



Contribution to the United Nations Secretary-General's Report on

“Combating intolerance, negative stereotyping, stigmatization, discrimination, incitement to violence and violence against persons, based on religion or belief”

April 2026

1. On 18 December 2025, the United Nations General Assembly adopted resolution 80/200, entitled “Combating intolerance, negative stereotyping, stigmatization, discrimination, incitement to violence and violence against persons, based on religion or belief”.¹
2. This resolution requests “the Secretary-General to submit to the General Assembly at its eighty-first session a report that includes information provided by the High Commissioner on steps taken by States to combat intolerance, negative stereotyping, stigmatization, discrimination, incitement to violence and violence against persons, based on religion or belief, as set forth in the present resolution”. A call for contributions was addressed to national human rights institutions and civil society organizations, with a submission deadline set for 20 April 2026.²
3. The European Centre for Law and Justice (ECLJ) is an international non-governmental organization founded in 1998 and holding special consultative status with the UN/ECOSOC since 2007.

¹ Human Rights Council resolution 80/200 adopted on 18 December 2025, “*Combating intolerance, negative stereotyping, stigmatization, discrimination, incitement to violence and violence against persons, based on religion or belief*” ([A/RES/80/200](#)).

² [Call for inputs](#) on combating intolerance against persons based on religion or belief (pursuant to HRC resolution 58/29).

4. In this contribution, the ECLJ draws attention to the growing problem of religious intolerance worldwide, particularly targeting **Christians**, with a focus on **Europe**,³ **Turkey**,⁴ **Algeria**,⁵ and **Pakistan**.⁶ According to Open Doors, in 2025, around 388 million Christians worldwide faced high levels of persecution and discrimination.⁷ We are witnessing an increase in direct violence, legal and social discrimination, and a widening gap between national and international commitments and actual practices, both in Europe and in non-European, Muslim-majority countries. Yet political responses remain limited compared to measures taken to address other forms of religious intolerance.

5. This submission draws on publicly available reports by international organizations, governmental data, academic studies, and documented cases, including reports by OIDAC Europe, Open Doors, and European institutions. It also builds on the ECLJ's own legal and advocacy work, including its direct involvement in defending victims of religious persecution, notably through its office in Pakistan.

A. Anti-Christian Hate Crimes: Direct Violence and Climate of Insecurity

1. The Increase of Violence against Christians in Europe

6. Christians across Europe are increasingly targeted in hate crimes. In 2024, the Observatory on Intolerance and Discrimination against Christians in Europe (OIDAC)⁸ recorded 2,211 anti-Christian hate crimes across 35 European countries. Among these acts of hatred, physical assaults against Christian people or Christian symbols have risen: 274 were recorded in 2024, compared with 232 in 2023. The typology is as follows:

- **Vandalism (50%)**: graffiti, inverted crosses, and decapitated statues. In July 2025, in Perugia (Italy), graffiti inciting violence against churches and priests was discovered on a building adjacent to the Basilica of San Domenico. The inscription read: “Churches must be burned, but with the priests inside; otherwise, it is not enough,” accompanied by anarchist and transgender symbols.
- **Arson (15%)**: churches set on fire, often without any claim of responsibility
- **Threats (4%)**: anonymous letters and verbal intimidation.
- **Physical violence (7.5%)**: assaults on priests, religious figures, or worshippers. In February 2025, outside Saint-Eusèbe Church in Auxerre (France), a Catholic priest was insulted on account of his religion and beaten up. His two attackers reportedly stated that they were constantly disturbed by the church bells.

³ ECLJ, [Christianophobia and anti-Christian hatred in Europe](#), 2025 report.

⁴ ECLJ, [The Persecution of Christians in Turkey](#), 2025 report.

⁵ ECLJ, [The Oppression of Christians in Algeria](#), 2026 report.

⁶ ECLJ, [Contribution to the UN Special Rapporteur on summary, extrajudicial or arbitrary executions](#), 27 February, 2026.

⁷ Open Doors, [The 2026 World Watch List](#).

⁸ Observatory on Intolerance and Discrimination against Christians in Europe (OIDAC) <https://www.intoleranceagainstchristians.eu/>.

