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An Assessment of Variation in National Processes of Defining and Designating Terrorist Groups

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security, and the activities of U.S. Special Forces and the CIA.

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Introduction

What is a terrorist organization? This question has become increasingly important as social media companies wrestle with demands from a wide range of countries and other organizations to moderate and restrict terrorist-related activity. This assessment aims to provide an initial evaluation of the variations in how and whether countries designate, label, and define organizations as terrorist groups.

Currently, United Nations member states are committed to an international framework that undergirds a range of counterterrorism efforts, most notably in combatting terrorist financing. In 2001, the United Nations established the Counter Terrorism Committee through UN Security Council Resolution (UNSCR) 1373 to monitor, promote, and facilitate relevant UN resolutions as they pertain to terrorist activities. In addition to several efforts listed in Resolution 1373, the discussion of terrorist financing states that “all States shall” take a range of actions including criminalizing the possession and collection of funds “by their nationals or in their territories with the intention that the funds should be used, or in the knowledge that they are to be used, in order to carry out terrorist acts.”¹ This commitment, affirmed in other resolutions, grounds the development of a system to identify and share information on individuals whose assets should be frozen.

However, when it comes to labeling specific groups as terrorist entities, the international community has repeatedly failed to come to an overarching consensus regarding who should be included.² As a result, rather than defining which groups constitute terrorist groups, the United Nations has tended to focus on defining specific acts as terrorist acts, allowing member states to outline and designate terrorist groups accordingly.³ Under United Nations Security Council Resolution 1373, states are required to freeze the assets of individuals and groups of individuals who pursue such acts but the decision on which groups should be designated as meeting that criteria is left to each state.⁴ Each state maintains its own list of those whose assets should be frozen and handles determinations of whether other countries’ actions under UNSCR 1373 meet their standards.⁵ In 2005, UNSCR 1624 was implemented, which among other points, condemns the glorification of terrorism and calls upon all states to prohibit incitement of terrorist violence, as required by international law.⁶ In 2006, the UN General Assembly adopted its Global Counter-Terrorism Strategy, calling on member states to have more collaborative efforts in combating the spread of terrorism. This plan is reviewed and updated every two years.⁷

Despite disagreement, the United Nations has identified some groups that are “designated” thereby committing all United Nations members to freezing their assets. Specifically, UN Security Council Resolution 1267 and follow-on

resolutions “obligate jurisdictions to freeze without delay the funds or other assets owned or controlled by Al-Qaida, the Taliban, Usama bin Laden, or persons and entities associated with them as designated by the United Nations Al-Qaida and Taliban Sanctions Committee established pursuant to United Nations Security Council Resolution 1267,” as summarized by an October 2001 Financial Action Task Force (FATF) document.⁸

This structure was originally aimed at Al-Qaeda and the Taliban and associated groups.⁹ However, in 2011, UN Security Council Resolution 1989 separated the two lists.¹⁰ The decision to split the lists, according to a UN fact sheet, was aimed at recognizing “that some members of the Taliban have reconciled with the Government of Afghanistan, rejected the terrorist ideology of Al-Qaida and its followers, and support a peaceful resolution of the continuing conflict in Afghanistan.”¹¹ The sanctions regime has also seen additions of new groups. In December 2015, the United Nations passed UNSCR 2253, extending the sanctions regime to individuals and entities tied to ISIS.¹² The United Nations also issues reports on the threat of ISIS, al-Qaeda, and affiliates, and related efforts to counter those threats.¹³ What is included in these reports is a possible highlight for member states’ review—a list of “not listed,” non-designated, but affiliated, members of these aforementioned terrorist groups. So, while the UN is not designating these specific individuals, it draws attention for their review and possible designation by member states.¹⁴

In August 2021, the United States withdrew from Afghanistan, the Taliban seized the country, and a major humanitarian catastrophe followed, generating substantial uncertainty concerning the future of sanctions regimes regarding the Taliban on the part of the United Nations and various national governments.¹⁵

The United Nations has, at times, used resolutions to call other groups terrorist organizations, though such references generally do not have the same force as the Al-Qaeda-related sanctions regime. For example, in February 2022, the UN Security Council adopted Resolution 2624, which referred to Yemen’s Houthi rebels as the “Houthi terrorist group.”¹⁶ The resolution, which expanded prior sanctions and was the first time the United Nations described the group as a terrorist group, followed Russia dropping its opposition to any resolution including such language.¹⁷

The United Nations also has other sanctioning authorities and maintains a record of “individuals and entities subject to measures imposed by the Security Council,” known as the Consolidated List.¹⁸ However, the Consolidated List includes entities sanctioned for reasons other than terrorism, limiting its usefulness as a record for understanding how nations define terrorist entities.¹⁹

Even so, some of the United Nations’ other sanctions regimes apply to groups understood by the United States or other countries to be terrorist organizations. Particularly relevant in this category is Al-Shabaab, which is designated as part of

the United Nations' sanctions regime regarding Somalia grounded in UNSCR 751 and related resolutions that are aimed at sanctioning entities that are “engaging in, or providing support for, acts that threaten the peace, security or stability of Somalia, including acts that threaten the peace and reconciliation process in Somalia, or obstruct, undermine or threaten the Federal Government of Somalia, AMISOM²⁰ or UNSOM by force” along with a variety of more specific inclusion criteria.²¹ However, Al-Shabaab is not listed under the Al-Qaeda/ISIS sanctions list.²²

In addition to the United Nations' structure, some states are committed to regional governance bodies that have promulgated their own lists of designated terrorist entities. One example is the European Union's (EU) list of terrorist groups.²³ The EU's process functions as a way of implementing autonomous EU decisions regarding what constitutes terrorism (in part following the mandates of UNSCR 1373) beyond its commitment to the UN Al-Qaeda sanctions regime.²⁴

While these international structures guide practices regarding designating terrorist groups, much of the process remains at the national level. For example, the United States maintains a State Department Foreign Terrorist Organization List linked to its powerful material support statute among other laws as well as its Terrorist Exclusion List, which relates to immigration policy and who is permitted to enter the United States.²⁵ At the national level, the lists promulgated by states can reflect the state's interpretation of which groups meet the criteria of UNSCR 1373 and similar international commitments but they can also reflect a decision to describe certain groups as terrorist organizations for domestic legal purposes without reference to the UN's mandates.

As a result, there is also variation at a national level in what countries consider a designation and the extent and character of enforcement tied to designations. For some countries, a designation may mean little more than a declaration that the government considers a particular group to be a terrorist organization. For others, it may trigger criminal statutes, asset freezes and sanctions, denial of entry at the border for a group's members, or a combination of such actions and more. Further, while a designation may be linked to the ability to impose criminal, economic, or other penalties, that does not mean that such penalties have necessarily been implemented in specific cases.

This assessment seeks to map this variation in national designation practices—understood in the broad sense of any official government labeling of a group as a terrorist organization or entity—and enable future analysis of what factors may generate variations in designation practices and how such variations may impact policy efforts by governments and social media companies that have to deal with multiple national designation processes. In order to do so, it examines the designation practices (or lack thereof) of 196 countries.

The report proceeds in three sections. This first section provides an overview of the designation landscape and the types of authorities and institutions that give rise to it and presents the key findings of our research. The second section delves more deeply into issues that the research sheds light on and that should be the subject of future research. The third section discusses the methods and definitions used in this report. The data underlying the report's findings is available in the [appendix](#).

Findings

- **Terrorist designation practices are complex.** This complexity limits the ability to compare designation practices cross-nationally.
 - Countries vary in whether they define particular organizations or entities as terrorist groups.
 - Countries vary in the processes they use to designate groups.
 - Some countries have multiple authorities and laws allowing for the definition of an entity as a terrorist group.
 - In some cases, countries also make use of legal structures not specifically framed as counterterrorism measures to act against or ban groups considered by other countries to be terrorist organizations.
 - The organizations that a country designates can change rapidly with organizations being added or removed from national lists for a variety of reasons.
- **At least 60 countries have labeled at least one entity as a terrorist organization.** This accounts for 31 percent of the 196 countries examined in this assessment.²⁶ These actions are separate from commitments to adhering to lists maintained by international or regional organizations.
 - Of the 196 countries examined for this assessment, 49 (82 percent of the 60 countries that have made a designation) have designations that are presented or described in government sources. Eleven countries (18 percent) were coded as having designated a group based only on media mentions.

- **The geographic distribution of countries that have nationally designated terrorist organizations is uneven (See Table 1 and Figure 1).**²⁷
 - North America has the highest proportion of countries having made a designation at 100 percent, although it is only made up of two countries. Central Asia, South Asia, and West Asia have the next highest proportions of countries having designated groups.
 - The Caribbean, Sub-Saharan Africa, and Oceania have the lowest proportions of countries maintaining designations.
 - In Oceania, only New Zealand and Australia appear to have promulgated national designations. This may reflect a difference between these larger states and the various small island states that make up the rest of the region.

