



Republic of Togo

Joint Submission to the UN Universal Periodic Review 54th Session of the UPR Working Group

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Joint submission by

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and

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1. Introduction

- 1.1 CIVICUS is a global alliance of civil society organisations (CSOs) and activists dedicated to strengthening citizen action and civil society around the world. Founded in 1993, CIVICUS has members in over 180 countries throughout the world.
- 1.2 Coalition Togolaise des Défenseurs des Droits Humains (CTDDH) is a coalition of 15 non-political associations established in April 2002 to protect human rights defenders (HRDs). CTDDH is a member of the West African Human Rights Defenders Network (ROADDH).
- 1.3 ROADDH is a CSO that aims to promote the work of HRDs. It is made up of national coalitions of human rights and individual focal points. It covers the 16 West African countries. It has Observer Status at the African Commission on Human and Peoples' Rights (ACHPR) and is a member of the Executive Committee of the ACHPR's NGO Forum.
- 1.4 In this submission, the authors examine the Government of Togo's compliance with its international human rights obligations to create and maintain a safe and enabling environment for civil society. Internationally, Togo is bound by the International Covenant on Civil and Political Rights (ICCPR), to which it is a state party. The ICCPR guarantees freedoms of association (article 22), expression and opinion (article 19), and peaceful assembly (article 21). Specifically, we analyse Togo's fulfilment of the rights to freedoms of association, expression and peaceful assembly and unwarranted restrictions on HRDs since its previous UPR examination on 24 January 2022.¹ To this end, we assess Togo's implementation of recommendations received during the 3rd UPR cycle relating to these issues and provide follow-up recommendations.
- 1.5 During the 3rd UPR cycle, the Government of Togo received 20 recommendations relating to the space for civil society (civic space). It accepted 16 and noted four. However, an evaluation of a range of legal sources and human rights documentation addressed in subsequent sections of this submission demonstrates that the Government of Togo has not implemented recommendations relating to civic space, with the exception of one recommendation that has been partly adopted. The government has persistently failed to address civic space restrictions since its last UPR examination and has particularly acute implementation gaps with regard to the rights to freedoms of expression and peaceful assembly and the state's duty to protect.

¹ 'Report of the Working Group on the Universal Periodic Review', Human Rights Council, Fiftieth Session, 13 June–8 July 2022, <https://docs.un.org/en/A/HRC/50/5>.

- 1.6** Togo's civic space has further deteriorated² since its previous UPR examination, with an escalation of violations since 7 May 2024 constitutional changes³ that abolished direct presidential elections by direct universal suffrage and transferred the power to nominate the president to parliament and removed the previous limit of two terms, allowing the current officeholder the potential to stay in power without a term limit. We are concerned about the arbitrary arrest of young activists and civil society personnel engaged in organising peaceful protests and the targeting and arrest of activists, comedians, HRDs and musicians for their criticism and support for pro-democracy protests.
- 1.7** We are further alarmed by continuous government bans on civil society meetings, peaceful assemblies and workshops and restrictions on media freedom through outlet suspensions and the surveillance of journalists.
- 1.8** As a result of these multiple attacks, the CIVICUS Monitor currently classifies Togo's civic space as repressed, indicating the existence of severe restrictions.⁴
- Section 2 of this submission examines Togo's implementation of UPR recommendations and compliance with international human rights standards concerning freedom of association.
 - Section 3 examines Togo's implementation of UPR recommendations and compliance with international human rights standards related to the protection of civil society activists, HRDs and journalists.
 - Section 4 examines Togo's implementation of UPR recommendations and compliance with international human rights standards concerning freedom of expression and media freedom.
 - Section 5 examines Togo's implementation of UPR recommendations and compliance with international human rights standards related to freedom of peaceful assembly.
 - Section 6 contains recommendations to address the concerns raised and advance implementation of recommendations under the 3rd cycle.
 - Section 7 is an annex on the implementation of 3rd cycle UPR recommendations related to civic space.

² 'Togo needs concrete actions to address the deterioration of civic space', CIVICUS, 30 June 2022, <https://www.civicus.org/index.php/media-resources/news/united-nations/geneva/5894-adoption-of-the-upr-report-of-togo>.

³ 'Au Togo, la nouvelle Constitution a été promulguée', Radio France Internationale, 7 May 2024, <https://www.rfi.fr/fr/afrique/20240506-au-togo-la-nouvelle-constitution-a-%C3%A9t%C3%A9-promulgu%C3%A9e>.

⁴ CIVICUS Monitor: Togo, <https://monitor.civicus.org/country/togo>.

2. Freedom of association

- 2.1** During Togo's examination under the 3rd UPR cycle, the government received six recommendations related to freedom of association. The government accepted all six, but it has only partly implemented one of them. The government pledged, among other things, to 'revise legislation that limits the right to freedom of association, foster a secure, respectful, and supportive atmosphere for civil society, and take measures to guarantee freedom of association'.
- 2.2** Article 10 of the Constitution of Togo guarantees the right to freedom of association.⁵ Despite these legal commitments, authorities have continued to impose restrictions on freedom of association. These include bans on or prevention of CSO meetings and workshops, burdensome registration and accreditation requirements for CSOs, discretionary powers for officials and restrictive laws.
- 2.3** On 24 December 2025, the Council of Ministers adopted a draft Law on Associations⁶ to replace the outdated 1901 French law applied in Togo by decree 46-432 of 13 March 1946, which contains unwarranted restrictions.⁷ However, CSOs have raised concerns about the lack of consultation on the draft law.⁸ The proposed legislation contains freedom of association restrictions and lacks transparency. For example, article 15 grants the Minister of Territorial Administration discretionary authority to conduct undefined 'morality inquiries' (enquêtes de moralité) and allows the minister to indefinitely suspend the six-month deadline⁹ for issuing formal recognition documents to associations, without specifying a maximum duration or objective criteria for such suspensions. Articles 44 and 51 of the proposed law permit the government to dissolve associations on vague grounds, including activities 'susceptible to disturb public order and peace' or that take 'the character of a private militia', without defining these terms or providing independent appeal mechanisms. Article 53 criminalises any person facilitating the meetings of dissolved associations or those denied the formal recognition

⁵ 'ANNEX: Of the solemn declaration of the fundamental rights and duties of persons and citizens', Section I of Law No. 2024-005 of 06/05/2024 on the Constitution of the Republic of Togo <https://www.refworld.org/legal/legislation/natlegbod/2024/fr/63240?prevPage=/node/63240>.