- **Homicides or attempted homicides (3%)**: killings or deadly attacks against priests, religious figures, or worshippers. On 10 September 2025, in Lyon (France), Ashur Sarnaya, an Iraqi Christian refugee, was killed with a machete while livestreaming his testimony of faith on TikTok, by a 27-year-old Algerian national in an irregular situation, linked to the Islamic State group. The ECLJ co-organized a demonstration in Paris on 29 September 2025, bringing together 1,500 people in tribute to Ashur Sarnaya and calling on national governments and European institutions to provide clear and concrete responses.⁹

7. **Radicalized Muslim individuals**—often in an irregular situation and influenced by jihadist propaganda—constitute the primary source of severe physical violence. **Militant secularist groups** do not advocate neutrality; they seek the complete removal of Christian symbols from the public sphere. Hostility from **far-left activists** stems from the idea that Christianity represents a “conservative” bloc opposed to certain progressive causes. Although their motives differ, all contribute to an anti-Christian climate in which physical violence, symbolic attacks, and forms of social or institutional pressure reinforce one another.

8. According to OIDAC, the countries most affected by anti-Christian acts in 2024 include **France** (770 incidents recorded by the police and 139 by civil society); **Germany** (337 incidents recorded by the police—an increase of 22% between 2023 and 2024, following a 105% rise the previous year—and 134 incidents recorded by civil society) and **Spain** (91 incidents recorded by civil society).

9. These crimes aim to intimidate believers and erase visible signs of Christianity. They form part of a broader continuum of violence, ranging from acts of vandalism and harassment to physical assaults and lethal attacks. Despite their seriousness, relatively few cases result in criminal prosecution, and the phenomenon remains insufficiently addressed by national and European authorities. It should also be noted that available figures likely underestimate the true scale of the problem due to underreporting by religious communities and by states, as well as the lack of harmonized data collection systems across countries, despite the annual report on anti-Christian hate crimes by the OSCE Office for Democratic Institutions and Human Rights (ODIHR).¹⁰

2. *Turkey: Direct Acts of Violence against Christians*

10. Direct violence against Christians is a reality in Turkey, marked by armed attacks, targeted assaults, and explicit threats. **The Islamic State group** has claimed responsibility for an attack that killed one person during Sunday Mass at a Roman Catholic church in Istanbul on 28 January 2024. The repeated assaults on the Çekmeköy Protestant Church, and the killing of members of the Syriac community illustrate a worrying climate of insecurity. Protestant

⁹ ECLJ, [An Unprecedented Gathering in Paris to Support Persecuted Christians in France and Worldwide](#), 9 October 2025.

¹⁰ [OSCE ODIHR Anti-Christian hate crime report](#).

Christian individuals or institutions experienced hate crimes or associated physical attacks due solely to their faith, according to the Turkish Association of Protestant Churches.¹¹

B. Political, Media, Social, and Cultural Hostility against Christians

1. In Europe, Increasing Marginalization of Christians for Their Beliefs

11. Beyond acts of physical violence, Christians in Europe increasingly face a climate of diffuse hostility shaped by political discourse, media narratives, and evolving social norms. This environment affects daily life, including public expression, professional settings, and education. The phenomenon is documented by several reports, notably *The Costs of Keeping the Faith* (2024) from Voice for Justice UK.¹²

12. According to this study, 56% of British Christians report having been mocked or socially rejected for expressing their beliefs, rising to 61% among those under 35. Approximately 18% report discrimination linked to their faith, particularly in professional and academic environments. These trends contribute to widespread self-censorship: only 35% of Christians under 35 feel free to express their religious views in the workplace.

13. This climate is reinforced by increasing social pressure around moral and societal issues. Christians expressing traditional views on topics such as marriage, sexuality, or bioethics are often portrayed as incompatible with prevailing norms, leading to stigmatization and reduced visibility in public discourse.

14. These developments take place within a broader process of secularization, in which Christianity is increasingly confined to the private sphere. This shift is often accompanied by a symbolic rejection—or even a form of cultural contempt—toward Christian traditions and values, as public debates increasingly challenge the place of Christian references in collective life.

15. At the same time, a form of cultural hostility has developed in media, artistic, and digital spaces, where Christian symbols and beliefs are frequently mocked or trivialized. While often framed as expressions of freedom of speech, such practices contribute to a broader environment in which Christianity is treated as a legitimate target of ridicule.

16. Taken together, these dynamics contribute to the gradual marginalization of Christianity in the public sphere. Without necessarily taking the form of legal restrictions, they weaken the social legitimacy of Christian expression and may discourage individuals from openly expressing their beliefs, thereby affecting the pluralistic character of European societies.