Table 1 | Regional Variation in Whether Countries Have Made National Designations

| Region | Percent of Region with an Identified List | Number of Countries in Region |
|--------------------|---|-------------------------------|
| North America | 100% | 2 |
| Central Asia | 80% | 5 |
| South Asia | 67% | 9 |
| West Asia | 59% | 17 |
| Southeast Asia | 45% | 11 |
| Central America | 38% | 8 |
| East Asia | 33% | 6 |
| North Africa | 33% | 6 |
| Europe | 31% | 45 |
| South America | 25% | 12 |
| Oceania | 14% | 14 |
| Sub-Saharan Africa | 13% | 48 |
| Caribbean | 8% | 13 |
| Grand Total | 31% | 196 |

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Figure 1 | Countries that Have Nationally Designated a Terrorist Entity

■ Has a National Designation ■ No Designation List Identified



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• **Designation practices also vary within regions.**

- The European Union designates only Hezbollah’s military wing as a terrorist organization. Some EU members follow only the EU’s designation list, while others have gone further to designate Hezbollah in its entirety, disputing that any divide exists in the organization.
- Of the 27 members of the EU, seven have taken further designation measures against Hezbollah beyond their EU commitments regarding the group’s military wing.

• **Most countries with national designations have designated groups that are domestically based. This stands in contrast to the United States’ reticence to designate domestic organizations.**

- Of the 196 countries examined in this study, 43 countries have designated domestic groups. That accounts for 72 percent of the countries that have made a national designation.

• **Geopolitical tensions deeply shape designation practices and divide countries over which groups they designate.**

- Countries in multiple regions including Europe, South America, the Middle East, and Oceania, are divided over whether and how to designate Hezbollah.

- Middle Eastern countries are also divided over whether to designate the Muslim Brotherhood, reflecting larger geopolitical differences. This regional split reached U.S. policy debates when the Trump administration signaled it was considering designating the Muslim Brotherhood.
 - The United States and Iran have designated parts of each other's governments as terrorist entities. These moves are tied to disputes over specific actions in the region, but have also taken on an element of tit-for-tat retaliation over the designation practices themselves.
 - The conflict in Ukraine has seen Russia designate a number of Ukrainian groups, including the Azov Regiment—previously referred to as the Azov Battalion—which is part of the Ukrainian armed forces, as terrorist or extremist organizations while Ukraine classified the Russian-backed breakaway republics as terrorist organizations. This dynamic serves as a cautionary tale about presumptions that designations of white supremacist or far-right groups will not see their own entanglements with geopolitical disputes.
- **There have been initial moves to designate white supremacist groups as terrorist organizations. However, such efforts have been limited, particularly compared to the extensive efforts against Al-Qaeda and other organizations linked to jihadist movements.**
- A total of 12 groups have been designated at a national level by five countries in an effort seemingly aimed at white supremacist organizations.
 - Mapping the designation of white supremacist and far-right groups is complicated by the existence of association bans and other authorities that are not necessarily framed as countering terrorist financing but may increasingly be used and linked to that end.

Areas for Further Inquiry

This initial assessment identifies four areas relevant for future research on this subject informed by the data collection conducted here.

1. Future Change in Designation Practices

National designation practices are not stable and can change over time, both in terms of the process itself and in terms of which groups are designated. Recent U.S. actions around the Foreign Terrorist Organization (FTO) list illustrate this variability over time. For example, President Trump's administration announced on January 10, 2021, that it would designate Ansarallah, the Houthi rebels in Yemen, as a FTO and as a Specially Designated Global Terrorist (SDGT) entity with a little over a week left in Trump's term in office.²⁸ The move drew criticism from many Yemen analysts, and was reversed by the Biden administration.²⁹

However, in the wake of a series of Houthi missile attacks, the Biden administration mulled reversing course again and re-adding the group to the FTO list.³⁰ As of this writing, Ansarallah remains off the U.S. FTO list. Yet, in an illustration of the complexity and variability of designation practices, in 2022, the United States did vote in favor of the aforementioned UN resolution that called the Houthis a "terrorist group."³¹

The United States has removed 20 groups from its FTO list since the list's inception.³² Most recently, the United States delisted five groups in May 2022 (Aum Shinrikyo, Euskadi Ta Askatasuna (ETA), Gama'a al-Islamiyya, Kahane Chai, and the Mujahidin Shura Council in the Environs of Jerusalem), as the result of a statutorily mandated review process that determined the "organizations are no longer engaged in terrorism or terrorist activity and do not retain the capability and intent to do so."³³ Even as the United States delisted the groups from the FTO list, it maintained designations under its SDGT list, as the State Department explained: "All five organizations will remain designated as Specially Designated Global Terrorists (SDGT) entities under Executive Order 13224. The Department is retaining these SDGT designations for a number of reasons, including to support law enforcement actions or ensure frozen assets are not released to still active individual terrorists."³⁴

On a different note, the United States delisted the Revolutionary Armed Forces of Colombia (FARC) in December 2021 in a decision connected to peace negotiations in Colombia.³⁵ However, the United States simultaneously designated two groups tied to the FARC that did not demobilize as part of the peace process between FARC and the Colombian government.³⁶

Reports also suggest that the Biden administration considered delisting Iran's Islamic Revolutionary Guard Corps (IRGC) in exchange for a nuclear deal with Iran, but the group remains on the list, and more recent reporting suggests that the Biden administration has taken such a move off the table.³⁷ The IRGC was originally listed under the Trump administration in a move notable for being the first time the U.S. placed part of a foreign government on the FTO list.

The United States is far from the only country where practices vary over time and can shift with domestic political winds. For example, in November 2021, the United Kingdom designated the entirety of Hamas as a terrorist organization, expanding its prior designation that only applied to the group's armed wing.³⁸

In another example, Norway initially aligned itself with the European Union's list, but in 2006 decided to restrict its designations to those promulgated by the United Nations, viewing other lists as "too comprehensive" and worrying that they "would place unnecessary limitations on our opportunities to engage in dialogues."³⁹ Yet in Norway's 2013 elections, the Conservative Party pushed to again align Norway's list with the EU, which would have added groups such as Hamas, the Kurdish Workers' Party (PKK), and—at the time—FARC.⁴⁰ Norway currently maintains UN-mandated sanctions with regard to Al-Qaeda and the Taliban, and cooperates with the EU on implementing a number of sanctions, but does not appear to maintain a national sanctions list with regard to terrorism organizations separate from these commitments.⁴¹

One area to monitor is the development of legal architecture regarding designations in sub-Saharan Africa. According to our review, sub-Saharan Africa is among the regions with the least developed architecture for designating terrorist groups, although there are regional agreements among African countries requiring the criminalization of terrorist acts and counterterrorism coordination among member states.⁴² We were only able to identify six countries in sub-Saharan Africa with national designation lists—just 13 percent of the countries in the region.⁴³

Yet, the perception of an increasing jihadist terrorist threat in sub-Saharan Africa is taking hold, which may drive further institutionalization and establishment of national designation lists.⁴⁴ For example, on October 8, 2022, the Federal Government of Somalia released a statement saying that it prohibits the dissemination of Al-Shabaab's media materials "both from official media broadcasts and social media." It added, "The federal government of Somalia recognized as a crime the dissemination of terrorist messages and encouraging their acts of brutality - by any media or person on social media - action will be taken according to the law to any who failed this resolution."⁴⁵ Somalia's Deputy Information Minister Abdirahman Yusuf told reporters, "The Somali government is totally banning all kinds of coverage relating to the terrorist ideology and acts of intimidation by (al Shabab)," and the press release referred to Al-Shabaab as a "terror group."⁴⁶

Notably, in March 2021, the United States designated ISIS in Mozambique and ISIS in the Democratic Republic of Congo as foreign terrorist organizations, signaling that the United States perceives the region as requiring greater legal architecture.⁴⁷

Kenya maintains a terrorist entities list that includes Al-Shabaab, which has conducted attacks in Kenya, suggesting that a growing sense of threat from jihadist groups might drive further development of such legal architecture.⁴⁸ In 2019, Kenya sought to internationalize the legal effort against Al-Shabaab, pushing for the United Nations to list the group alongside Al-Qaeda for the purposes of sanctions.⁴⁹ Kenya's push drew opposition on the UN Security Council from Germany, Belgium, Poland, France, Kuwait, and the United States as well as from international aid providers, even though the United States designates Al-Shabaab as a foreign terrorist organization.⁵⁰ Kenya's 2019 push for United Nations designation of Al-Shabaab was its second attempt following a 2014 effort that was vetoed by the United Kingdom.⁵¹ While the effort to include Al-Shabaab alongside Al-Qaeda and ISIS was rejected by the Security Council, the group is sanctioned under resolutions pursuant to UNSCR 751, which relates to the conflict in Somalia. Those sanctions are not as restrictive as they would have been if Kenya's proposal to include the group alongside Al-Qaeda and ISIS had been accepted.⁵²

Sub-Saharan Africa similarly provides evidence that countries in the region can also move away from designating terrorist entities. Notably, in 2018, Ethiopia's parliament voted to remove the Oromo Liberation Front (OLF), Ogaden National Liberation Front (ONLF), and Ginbot 7 from its terrorism list as part of peace negotiations with the rebel movements.⁵³ However, on May 6, 2021, the Ethiopian government issued a declaration that the former armed division of the OLF, the Oromo Liberation Army (OLA) or OLF Shene, was a terrorist organization. The OLA separated from the OLF in 2020.⁵⁴ Also on May 6, the Ethiopian Parliament's House of Peoples' representatives voted in favor of a government declaration that Tigray People's Liberation Front (TPLF) is a terrorist organization.⁵⁵

Further research on designation practices could track changes over time—either in the past or via continual monitoring—and evaluate whether there are specific factors that give rise to a decision to establish, expand, reduce, or eliminate a national list of terrorist organizations.

