

## Contribution to the Report of the United Nations High Commissioner for Human Rights on

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

### September 2025

- 1. On 4 April 2025, the United Nations Human Rights Council adopted resolution 58/29 on "combating intolerance, negative stereotyping, stigmatization, discrimination, incitement to violence and violence against persons based on religion or belief." This resolution requests the High Commissioner to present, at the 61<sup>st</sup> session of the Human Rights Council, a report on measures taken by States to implement this mandate, as set out in resolution 58/29. A call for contributions was addressed to civil society organizations, with a submission deadline set for 30 September 2025.<sup>2</sup>
- 2. The European Centre for Law and Justice (ECLJ), an international non-governmental organization founded in 1998 and holding special consultative status with the UN/ECOSOC since 2007, draws attention to the growing problem of religious intolerance in Europe targeting in particular Christians: an increase in hate crimes, legal and social discrimination, restrictions on religious expression, and desecration of places of worship. These acts often

<sup>&</sup>lt;sup>1</sup> Human Rights Council resolution 58/29, adopted on 4 April 2025, "Combating intolerance, negative stereotyping, stigmatization, discrimination, incitement to violence and violence against persons based on religion or belief" (A/HRC/RES/58/29).

<sup>&</sup>lt;sup>2</sup> Call for inputs on combating intolerance based on religion or belief (pursuant to HRC resolution 58/29).

remain insufficiently recognized by national and European institutions, with weaker political responses compared to forms of intolerance directed against followers of other religions.

3. In 2023, 2,444 anti-Christian incidents were recorded in Europe, including 232 physical assaults, confirming an upward trend.<sup>3</sup> Assaults, desecrations, bans on prayer and dismissals on religious grounds are multiplying without adequate responses, leading to the marginalization of Christians and a gradual criminalization of convictions inspired by Christianity. Shedding light on this anti-Christian hatred is necessary to raise awareness and to strengthen the protection of freedom of religion or belief.

### I. Definition and Recognition of Anti-Christian Hatred

#### A. Anti-Christian Hatred and Christianophobia

- 4. Anti-Christian hatred (or "Christianophobia") refers to any hostility directed against persons, places, or symbols on account of their Christian identity. It encompasses insults, threats, discrimination, acts of vandalism, and assaults motivated by the victims' faith, as well as violations of freedom of religion or belief. In line with the international definition of "intolerance and discrimination based on religion or belief," it includes any distinction, exclusion, restriction or preference based on the Christian religion which has the purpose or effect of impairing the enjoyment of fundamental rights on an equal basis.
- 5. Affecting all Christian denominations Catholic, Protestant and Orthodox and taking place within a climate of growing hostility towards the Christian religion and its values, this reality poses a threat to social cohesion and to freedom of religion or belief. Among the most serious manifestations was the attack of 25 January 2023 in Algeciras (Spain), where an armed man assaulted two churches, killing a sacristan and injuring a priest while shouting "death to Christians," an act qualified as terrorism by the authorities. More commonly, church arson, desecration of tabernacles, and hateful graffiti on the façades of places of worship are recorded on a weekly basis in several European countries.

#### B. Anti-Christian Hatred and International and European Law

- 6. The international framework explicitly or implicitly recognizes hatred directed against Christians. At **the United Nations (UN)**, several resolutions refer to Christianophobia: resolution 72/177 calls upon States to prevent acts motivated by Christianophobia, alongside antisemitism and Islamophobia; resolution 77/318 expresses concern at the increase in discrimination, intolerance and violence against numerous communities, including Christians. 6
- 7. The Organization for Security and Co-operation in Europe (OSCE), for its part, defines as an anti-Christian hate crime any offence accompanied by a bias motivation targeting

<sup>&</sup>lt;sup>3</sup> Observatory on Intolerance and Discrimination against Christians in Europe (OIDAC), Annual Report 2024.

<sup>&</sup>lt;sup>4</sup> Article 2 of the 1981 Declaration on the Elimination of All Forms of Intolerance and of Discrimination Based on Religion or Belief.