⁶ 'Liberté d'association au Togo : Un nouveau cadre juridique adopté', Aux Nouvelles, 25 December 2025, <https://auxnouvelles.tg/2025/12/25/liberte-dassociation-au-togo-un-nouveau-cadre-juridique-adopte;>

⁷ 'Republic of Togo Joint Submission to the UN Universal Periodic Review 40th Session of the UPR Working Group', CIVICUS, 15 July 2021, <https://www.civicus.org/documents/Togo.EN.JointUPRSubmission2021.pdf>.

⁸ 'Togo-Adoption d'un projet de loi sur la liberté d'association, la société civile tire la sonnette d'alarme – IciLome', iciLome.com, 29 December 2025, <https://icilome.com/2025/12/togo-adoption-dun-projet-de-loi-sur-la-liberte-dassociation-la-societe-civile-tire-la-sonnette-dalarme>.

⁹ This is a standard timeline established in article 15 of the draft law for the Minister of Territorial Administration to issue a formal recognition document acknowledging the existence of an association.

receipt by providing premises or logistics, imposing penalties of 150,000 to 1,000,000 CFA Francs (approx. US\$260 to US\$1,740) and jail sentences of three months to three years.

- 2.4** Articles 9 and 10 of Decree No. 2022-002/PR,¹⁰ adopted in January 2022, mandates all NGOs, including international NGOs, to seek partnership agreements or align their activities to governmental development priorities to obtain official accreditation of their NGO status before conducting any operations. On 7 October 2024, the Togolese Ministers for Development Planning and Territorial Administration issued a letter demanding strict compliance with articles 9 and 10. Existing organisations were granted a one-year grace period from October 2024 to comply with the new regulations, while new ones were given only six months to comply.¹¹ This created operational barriers, as CSOs are required to navigate bureaucratic accreditation processes, potentially enabling authorities to arbitrarily regulate which CSOs can operate, on what terms and subject to what governmental priorities.
- 2.5** Authorities have also used administrative measures to restrict activities of associations, including by frequently banning CSO activities and meetings. On 13 November 2023, a letter sent by the Minister of Territorial Administration ‘reminded’ all prefects that only NGOs and associations with valid receipts of registration are authorised to implement activities in Togo, with the instruction that ‘respect of this disposition is mandatory’.¹²
- 2.6** On 21 February and 21 March 2024, the Ministry of Territorial Administration banned a ‘citizen’s café’, organised by the civil society association Grand mouvement pour la refondation du Togo, claiming it has ‘no legal base’ despite its lawful establishment.¹³ On 27 March 2024, local authorities in Tsévié prevented a civil society workshop dedicated to freedoms of association and peaceful assembly, with gendarmes demanding that participants leave and obliging organisers to provide lists of participants.¹⁴

3. Harassment, intimidation and attacks against civil society activists, human rights defenders and journalists

- 3.1** Under Togo’s previous UPR examination, the government received five recommendations on the protection of civil society activists, HRDs and journalists. The government accepted all

¹⁰ ‘Décret n° 2022-002/PR du 5 janvier 2022, fixant les conditions de coopération entre les organisations non gouvernementales (ONG) et le gouvernement’, <https://bdd.pseau.org/outils/biblio/resume.php?d=12662>.

¹¹ ‘Fundamental freedoms under constant attack in Togo’, CIVICUS Monitor, 27 February 2025, <https://monitor.civicus.org/explore/fundamental-freedoms-under-constant-attack-in-togo>.

¹² Ibid.

¹³ ‘Protests and meetings over controversial constitutional reform banned; journalist arrested’, CIVICUS Monitor, 19 April 2024, <https://monitor.civicus.org/explore/protests-and-meetings-over-controversial-constitutional-reform-banned-journalist-arrested>.

¹⁴ ‘Togo: Two journalists prosecuted; CSO meetings banned by authorities’, CIVICUS Monitor, 23 January 2024, <https://monitor.civicus.org/explore/togo-two-journalists-prosecuted-cso-meetings-banned-by-authorities>.

five recommendations and committed to ‘provide civil society members, HRDs and journalists with a safe and secure environment in which to carry out their work, ensure that HRDs are able to carry out their legitimate activities without fear or undue hindrance, obstruction, or legal and administrative harassment’. The government has not implemented any of the five recommendations.

- 3.2** Article 12 of the UN Declaration on Human Rights Defenders mandates states to take the necessary measures to ensure the protection of HRDs. However, in spite of these protections, civil society activists, HRDs and journalists continue to face arbitrary arrests, harassment intimidation and judicial prosecution under restrictive laws such as the penal code.
- 3.3** Civil society activists and HRDs have been subjected to arbitrary arrests and prosecution. For example, on 22 August 2025 in Lomé, plainclothes officers arrested¹⁵ Oséi Agbagnou and Armand Agblézé, members of Synergie des Élèves et Étudiants du Togo (SEET) and Tournons la Page Togo, a citizen movement focusing on democratic governance in Africa.¹⁶ According to reports, Agbagnou and Agblézé were arrested while attending a meeting to organise protests against injustice and poor governance, planned for 30 August 2025.¹⁷ On 28 August 2025, they were charged and detained with ‘aggravated disturbance of public order’ under article 495 of the penal code.¹⁸ Agbagnou and Agblézé were released along with several other activists from Tournons la Page¹⁹ on 31 December 2025 following the granting of a presidential pardon.²⁰
- 3.4** HRDs have been targeted with arrests for their online criticisms and public support for peaceful pro-democracy protests. During June 2025 protests against constitutional amendments,

¹⁵ ‘Au Togo, le mouvement citoyen «Tournons la Page» dénonce l’arrestation de deux de ses militants’, RFI, 27 August 2025, <https://www.rfi.fr/fr/afrique/20250827-au-togo-le-mouvement-citoyen-tournons-la-page-d%C3%A9nonce-l-arrestation-de-deux-de-ses-militants>.