2. Differences in Which Groups Are Designated

Another question ripe for further investigation is: What drives differences in terms of which groups countries designate? Our initial review makes clear that there are differences in the types of groups countries list as well as major debates

over specific groups driven by domestic politics, ideas about the appropriate limits of counterterrorism, perceptions about the nature of particular groups, and geopolitical disputes.

For example, 72 percent of the countries with national lists use them to designate groups with a significant domestic presence, including India's designation of local rebel movements⁵⁶ and El Salvador's designation of domestic gangs.⁵⁷ In contrast, the United States lacks a strong statutory basis for designating primarily domestic groups as terrorist organizations and has often shied away from labeling or charging individuals involved in activities that might be labeled as domestic terrorism with terrorism charges.⁵⁸ That said, in May 2020, then President Trump announced his intention to designate Antifa, a movement with a domestic presence, as a terrorist organization.⁵⁹ The move was criticized for lacking statutory authority and for being unclear as Antifa is generally not understood to be an organization. In January 2021, Trump directed the Attorney General, Secretary of State, and Secretary of Homeland Security to consider and assess designating Antifa as a terrorist organization or criminal organization via the Terrorist Exclusion List so as to render those tied to the group as inadmissible to the United States; that effort did not result in a designation.⁶⁰

While the United States does not designate domestic entities, Canada has designated a domestic entity, listing the International Relief Fund for the Afflicted and Needy—Canada, due to its alleged fundraising for Hamas.⁶¹ In the wake of the U.S. Capitol siege on January 6, 2021, Canada also designated the Proud Boys, a far-right group with branches in Canada and the United States, as a terrorist organization on February 3, 2021.⁶²

In other cases, disputes over which groups to designate relate to broader geopolitical debates. A case of this dynamic is the split over whether to designate Hezbollah and whether to designate it in its entirety. This split is particularly clear when it comes to the European Union. The EU does not designate Hezbollah as a whole, but in 2013 it designated the group's military wing.⁶³ Over the course of the EU's debates over labeling Hezbollah, some countries, including France and Cyprus, expressed concerns that, given Hezbollah's prominence in Lebanese politics and governance, designating Hezbollah would harm stability in the country.⁶⁴ Illustrating the complex geopolitical factors behind debates regarding designation, in 2013, Cyprus not only expressed concern over designating Hezbollah due to Hezbollah's role in Lebanon but also emphasized that while it would follow an EU decision, as a small state, it felt it could not set designation policy on its own.⁶⁵ Other countries such as Germany and the Czech Republic view the EU's designation of only the military wing as insufficient and, in recent years, have taken independent steps against the organization as a whole.⁶⁶

Among the 27 countries that make up the EU,⁶⁷ seven have taken actions that appear to go beyond the EU's policy of designating Hezbollah's military wing. Those countries are:

1. **Austria**, which bans support for Hezbollah and the use of its symbols, and whose foreign minister stated that “this step reflects reality. The group itself makes no distinction between the military and the political arm.”⁶⁸
2. **Estonia**, which in October 2020 announced it would impose sanctions on Hezbollah affiliates, prohibiting entry into the country, and signaling its alignment with other countries that have designated the group in its entirety.⁶⁹ The U.S. State Department's *Country Reports on Terrorism 2020* report states: “In October, Estonia recognized Hizballah as a terrorist organization in its entirety.”⁷⁰
3. **Germany**, which in April 2020 announced that it “banned all activities by the Shiite terrorist organization Hezbollah (in English: Party of God, also transliterated as Hizbollah and Hizbullah) in Germany,” by way of its Act Governing Private Associations.⁷¹ German police conducted a series of raids aligned with the announcement.⁷²
4. **Latvia**, which in September 2020 stated, that Hezbollah is “regarded as a terrorist organization in Latvia” in reference to a call with then U.S. State Department Coordinator for Counterterrorism, Ambassador Nathan A. Sales.⁷³ The U.S. State Department's *Country Reports on Terrorism 2020* stated: “Latvia automatically adopts all U.S. FTO designations, including for Hizballah, and also issued a formal statement on Hizballah in December.”⁷⁴ Latvia's Regulation #138 states: “The Republic of Latvia recognizes the terrorist lists compiled by Member States of the European Union and North Atlantic Treaty Organization.”⁷⁵
5. **Lithuania**, which announced a ban on entry for Hezbollah affiliates in 2020.⁷⁶ The U.S. State Department's *Country Reports on Terrorism 2020* report states: “In August, Lithuania publicly declared Hizballah a terrorist organization in its entirety and banned all Hizballah affiliates from entering the country.”⁷⁷
6. **The Netherlands**, which in 2004 stated that “the Netherlands has changed its policy and no longer makes a distinction between the political and terrorist Hezbollah branches. The Netherlands informed the relevant EU bodies of its findings.”⁷⁸ However, the Netherlands does not include Hezbollah on its national sanctions list, saying it does not have a sufficient presence in the country that would allow such a listing.⁷⁹ More generally,

the Netherlands has expressed a preference for instituting sanctions via multilateral bodies like the EU and UN rather than on a national level.⁸⁰

7. **Slovenia**, which designated Hezbollah in its entirety as a terrorist organization in November 2020.⁸¹ The move was noted by the U.S. State Department⁸² and a 2021 MONEYVAL follow up report explained: “In 2020, following sequential consultations, the Sanctions Coordination Group (SCG) proposed to the Slovenian Government to list a terrorist organisation. The designation was approved in December 2020. The designation demonstrates that albeit no explicit provisions are provided in the legal framework, Slovenia has a mechanism to collect or solicit information to identify targets for designations. It also demonstrates that Slovenia was able to list a terrorist organisation before a similar measure was taken at the EU level.”⁸³

Nor are such splits within Europe restricted to the EU countries. The United Kingdom designated Hezbollah in its entirety in 2019 and subjects the group to its asset freeze measures.⁸⁴ Some non-EU countries, including Switzerland⁸⁵ and Norway,⁸⁶ have seen internal political divisions regarding designating Hezbollah.

Russia does not categorize Hezbollah as a terrorist organization, and in 2015, Russian Deputy Foreign Minister Mikhail Bogdanov reportedly said, “We maintain contacts and relations with [Hezbollah] because we do not consider them a terrorist organization. They have never committed any terrorist attacks on Russian territory,” adding a description of Hezbollah and Hamas as “legitimate societal-political forces.”⁸⁷

The issue of whether and how to designate Hezbollah divides countries outside of Europe as well. Iran and Syria, for example, not only do not designate Hezbollah but see it as both a legitimate organization and a key partner. Speaking on Hezbollah’s television channel al-Manar (al-Manar has itself long been designated by the United States via the SDGT list),⁸⁸ Syrian President Bashar al-Assad stated: “There is a big difference. The Syrian state requested the assistance of Hezbollah,” adding, “It was a request by the Syrian state—which is a legitimate state—in order to help defend the Syrian people.”⁸⁹ In Lebanon itself, Hezbollah is a major political force, even within the government.⁹⁰

The question of designating Hezbollah also divides South America. Three out of 12 countries in South America (Colombia,⁹¹ Argentina,⁹² and Paraguay⁹³) designate Hezbollah. In 2020, statements from leaders in Brazil and Uruguay indicated that they were also considering designating Hezbollah.⁹⁴

In Oceania, we identified only two countries with national lists: Australia and New Zealand. Despite their linked histories and close intelligence cooperation via Five Eyes, they diverge on their treatment of Hezbollah. Australia designates

the entire group.⁹⁵ New Zealand designates only Hezbollah's military wing.⁹⁶ The divergence is relatively recent with Australia only designating Hezbollah in its entirety in 2021, and previously designating only Hezbollah's External Security Organization.

