

June 20, 2016

Jeffrey Feltman
Chairman of CTITF
Under-Secretary-General for Political Affairs
United Nations
New York, NY

Dear Chairman Feltman,

Thank you for your continued leadership to advance peace, security and development for all. The Alliance for Peacebuilding is writing to provide inputs into the ten-year review of the 2006 United Nations Counter-Terrorism Strategy and deliberations of your Platform for Action to Prevent Violent Extremism. The Alliance for Peacebuilding (AfP) is the institutional home for the peacebuilding community—a network of 106 organizations, working to resolve conflict and create sustainable peace in 153 countries.

We are writing this open letter as an effort to proactively submit formal input, on the record. While we welcome this review, we share in the General Assembly's concerns that the plan to prevent violent extremism contains significant omissions and elements that need improvement. To be clear, many of the organizations we represent also reject the "Counter-Terrorism" (CT) frame as useful for steering international relations. For decades, government policies and actions in service of CT have often fueled the precise grievances that led individuals into groups that states now call "violent extremist" organizations, the very groups that states are now allegedly trying to counter. The cognitive dissonance between states' CT, C/PVE, and development agendas is significant, and frustrating.

However, our organizations also recognize the important progress made by the Platform for Action to Prevent Violent Extremism in moving global conversations about solutions to political violence away from narrow, securitized responses and towards preventive, systems-based approaches rooted in human rights, inclusive development, and respect for the rule of law. Here, we find common ground. We commend the Secretary-General for his recognition that terrorism can only be countered by adopting a systems-based approach that respects human rights and moves beyond security-based counter-terrorism measures. We support the Plan of Action in its focus on preventive action that addresses the underlying conditions that drive individuals to join violent extremist groups. The Secretary-General's Plan of Action to Prevent Violent Extremism prescribes a **systems approach to prevent violent extremism** that not only engages the security sector, but also local communities, women, religious leaders and members of civil society.

As the General Assembly prepares a review of the 2006 UN Counter-Terrorism Strategy and the 2016 Plan of Action to Prevent Violent Extremism for late June, we urge Member States to consider the following concerns and recommendations.

Major concerns with the 2006 CT Strategy and its 10-year implementation:

- The lack of a definition of terrorism in the 2006 strategy led to overly-broad interpretations of the term and legalized crackdowns on civil society, including torture, extrajudicial killings, excessive police brutality, excessive surveillance, and limited access to due process. Such actions



by states have been documented as principal drivers of political violence. Yet, ten years later, the definition has not been reconciled by the UN and states continue to pass politically motivated anti-terrorism legislation that further legalizes the precise types of actions that fuel cycles of political violence.

- The 2006 strategy offers no monitoring and evaluation framework or indicators for member states to measure the effectiveness of CT actions on decreasing incidents of terrorism against any rigorous dataset that can be evaluated empirically by states themselves or third party actors.
- The Secretary-General's Plan of Action to Prevent Violent Extremism **does not provide for explicit protections for human rights**. The plan of action only provides Member States with recommendations, and the freedom to design their own PVE programs with little oversight or support mechanisms. Without sufficient oversight, States may use PVE as an excuse by which to subvert human rights.
- Development and implementation of the international anti-money laundering and counter-terrorist financing (AML/CFT) regimes, as called for in Pillar II(1)(10), serve to exclude Muslims from the formal global economy and severely constrain the international humanitarian, development, and charities sectors. Financially constraining these actors works in direct contradiction of the ability of these actors, and states by association, to uphold Pillars I and IV of the 2006 strategy.

Recommendations for the 10-year Review of the 2006 Strategy

1. **Provide a provisional definition for terrorism**, and utilize funding for the UN's Counter-Terrorism Implementation Task Force (UNCTITF), and/or provide judicial counsel to member states to reconcile existing laws with best practice.
2. **Call for a reflective analysis to be completed by the Secretary General's office and relevant UN offices by January 2017 assessing the relationship between the passage and implementation of member states' Counter-Terrorism policies and levels of political violence in their states since the commencement of the 2006 strategy.**
3. **Bring monitoring and evaluation (M&E) standards into the field of counter-terrorism by developing a provisional framework for measuring the impact of CT actions against stated CT goals and encouraging state compliance to share measurements for efficacy.** The field of counter-terrorism is plagued by ambiguity, insularity, and a lack of empirical, rigorous evaluation. The development sector was in a similar position twenty years ago. Under pressure and scrutiny to demonstrate effectiveness, the international development community reformed itself to develop robust theories of change and measure its progress against tangible, third party verifiable impact indicators. The development sector created the Millennium Development Goals and instituted rigorous theories of change and impact evaluation models. CT policy cannot be allowed to continue to be developed on a track impervious to evaluation.
4. **Create a formal, transparent, process through which international financial actors, including banks, and non-governmental organizations can share their experiences with the AML/CTF**



regime with Member States and the relevant UN entities so that we can work collectively towards reform solutions.

5. **Include within the plan strong guarantees for the protection of human rights; recognition of the root causes of violent extremism, including marginalization, discrimination and isolation; and the role that militarized foreign policy plays in driving violent extremism.** Further, the Alliance for Peacebuilding urges the United Nations to adopt an action plan that provides support to national Governments in the development of PVE programs that are consistent with human rights and humanitarian obligations. Without such proactive efforts, PVE programs can be abused, and can restrict both individual human rights and civil society space. The experience of the Financial Action Task Force in implementing Recommendation 8 on Nonprofit Organizations demonstrates how countries can abuse otherwise positive programs. While FATF has taken meaningful steps to address the problems with implementation of R8, significant damage has been done and significant resources were required to address the problem. The UN can avoid this problem by building strong elements of human rights protection into its implementation of the Secretary General's Plan. In addition, the UN should encourage international cooperation in the prevention of the global terrorist phenomenon.

Sincerely,

Melanie Greenberg
President and CEO
Alliance for Peacebuilding