¹⁶ ‘Togo : Arrestation de responsables étudiants, activistes et défenseurs des droits humains entre juin et septembre 2025 (communication conjointe)’, UN Special Rapporteur on Human Rights Defenders, 21 January 2026, <https://srdefenders.org/togo-arrestation-de-responsables-etudiants-activistes-et-ddh-juin-septembre-2025-communication-conjointe>.

¹⁷ ‘Togo : Détention arbitraire des défenseurs Armand Agblézé et Oséi Agbagnou liée aux manifestations du 30 août 2025’, International Federation for Human Rights, 1 September 2025, <https://www.fidh.org/fr/themes/defenseurs-des-droits-humains/togo-detention-arbitraire-des-defenseurs-armand-agbleze-et-osei>.

¹⁸ ‘Loi n° 2015-10 du 24 novembre 2015 portant nouveau code pénal modifié par la loi n° 2016-027 du 11 octobre 2016’, https://jo.gouv.tg/sites/default/files/publications/LOI_2015_010.pdf; https://assemblee-nationale.tg/lois_adoptees/loi-portant-modification-de-la-loi-n-2015-10-du-24-novembre-2015-portant-nouveau-code-penal-modifie-par-la-loi-n-2016-027-du-11-octobre-2016.

¹⁹ ‘In Togo, four figures behind Tournons La Page’s victory in 2025’, Tournons La Page, 8 January 2026, <https://www.tournonslapage.org/en/actualites/au-togo-quatre-figures-de-la-victoire-de-tournons-la-page-en-2025>.

²⁰ On 30 December 2025, the President of the Council of Ministers, Faure Gnassingbé, issued a presidential pardon decree. The decree pardoned 1,511 convicts. This pardon included people incarcerated for minor offences, older prisoners nearing the end of their sentences, seriously ill convicts and those serving long prison terms who had already completed the majority of their sentences. Agblézé and Agbagnou were amongst those that benefited from the pardon.

security forces arbitrarily arrested at least 81 protesters, including HRDs (see section 5.5).²¹ On 7 July 2025, armed and masked men in civilian clothing arrested Foly Satchivi, a prominent HRD and leader of civil society movement En Aucun Cas, at his home in Bè, Lomé.²² Satchivi was arrested for posting social media videos²³ in support of the June 2025 protests.²⁴ According to Front Line Defenders, Satchivi received several anonymous smears, threats and messages inciting violence against him on social media and by phone.²⁵ Satchivi faced charges under penal code articles 230, 495 and 497, including for ‘disturbing public order’, ‘inciting violence’ and ‘spreading false news’.²⁶ Satchivi was eventually released on bail on 31 December 2025 following a presidential pardon.²⁷

- 3.5** In 2025, two human rights defenders and online critics in Togo—midwife Grâce Koumayi Bikonibiyate and content creator René Koffi Missode (À votre avis)—were arbitrarily arrested without legal warrants for their online activities. Bikonibiyate was arrested²⁸ on 3 October in Lomé by men claiming to be gendarmes; detained for three days, she was charged under penal code articles 495 and 663 with ‘attempted undermining of the internal security of the state’ and ‘incitement to revolt’ following her posting of videos criticising authorities and governance.²⁹ Missode was abducted³⁰ on 27 June by masked armed individuals and subsequently charged with ‘inciting popular revolt’ and ‘threatening the interior security of the state’ for his live broadcasts of public protests and government criticism.³¹ Bikonibiyate³² and Missode³³ endured torture during detention and were transferred to Lomé Civil Prison, where Missode remains detained.³⁴

²¹ ‘Togo : Au moins 81 arrestations arbitraires et actes de torture contre les manifestant-es du 5 et 6 juin’, International Federation for Human Rights, 13 June 2025, <https://www.fidh.org/fr/themes/defenseurs-des-droits-humains/togo-au-moins-81-arrestations-arbitraires-et-actes-de-torture-contre>.

²² ‘Human rights defender Foly Satchivi released on bail’, Front Line Defenders, 9 January 2026, <https://www.frontlinedefenders.org/en/case/human-rights-defender-foly-satchivi-released-bail>.

²³ ‘Folly Satchivi de Nouveau dans le Couloir de la Justice’, Aux Nouvelles, 8 July 2025, <https://auxnouvelles.tg/2025/07/08/folly-satchivi-de-nouveau-dans-le-couloir-de-la-justice>.

²⁴ ‘Togo : Arrestation et détention arbitraire des défenseurs des droits humains René Koffi Missode et Foly Satchivi (communication conjointe)’, UN Special Rapporteur on Human Rights Defenders, 19 November 2025, <https://srdefenders.org/togo-arrestation-et-detention-arbitraire-des-ddh-rene-koffi-missode-et-foly-satchivi-communication-conjointe>.

²⁵ Ibid.

²⁶ Front Line Defenders, 9 January 2026, op. cit.

²⁷ Ibid.

²⁸ ‘Togo : Deuxième détention arbitraire de la sage-femme activiste Grâce Koumayi Bikonibiyate’, International Federation for Human Rights, 20 October 2025, <https://www.fidh.org/fr/themes/defenseurs-des-droits-humains/togo-deuxieme-detention-arbitraire-de-la-sage-femme-activiste-grace>.

²⁹ Penal code, op. cit.

³⁰ ‘UN Special Rapporteur on Human Rights Defenders, 19 November 2025, op. cit.

³¹ Ibid.

³² International Federation for Human Rights, 20 October 2025, op. cit.

³³ Ibid.

³⁴ Ibid.