The Muslim Brotherhood provides another example of how practices regarding designating terrorist organizations can vary substantially based on the political views of the state. Some countries have designated the Muslim Brotherhood or their national branches as terrorist organizations. These countries include Saudi Arabia, the United Arab Emirates (UAE), and Egypt, who have generally aligned together on regional security issues in the Middle East.⁹⁷ On the other hand, in 2020, Tunisia's parliament rejected a proposal to blacklist the Muslim Brotherhood.⁹⁸ However, in 2021, Tunisian President Kais Saied dissolved parliament and moved to restrict civil society organizing with an eye towards targeting the Islamist Ennahda party, a move that aligns him more closely with Egypt.⁹⁹

Under the Trump administration, the United States considered designating the Muslim Brotherhood but did not do so, in part because in some countries including Kuwait, Qatar, Turkey, and Iraq, the Muslim Brotherhood integrated into the political system or received support from the governments in question and, in some cases, has been supportive of U.S. policies.¹⁰⁰ Notably, Turkey and Qatar have been at odds on a range of regional issues with Egypt, Saudi Arabia, and the UAE in part because of their differing views of the Muslim Brotherhood and associated groups.¹⁰¹

Another example of the role of geopolitical disputes in shaping designation lists can be found in the designation practices of the United States and Iran regarding each other's intelligence and military forces. In April 2019, the Trump administration used the FTO list to designate Iran's IRGC as a terrorist organization.¹⁰² Trump noted at the time: "This designation will be the first time that the United States has ever named a part of another government as a FTO."¹⁰³ In contrast, Iran, which obviously does not label its own government entities as terrorist organizations, responded to the U.S. designation by passing a law to designate American forces in the Middle East as terrorists.¹⁰⁴ Iran made numerous terrorism sanction listings aimed at U.S. officials, entities, and others, in the aftermath of the United States' January 2020 assassination of IRGC Qods Force Commander Qassem Soleimani.¹⁰⁵ This US-Iranian dispute over designation practices is not new, although the decision to actually designate the IRGC—along with the assassination of Soleimani escalated it. In 2007, Iran's legislature had previously passed a non-binding resolution calling U.S. forces terrorists in response to the U.S. Senate having passed a resolution urging that the IRGC be designated.¹⁰⁶

Russia's conflict with Ukraine is another site of geopolitical disagreement over the labeling of particular groups as terrorist organizations, one that illustrates the

potential for geopolitical tensions surrounding designation practices when it comes to white supremacist and far-right groups. For example, in December 2014, following the March invasion of Crimea and war in the Donbas area, Russia designated a number of Ukrainian organizations, some of which were generally viewed as being on the far-right, as terrorist or extremist groups, and “denazification” has been a substantial part of Russia’s widely criticized propaganda effort to defend its 2022 invasion.¹⁰⁷ In August 2022, Russia reportedly designated the Azov Regiment, of which *Radio Free Europe/Radio Liberty* wrote, “The Azov Regiment is a far-right, volunteer group that is part of Ukraine’s National Guard. Formerly known as the Azov Battalion, it espouses an ultranationalist ideology that U.S. law enforcement authorities have linked with neo-Nazi extremism. But supporters see it as a patriotic and effective part of the country’s defense forces.”¹⁰⁸ In contrast, Ukraine classified the Russian-backed separatist republics in Eastern Ukraine as terrorist organizations.¹⁰⁹

Designation practices are also likely shaped by the ideological and demographic character of the groups being listed and how the designating countries perceive those ideologies. For example, designation lists tend to overwhelmingly feature jihadist groups, and where they list other types of groups, those groups’ demographics tend to be predominantly Muslim or Arab. While there are many factors that may partially explain this level of focus (including differences in the level and character of the threat posed by different groups and movements), research shows that attacks by Muslims receive more media coverage than attacks by non-Muslims even controlling for fatalities and other factors.¹¹⁰

Notably, 66 percent of the groups on the U.S. FTO List are tied to the jihadist movement, and another 6 percent are part of Iran’s proxy network, Iran-backed Shi’a militias, or in the case of the IRGC, the Iranian state. In total only 11 (16 percent) of the 68 groups currently designated on the FTO list are neither tied to the jihadist movement, nor tied to Iran, nor composed primarily of Arabs or Muslims.¹¹¹ Among those that fit this bill, Marxist groups (or groups with a Marxist origin) are predominant along with nationalist groups not based in Palestine or other parts of the Middle East. No white supremacist or far-right groups are currently designated via the FTO list.

However, attacks by white supremacists have increased the pressure on the United States and other countries to designate white supremacist groups. Despite this pressure, implementation of such designations has been limited. Our initial review found 12 groups designated as terrorist organizations that appear to have been designated in line with this effort: Aryan Strikeforce, Atomwaffen Division, The Base, Blood & Honor, Combat 18, Feuerkrieg Division, National Action, National Socialist Order, the Proud Boys,¹¹² the Russian Imperial Movement (RIM), the Sonnenkrieg Division, and the Three Percenters.¹¹³

The countries identified as listing white supremacist entities are Australia (Atomwaffen,¹¹⁴ The Base, National Socialist Order, the Russian Imperial

Movement,¹¹⁵ Sonnenkrieg Division); Canada¹¹⁶ (Aryan Strikeforce, Atomwaffen Division, The Base, Blood & Honor, Combat 18, the Proud Boys, Russian Imperial Movement, and the Three Percenters); New Zealand (The Base, The American Proud Boys¹¹⁷); the United Kingdom (Atomwaffen, Feuerkrieg Division, National Action, Sonnenkrieg Division, and The Base); and the United States (Russian Imperial Movement).¹¹⁸

Russia has also made designations of groups that might be deemed white supremacist or linked to the movement, but many of these appear to be closely linked to the current conflict in Ukraine and not part of the above effort and are thus not included in the above list (though their relevance is discussed in other parts of the report). Austria's inclusion of the Ustasha in the application of its symbols law is another arguable addition.¹¹⁹

However, the limited institutionalization of designation efforts against white supremacist groups makes it difficult to judge the full extent of the actions of states. While there are few white supremacist groups designated as terrorists, some countries use other authorities to ban such groups. For example, Germany lists a variety of white supremacist and far-right groups as extremist and bans them on the grounds of violating the constitution, including neo-Nazi groups like the Nordadler, Combat 18, and the White Wolves Terror Crew.¹²⁰ Though this is the same law used against groups labeled as terrorists, when it comes to white supremacist groups, press releases do not appear to have described the groups as terrorist organizations in contrast to the press releases regarding groups tied to Al-Qaeda, ISIS, or Hezbollah.¹²¹

Efforts to further institutionalize a designation system around white supremacist groups are likely to face challenges. So far designation efforts are largely restricted to the Five Eyes countries. In addition, there are major differences even among the few countries that have designated groups. For example, Canada has designated the Proud Boys, but they are not designated just across the border in the United States. The tension between Canadian and American practices pales in comparison with the issues raised by the war in Ukraine and geopolitical tensions with Russia, an issue noted above. One sign of the potential for such geopolitical disputes to challenge designation efforts came when Japan edited its International Terrorism Handbook 2021 to drop its inclusion of the Azov Battalion, a group that is now integrated within the Ukrainian armed forces under the name Azov Regiment but that also has a history of intersection with white supremacist networks designated as terrorist groups by some countries. The Azov Battalion has itself been at times the subject of calls for designation.¹²² Russia designated the Azov Regiment in August 2022 amid its war in Ukraine (the designation post-dated Japan's edit of its handbook).¹²³ Japan clarified that its handbook was intended to only be informational and was not itself a designation list and explained the edit as an attempt to avoid spreading misinformation.¹²⁴

In addition, there are questions about the usefulness of designations against white supremacist groups. An FATF report exploring the issue of ethnically or racially motivated terrorist financing, notes that one challenge is that much of the white supremacist terrorist threat involves “the fact that most ERW [Extreme Right Wing] attacks are carried out by self-funded lone actors,” which may limit the ability of designations to be a responsive tool.¹²⁵

Moreover, the existence of separate association bans and other criminal statutes regarding racially motivated crimes that which are not framed as counter-terrorism measures may encourage countries to assess they already possess the tools to respond to far-right extremism. These other laws challenge efforts to map the counterterrorism designations and may also challenge efforts to institutionalize designations of far-right groups.¹²⁶

3. Interactions Between International Organization Lists and National Lists

An important area for examination is how countries vary in their implementation of lists that they are committed to through membership in international organizations and how that implementation interacts with the existence of national lists. Our examination of designation activity in Europe shows a relatively low number of national designation lists compared to other regions. However, this does not necessarily reflect a lack of legal architecture or will. Instead, many European countries may not have their own national lists because they rely upon the EU list. There may be similar dynamics in other regions, although the EU appears to be an organization whose list is particularly powerful as the bloc is a legal institution in its own right.

In the Middle East, the Arab League released a statement calling Hezbollah a terrorist organization in 2016. Yet the stance drew opposition from Arab League members Iraq, Algeria, and Lebanon as well as from suspended member Syria.¹²⁷ Some Arab League members have established national level measures designating Hezbollah as a terrorist organization. Prominent among those states are the Gulf Cooperation Council (GCC) member countries of Bahrain, Kuwait, Saudi Arabia, and the United Arab Emirates.

Yet, national level designation efforts on Hezbollah as an entity beyond the GCC nations appear to be limited. For example, while Egypt reportedly supported the statement, it does not appear to have joined GCC members in implementing national sanctions.¹²⁸ Hezbollah does not appear on Egypt’s list pursuant to UNSCR 1373.¹²⁹

The GCC also declared Hezbollah a terrorist organization in 2016.¹³⁰ The GCC has proven more unified in its moves to implement the resolution via various enforcement mechanisms than the Arab League.¹³¹ Four GCC members

(Bahrain,¹³² Kuwait,¹³³ Saudi Arabia,¹³⁴ and the UAE¹³⁵) appear to have designated Hezbollah (or parts of it) via national lists, according to their government sites or media reports. Hezbollah itself is absent from the list of designation orders available on Qatar’s Ministry of Interior website, but a May 2018 order includes a number of entities described as tied to Hezbollah as well as Hezbollah leaders including its Secretary General Hasan Nasrallah.¹³⁶ Oman does not have a national list that we could identify.