2. Turkey: A Hostile Sociopolitical Environment

¹¹ 2025 Human Rights violation report by the Association of Protestant Churches, published on 25 March 2026.

¹² Voice for Justice UK, [The Costs of Keeping the Faith](#), June 2024.

17. Despite Turkey’s constitutional guarantees of secularism and equality, Christians today face a sociopolitical environment marked by hostility, suspicion, and growing insecurity. In recent years, Christian communities have increasingly been portrayed as scapegoats in political, media, and societal discourse. Under President Erdoğan, national identity has become closely associated with Turkish ethnicity and Sunni Islam, fostering a climate in which Christians—particularly foreign Christians—are depicted as alien, subversive, or instruments of foreign influence. This framing undermines public trust and weakens their ability to participate fully in civic life.

18. In this context, hate speech against Christians remains widespread in both media and public discourse, while religious education in schools promotes a vision of Turkish identity that is inseparable from Islam. Christians from a Muslim background are especially vulnerable, often facing violence or rejection within their own families. At the same time, the continued official denial of the Armenian genocide—despite its recognition by the European Parliament, France, and the United States—contributes to a broader environment in which historical injustices affecting Christian communities are minimized or dismissed.

19. According to the European Commission against Racism and Intolerance (ECRI), “hate speech against religious and ethnic minorities, such as Alevi, various non-Muslim groups and Kurds, is widespread in the media,” and is “particularly prevalent during election periods.”¹³ This rhetoric has tangible consequences. On 4 May 2020, President Erdoğan referred to survivors of the Armenian genocide as “terrorists escaped from the sword.” Shortly thereafter, two Armenian churches in Istanbul were attacked (on 8 May and 23 May 2020), and the Hrnt Dink Foundation received death threats. More broadly, documented hate crimes targeting Christians more than doubled between 2021 and 2023, making them the most frequently targeted religious group, according to the Norwegian Helsinki Committee’s Freedom of Belief Initiative.¹⁴

20. The convergence of inflammatory political rhetoric and hostile media narratives contributes to an environment of intolerance in which hate crimes—whether violent, symbolic, or directed against religious property—are increasingly normalized, further marginalizing an already vulnerable Christian minority.

3. Algeria: A Political Framework That Marginalizes Religious Minorities

21. Algeria bases its identity on Islam and Arab identity, leaving no room for religious pluralism. Conversions to Christianity are perceived as a challenge to the religious and social order. Christians are marginalized in various ways, including administrative prohibition of certain first names for children, social pressure on converts, who are often regarded as traitors by those around them.

¹³ European Commission against Racism and Intolerance (ECRI), “[ECRI Report on Türkiye](#)” adopted on 18 June 2023, published on 12 June 2025.

¹⁴ Norwegian Helsinki Committee’s Freedom of Belief Initiative, “[Hate Crimes Motivated by Bias against Religion, Belief, or Non-Belief in Türkiye 2023 Report – Summary Findings](#)”, August 2024.

22. Christians also face discrimination in the professional sphere. In general, they struggle to find employment: employers are strongly encouraged, or even required, to report Christian employees to the authorities, contributing to significant social stigmatization. Christians are often excluded from public sector positions, thereby depriving them of many rights and opportunities.

23. Moreover, difficulties also arise in the context of burial-related formalities: families have been refused a death certificate simply because the deceased bore a Christian name. In addition, an individual may be denied the right to be buried as a Christian, especially if they are a former Muslim convert.

C. State Repression against Christians

1. Laws and Administrative Abuses in Europe

24. Within the European states, certain laws or administrative practices restrict the effective exercise of religious freedom by Christians. In recent years, several individuals have been prosecuted for praying silently in public spaces, particularly near abortion clinics. In the United Kingdom, Adam Smith-Connor was convicted in October 2024 for praying silently within a “buffer zone,” without disturbing public order. “Buffer zone” laws, adopted in the United Kingdom, Spain, and Germany, prohibit any form of presence deemed “influential” around clinics, including silent prayer without signs or written messages.