- 3.6** Artists and activists have also faced arrest and prosecution for criticising the authorities.³⁵ For example, on 12 January 2025, plainclothes police officers arrested activist and poet Honoré Sitsopé Sokpor, also known as Affectio, in Adidogomé, Lomé, following the publication of his poem ‘Fais ta part’ (Do your part) on social media, in which he condemned arbitrariness and governmental oppression.³⁶ On 4 April 2025, Sokpor was once again arrested and subjected to torture.³⁷
- 3.7** Musicians engaging in political and social commentary have been arrested for criticising authorities on social media. Rapper Aamron (Tchalla Essowe Narcisse) was arrested twice in 2025 for posts criticising President Gnassingbé and calling for youth mobilisation against the government.³⁸ First arrested on 26 May and released on 21 June,³⁹ Aamron was re-arrested on 19 September and charged with incitement to revolt, spreading false information, and insulting authorities.⁴⁰ Aamron was released on 20 September under judicial supervision with his passport confiscated.⁴¹
- 3.8** Journalists have faced frequent arrest, detention, forced deletion of materials and prosecutions under restrictive legislation. In June 2025, French journalist Flore Monteau was detained while filming police clearing barricades during anti-government protests.⁴² Despite presenting valid press credentials, gendarmes confiscated her equipment and forced her to delete footage before her release.⁴³
- 3.9** On 15 March 2023, the High Court in Lomé sentenced journalists Ferdinand Ayité and Isidire Kouwonou, director of publication and editor-in-chief of the bi-weekly newspaper *L'Alternative*, to three years’ imprisonment and fines of three million CFA Francs (approx. US\$5,000) for ‘insulting authorities’ under the penal code.⁴⁴ The prosecution stemmed from

³⁵ CIVICUS Monitor, 27 February 2025, op. cit.

³⁶ ‘Au Togo, Affectio, poète détenu et devenu un symbole pour l’opposition’, *Jeune Afrique*, 25 April 2025, <https://www.jeuneafrique.com/1682806/politique/au-togo-affectio-poete-detenu-et-devenu-un-symbole-pour-lopposition>.

³⁷ ‘Quand photographier un caniveau devient une « Atteinte à la sûreté de l’État »’, *Tournons la page*, 21 May 2026, <https://www.tournonslapage.org/fr/documents/togo-quand-photographier-un-caniveau-devient-une-atteinte-a-la-surete-de-letat>.

³⁸ ‘Togo - Le rappeur Aamron libéré après un mois d’internement controversé’, *New Afrique*, 21 June 2025, <https://www.newafrique.net/articles/0ITyTQtUfSKWsOpLAjyQ>.

³⁹ Ibid.

⁴⁰ ‘Togo: Artiste arrested again, passport confiscated’, *Media Foundation for West Africa*, 20 September 2025, <https://mfwa.org/country-highlights/togo-artiste-arrested-again-passport-confiscated>.

⁴¹ Ibid.

⁴² ‘Togo detains TV5 Monde journalist, forces deletion of protest videos’, *Committee to Protect Journalists*, 11 June 2025, <https://cpj.org/2025/06/togo-detains-tv5-monde-journalist-forces-deletion-of-protest-videos>.

⁴³ ‘Togo: Police detain, force journalist to delete footage of anti-government protests’, *Media Foundation for West Africa*, 13 June 2025, <https://mfwa.org/country-highlights/togo-police-detain-force-journalist-to-delete-footage-of-anti-government-protests>.

⁴⁴ ‘Togo: Journalists sentenced to prison following government criticism’, *International Press Institute*, 23 March 2023, <https://ipi.media/togo-journalists-sentenced-to-prison-following-government-criticism>.

criticisms made by Ayité and Kouwonou during a broadcast programme in November 2021 alleging corruption by government ministers.⁴⁵ Ayité and Kouwonou were sentenced in absentia with international warrants issued against them, despite issuing official apologies.⁴⁶

- 3.10** On 13 November 2023, police arrested Loïc Lawson, publication director of the newspaper *Le Flambeau des Démocrates*, and freelance journalist Anani Sossou, following a complaint by the Minister of Urban Planning, Housing and Land Reform over social media posts alleging a theft at the minister's residence.⁴⁷ The following day, Lawson and Sossou were charged under the penal code with 'attacking the honour' of the minister, 'defamation' and 'inciting revolt'.⁴⁸ Lawson and Sossou were provisionally released on 1 December 2023 and placed under judicial control with their passports confiscated.⁴⁹

4. Freedom of expression and media freedom

- 4.1** During the 3rd UPR cycle, the Government of Togo received 11 recommendations concerning freedom of expression and media freedom. It accepted 10 recommendations and noted one. The government committed among other recommendations to 'adopt and implement legislation to protect journalists and bloggers, ensure the promotion and protection of freedom of expression, and protect fundamental freedoms'. However, as discussed below, the government has not implemented any of these recommendations. Instead, it has restricted freedom of expression through administrative interference, internet and social media surveillance and media suspensions.
- 4.2** Article 5 of the Constitution guarantees the right to freedom of expression.⁵⁰ While the government formally accepted recommendations to align legislation with international standards, in practice, restrictive laws, particularly the Cybersecurity Law and Press and Communication Code, continue to significantly hamper freedom of expression.
- 4.3** The Cybersecurity Law, adopted in December 2018,⁵¹ imposes severe prison terms for online activities, including dissemination of false information and content deemed to undermine

⁴⁵ Ibid.

⁴⁶ 'L'intégralité des excuses officielles (et regrets) de Ferdinand Ayité et de Joël Egah aux ministres Pius Agbetomey et Kodjo Adedze', Togoactualité, 7 January 2022, <https://togoactualite.com/lintegralite-des-excuses-officielles-et-regrets-de-ferdinand-ayite-et-de-joel-egah-aux-ministres-pius-agbetomey-et-kodjo-adedze>.

⁴⁷ 'Togo: Deux journalistes placés en garde à vue pour "diffamation et incitation à la révolte"', TRT Afrika, 14 November 2023, <https://www.trtafrika.com/francais/article/15821558?rt=1>.

⁴⁸ Ibid.

⁴⁹ Ibid.

⁵⁰ Constitution of the Republic of Togo, op. cit.