<sup>&</sup>lt;sup>5</sup> General Assembly resolution 72/177, Freedom of religion or belief, adopted on 19 December 2017 (A/RES/72/177).

<sup>&</sup>lt;sup>6</sup> General Assembly resolution 77/318, Countering hate speech: promoting interreligious and intercultural dialogue and tolerance, adopted on 25 July 2023 (A/RES/77/318).

a person or property because of an actual or perceived Christian identity. The OSCE documents such incidents annually through its Office for Democratic Institutions and Human Rights (ODIHR). On 28 July 2025, the OSCE published a practical guide entitled "Understanding Anti-Christian Hate Crimes and Addressing the Security Needs of Christian Communities." The official launch of this first-of-its-kind guide will take place in Warsaw on 13 October 2025, during the Human Dimension Conference.

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- 8. At the European level, **the European Union (EU)** does not recognize Christianophobia as a distinct category: incidents are aggregated under the general heading of "religion," while acts against Jews and Muslims are addressed within the framework of combating racism, xenophobia and antisemitism. However, several Members of the European Parliament have regularly advocated for the appointment of a coordinator specifically mandated to address anti-Christian hatred, similar to the positions established since 2015 for antisemitism and anti-Muslim hatred.<sup>8</sup>
- 9. At the jurisdictional level, the European Court of Human Rights (ECtHR) prohibits discrimination on the grounds of religion (Article 14 of the Convention) without employing the term "Christianophobia" in its case law, even though it explicitly refers to "antisemitism" and "Islamophobia" in certain judgments and documents (Guide on Article 17, "Prohibition of abuse of rights"). By contrast, the Parliamentary Assembly of the Council of Europe (PACE) has already used the term: its Recommendation 1957 (2011) called on member States to develop and disseminate educational materials against anti-Christian stereotypes and Christianophobia more generally.<sup>9</sup>

### II. The Increase of Violence against Christians in Europe

10. In 2023, the Observatory on Intolerance and Discrimination against Christians in Europe (OIDAC) recorded **2,444 anti-Christian hate crimes** across 35 European countries. This figure, representing an increase compared to 2022, reflects an intensification of violence targeting churches, religious symbols, and individuals on account of their Christian faith. Among these incidents, **232 assaults** were directed specifically against individuals. These data are drawn from multiple cross-checked sources: OIDAC reports, national police statistics, OSCE/ODIHR records, and civil society reporting. They highlight a phenomenon that remains under-documented by public institutions.

#### 11. The **typology** is as follows:

• Vandalism (62%): graffiti, overturned crosses, desecrated churches and cemeteries. Between 2019 and 2023, around forty acts of vandalism specifically targeting the devotion to Saint John Paul II were recorded across Poland, leading to a case brought before the ECtHR. Damage to statues was accompanied by the destruction of a

<sup>&</sup>lt;sup>7</sup> OSCE, <u>Understanding Anti-Christian Hate Crimes and Addressing the Security Needs of Christian Communities</u>

— A Practical Guide, 28 July 2025.

<sup>&</sup>lt;sup>8</sup> European Parliament, *Increase in criminal acts against Catholic churches*, Written Question E-000584/2025 by Jean-Paul Garraud to the Commission, 8 February 2025.

<sup>&</sup>lt;sup>9</sup> Parliamentary Assembly of the Council of Europe (PACE), Recommendation 1957 (2011), *Violence against Christians in the Middle East*, 27 January 2011.

<sup>&</sup>lt;sup>10</sup> ECLJ, Written Observations submitted to the European Court of Human Rights in the case Dariusz Czerski v. *Poland* (Application No. 55654/21), March 2025.

reliquary, the interruption of a Mass, the desecration of a consecrated host, the damaging of a banner, the physical assault of persons defending a monument, and the burning of a shrine.