25. Conscientious objection is also being weakened by recent legislative developments. In Germany, abortion is now integrated into mandatory medical training. In Spain, physicians must register on an official list to refuse to perform abortions, without any guarantee that their choice will be respected and at the risk of professional stigmatization. Furthermore, Christian institutions are no longer permitted to refuse to perform euthanasia.¹⁵

26. Most recently, the debate on the limits of freedom of religious expression has been revived by the ruling rendered by the Finnish Supreme Court on 27 March 2026. The Court convicted Päivi Räsänen and Juhana Pohjola of incitement to hatred over a decades-old pamphlet defending traditional marriage.¹⁶ The case has been going on for nearly seven years. It illustrates a growing tension, observable in several European countries, between anti-discrimination legislation and the right to publicly express traditional religious beliefs.

27. Finally, these political developments also involve a challenge to Europe’s Christian heritage through a form of anti-Christian historical revisionism. On the one hand, this takes the form of the gradual erasure of references to Christian heritage from public discourse. On the other hand, anti-Christian historical revisionism is expressed through concrete actions of the dismantling of Christian symbols. For example, in Spain, under the banner of “democratic memory” or anti-Francoism, crosses and other Christian symbols have been systematically removed from public space.

¹⁵ ECLJ, [Will Nuns be Forced to Accept Euthanasia?](#)

¹⁶ Breizh-Info, [“Finland: Christian parliamentarian sentenced for quoting the Bible”](#), 29 March of 2026.

28. In Muslim-majority countries such as Turkey, Pakistan, and Algeria, where Islam is the state or dominant religion, Christians face state repression that is justified on grounds of national security and of maintaining homogeneity around Islam as a foundation of national identity.

2. Turkey: Institutional Discrimination and Legal Marginalization

29. Christians are facing legal discrimination under the Treaty of Lausanne, signed in 1923, which laid the foundations of the modern Republic of Turkey following the collapse of the Ottoman Empire. While it guaranteed certain minority rights, Turkey adopted a narrow interpretation, excluding some Christian groups from its protection, such as Assyrians, Chaldeans, Catholics, and Protestants, despite their historical presence. Rather than functioning as a safeguard, the Treaty of Lausanne has been used by Turkish authorities as a legal instrument of exclusion and control, limiting minority rights to a narrow list of groups and denying protection to all others.

30. In Turkey, no church—including those belonging to officially recognized minorities—enjoys legal personality as a religious institution.¹⁷ This institutional void severely restricts the autonomy of Christian churches, particularly the Greek Orthodox Patriarchate of Constantinople, which lacks any legal recognition as a religious body. The same applies to the Armenian Patriarchate of Constantinople,¹⁸ and the Roman Catholic Church.

31. Because they lack legal status, **patriarchates, dioceses, and churches cannot own property in their own name**, initiate legal proceedings, employ staff, open bank accounts, or formally interact with public authorities. They are compelled to operate indirectly through affiliated foundations or associations. This legal invisibility places them in a state of structural vulnerability and dependency, undermining their ability to function independently and threatening their institutional continuity.

32. Two recent studies have stressed that the issue remains unresolved and continues to affect the rights of minorities. In its 2025 report on Turkey, the European Commission observed that “the lack of legal personality for non-Muslim and Alevi communities remained an unresolved issue, especially regarding the legal status of places of worship.”¹⁹ In its 2025 report on Turkey, the European Commission against Racism and Intolerance made the same observation.²⁰

33. State Interference in Minority Properties and Governance. The system of community foundations constitutes the central legal framework through which Christian and Jewish minorities administer their churches, schools, cemeteries, hospitals, and charitable

¹⁷ European Commission for Democracy Through Law (Venice Commission), [Opinion on the Legal Status of Religious Communities in Turkey and the Right of the Orthodox Patriarchate of Istanbul to Use the Adjective “Ecumenical”](#), Adopted by the Venice Commission at its 82nd Plenary Session (Venice, 12-13 March 2010).

¹⁸ Public Orthodoxy, “[Armenian Patriarchate and the Sanasaryan Han](#),” 28 March 2019.

¹⁹ European Commission, Directorate-General for Neighbourhood and Enlargement Negotiations, “[Türkiye Report 2025](#)”, 4 November 2025.

²⁰ European Commission against Racism and Intolerance (ECRI), “[ECRI Report on Türkiye](#),” adopted on 18 June 2023, published on 12 June 2025, §93.

institutions in Turkey. These foundations have increasingly become the main mechanism through which the state restricts, supervises, and often dispossesses religious minorities. Christian community foundations are deprived of the right to freely hold elections for their boards of directors. Thousands of their properties have been expropriated; many have been placed under state trusteeship (“*mazbut*”) or nationalized.