4. Variation in Means of Defining and Sanctioning Terrorism and Related Activity

Finally, further research should be conducted on the variation in legal authorities to not just ban or sanction terrorist organizations, but also other legal tools used for counterterrorism purposes and other means of banning organizations that are not explicitly related to counterterrorism. National lists of terrorist entities are not the only way countries define and designate certain groups or activities that are widely discussed domestically or viewed by other countries as terrorist entities. There are also more general sanctioning authorities and bans on some groups that don’t define them as terrorist organizations. As noted above, constitutional bans on associations are already an area that intersects with the counter terrorism financing and terrorism designation space. Moreover, the division between these measures—already blurred—is in flux due to increasing pressure to act against white supremacist groups.

There is also variation within the legal systems of specific countries that maintain lists. An illustrative case is that while the U.S. State Department Foreign Terrorist Organization list supports the United States’ powerful “material support” statute, the United States has additional lists tied to other legal functions. For example, the United States designated the Russian Imperial Movement (RIM) as a Specially Designated Global Terrorist—in the United States’ first designation of a white supremacist group—but did not designate the RIM via the State Department Foreign Terrorist Organization list, which has a different purpose and statutory basis.¹³⁷ Nor is the RIM designated under the Terrorist Exclusion List that the United States maintains under yet another authority.¹³⁸ Similarly, when the State Department delisted several groups in 2022, it left them on other terrorism sanction lists.

The way governments structure their authority to designate also varies. Egypt appears to place the authority to designate terrorist organizations within its judiciary in interaction with the public prosecutor’s office.¹³⁹ In contrast, in the United States, the authority rests almost exclusively within the executive branch.

Methods, Definitions, and Analytical Limitations

This assessment and the attached database were produced via an open source review of government websites, news coverage, and governmental and non-governmental assessments and reviews of counterterrorism law in the 196 countries listed by the *Encyclopedia Britannica*.¹⁴⁰

In evaluating the findings, it is important to acknowledge two key limitations:

- 1. Language and Local Knowledge Barriers:** This assessment examined the definition and designation processes of more than 190 countries with a wide range of languages, levels of governmental transparency, and governmental structures. As a result, it is likely that some countries coded as not having a national list may have such a list but this research team failed to identify it. This limitation does not diminish this assessment's value. First, if many countries' lists are inaccessible or difficult to find for a dedicated research team whose primary language is English, that is an important finding as that is the primary language of many tasked with making policy shaped by variations in designation processes. Second, the research team supplemented its research on particularly opaque countries by contracting supplemental research from individuals proficient in Spanish, French, and Arabic.
- 2. Scale of Variation in Legal Processes:** Efforts to compare designation and definition practices were also limited by the wide range of different authorities that can be used to define and restrict terrorism related activity. These authorities can include sanctions on individuals as well as entities, and not every country shares the same legal approach. Some countries proscribe organizations but not on the grounds of terrorism. Some countries have multiple authorities for proscribing terrorist organizations. The extent of this variation challenges comparisons across countries on a large scale.

Definitions of Key Terms

The key terms used in coding the database are presented below.

1. Designation

- We define a designation as existing where there are reports that the country in question has labeled at least one group as a terrorist entity. The reports can consist of either official statements by the government or unofficial reports in the media. To qualify, a designation should occur via a process that goes beyond off-hand statements by officials or references to

acts alone being terrorist. A designation must also define or describe groups or entities as being terrorists and not simply identify individuals who are subject to sanction or ban groups for other reasons (such as violating a state's constitution).¹⁴¹ The level and type of enforcement of designations varies among the countries we examined, but for our purposes a public statement that a group is designated and/or labeling a group as a terrorist entity qualifies even in the absence of evidence of further action.

- We focus on the existence of national-level designations. Most, if not all, countries have some form of sanctioning process to implement the United Nations' sanctions on Al-Qaeda and ISIS, and some countries have similar processes for commitments to designation lists maintained by other international organizations. This is insufficient for inclusion in our database as having a national designation process.

2. Designation Enforcement Types

- While we define national designation broadly so as to include government statements that label a group as a terrorist entity without clear evidence of further enforcement, we further identify the types of designations a country maintains. We track the following categories:
 - Proscription and Criminalization of Membership/Support: This is coded as "yes" if a country maintains designations that are tied to legislation that bans the group itself or imposes criminal penalties for being a member, providing support to, or other forms of association with a designated entity.
 - Entry Prohibitions: This is coded as "yes" if a country maintains designations that specifically limit the entry of individuals tied to a designated entity into the country. This is not coded as "yes" if the entry prohibition is merely a result of a broader proscription or ban and not a separately specified purpose or consequence of designation.
 - Asset Focused Sanctions: This is coded as "yes" if a country maintains designations linked to legislation that triggers asset freezes, the seizure of assets short of a criminal conviction, or is presented as enforcement of UNSCR 1373.
 - Labeled but Enforcement Measure Unknown or Other: This is coded as "yes" if the country has an official statement saying a group is labeled or designated as a "terrorist entity," but it is not

clear what specific consequences (if any) follows from such a labeling, or if the designation triggers actions other than those covered by the above categories—for example, greater surveillance authorities or different legal treatment short of criminalization.

3. Yes (Government) and Yes (Media)

- We identify whether our determination that a country has made a national designation is based on an official government statement or not. A coding of “Yes (government)” means that there is an official government source describing the existence of a national designation.
- By contrast, “Yes (media)” means that a designation is described in news coverage, non-governmental reports, or material from other governments, but we could not identify an official government acknowledgement.

4. Domestic Entities

- We code a country as having designated domestic entities if they have designated at least one group that originates or has a substantial military, governing, or other organizational presence inside the country in question.

Appendix: The Data

New America's database of designation practices around the world, which underlies this report's findings, is accessible below.

Notes

1 “Resolution 1373 (2001)” (United Nations Security Council, September 28, 2001), https://www.unodc.org/pdf/crime/terrorism/res_1373_english.pdf.

2 One international institution that outlines recommendations for specific terrorist financing activity is the Financial Action Task Force (FATF). FATF breaks down anti-money laundering (AML) and the prevention of financing of terrorism mechanisms, as well as how they pertain to various international accords and United Nations resolution sanction requirements. FATF even provides “designated categories of offences” related to money-laundering and terrorist financing. FATF defines terrorists based on terrorist acts that are outlined by internationally ratified conventions, as well as its own definition of what a terrorist act is. However, there are only 39 members of FATF (37 jurisdictions and two regional organizations), and “31 international and regional organisations which are Associate Members or Observers of the FATF and participate in its work,” according to the FATF website: [https://www.fatf-gafi.org/faq/membercountriesandobservers/#:~:text=Which%20jurisdictions%20are%20members%20of](https://www.fatf-gafi.org/faq/membercountriesandobservers/#:~:text=Which%20jurisdictions%20are%20members%20of.). For more information on FATF recommendations, see: <https://www.fatf-gafi.org/media/fatf/documents/recommendations/pdfs/FATF%20Recommendations%202012.pdf>

3 This report highlights that some states choose to designate local or international groups as terrorist organizations, while others refer to groups’ acts as terrorist acts, and others do not designate the act or the group as a terrorist organization for various reasons relating to perceived threat, national law, or otherwise.

4 “Resolution 1373 (2001).”

5 See for example discussion in: “Technical Guide to the Implementation of Security Council Resolution 1373 (2001) and Other Relevant Resolutions” (Counter-Terrorism Committee Executive Directorate

(CTED), 2017), Archived at <https://web.archive.org/web/20210127145212/https://www.un.org/sc/ctc/wp-content/uploads/2017/08/CTED-Technical-Guide-2017-compressed.pdf>; “Recommendation 6: Targeted Financial Sanctions Related to Terrorism and Terrorist Financing,” Caribbean Financial Action Task Force, accessed June 23, 2021, <https://www.cfatf-gafic.org/documents/fatf-40r/372-fatf-recommendation-6-targeted-financial-sanctions-related-to-terrorism-and-terrorist-financing>.

6 “Resolution 1624 (2005)” (United Nations Security Council, September 14, 2005), <http://unscr.com/en/resolutions/doc/1624>.

7 “A/RES/60/288 (2006)” (United Nations General Assembly, September 8, 2006), <https://undocs.org/Home/Mobile?FinalSymbol=A%2FRES%2F60%2F288>.

8 “FATF IX Special Recommendations” (FATF-GAFI, October 2001), <https://www.fatf-gafi.org/media/fatf/documents/reports/FATF%20Standards%20-%20IX%20Special%20Recommendations%20and%20IN%20rc.pdf>.