- Arson (10%): burned churches, with a 30% increase in France in 2024 compared to 2023.
- Threats/harassment (8%): anonymous letters, intimidation, and the disruption of Masses.
- **Physical violence** (7%): assaults against priests, religious, and faithful. In February 2025, in front of Saint-Eusèbe Church in Auxerre (France), a Catholic priest was insulted because of his religion and severely beaten by two attackers who claimed to be constantly disturbed by the church bells.
- Homicides or attempted homicides (2%): On 9 November 2024, Franciscan priest Juan Antonio Llorente was killed by a mentally unstable individual at the monastery of Gilet, near Valencia (Spain). On 10 September 2025, Iraqi Christian Ashur Sarnaya was murdered in Lyon (France), outside his home, during a live broadcast on TikTok while bearing witness to his Christian faith. Disabled since childhood and in a wheelchair, he had fled Iraq in 2014, threatened like all Christians by the Islamic State. To honour his memory, the ECLJ supported on 28 September 2025 in Paris a unique gathering of around 1,500 people, denouncing the persecution of Christians in France and worldwide.<sup>11</sup>
- 12. The countries most affected in 2023 were **France** (950 incidents, 90% of which targeted churches and cemeteries), the **United Kingdom** (702 incidents), and **Germany** (277 incidents, representing a doubling since 2022). These crimes are intended to intimidate believers and to erase visible signs of Christianity; few result in prosecution, and the phenomenon remains largely ignored by national and European authorities. In France, with a 13% increase in anti-Christian incidents between January–June 2025 compared to the same period in 2024, and with the growing Islamist terrorist threat against Christians in Europe, the Minister of the Interior called on prefects to exercise vigilance. The gravity of the situation is such that on 26 September 2025, 86 French senators issued an appeal for Christians to be protected in France on the same basis as all other believers. <sup>12</sup>

### III. Intolerance, Negative Stereotyping, Stigmatization and Discrimination against Christians in Europe

13. The visible and sometimes bloody violence against Christians must be placed in the broader context of what Pope Francis has called "polite persecution," "disguised as culture, modernity and progress." It manifests itself through non-violent but socially significant cases of progressive marginalization and exclusion from political and social life, as well as from the exercise of certain professions, including in traditionally Christian lands. <sup>13</sup>

<sup>&</sup>lt;sup>11</sup> Aleteia, "A first demonstration in Paris to make the voice of persecuted Christians heard," 29 September 2025.

<sup>&</sup>lt;sup>12</sup> Boulevard Voltaire, "Anti-Christian acts: the Republic must protect all its children!", op-ed by Senator Sylviane Noël supported by 85 senators, 26 September 2025.

<sup>&</sup>lt;sup>13</sup> Commission of the Bishops' Conferences of the European Union (COMECE), *Annual Report 2023*.

- 14. Many Christians in Europe report experiencing a diffuse marginalization affecting employment, education, public expression, the media, and institutions. A study by Voice for Justice UK<sup>14</sup> indicates that 56% of respondents have been mocked or rejected because of their beliefs (61% among those under 35), and 18% report having faced direct discrimination, particularly in the workplace. Young adults, especially in academic settings and in the liberal professions, are the most exposed.
- 15. In practice, dismissals, refusals to hire, or harassment occur when Christian positions (on abortion, marriage, sexuality) are expressed. The case of Kristie Higgs in the United Kingdom, ultimately won in court, illustrates these tensions between freedom of conscience and prevailing social norms. In several countries, pro-life students report intimidation, exclusion from debates, and in some cases death threats.
- 16. This pressure leads to marked self-censorship: only 35% of Christians under 35 in the United Kingdom feel free to express their religious views at work, with the fear of being accused of "hate speech" acting as a strong deterrent. These dynamics contribute to the progressive marginalization of Christians in the public sphere, undermining both individual freedom of religion and the possibility of expressing convictions inspired by Christianity in a society that presents itself as pluralistic.