⁵¹ 'Law n° 2018-026 of 07/12/18 on cybersecurity and the fight against cybercrime', https://www.unodc.org/cld/uploads/res/loi-n-2018---026-du-07-12-18sur-la-cybersecurite-et-la-lutte-contre-la-cybercriminalite_html/JOS_07_12_2018-63E_ANNEE_N_C2_B024TER.pdf. Articles 2, 3 and 6 were amended in 2022. See <https://assemblee-nationale.tg/wp-content/uploads/2022/06/8CYBER-SEC-CRIME-LOI-AN.pdf>.

public order.⁵² Additionally, the Cybersecurity Law grants police broad powers, including for surveillance of communication or IT equipment, without adequate judicial oversight.⁵³

- 4.4** The Press and Communication Code imposes substantial fines and media licence suspensions for journalists publishing information deemed inaccurate⁵⁴ and prescribes fines for defamation and insulting public officials.⁵⁵
- 4.5** The HAAC has continued to exercise its extensive powers over media outlets. On 16 June 2025, HAAC suspended French media outlets France 24 and Radio France Internationale for three months, citing ‘repeated breaches... in terms of impartiality, accuracy, and fact-checking’ and accusing them of broadcasting content ‘contrary to established facts’ that harmed the ‘stability of republican institutions and the image of the country’.⁵⁶ On 4 April 2024, the HAAC suspended the news outlet Tampa Express for three months, citing breaches of journalism ethics. The HAAC accused Tampa Express of making defamatory remarks and of accusing Sandra Ablamba Johnson, the Secretary General at the Presidency of Togo, of maladministration.⁵⁷
- 4.6** Access to internet and social media have been disrupted, particularly in the context of the protests that broke out in June 2025.⁵⁸ Such measures severely hinder communication and the ability of HRDs such to monitor and report violations.⁵⁹ Between 26 and 30 June 2025, targeted restrictions and slowdowns affected platforms including Facebook, Signal, Telegram and YouTube, as confirmed by data from Georgia Tech University’s IODA platform, Internet Society Togo and Internet Without Borders.⁶⁰
- 4.7** Authorities have subjected journalists to surveillance. In January 2024, Reporters without Borders found traces of Pegasus spyware on the phones of Loïc Lawson, publisher of Flambeau des Démocrates, and Anani Sossou, an independent journalist, with at least 23 intrusions documented between 1 February and 10 July 2021 on Lawson’s device.⁶¹

⁵² Ibid., articles 17, 21, 22, 25, 27, 28, and 29.

⁵³ Ibid., articles 40-46.

⁵⁴ ‘Law n° 2020-001 of 07/01/20 relating to the press and communications code in the Republic Togolese, <https://www.scribd.com/document/579439611/Togo-Code-2020-Press>.

⁵⁵ Ibid., articles 159 to 169.

⁵⁶ ‘Turmoil in Togo over constitutional amendments and President Faure’s continued rule’, CIVICUS Monitor, 18 August 2025, <https://monitor.civicus.org/explore/turmoil-in-togo-over-constitutional-amendments-and-president-faures-continued-rule>; ‘Togo: la HAAC Suspend France 24 et RFI’, Africa Press, 20 June 2025, <https://www.africa-press.net/togo/toutes-les-actualites/togo-la-haac-suspend-france-24-et-rfi>.

⁵⁷ Ibid.

⁵⁸ ‘Togo: Internet disruptions undermine the work of human rights defenders within the context of protest crackdowns’, Front Line Defenders, 11 August 2025, <https://www.frontlinedefenders.org/en/statement-report/togo-internet-disruptions-undermine-work-human-rights-defenders-within-context>.

⁵⁹ Ibid.

⁶⁰ Ibid.

⁶¹ ‘In first for Togo, RSF identifies spyware on phones of two Togolese journalists’, Reporters Without Borders, 23 January 2024, <https://rsf.org/en/first-togo-rsf-identifies-spyware-phones-two-togolese-journalists>.

4.8 Administrative authorities in Togo have directly interfered in media operations to exercise extra-legal force to suppress broadcasts, despite lacking any regulatory power or legal authority to do so. In 2024, when a radio broadcast hosted by Leon Koudoungou raised issues regarding electoral delays for a town chief position in Pana, the local Prefect Yendoukoua telephoned the radio station's manager and ordered the immediate termination of the live broadcast, subsequently sending law enforcement officers who arrived during the broadcast to bring it to an abrupt end.⁶²

5. Freedom of peaceful assembly

5.1 During Togo's examination under the 3rd UPR cycle, the government received 10 recommendations on the right to freedom of peaceful assembly. It accepted nine recommendations and noted one. Among other recommendations, the government committed to 'ensure freedom of assembly by removing legislative provisions that restrict public demonstrations'. However, as evidenced below, the government has not implemented any of the recommendations. Authorities have systematically banned protests, and the government has continued to enforce legal restrictions on peaceful assembly without implementing the legislative reforms recommended during the 3rd cycle.

5.2 Article 9 of the constitution guarantees the right to freedom of peaceful assembly.⁶³ Civic space violations related to peaceful assembly have however escalated since the protests in June 2025.

5.3 In August 2019, the National Assembly of Togo amended the 2011 law on the right to peaceful meetings and protests,⁶⁴ tightening spatial and temporal restrictions: demonstrations were prohibited before 11 a.m. and after 6 p.m., as well as in sensitive locations (national roads, economic zones, urban centres, state institutions, diplomatic residences, and military camps).⁶⁵ Local authorities may limit the weekly number of demonstrations based on the availability of security forces and prohibit demonstrations at short notice.⁶⁶ Law No. 2021-010 of 1 October 2021 confirmed and extended these restrictive measures, notably by broadening the bans to other sensitive locations (main roads, markets, and high-traffic areas) and reaffirming the

⁶² 'Intervention musclée du préfet de Tône contre la radio « Courtoisie »: la liberté d'expression étouffée', togoweb, 25 October 2024, <https://togoweb.net/intervention-musclée-du-prefet-de-tone-contre-la-radio-courtoisie-la-liberté-d'expression-etouffée>; 'Togo – Préfecture de Tône: Quand le préfet Tchimblandja usurpe le rôle de la HAAC et fait arrêter une émission radio', iciLome.com, 24 October 2024, <https://icilome.com/2024/10/togo-prefecture-de-tone-quand-le-prefet-tchimblandja-usurpe-le-role-de-la-haac-et-fait-arreter-une-emission-radio>.

