since his transfer from Evin Prison last June, following the Israeli attack on the facility; his family reports having no information regarding his whereabouts. See Center for Human Rights in Iran, "International Community Must Demand Immediate Release of Swedish Academic Facing Execution in Iran," January 15, 2025, <https://iranhumanrights.org/2025/01/international-community-must-demand-immediate-release-of-swedish-academic-facing-execution-in-iran/>.

6. Non-Retroactivity of Criminal Laws

Article 9 of Iran's 2025 Espionage Bill stipulates that the law applies to offenses allegedly committed before its enactment, unless the accused voluntarily surrenders within three days. This provision represents a direct violation of the principle of non-retroactivity in criminal law, a fundamental safeguard enshrined in Article 15 of the International Covenant on Civil and Political Rights (ICCPR). Under international law, no individual may be punished for conduct that did not constitute a criminal offense at the time it occurred.

The United Nations Special Rapporteur has further emphasized that extending the death penalty to vaguely defined charges such as "corruption on earth" contravenes international legal standards.⁸ Particularly concerning is the bill's expansion of capital punishment to offenses previously outside its scope—including charges of "spreading lies" or offering "indirect assistance." Such provisions grossly undermine Article 6 of the ICCPR, which strictly limits the use of the death penalty to "the most serious crimes," typically understood to mean intentional killing. The following provisions of the Espionage Bill directly conflict with binding obligations under the ICCPR:

⁸ United Nations General Assembly. A/77/181. Accessed 25 August 2025. Available at: [\[https://docs.un.org/en/A/77/181\]](https://docs.un.org/en/A/77/181).

Table 2 highlights how the 2025 Iranian Espionage Bill introduces provisions fundamentally at odds with the ICCPR, particularly in relation to the rights to life, fair trial, freedom of expression, and protection from retroactive punishment.

Article of the Bill	Violation of the ICCPR
Articles 1, 2, 3	Violation of Article 6: Expands the death penalty to ambiguous and undefined crimes that cannot be classified as "the most serious crimes."
Article 4	Violation of Article 19: Criminalizes expression through vague charges such as "false news" and "creating division," exceeding the narrowly defined restrictions permitted under international law.
Article 4	Violation of Article 19: Outlaws the sharing of images or films with foreign media, infringing upon the right to "seek, receive, and impart information" across borders.
Article 7	Violation of Article 14: Refers cases to special courts—namely the Revolutionary Court—depriving defendants of public hearings and basic guarantees of a fair trial.
Article 9	Violation of Article 15: Applies the law retroactively, criminalizing acts that were not offenses at the time of commission, breaching the principle of legality in international law.

II. Impact on Iranians and Conflict with Legal and Jurisprudential Principles

The implications of Iran's new Espionage Bill extend far beyond national security considerations, striking at the core of citizens' fundamental rights. Chief among these are the rights to freedom of expression and to a fair trial. By assigning cases to expedited Revolutionary Courts, the law strips defendants of essential procedural guarantees. Moreover, its reliance on vague and undefined terminology hands

sweeping discretionary powers to judicial and security authorities, effectively enabling the criminalization of peaceful civic activity, dissent, and independent journalism. The chilling effect is clear: ordinary Iranians are pushed toward self-censorship under the looming threat of prosecution.

The bill has also provoked rare internal criticism. The Guardian Council—responsible for ensuring that legislation aligns with both the Iranian Constitution and Islamic jurisprudence—returned the draft to Parliament with significant objections.⁹ Its remarks focused on several contentious areas:¹⁰ the use of ambiguous language; the absence of a legal definition for "hostile states and groups";¹¹ the violation of Article 169 of the Constitution, which explicitly forbids retroactive criminalization; and the broad extension of the charge of corruption on earth to include "any direct or indirect assistance." The latter provision, in particular, clashes with established Sharia jurisprudence, which requires strict evidentiary conditions before such a charge can be substantiated.

Despite these criticisms, there is no fundamental disagreement between Parliament and the Guardian Council over the passage of the bill's nine articles. Both bodies appear aligned on enacting the law in principle. What emerges, however, is a measure that—rather than protecting the state from genuine security threats—effectively places the entire population under suspicion of espionage or corruption on earth.

1. Consolidation of an Existing Practice

The Espionage Bill does not represent a new direction in Iran's security policy; it formalizes a long-standing practice of using the law as a weapon against dissent. Its

⁹ National Security News. "Iran's Crackdown on Alleged Espionage Stalls as Guardian Council Sends Bill Back for Revision." Accessed 25 August 2025. Available at: <https://nationalecuritynews.com/2025/07/irans-crackdown-on-alleged-espionage-stalls-as-guardian-council-sends-bill-back-for-revision/>.