9 The lists maintained under the Al-Qaeda/ISIS sanctions resolutions include a range of organizations, affiliates, and groups with close links to the Al-Qaeda and ISIS, including groups that are not officially part of the Al-Qaeda or ISIS organizations as the groups see themselves. For example, Lashkar-e-Taiba and the Pakistani Taliban are sanctioned under the list for having assisted and cooperated with a-Qaeda although both are separate organizations. See for example: “Lashkar-e-Tayyiba” (United Nations Security Council, April 17, 2018), https://www.un.org/securitycouncil/sanctions/1267/aq_sanctions_list/summaries/entity/lashkar-e-tayyiba; “Tehrik-E Taliban Pakistan (TTP)” (United Nation Security Council, May 7, 2020), https://www.un.org/securitycouncil/sanctions/1267/aq_sanctions_list/summaries/entity/tehrick-e-taliban-pakistan-%28ttp%29.

- 10 “Resolution 1989 (2011)” (United Nations Security Council, June 17, 2011), [https://www.undocs.org/S/RES/1989%20\(2011\)](https://www.undocs.org/S/RES/1989%20(2011)); Louis Charbonneau, “U.N. Council Splits U.N. Taliban, Qaeda Sanctions List,” *Reuters*, June 17, 2011, <https://www.reuters.com/article/us-afghanistan-un/u-n-council-splits-u-n-taliban-qaeda-sanctions-list-idUSTRE75G62720110617>.
- 11 “Subsidiary Organs of the United Nations Security Council Fact Sheets” (United Nations Security Council, January 8, 2021), https://www.un.org/securitycouncil/sites/www.un.org.securitycouncil/files/subsidiary_organs_factsheets.pdf.
- 12 “Security Council Committee Pursuant to Resolutions 1267 (1999) 1989 (2011) and 2253 (2015) Concerning Islamic State in Iraq and the Levant (Da’esh), Al-Qaida and Associated Individuals, Groups, Undertakings and Entities,” United Nations Security Council, accessed January 10, 2021, <https://www.un.org/securitycouncil/sanctions/1267%20>.
- 13 For example, see “S/2022/576 (2022)” (United Nations Security Council, July 26, 2022), <https://documents-dds-ny.un.org/doc/UNDOC/GEN/N22/430/78/PDF/N2243078.pdf?OpenElement> and “S/2022/419 (2022)” (United Nations Security Council May 26, 2022), <https://documents-dds-ny.un.org/doc/UNDOC/GEN/N22/333/77/PDF/N2233377.pdf?OpenElement>
- 14 Lauren Fredericks and Matthew Levitt, “The United Nations’ List of ‘Not Listed’ Terrorist Entities,” *Lawfare*, June 13, 2022, <https://www.lawfareblog.com/united-nations-list-not-listed-terrorist-entities>.
- 15 “Explaining US Sanctions Against Taliban,” *Voice of America*, February 5, 2022, <https://www.voanews.com/a/ready-explaining-us-sanctions-against-taliban-/6427771.html>; Brian O’Toole, “They Aren’t Listed, but Make No Mistake: The UN Has Sanctions on the Taliban,” *New Atlanticist* (blog), August 23, 2021, <https://www.atlanticcouncil.org/blogs/new-atlanticist/they-arent-listed-but-make-no-mistake-the-un-has-sanctions-on-the-taliban/>; “Is Russia Going to Remove the Taliban from Its List of Terrorist Organizations?,” *Meduza*, August 17, 2021, <https://meduza.io/en/cards/is-russia-going-to-remove-the-taliban-from-its-list-of-terrorist-organizations>.
- 16 “Resolution 2624,” United Nations Security Council, February 28, 2022, https://www.securitycouncilreport.org/atf/cf/%7B65BFCF9B-6D27-4E9C-8CD3-CF6E4FF96FF9%7D/S_RES_2624.pdf.
- 17 Ephrem Kossaiy, “UN Security Council Calls Houthis a Terrorist Group for First Time, Expands Arms Embargo,” *Arab News*, March 1, 2022, <https://www.arabnews.com/node/2033376/middle-east>; Peter Salisbury and Michael Wahid Hanna, “Ending War in Yemen Requires Talk, Not Labels,” *Foreign Policy*, March 1, 2022, <https://foreignpolicy.com/2022/03/01/yemen-war-terrorism-un-houthi-uae-russia/>.
- 18 That list is available at: <https://scsanctions.un.org/consolidated/#alqaedaent>.
- 19 On the issues regarding relying on the consolidated list see discussion in Chris Meserole and Daniel Byman, “Terrorist Definitions and Designations Lists” (RUSI/Brookings, July 22, 2019), <https://www.brookings.edu/wp-content/uploads/2019/07/GRNTT-Paper-No.-7.pdf>.
- 20 The AMISOM mission has concluded and has been replaced by the African Union Transition Mission in Somalia (ATMIS). See “UN Chief Welcomes New Somali Mission, Lauds Work of African Union | | 1UN News,” *UN News* (United Nations, April 6, 2022), <https://news.un.org/en/story/2022/04/1115732>.
- 21 “Al-Shabaab” (United Nation Security Council, October 29, 2014), <https://www.un.org/securitycouncil/sanctions/751/materials/summaries/entity/al-shabaab>; “Security Council Committee Pursuant to Resolution 751 (1992) Concerning Somalia,” United Nations Security Council, accessed

May 26, 2021, <https://www.un.org/securitycouncil/sanctions/751>.

22 The Al-Qaeda and ISIS sanctions list does designate Al-Itihaad Al-Islamiya (AlAI), a group it describes as having reportedly merged with Al-Shabaab. The AlAI listing points to the Somalia sanctions regime but does not itself list Al-Shabaab even as it notes that Al-Shabaab “was accepted as an affiliate of Al-Qaida.” The resolutions undergirding the Somalia sanctions regime do not reference terrorism as liberally as the Al-Qaeda/ISIS regime. However, at least some of the resolutions do describe Al-Shabaab as a terrorist organization or an organization engaged in terrorist acts. See for example: “Resolution 2331 (2016)” (United Nation Security Council, December 20, 2016), [https://www.undocs.org/S/RES/2331%20\(2016\)](https://www.undocs.org/S/RES/2331%20(2016)); “Resolution 2093 (2013)” (United Nation Security Council, March 6, 2013), [https://www.undocs.org/S/RES/2093\(2013\)](https://www.undocs.org/S/RES/2093(2013)); “Resolution 2036 (2012)” (United Nation Security Council, February 22, 2012), [https://www.undocs.org/S/RES/2036%20\(2012\)](https://www.undocs.org/S/RES/2036%20(2012)).

23 “EU Terrorist List,” European Council Council of the European Union, accessed January 10, 2021, <https://www.consilium.europa.eu/en/policies/fight-against-terrorism/terrorist-list/#>.

24 Kristina Thorne, “Terrorist Designation in the European Union” (Centre for Humanitarian Dialogue, June 2006), <https://www.hdcentre.org/wp-content/uploads/2016/07/TerroristdesignationintheEuropeanUnion-June-2006.pdf>.

25 “Foreign Terrorist Organizations,” U.S. Department of State Bureau of Counterterrorism, accessed May 26, 2021, <https://www.state.gov/foreign-terrorist-organizations/>; “Terrorist Exclusion List” (United States Department of State Bureau of Counterterrorism), accessed May 26, 2021, <https://www.state.gov/terrorist-exclusion-list/>.

26 The list of countries examined in this assessment was drawn from the *Encyclopedia Britannica*. The

Editors of *Encyclopedia Britannica*, “List of Countries,” *Britannica.com*, accessed January 10, 2021, <https://www.britannica.com/topic/list-of-countries-1993160>.

27 The regional division we use was drawn from the United Nations’ system here with any countries not in the U.N. list determined by the region given to their neighbors: <https://unstats.un.org/unsd/methodology/m49>. Any determination of regional divisions is likely to miss continuities between countries labeled as in different regions and differences internal to a named region. The aim here is to provide one glance at how designation practices may vary. The map provided in Figure 1 also provides a check on conclusions about regional variation based solely on one system of regional categorization.

28 Michael R. Pompeo, “Terrorist Designation of Ansarallah in Yemen,” U.S. Department of State (Press Statement), January 10, 2021, <https://2017-2021.state.gov/terrorist-designation-of-ansarallah-in-yemen/index.html>.

29 Robert Malley and Peter Salisbury, “Labeling the Houthi Rebels as Terrorists Would Prolong Yemen’s War, Not End It,” *Washington Post*, November 27, 2020, <https://www.washingtonpost.com/outlook/2020/11/27/houthi-yemen-iran-saudi-terrorist-pompeo/>; Nick Schifrin and Ali Rogin, “In Foreign Policy Shift, Biden Lifts Terrorist Designation for Houthis in Yemen,” *PBS*, February 16, 2021, <https://www.pbs.org/newshour/show/in-foreign-policy-shift-biden-lifts-terrorist-designation-for-houthis-in-yemen>.

30 Missy Ryan and John Hudson, “Missile Attacks Fuel Support for Reversing U.S. Stance and Placing Yemen Rebels Back on Terrorist Blacklist,” *Washington Post*, February 11, 2022, <https://www.washingtonpost.com/national-security/2022/02/11/yemen-houthis-biden-terrorist-designation/>.