⁶³ Constitution of the Republic of Togo, op. cit.

⁶⁴ Law no. 2019-010 of 12 August 2019 modifying Law no 2011-010 of 16 May 2011 on conditions to exercise the freedom of meetings and peaceful public protests.

⁶⁵ See Paragraph 5.3 'Republic of Togo Joint Submission to the UN Universal Periodic Review 40th Session of the UPR Working Group' CIVICUS, 15 July 2021 <https://www.civicus.org/documents/Togo.EN.JointUPRSubmission2021.pdf>.

⁶⁶ Ibid.

power of administrative prohibition in cases of serious risks to public order, as well as the time and day constraints that greatly limit the organisation of demonstrations.⁶⁷

5.4 Additionally, the penal code⁶⁸ criminalises the participation in and organisation of assemblies that have not complied with the necessary administrative formalities, including spontaneous assemblies, with penalties ranging from a fine of 50,000 CFA Francs (approx. US\$90) to a prison term of five years. This maximum sentence is applicable if violence is committed during a protest.⁶⁹ These provisions make the organisers of assemblies criminally liable for any violence or crimes that may occur during protests.

5.5 In June 2025, security forces responded to peaceful demonstrations against constitutional amendments and rising cost of living with systematic excessive force. On 6 June, gendarmes, militia, and anti-gang officers beat protesters with batons and sprayed water, resulting in 81 arbitrary arrests; seven detainees reported torture and ill-treatment.⁷⁰ Most were released the following day,⁷¹ though six appeared in court on 10 June with three charged under penal code article 495 with ‘aggravated disturbance of public order’.⁷² Between 26 and 28 June, security forces escalated violence using clubs, ropes, and teargas to disperse further protests,⁷³ killing at least seven people, wounding dozens,⁷⁴ and committing additional violations including enforced disappearances, ill-treatment and torture.⁷⁵

5.6 On 27 March 2024, when civil society organisations and political opposition parties attempted to hold a press conference against the constitutional amendments, gendarmes intimidated organisers and used teargas to disperse participants.⁷⁶ Security forces demanded that workshop participants leave and obliged organisers to provide lists of attendees.⁷⁷ Security agents threatened journalists reporting on events, preventing them from filming.⁷⁸

5.7 Authorities have maintained a pattern of banning peaceful assemblies and protests, particularly those organised by civil society and the political opposition. For example, on 6 August 2025,

⁶⁷ ‘C’est voté! Les manifestations publiques s’arrêtent désormais à 17 heures’, Togotopnews, 20 October 2021, <https://togotopnews.tg/2021/10/02/cest-vote-les-manifestations-publiques-sarretent-desormais-a-17-heures>.

⁶⁸ Penal code, op. cit.

⁶⁹ Ibid., articles 539, 540, 541 and 542.

⁷⁰ International Federation for Human Rights, 13 June 2025, op. cit.

⁷¹ ‘Togo – Manifestations du 06 juin: 56 personnes remises en liberté’, icilome.com, 10 June 2025, <https://icilome.com/2025/06/togo-manifestations-du-06-juin-56-personnes-remises-en-liberte>.

⁷² International Federation for Human Rights, 13 June 2025, op. cit.

⁷³ ‘Did security forces use excessive force in Togo protests?’, Impact International, 30 June 2025, <https://impactpolicies.org/news/524/did-security-forces-use-excessive-force-in-togo-protests>.

⁷⁴ ‘Togo groups say recent protests left 7 dead’, France 24, 29 June 2025, <https://www.france24.com/en/live-news/20250629-togo-groups-say-recent-protests-left-7-dead>.

⁷⁵ ‘Togo: Testimonies provide glimpse into violent repression of protests’, Amnesty International, 3 July 2025, <https://www.amnesty.org/en/latest/news/2025/07/togo-repression-protests>.

⁷⁶ ‘Togo: Répression sur fonds de changement de constitution’, Amnesty International, 29 March 2024, <https://www.amnesty.org/fr/latest/news/2024/03/togo-repression-sur-fonds-de-changement-de-constitution>.

⁷⁷ Ibid.

⁷⁸ Ibid.

the Minister of Territorial Administration banned a peaceful march planned by l'organisation Novation Internationale and its partners, scheduled for 9 August 2025 in Lomé.⁷⁹ The march was intended to honour the victims of state violence in the June 2025 protests and to denounce violence. Government authorities cited a 'tense national climate' marked by alleged 'calls for hatred, mob justice, and attacks on security forces' as the reason for the decision.⁸⁰

5.8 On 17 September 2024, the Ministry of Territorial Administration banned a day of prayer and solidarity for political prisoners planned for 20 September 2024 in Sokodé.⁸¹ The event was organised by 'Touche Pas à Ma Constitution', a coalition of CSOs and political parties.⁸² The minister cited 'preserving public order' as grounds for the ban.⁸³ The Ministry of Territorial Administration previously banned a sit-in organised by Touche Pas à Ma Constitution to protest against the constitutional changes on 8 August 2024, citing proximity to state institutions.⁸⁴

5.9 Political gatherings have been subject to violent disruption. On 29 September 2024 in Lomé, unknown individuals violently disrupted a meeting organised by the political party Convention Démocratique des Peuples Africains at its headquarters, where Guy Marius Sagna, a Senegalese Member of Parliament of the Economic Community of West African States, was promoting dialogue with citizens.⁸⁵ The assailants launched a violent assault, throwing stones and projectiles at the audience gathered at the event.⁸⁶ This disruption of the peaceful meeting resulted in injuries to seven people, including Sagna, along with journalists and other politicians.⁸⁷ In addition to physically attacking attendees, the assailants destroyed property, including chairs.⁸⁸

6. Recommendations to the Government of Togo

⁷⁹ 'Togo bans peace march honoring June protest victims', icilome.com, 8 August 2025, <https://icilome.com/2025/08/togo-bans-peace-march-honoring-june-protest-victims>.