34. The European Court of Human Rights has repeatedly condemned Turkey for violating the property rights of Christian community foundations. These rulings concern various legal and administrative mechanisms used to dispossess Greek Orthodox, Armenian, and Syriac foundations. The ECLJ regularly intervenes in such cases before the European Court of Human Rights.

35. **Systematic Arbitrary Expulsions of Foreign Christians.** Since 2016, Turkey has implemented a systematic policy of expelling foreign Christians—including pastors, missionaries, long-term residents, and even spouses of Turkish citizens—by relying on opaque “national security” classifications rather than formal arrests or prosecutions. Between 2019 and 2025, at least 178 foreign Christians were banned or expelled.²¹ These measures are typically enforced through administrative codes such as N-82 or G-87, invoked on national security grounds but without disclosure of evidence or access to a fair trial. In practice, individuals are often targeted solely for participating in Christian activities, which are entirely lawful.

36. Illustrative cases include Kenneth Wiest, who lived in Turkey for more than 34 years before being banned; his case is expected to be examined in the coming weeks. In parallel, around 20 applications have been joined in the *Wilson* case, in which the ECLJ has sought leave to intervene.

37. In total, approximately 380 individuals have been affected when including family members. Those targeted come from a wide range of national backgrounds, including the United States, South Korea, Germany, Australia, Canada, and Iran. In a resolution adopted on 12 February 2026, the European Parliament strongly condemned these expulsions carried out under the pretext of national security.²²

38. These measures, which disproportionately affect foreign Protestants, appear designed to weaken Christian communities in Turkey. They do not constitute isolated incidents but rather form part of a broader, systematic policy raising serious concerns with regard to freedom of religion or belief.

3. Pakistan: Blasphemy Laws and Forced Conversions Targeting Christians

39. Pakistani Christians are arbitrarily placed on death row for blasphemy they did not commit. Section 295-C of the Pakistan Penal Code provides the death penalty for anyone accused of insulting the Prophet of Islam. Although the text formally allows for life imprisonment, the Federal Shariat Court ruled in 1991 that only the death penalty is consistent

²¹ 2025 Human Rights violation report by the Association of Protestant Churches, published on 25 March 2026.

²² ECLJ, “[Expulsion of Foreign Christians: Ursula von der Leyen’s Inaction Against Turkey’s Silent Purge](#)”, 17 March 2026.

with Islamic law, effectively making it mandatory. On 27 February 2026, the ECLJ referred this issue to the United Nations Special Rapporteur on summary, extrajudicial or arbitrary executions, urging action in response to these violations.²³

40. At the same time, religious minorities—particularly Christian and Hindu women—are also exposed to widespread forced conversions and marriages. Each year, approximately 1,000 women are reportedly forced to convert to Islam and marry Muslim men, a trend that continues to grow.²⁴ The federal and provincial authorities have failed to take effective action, while law enforcement agencies are often reluctant to investigate such cases or do so inadequately.

41. More broadly, the treatment of religious minorities reflects a systemic pattern of discrimination. Law enforcement, media, and judicial institutions frequently exhibit bias against Christians and other non-Muslims. Cases involving minority victims are often delayed for months or years, whereas cases involving Muslim victims tend to be handled more swiftly.²⁵ This double standard contributes to a climate of impunity and reinforces the vulnerability of Christian communities in Pakistan.

4. Algeria: Algerian Law Restricting the Religious Freedom of Christians

42. In Algeria, Islam is not only the majority religion but a core element of national identity, enshrined as the state religion in the Constitution. This framework leaves little room for religious pluralism, especially since the 2020 revision removed the reference to freedom of conscience. Christians lack official recognition and are subject to a legal system largely inspired by Islamic law, notably in the Family Code, which applies to all citizens and creates concrete constraints (marriage, inheritance, civil status). As a result, although religious practice is formally allowed, Christians remain in a legal and social grey area, facing administrative obstacles and marginalisation that reinforce their invisibility in Algerian society.

43. Although the Constitution guarantees freedom of worship, it is subject to the law, which in practice severely restricts Christianity. The 2006 ordinance imposes a strict authorization system for places of worship,²⁶ with virtually all requests for new churches rejected. This is compounded by the 2012 law on associations,²⁷ which makes it nearly impossible for Christian groups to obtain legal recognition. Since 2006, 58 Protestant churches have been forced to cease their activities and have been closed by the authorities. Among these churches are the 47 affiliated with the Protestant Church of Algeria (EPA). As a result, many believers are forced to practise in private or informally, sometimes in near-clandestine conditions.