31 Linda Thomas-Greenfield, “Remarks by Ambassador Linda Thomas-Greenfield at a UN Security Council Briefing on Yemen” (United States Mission to the United Nations, March 15, 2022), <https://usun.usmission.gov/remarks-by-ambassador-linda-thomas-greenfield-at-a-un-security-council-briefing-on-yemen-6/>; “Security Council Renews Arms Embargo, Travel Ban, Asset Freeze Imposed on Those Threatening Peace in Yemen, by 11 Votes in Favour, None against, 4 Abstentions” (United Nations Security Council, February 28, 2022), <https://www.un.org/press/en/2022/sc14810.doc.htm>.

32 “Foreign Terrorist Organizations,” U.S. Department of State Bureau of Counterterrorism, accessed September 9, 2022, <https://www.state.gov/foreign-terrorist-organizations/>.

33 “Foreign Terrorist Organizations,” U.S. Department of State Bureau of Counterterrorism, accessed June 3, 2022, <https://www.state.gov/foreign-terrorist-organizations/>; “Revocation of Five Foreign Terrorist Organizations Designations and the Delisting of Six Deceased Individuals as Specially Designated Global Terrorists” (U.S. Department of State Office of the Spokesperson, May 20, 2022), <https://www.state.gov/revocation-of-five-foreign-terrorist-organizations-designations-and-the-delisting-of-six-deceased-individuals-as-specially-designated-global-terrorists/>
#:~:text=Today%2C%20the%20Department%20of%20State.

34 “Revocation of Five Foreign Terrorist Organizations Designations and the Delisting of Six Deceased Individuals as Specially Designated Global Terrorists.”

35 “Foreign Terrorist Organizations,” U.S. Department of State Bureau of Counterterrorism, accessed March 8, 2022, <https://www.state.gov/foreign-terrorist-organizations/>.

36 “Revocation of the Terrorist Designations of the Revolutionary Armed Forces of Colombia (FARC) and Additional Terrorist Designations” (Department of

State, November 30, 2021), <https://www.state.gov/revocation-of-the-terrorist-designations-of-the-revolutionary-armed-forces-of-colombia-farc-and-additional-terrorist-designations/>; “Designation of Revolutionary Armed Forces of Colombia People’s Army, Nestor Gregorio Vera Fernandez, Miguel Santanilla Botache, and Euclides Espana Caicedo as Specially Designated Global Terrorists” (Department of State, December 1, 2021), <https://www.federalregister.gov/documents/2021/12/01/2021-26123/designation-of-revolutionary-armed-forces-of-colombia-peoples-army-nestor-gregorio-vera-fernandez>; “Designation of Segunda Marquetalia, Luciano Marin Arango, Hernan Dario Velasquez Saldarriaga, and Henry Castellanos Garzon as Specially Designated Global Terrorists” (Department of State, December 1, 2021), <https://www.federalregister.gov/documents/2021/12/01/2021-26089/designation-of-segunda-marquetalia-luciano-marin-arango-hernan-dario-velasquez-saldarriaga-and-henry>.

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organizations-348212.html. On domestic implementation and the interaction with broader international efforts on terrorist financing see: “Anti-Money Laundering and Counter-Terrorist Financing Measures Ukraine Fifth Round Mutual Evaluation Report” (Council of Europe, December 2017), <https://www.fatf-gafi.org/media/fatf/content/images/MER-MONEYVAL-Ukraine-Dec-2017.pdf>.

110 Erin M. Kearns, Allison E. Betus, and Anthony F. Lemieux, “Why Do Some Terrorist Attacks Receive More Media Attention Than Others?,” *Justice Quarterly* 36, no. 6 (September 19, 2019): 985–1022, <https://doi.org/10.1080/07418825.2018.1524507>.

111 Those groups are the Kurdistan Workers Party (PKK, aka Kongra-Gel), Liberation Tigers of Tamil Eelam (LTTE), National Liberation Army (ELN), Revolutionary People’s Liberation Party/Front (DHKP/C), Shining Path (SL), Real Irish Republican Army (RIRA), Communist Party of the Philippines/New People’s Army (CPP/NPA), Continuity Irish Republican Army (CIRA), Revolutionary Struggle (RS), Segunda Marquetalia, and Revolutionary Armed Forces of Colombia – People’s Army (FARC-EP).

112 The specific role and character of white supremacy within Proud Boy ideology and self-understanding is contested. However, this report includes the group among its list of white supremacist groups rather than describing it as simply a far-right group because the Canadian designation decision frames the group through some of its members’ ties to white supremacy and thus the designation is best understood as part of the broader response to a white supremacist threat on the parts of countries designating terrorist groups. See: “Currently Listed Entities: Proud Boys,” Public Safety Canada, accessed May 26, 2021, <https://www.publicsafety.gc.ca/cnt/ntnl-scrnt/cntr-trrrsm/lstd-ntts/crrnt-lstd-ntts-en.aspx#510>. In addition while Canada lists the “Proud Boys,” New Zealand specifies “The American Proud Boys,” and considers it a “separate entity” from the Proud Boys organizations elsewhere including in Canada and

Australia. We have not treated this as a separate organization in this list, however given it presumably overlaps with the seemingly broader Canadian designation. “STATEMENT OF CASE TO DESIGNATE THE AMERICAN PROUD BOYS AS A TERRORIST ENTITY” (New Zealand Police, June 20, 2022), <https://www.police.govt.nz/sites/default/files/publications/statement-of-case-the-american-proud-boys-terrorist-entity-20-june-2022.pdf>.

113 Canada describes the Three Percenters as a “decentralized entity within the broader anti-government militia movement,” and does not specifically mention white supremacy. However, it does reference incidents involving the targeting of Muslims and the Black Lives Matter Movement. While it is debatable whether the Three Percenters should be included in a discussion of white supremacist groups that are designated, we have chosen to include it here because it does appear to be part of the broader effort sparked by white supremacist attacks regardless of one’s assessment of the role of white supremacy within it.

114 The Atomwaffen Division only appears on Australia’s “Consolidated List” of sanctions citing UNSCR 1373. It does not appear in Australia’s page of “Listed Terrorist Organizations.” “Consolidated List,” Australian Government Department of Foreign Affairs and Trade, accessed September 9, 2022, <https://www.dfat.gov.au/international-relations/security/sanctions/consolidated-list>; “Listed Terrorist Organizations,” Australian Government Australian National Security, April 9, 2022, <https://www.nationalsecurity.gov.au/what-australia-is-doing/terrorist-organisations/listed-terrorist-organisations>.

115 The Russian Imperial Movement only appears on Australia’s “Consolidated List” of sanctions citing UNSCR 1373. It does not appear in Australia’s page of “Listed Terrorist Organizations.” “Consolidated List”; “Listed Terrorist Organizations.”

116 Canada also lists one individual, James Mason, pointing to his association with Atomwaffen Division.

117 New Zealand also designated a white supremacist individual, the perpetrator of the Christchurch attack. “Lists Associated with Resolution 1373.”

118 Stewart Bell, “Canada adds neo-Nazi groups Blood & Honour, Combat 18 to list of terror organizations,” *Global News*, June 26, 2019. Jessica Elgot, “Neo-Nazi group National Action banned by UK home secretary,” *The Guardian*, December 12, 2016. Nathan Sales, “Designation of the Russian Imperial Movement,” U.S. Department of State (Press Release), April 6, 2020.

119 The Ustasha, Croatia’s fascist regime during World War 2, is an arguable additional inclusion. Austria reportedly bans the use of the group’s symbols under its symbols law. This may be more similar to other European countries’ banning of far-right groups on constitutional grounds. Austria and others have framed the symbols law at least in some cases as part of a counterterrorism structure, and in our survey we have thus included Austria as having a list. . However, unlike some of the other apparent uses of the law, the law’s application to the Ustasha appears to be more about fascist symbols given the seeming lack of a specific active group identifiable as “the Ustasha” with the symbols of the World War 2 era fascist Croatian regime being used by a range of groups and individuals.

120 “Federal Minister Seehofer Bans the Association ‘Nordadler’” (Federal Ministry of the Interior, Building, and Community, June 23, 2020), <https://www.bmi.bund.de/SharedDocs/pressemitteilungen/EN/2020/06/vereinsverbot-nordadler.html>.

121 See for example, the contrast between the statement regarding Hezbollah and the statement regarding the White Wolves Terror Crew: “Ban on Activities of Terrorist Organization Hezbollah in Germany”; “Weisse Wölfe Terrorcrew” (German Federal Ministry of the Interior and Community, March 16, 2016), <https://www.bmi.bund.de/SharedDocs/kurzmeldungen/EN/2016/03/ban-white-wolves-right-wing%20extremism-brotherhood.html>.

On Germany's associations bans see: "Ethnically or Racially Motivated Terrorism Financing" (FATF, June 2021), 34, <https://www.fatf-gafi.org/media/fatf/documents/reports/Ethnically-or-racially-motivated-terrorism-financing.pdf>.