⁸⁰ 'Togo: Interdiction pour la marche du 09 août, le Colonel Hodabalo Awaté donne trois raisons', Lomé Actu, 8 August 2025, <https://lomeactu.info/togo-interdiction-pour-la-marche-du-09-aout-le-colonel-hodabalo-awate-donne-trois-raisons>.

⁸¹ 'Togo/Sokodé : la manifestation de « Touche Pas à ma Constitution » interdite par les autorités', Togoactualite, 20 September 2025, <https://togoactualite.com/togo-sokode-la-manifestation-de-touche-pas-a-ma-constitution-interdite-par-les-autorites>.

⁸² Ibid.

⁸³ Ibid.

⁸⁴ 'Togo: Le gouvernement togolais interdit un sit-in du Front « Touche pas à ma Constitution » devant la Cour constitutionnelle', aLome.com, 9 August 2024, <http://www.alome.com/m/actualites/article.asp?ID=151425>.

⁸⁵ 'Togo: Security forces' failure to protect participants at opposition party conference must be investigated', Amnesty International, 3 October 2024, <https://www.amnesty.org/en/latest/news/2024/10/togo-security-forces-failure-to-protect-participants-at-opposition-party-conference-must-be-investigated>.

⁸⁶ Ibid.

⁸⁷ 'Le député guy marius sagna blessé lors d'une réunion publique à Lomé', RTS, 29 September 2024, <https://www.rts.sn/actualite/detail/a-la-une/le-depute-guy-marius-sagna-blesse-lors-dune-reunion-publique-a-lome>.

⁸⁸ Amnesty International, 3 October 2024, op. cit.

CIVICUS, CTDDH and WAHRDN/ROADDH call on the Government of Togo to create and maintain, in law and in practice, an enabling environment for civil society, in accordance with the rights enshrined in the ICCPR, the UN Declaration on Human Rights Defenders and Human Rights Council resolutions 22/6, 27/5 and 27/31.

At a minimum, the following conditions should be guaranteed: freedoms of association, expression and peaceful assembly, the right to operate free from unwarranted state interference, the right to communicate and cooperate, the right to seek and secure funding and the state's duty to protect. In the light of this, the following specific recommendations are made:

6.1 Freedom of association

- Ensure the final draft Law on Associations excludes provisions that grant the minister undefined discretionary powers and that criminalise those supporting dissolved or unrecognised associations and include clear accountability mechanisms and precise definitions of terms.
- Repeal or amend articles 9 and 10 of Decree No. 2022-002/PR to ease operational requirements for CSOs.
- Establish transparent, objective registration timelines and abolish criminal liability for CSO participation, whether formally registered or not.
- Guarantee CSO advocacy rights on governance issues without administrative harassment.
- Abolish criminal responsibility for organising and participating in the activities of CSOs, whether formally registered or not.

6.2 Protection of civil society activists, human rights defenders and journalists

- Immediately release or ensure fair trial for all civil society activists, HRDs and journalists detained for exercising legitimate rights of freedom of association, expression and peaceful assembly.
- Immediately cease all arbitrary arrests, detentions and prosecutions of artists, civil society activists, HRDs, journalists and musicians for exercising legitimate rights of association, expression and peaceful assembly.
- Conduct immediate, independent and impartial investigations into all documented cases of ill-treatment, torture and violence towards activists and HRDs during arrest, detention and interrogation.

- Publicly condemn, at the highest levels of government, all instances of arbitrary arrest, detention, harassment, intimidation and violence towards civil society activists and HRDs.
- Establish an independent mechanism for the protection of HRDs, including by adopting a specific law on their protection in accordance with Human Rights Council resolution 27/31.
- Cease all administrative and legal harassment of HRDs, including arbitrary prosecution under vague charges, prolonged detention and judicial supervision.

6.3 Freedom of expression and media freedom

- Repeal or amend restrictive penal code provisions that criminalise legitimate freedom of expression rights.
- Reform penal code and press code provisions on defamation to comply with international human rights standards and protect journalists and writers from prosecution for critical reporting or commentary.
- Reinstate all media outlets that have been arbitrarily suspended.
- Adopt a comprehensive framework for the protection of journalists from harassment, intimidation and persecution including protection from administrative interference, state surveillance and spyware use.
- Cease all direct administrative interference in media operations.
- Develop a comprehensive action plan to ensure that internet laws comply with the government's commitments to guarantee freedom of expression, media freedom and access to information.
- Organise inclusive consultations with media outlets and relevant stakeholders to resolve challenges concerning current laws affecting media freedom and ensure that such reforms comply with international human rights standards.
- Ensure that the media regulatory authority operates within a clearly defined legal framework that prevents discretionary or politically motivated suspension of media outlets.

6.4 Freedom of peaceful assembly

- Immediately and impartially investigate all instances of extrajudicial killing and excessive force committed by security forces in the context of protests.
- Review and update human rights training for police and security forces, with the assistance of independent civil society organisations, to foster the more consistent application of international human rights standards, including the UN Basic Principles on the Use of Force and Firearms.
- Launch formal investigations into instances of brutal and excessive force by security forces and bring the perpetrators to justice.
- Provide legal recourse and effective remedy for victims of excessive use of force during public protest.
- Cease all administrative bans and restrictions on assemblies and meetings organised by registered associations, CSOs, civil society coalitions and political parties.
- Ensure that only declaration, rather than prior authorisation, is required for civil society meetings and other activities, in accordance with Togolese law and international human rights standards.

6.5 Access to UN Special Procedures mandate holders

- Extend standing invitation to all UN Special Procedure mandate holders, prioritising visits by: Special Rapporteur on human rights defenders; Special Rapporteur on Freedom of Opinion and Expression; and Special Rapporteur on Freedom of Assembly and Association.