44. Practising the Christian faith also exposes individuals to criminal sanctions. The same 2006 ordinance punishes “proselytising” Christians with up to five years’ imprisonment and a

²³ [Contribution to the UN Special Rapporteur on summary, extrajudicial or arbitrary executions](#), 27 February, 2026.

²⁴ Ewelina Ochab. Another Girl, Another Abduction, Another Forced Conversion, Another Child Marriage, FORBES (Nov. 3, 2020).

²⁵ ECLJ, [Status of Human Rights in Pakistan for the 42nd Session of the Universal Periodic Review](#).

²⁶ [Ordinance No. 06-03 of 28 February 2006 laying down the conditions and rules for the exercise of non-Muslim religions](#).

²⁷ [Law of 12 January 2012 relating to associations](#).

heavy fine if they are deemed to have attempted to “convert” a Muslim or undermine their faith. The authorities sanction not only Christian missionaries but also Muslim converts, who additionally face social stigma. According to the NGO Open Doors, more than fifty Christians have been prosecuted in recent years, with Kabyle Christians particularly affected.²⁸

D. Gap Between National and International Commitments and Actual Practices

1. Christians Less Institutionally Protected Despite Formal Equality in Europe

45. The international legal framework provides for the equal protection of all individuals against discrimination and violence based on religion or belief, including Christians. At the United Nations (UN), several resolutions explicitly or implicitly refer to anti-Christian hatred: resolution 72/177 calls upon states to prevent acts motivated by Christianophobia, alongside antisemitism and Islamophobia;²⁹ resolution 77/318 expresses concern at the increase in discrimination, intolerance, and violence affecting various communities, including Christians.³⁰

46. Similarly, the Organization for Security and Co-operation in Europe recognizes anti-Christian hate crimes as a specific form of bias-motivated violence. Through its Office for Democratic Institutions and Human Rights, it documents such incidents annually and has developed tools to better understand and address them, including the 2025 guide on anti-Christian hate crimes.³¹

47. In principle, therefore, all religious groups benefit from equal protection under international and European human rights law. However, in practice, a significant imbalance persists at the institutional level within Europe. The European Union and the Council of Europe have developed dedicated mechanisms to combat antisemitism and anti-Muslim hatred—such as coordinators, targeted strategies, funding instruments, and regular reporting—while no equivalent framework exists to address anti-Christian hatred, despite Christians being the largest religious community in Europe and increasingly exposed to hostility.

48. This asymmetry is also reflected in data collection and policy categorization. At the European level, anti-Christian incidents are generally subsumed under the broad category of “religion,” whereas antisemitism and anti-Muslim hatred are treated as distinct policy priorities within broader frameworks addressing racism and discrimination.

49. This gap has been acknowledged at the political level. Paragraph 84 of the European Parliament resolution of 21 January 2026 “regrets that, while Christianity remains today the most persecuted religion in the world, affecting more than 380 million people, the position of

²⁸ ECLJ, [Christianophobia and anti-Christian hatred in Europe](#), 2025 report.

²⁹ General Assembly resolution 72/177, Freedom of religion or belief, adopted on 19 December 2017 ([A/RES/72/177](#)).

³⁰ General Assembly resolution 77/318, Countering hate speech: promoting interreligious and intercultural dialogue and tolerance, adopted on 25 July 2023 ([A/RES/77/318](#)).

³¹ OSCE, [Understanding Anti-Christian Hate Crimes and Addressing the Security Needs of Christian Communities — A Practical Guide](#), 28 July 2025.

European Coordinator on combating Christianophobia does not exist, whereas a coordinator has been appointed to combat Islamophobia.”³²

50. At the same time, a draft resolution of the Parliamentary Assembly of the Council of Europe (PACE), entitled “*Countering discrimination based on religion and protecting freedom of religion or belief in Europe*”, is expected to be adopted during the second part of the 2026 Ordinary Session (20-24 April 2026).³³ While this initiative reflects a growing awareness of the need to strengthen the protection of freedom of religion or belief, it remains framed in general terms and does not specifically address the structural imbalance affecting the recognition of anti-Christian hatred.

51. At the judicial level, the European Court of Human Rights (ECtHR) guarantees protection against discrimination on the grounds of religion under Article 14 of the European Convention on Human Rights (ECHR). However, while the Court has explicitly referred to antisemitism and Islamophobia in its case law and interpretative documents, it has not developed a comparable recognition of anti-Christian hatred as a distinct phenomenon.