122 On connections to groups designated as terror groups by other countries and Azov's inclusion in some calls for designation of far-right groups see: Christopher Miller, "Ukraine Deported Two American Members Of A Neo-Nazi Group Who Tried To Join A Far-Right Military Unit For 'Combat Experience,'" *BuzzFeed*, October 8, 2020, <https://www.buzzfeednews.com/article/christopherm51/ukraine-deports-american-neo-nazi-atomwaffen-division>; Christopher Miller, "This Lawmaker Wants To Label Foreign White Supremacist Groups As 'Terrorists,' But Some Of Them No Longer Exist," *BuzzFeed*, April 14, 2021, <https://www.buzzfeednews.com/article/christopherm51/slotkin-label-foreign-white-supremacists-terrorists>.

123 "Russian Supreme Court Labels Ukrainian Azov Military Regiment A 'Terrorist' Organization."

124 "「国際テロリズム要覧2021」中の「アゾフ大隊」に関する記載の削除について," *Japan Public Security Intelligence Agency*, April 8, 2022, https://www.moj.go.jp/EN/psia/20220407_oshirase.html.

125 "Ethnically or Racially Motivated Terrorism Financing," 5.

126 "Ethnically or Racially Motivated Terrorism Financing," 33.

127 Adlene Meddi, "Algeria's Hezbollah stance 'reflects view on resistance, not terrorism,'" *Middle East Eye*, March 31, 2016, <https://www.middleeasteye.net/news/algerias-hezbollah-stance-reflects-view-resistance-not-terrorism>; "Arab League Brands Hezbollah a Terrorist Organisation," *BBC*, March 11, 2016, <https://www.bbc.com/news/world-middle-east-35789303>.

128 "Eye on Hezbollah: Egypt," *United Against a Nuclear Iran* (blog), accessed September 12, 2022, <https://hezbollah.org/country/egypt>.

129 "قوائم ادراج الكيانات الارهابية والارهابيين المحلية (Egyptian Anti-Money) "1373 عملا بقرار مجلس الامن (Laundering and Terrorist Financing), accessed September 12, 2022, <https://www.mlcu.org.eg/ar/3125/%D9%82%D9%88%D8%A7%D8%A6%D9%85-%D8%A7%D8%AF%D8%B1%D8%A7%D8%AC-%D8%A7%D9%84%D9%83%D9%8A%D8%A7%D9%86%D8%A7%D8%AA-%D8%A7%D9%84%D8%A7%D8%B1%D9%87%D8%A7%D8%A8%D9%8A%D8%A9-%D9%88%D8%A7%D9%84%D8%A7%D8%B1%D9%87%D8%A7%D8%A8%D9%8A%D9%8A%D9%86-%D8%A7%D9%84%D9%85%D8%AD%D9%84%D9%8A%D8%A9-%D8%B9%D9%85%D9%84%D8%A7-%D8%A8%D9%82%D8%B1%D8%A7%D8%B1-%D9%85%D8%AC%D9%84%D8%B3-%D8%A7%D9%84%D8%A7%D9%85%D9%86-1373>.

130 "Gulf States Declare Lebanon's Hezbollah Terrorist Group," *BBC*, March 2, 2016, <https://www.bbc.com/news/world-middle-east-35706761>; "Gulf Arab States Label Hezbollah a Terrorist Organization," *Reuters*, March 2, 2016, <https://www.reuters.com/article/us-gulf-hezbollah/gulf-arab-states-label-hezbollah-a-terrorist-organization-idUSKCN0W40XF>; "GCC Declares Hezbollah a Terrorist Organization," Embassy of the Kingdom of Saudi Arabia Washington, DC, March 2, 2016, <https://www.saudiembassy.net/news/gcc-declares-hezbollah-terrorist-organization>.

131 For one assessment of enforcement efforts see: David Andrew Weinberg, "Grading Counterterrorism Cooperation with the G.C.C. States," § House Committee on Foreign Affairs Subcommittee on Terrorism, Nonproliferation, and Trade Subcommittee on the Middle East and North Africa (2018), <https://www.adl.org/resources/news/grading-counterterrorism-cooperation-gcc-states>.

132 Ministry of Information Affairs Kingdom of Bahrain. "قوائم الإرهاب qawayim al-irhab al-watani"

."[National Terrorist List] الوطنية *Official Gazette No. 3539*, July 6, 2021, p. 9, <https://www.mia.gov.bh/wp-content/uploads/2021/07/3539.pdf>.

133 "Kuwait Designates 10 Individuals, 4 Entities as Terrorists' Entities," *Kuwait News Agency*, May 17, 2018, <https://www.kuna.net.kw/ArticleDetails.aspx?id=2727769>

134 Ajbaili, "Saudi: Muslim Brotherhood a Terrorist Group"; "Saudi Arabia: New Terrorism Regulations Assault Rights," *Human Rights Watch* (blog), March 20, 2014, <https://www.hrw.org/news/2014/03/20/saudi-arabia-new-terrorism-regulations-assault-rights#>.

135 United Arab Emirates Ministry of Justice. "Cabinet Resolution No. 18 of 2017 on the Approval of the List of Terrorist Persons and Organizations." *Official Gazette No. 617*, June 29 2017, p.3, <https://www.moj.gov.ae/assets/2022/%D9%82%D8%B1%D8%A7%D8%B1%20%D9%85%D8%AC%D9%84%D8%B3%20%D8%A7%D9%84%D9%88%D8%B2%D8%B1%D8%A7%D8%A1%20%D8%B1%D9%82%D9%85%2018%20%D9%84%D8%B3%D9%86%D8%A9%202017%20%D8%A8%D8%B4%D8%A3%D9%86%20%D8%A7%D8%B9%D8%AA%D9%85%D8%A7%D8%AF%20%D9%82%D8%A7%D8%A6%D9%85%D8%A9%20%D8%A7%D9%84%D8%A7%D8%B4%D8%AE%D8%A7%D8%B5%20%D9%88%D8%A7%D9%84%D8%AA%D9%86%D8%B8%D9%8A%D9%85%D8%A7%D8%AA%20%D8%A7%D9%84%D8%A7%D8%B1%D9%87%D8%A7%D8%A8%D9%8A%D8%A9.pdf.aspx>; United Arab Emirates Ministry of Justice. "Cabinet Resolution No. 41 of 2014 regarding the adoption of the list of terrorist organizations." *Official Gazette No. 572*, November 30, 2014, p. 2 <https://www.moj.gov.ae/assets/2022/%D9%82%D8%B1%D8%A7%D8%B1%20%D9%85%D8%AC%D9%84%D8%B3%20%D8%A7%D9%84%D9%88%D8%B2%D8%B1%D8%A7%D8%A1%20%D8%B1%D9%82%D9%85%2041%20%D9%84%D8%B3%D9%86%D8%A9%202014%20%D9%81%D9%8A%20%D8%B4%D8%A3%D9%86%20%D8%A7%D8%B9%D8%AA%D9%85%D8%A7%D8%AF%20%D8%A7%D9%84>

%D8%AA%D9%86%D8%B8%D9%8A%D9%85%D8%A7%D8%AA%20%D8%A7%D9%84%D8%A7%D8%B1%D9%87%D8%A7%D8%A8%D9%8A%D8%A9.pdf.aspx.

136 Hezbollah is not included on Qatar's public terrorist designation list. David Weinberg, "Qatar's Swiss Cheese Terrorism List," *Anti-Defamation League*, April 11, 2018, <https://www.adl.org/news/oped/qatars-swiss-cheese-terrorism-list>; "Sanction List," State of Qatar Ministry of Interior, June 13, 2022, <https://portal.moi.gov.qa/wps/portal/NCTC/sanctionlist/nationalsection/>. More broadly for a critical look at questions of implementation when it comes to Qatari listing practices see: Matthew Levitt, "Assessing the U.S.-Qatar Relationship" (2017), <https://docs.house.gov/meetings/FA/FA13/20170726/106329/HHRG-115-FA13-Wstate-LevittM-20170726.pdf>., Qatar does appear to have taken some actions against Hezbollah in coordination with the United States. "The United States and Qatar Take Coordinated Action Against Hizballah Financiers" (U.S. Department of the Treasury, September 29, 2021), <https://home.treasury.gov/news/press-releases/jy0381>.

137 Michael R. Pompeo, "United States Designates Russian Imperial Movement and Leaders as Global Terrorists" (U.S. Department of State, April 7, 2020), <https://2017-2021.state.gov/united-states-designates-russian-imperial-movement-and-leaders-as-global-terrorists/index.html>.

138 "Terrorist Exclusion List."

139 "TIMEP Brief: Terrorist Entities Law" (The Tahrir Institute for Middle East Policy, April 4, 2019), <https://timep.org/reports-briefings/timep-brief-terrorist-entities-law/>.

140 The Editors of Encyclopedia Britannica, "List of Countries."

141 This means that the fact that a country may prosecute individuals or even groups of individuals on terrorism charges does not mean they have a list if

the court decision does not establish that the group as a whole should be understood as a terrorist group in future cases. It also means that a government official referring to a group as being a “terrorist” group while speaking in the absence of a larger process or decision does not constitute a designation.



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