6.6 State engagement with civil society

- Establish formal multi-stakeholder dialogue with CSOs, HRDs and media on civic space issues.
- Provide timely access to draft legislation and policy documents.
- Incorporate UPR recommendations into action plans with civil society input and present midterm evaluation to Human Rights Council.

7. Annex: Assessment of implementation of civic space recommendations under the 3rd cycle - Togo

Recommendation	Position	Assessment/Comments on level of implementation
119.23 Issue a standing invitation to the special procedures, including accepting a visit from the Special Rapporteur on the rights to freedom of peaceful assembly and of association (Finland); Source of Position: A/HRC/50/5/Add.1	Noted	Status: Not implemented Section 5: Paras, 5.1-11
119.26 Involve relevant civil society actors in the elaboration of legislation on human rights defenders and establish their legal recognition (Germany); Source of Position: A/HRC/50/5/Add.1	Accepted	Status: Not implemented Section 2: Paras, 2.1/3 Section 3: Paras, 3.1-6
119.28 Adopt and implement legislation to protect and facilitate the work of journalists and bloggers (Germany); Source of Position: A/HRC/50/5/Add.1	Accepted	Status: Not implemented Section 4: Paras, 4.1-8
119.43 Reform the 2019 law on public demonstrations, as well as the law on association, in order to guarantee the exercise of the right to freedom of peaceful assembly and of association, in accordance with international human rights standards (Spain); Source of Position: A/HRC/50/5/Add.1	Accepted	Status: Partially implemented Section 2: Para, 2.3
119.45 Amend legislation that violates the right to freedom of peaceful assembly, such as Law No. 2019-010 of 12 August 2019	Accepted	Status: Not implemented

establishing the conditions for the exercise of freedom of peaceful public assembly and protest, in order to bring it into compliance with international human rights standards (Switzerland); Source of Position: A/HRC/50/5/Add.1		Section 5: Paras, 5.1-11
119.55 Amend laws that restrict the right to freedom of expression, freedom of peaceful assembly and association to bring them into line with international human rights standards (Canada); Source of Position: A/HRC/50/5/Add.1	Accepted	Status: Not implemented Section 2: Para, 2.3 Section 4: Paras, 4.1-8 Section 5: Paras, 5.1-11
119.56 Introduce legislation prohibiting discrimination on the basis of sexual orientation or gender identity and expression (Canada); Source of Position: A/HRC/50/5/Add.1	Noted	Status: Not implemented Section 2:
119.62 Review and amend its legislation to guarantee the rights to freedom of expression and peaceful assembly, allowing individuals to safely protest, without fear of intimidation or excessive use of force (Ireland); Source of Position: A/HRC/50/5/Add.1	Accepted	Status: Not implemented Section 5: Paras, 5.1-11
119.68 Align legislation with the international standards regarding freedom of expression and peaceful assembly (Italy); Source of Position: A/HRC/50/5/Add.1	Accepted	Status: Not implemented Section 4: Paras, 4.1-8

119.71 Decriminalise sexual relations between consenting adults of the same sex and adopt comprehensive legislation that clearly prohibits discrimination on the basis of sexual orientation, gender identity and expression, and sex characteristics (Iceland); Source of Position: A/HRC/50/5/Add.1	Noted	Status: Not implemented Sections 2 & 4
119.111 Release all persons who remain in custody for demonstrating peacefully and exercising their freedom of expression (Marshall Islands); Source of Position: A/HRC/50/5/Add.1	Noted	Status: Not implemented Section 3: Para 3.5 Section 5: Paras, 5-6
119.112 Amend laws that restrict the right to freedom of peaceful assembly, such as the Criminal Code and Law No. 2011–010 on freedom of assembly and public and peaceful demonstrations, and bring them into line with international and regional human rights standards, including by removing provisions that criminalise the organisation of and participation in peaceful demonstrations (Netherlands); Source of Position: A/HRC/50/5/Add.1	Accepted	Status: Not implemented Section 5: Paras, 5.1-4
119.113 Guarantee the exercise of the right to freedom of expression and media freedom, without undue restrictions, harmonising the relevant legislation with international human rights standards, among others,	Accepted	Status: Not implemented Section 4: Paras, 4.1-4

concerning the crime of defamation, and protect journalists and their activities (Spain);		
Source of Position: A/HRC/50/5/Add.1		
119.114 Leverage the promotion and protection of the right to freedom of expression (Timor-Leste);	Accepted	Status: Not implemented Section 4
Source of Position: A/HRC/50/5/Add.1		
119.115 Protect the right to freedoms of expression and peaceful assembly regardless of political belief or affiliation (United States of America);	Accepted	Status: Not implemented Sections 4 & 5
Source of Position: A/HRC/50/5/Add.1		
119.116 Redouble efforts to foster a safe and enabling environment for civil society activities, free from acts of intimidation and reprisals, including by removing measures that unjustifiably restrict the legal registration of non-governmental organisations and the exercise of the rights to freedom of association and expression (Uruguay);	Accepted	Status: Not implemented Section 3: Paras, 3.1-14
Source of Position: A/HRC/50/5/Add.1		
119.117 Guarantee freedom of expression and assembly by removing legislative provisions that limit free speech and public demonstrations, and ensure a safe and enabling environment for civil	Accepted	Status: Not implemented Sections 3, 4 & 5

society, human rights defenders and journalists (Australia); Source of Position: A/HRC/50/5/Add.1		
119.118 Take measures to promote a safe, respectful and enabling environment for civil society, including by abolishing legal and administrative measures that unjustifiably restrict freedom of association (Belgium); Source of Position: A/HRC/50/5/Add.1	Accepted	Status: Not implemented Section 2
119.120 Protect fundamental freedoms, including freedom of expression and of the media, as well as combating arbitrary arrests (France); Source of Position: A/HRC/50/5/Add.1	Accepted	Status: Not implemented Section 4
119.119 Take steps to ensure freedom of conscience, religion and association (Brazil); Source of Position: A/HRC/50/5/Add.1	Accepted	Status: Not implemented Section 2