¹⁰ National Security News. "Iran's Crackdown on Alleged Espionage Stalls as Guardian Council Sends Bill Back for Revision." Accessed 25 August 2025. Available at: <https://nationalecuritynews.com/2025/07/irans-crackdown-on-alleged-espionage-stalls-as-guardian-council-sends-bill-back-for-revision/>.

¹¹ خبرگزاری دنیای اقتصاد. "آخرین وضعیت طرح «تشدید مجازات جاسوسی» به روایت سخنگوی شورای نگهبان." دسترسی: 25 اوت 2025. <https://donya-e-eqtasad.com/fa/tiny/news-4201422>.

central aim is not the prevention of espionage in the traditional sense, but the institutionalization of "legal terrorism" to silence opposition. By equating peaceful civic activity—such as expression, organizing, or journalism—with espionage, the bill extends the death penalty to conduct that falls squarely within the realm of fundamental rights. The result is an atmosphere of fear, reinforced by rapid and often secret executions. Justice is recast as intimidation, serving the consolidation of political control rather than the protection of society.

The timing is also significant. Introduced in the wake of escalating tensions with Israel, the bill provides the regime with a ready-made legal framework to accelerate executions in cases it categorizes as threats to national security. Its scope, however, extends far beyond genuine espionage cases: activists, human rights defenders, and independent journalists are all brought within its reach, exposed to capital charges for their work.

Beyond repression of dissent, the legislation reflects a deliberate attempt to tighten control over Iran's digital landscape. Article 5 criminalizes the possession or use of unlicensed communication tools, explicitly targeting satellite-based services such as Starlink. The provision underscores the regime's fear of technologies capable of bypassing its censorship apparatus, as these services undermine the state's monopoly over the flow of information, particularly during times of unrest.

This strategy is consistent with earlier efforts such as the "Anti-Fake News Bill," which sought to empower private platforms to censor content without court oversight. Although withdrawn following public outcry,¹² it revealed the regime's intent to extend censorship beyond state agencies by co-opting private actors as enforcement arms. Together, these measures fuse "national security" with "digital security," positioning control of information as the cornerstone of the state's survival strategy.

¹² Radio Free Europe/Radio Liberty. "Iran Withdraws 'Fake News' Bill After Public Outcry." Accessed August 25, 2025. <https://www.rferl.org/a/iran-fake-news-bill-free-speech/33489342.html>.

2. Broad Categories of Citizens at Risk

The Espionage Bill, if enacted, would not be limited to suspected spies or intelligence operatives. Its sweeping and undefined provisions place entire segments of Iranian society under threat, fostering a climate of fear and self-censorship.

Journalists, activists, and researchers: Article 4 makes this group especially vulnerable. Any report, study, or social media post critical of state policies could be reclassified as "false news" or an attempt to "undermine national security," effectively criminalizing independent reporting and public debate.

Ordinary citizens: The bill's vague wording ensures that everyday activities can be construed as crimes. A conversation with a foreign visitor, or a bank transfer from relatives abroad, could be treated as "cooperation" with hostile actors. The ban on sending photos or videos to foreign outlets further criminalizes the documentation of protests, local grievances, or human rights violations, exposing ordinary citizens to charges of corruption on earth.

Dual nationals and citizens with international connections: Article 3 poses particular risks for this group by criminalizing the mere receipt of funds or property from individuals later designated as spies or intelligence affiliates. With no requirement of proof, Iranians with overseas ties can be accused of espionage solely on the basis of family, financial, or professional relationships.

Business and technology professionals: Entrepreneurs, engineers, and companies working with foreign partners are also at risk. Under Articles 1 and 2, contracts with firms later linked to "hostile" states may be retroactively treated as espionage. The explicit prohibition of technologies such as Starlink illustrates the regime's fear of tools that bypass its censorship apparatus and undermine control over information flows.

By stretching the definition of espionage to encompass routine civic, professional, and personal activities, the bill converts ordinary interactions into potential capital offenses. It dismantles the distinction between legitimate security concerns and basic civil life, placing virtually every Iranian at risk.

3. "Chilling Effect" and Public Fear

Analysts argue that the Espionage Bill is less about countering foreign threats than about suppressing domestic dissent and consolidating state control.¹³ By attaching the death penalty to routine activities, the law aims to create a sweeping "chilling effect," compelling citizens to self-censor under constant fear of prosecution. In practice, it institutionalizes the use of capital punishment as an instrument of political repression.