52. Taken together, these elements illustrate a gap between the principle of equal protection of all religions and its institutional implementation in Europe. This imbalance risks contributing to the relative invisibilization of anti-Christian hatred and undermining the consistency of efforts to combat religious intolerance. In this context, the ECLJ has called on the European Parliament and the Parliamentary Assembly of the Council of Europe to place the fight against anti-Christian hatred more prominently on their agenda.³⁴

2. Turkey, Pakistan and Algeria: Systematic Restrictions on Christians in Breach of International Law

53. In **Turkey**, a range of measures affecting Christian individuals and communities raise serious concerns under international human rights law. Several of these restrictions appear to be incompatible with Article 9 of the ECHR and Article 18 of the International Covenant on Civil and Political Rights (ICCPR), which protect the right to freedom of religion or belief, including the freedom to manifest one’s religion in practice, worship, teaching, and observance. More broadly, these measures reflect a pattern of structural discrimination, contrary to the principles of equality and non-discrimination enshrined in Article 10 of the Turkish Constitution, Article 14 of the ECHR, and Article 26 of the ICCPR.

54. **Pakistan** is a party to the ICCPR, the Convention on the Elimination of All Forms of Discrimination against Women (CEDAW), and the Convention on the Rights of the Child (CRC), all of which impose obligations to protect fundamental rights without discrimination, including on religious grounds. As a Member State of the United Nations, Pakistan is also expected to uphold the principles set out in the Universal Declaration of Human Rights (UDHR), notably the right to freedom of thought, conscience, and religion under Article 18.

³² European Parliament Resolution of 21 January 2026 on human rights and democracy in the world and the European Union’s policy on the matter – Annual Report 2025 ([2025/2166\(INI\)](#)).

³³ PACE, [Countering discrimination based on religion and protecting freedom of religion or belief](#), 23 March 2026.

³⁴ ECLJ, [Christianophobia: Enough is enough!](#), 1 December 2025.

However, the situation of Christians in Pakistan raises serious concerns regarding the effective implementation of these commitments, particularly in relation to blasphemy laws, forced conversions, and unequal access to justice.

55. **Algeria** likewise presents itself as committed to international human rights standards. Since gaining independence in 1962, it has repeatedly affirmed—most recently in the preamble to its 2020 Constitution—its attachment to the principles of the UDHR, including freedom of religion as defined in Article 18. Algeria is also a party to the ICCPR, which guarantees the right to adopt, change, and practise a religion, as well as related freedoms such as assembly and association. However, this commitment is only partially reflected in domestic law. The 2020 Constitution does not explicitly guarantee freedom of religion and has removed the protection of freedom of conscience, instead limiting itself to recognising freedom of opinion and freedom to practise religious worship, both of which remain subject to national legislation.

56. In all three contexts, these restrictions are not isolated but form part of broader, systemic patterns that directly interfere with the right to manifest religion or belief. They illustrate a persistent gap between formal international commitments and their effective implementation in practice, in particular with regard to the rights protected under Article 18 of the ICCPR and, in the European context, Article 9 of the ECHR.

E. Recommendations: The Role of Government and Institutions

57. Taken together, the situations described in this contribution highlight a growing gap between the formal commitment of states to freedom of religion or belief and the lived reality of many Christians, both in Europe and in other regions. This gap is reflected in acts of violence, legal and administrative restrictions, and unequal institutional responses, which undermine the effective enjoyment of fundamental rights guaranteed under international human rights law.

58. In this context, the role of the United Nations is essential. The Secretary-General and Member States are encouraged to strengthen efforts to ensure the equal protection of all religious groups, including by improving data collection on anti-Christian incidents, ensuring effective investigation and prosecution of hate crimes, and promoting policies that safeguard freedom of religion or belief in practice.

59. States concerned, including Turkey, Pakistan and Algeria, should take concrete steps to bring their domestic legal frameworks and practices into conformity with their international obligations, in particular under the ICCPR and, where applicable, the ECHR. This includes ensuring legal recognition of religious communities, preventing abuses of laws that restrict religious freedom, and guaranteeing effective protection against discrimination and violence.

60. Ultimately, ensuring the consistent and non-selective protection of all religious groups is a necessary condition for upholding the universality and credibility of international human rights standards.