The impact is likely to fall disproportionately on already marginalized communities. Historically, Iran's ethnic minorities—particularly the Baluch, Kurds, and Lurs—have been overrepresented among those executed. This pattern has continued into 2025: of the 800 executions documented in the first eight months of the year (through August 18), at least 116 were Kurds, 107 Lurs, and 92 Baluch.¹⁴

The bill has also reignited fears of a repetition of the "1988 Prison Massacre," when thousands of political prisoners were summarily executed following secret trials. Recent commentary in Iranian state media has openly called for a similar campaign,¹⁵ framing mass executions as a legitimate response to the current security environment. Human rights observers warn that the Espionage Bill provides the legal scaffolding for such actions, raising the specter of large-scale and clandestine executions under the guise of national security.¹⁶

III. Conclusions and Recommendations

The bill entitled "Tightening Penalties for Spies and Collaborators with the Zionist Regime and Hostile States" cannot be viewed as a legitimate security measure. Its

¹³ Sharifi, Kian. "Fears Of More Executions As Iran's New Espionage Bill Raises Alarm." Accessed August 25, 2025. <https://www.rferl.org/a/farda-briefing-iran-spying-israel/33462902.html>.

¹⁴ Hengaw Organization for Human Rights. "800 Prisoners Executed in Iran in Less than Eight Months." Accessed August 25, 2025. <https://hengaw.net/en/reports-and-statistics-1/2025/08/article-5>.

¹⁵ Iran Wire. "Iran's Judiciary Chief Orders Expedited Trials for Israel-Related Cases." Accessed August 25, 2025. <https://iranwire.com/en/news/143298-irans-judiciary-chief-orders-expedited-trials-for-israel-related-cases/>.

¹⁶ Radio Free Europe/Radio Liberty. "Fears Of More Executions As Iran's New Espionage Bill Raises Alarm." Accessed August 25, 2025. <https://www.rferl.org/a/farda-briefing-iran-spying-israel/33462902.html>.

vague terminology, disproportionate punishments, and reliance on expedited and opaque judicial processes transform it into a sweeping tool of repression. By granting authorities unchecked powers to criminalize dissent, it poses a direct threat to the safety, rights, and dignity of Iranian citizens.

Evidence strongly suggests that the law, if enacted, will be applied in an arbitrary and discriminatory manner, particularly against ethnic minorities. Statistical data already shows that Kurdish, Arab, and Baluch communities bear a disproportionate share of executions in Iran. These groups are frequently scapegoated in campaigns of repression,¹⁷ and the new bill risks deepening this pattern. Coupled with alarming calls in state media to replicate the 1988 prison massacres, the legislation raises grave concerns that Iran may be laying the groundwork for large-scale, organized executions under the cover of national security.

Women Journalists Without Chains (WJWC) stands with the UN fact-finding mission on Iran and the UN Special Rapporteur in warning against the escalation of death-penalty cases brought under vague "national security" charges. WJWC also echoes the United Nations' demand for an immediate moratorium on executions in Iran, particularly in political cases and cases that fail to meet the threshold of "the most serious crimes" under international law.

Therefore, Women Journalists Without Chains issues the following recommendations:

To the Iranian authorities:

- Cancel the Espionage Bill in its entirety, or amend it fundamentally to bring it into compliance with international human rights standards.
- Guarantee fair, transparent, and public trials in all cases involving national security charges.

¹⁷ Hengaw Organization for Human Rights. "800 Prisoners Executed in Iran in Less than Eight Months." Accessed August 25, 2025. <https://hengaw.net/en/reports-and-statistics-1/2025/08/article-5>.

- Halt immediately the use of vague charges such as spreading false news or corruption on earth to justify executions or suppress dissent.

To legal experts and civil society actors:

- Continue to expose the bill's violations of constitutional guarantees and international obligations through legal analysis and public reporting.
- Systematically document cases where the law is applied arbitrarily against journalists, activists, ethnic minorities, and ordinary citizens.

To the international community:

- Publicly condemn the bill and underline its incompatibility with international human rights law.
- Urge the United Nations, including the Office of the High Commissioner for Human Rights, to activate accountability mechanisms and prioritize protection for dissidents and activists at risk.
- Move beyond rhetorical condemnation by imposing financial sanctions and travel bans on Iranian judges, prosecutors, and security officials implicated in human rights abuses.
- Invoke the principle of universal jurisdiction to initiate investigations and legal proceedings against Iranian officials responsible for international crimes.
- Increase financial and logistical support for Iranian human rights organizations, activists, and journalists documenting violations and raising international awareness of repression.

WJWC stresses that an immediate halt to all executions must be set as a non-negotiable condition for any dialogue or engagement with the Iranian authorities, ensuring that human rights remain central to the international community's approach to Iran.