### IV. Restrictions on the Freedom of Religion of Christians: Laws and Administrative Abuses in Europe

- 17. In several European States, legal or administrative restrictions often indirect limit the effective exercise of freedom of religion by Christians. These affect **public prayer**, **even** in silence (prosecutions for silent prayer around abortion clinics, with "buffer zones" in the United Kingdom, Spain, Germany, and an extended scope in Scotland), freedom of expression, conscientious objection, and parental rights.
- 18. With regard to religious expression, pastors and ministers of religion have faced legal or administrative proceedings for **public statements** (Christian Member of Parliament Päivi Räsänen in Finland on homosexuality; Father Custodio Ballester in Spain on Islam). **Conscientious objection** is being weakened: the integration of abortion into medical training in Germany, registries of conscientious objectors in Spain, and new obligations imposed on Christian institutions concerning euthanasia. **Parental prerogatives** are also being challenged, as in Switzerland in a case related to the gender transition of a minor, or in France with the introduction, as of September 2025, of a new sexuality education programme mandatory for all public and private schools, from kindergarten to high school.<sup>15</sup>
- 19. Finally, a challenge to the Christian heritage is evident in the form of **anti-Christian revisionism**. In **Spain**, in the name of democratic memory or the fight against Francoism, several municipalities have ordered the removal of crosses, calvaries, and other Christian symbols from public spaces, including historical monuments with no direct link to the dictatorship. The emblematic case is the Valley of the Fallen (*Valle de los Caídos*): proposals

15 ECLJ, "Mandatory Sex Education in France: ECLJ Takes Action at the United Nations for Parents' Rights," 5 September 2025.

<sup>&</sup>lt;sup>14</sup> Voice for Justice UK, *The Costs of Keeping the Faith*, June 2024.

have been put forward for a radical transformation of the site, including even the removal of its cross of more than 150 metres. For many Christians a religious symbol, it has become the target of an effort to erase the connection between religion and national memory. The ECLJ denounced this situation during the Universal Periodic Review of Spain (October 2024), illustrating the growing gap between legal guarantees and concrete implementation.<sup>16</sup>

### V. Understanding the Causes of Anti-Christian Hatred

### A. Secularization, Laicism and the Culture of Blasphemy: The Retreat of Christianity in Europe

- 20. Europe is undergoing advanced secularization, in which Christianity is increasingly confined to the private sphere. In the name of a narrowly interpreted neutrality, Christian symbols are being removed from public space (crosses, Christmas crèches, processions), and proposals have even been made to abolish certain public holidays of Christian origin, marking a symbolic erasure of this heritage. In September 2025, the advertising campaign for the film "Sacré-Cœur" in metro stations and train stations was banned by SNCF and RATP on the grounds that it was too "confessional and proselytizing" and "incompatible with the principle of neutrality of public service." <sup>17</sup>
- 21. At the same time, a "culture of blasphemy" has taken root: in the media, the arts, advertising, and social networks, Christian references are regularly ridiculed. The Christian sacred is perceived as outdated, and its transgression raises little concern, while public expressions of faith are often portrayed as archaic or contrary to progress.
- 22. Recent episodes have crystallized this dynamic. In June 2025, a Spanish comedian, who claims a "punk humour" style and whose attacks target "the police, fascists and the Catholic Church," simulated an act of masturbation with a cross on the altar of the church of Arbérats-Sillègue in France. While not necessarily amounting to criminal offences, such acts foster a hostile climate that culturally delegitimizes Christianity.

### B. Perpetrators of Anti-Christian Acts: Radical Muslims, Laicist Activists and the Far Left

- 23. Acts of anti-Christian hatred in Europe stem from diverse ideological currents united by an explicit hostility toward Christianity as a faith, heritage, or cultural reference point. A first recurring profile is that of **radical Muslims**, often involved in physical violence: in 2023, 21 documented attacks in Europe displayed an Islamist motivation. Christian converts from Islam are particularly targeted, as highlighted in an ECLJ report of 2021.<sup>18</sup>
- 24. A second type of actors consists of **militant laicist organizations** which do not merely seek the separation of Church and State, but the exclusion of all religious expression particularly Christian from the public sphere. In France, the National Federation of Free Thought (*Fédération nationale de la Libre Pensée*) has obtained or demanded the removal of

<sup>&</sup>lt;sup>16</sup> ECLJ, <u>Status of Human Rights</u> in the Kingdom of Spain for the 49<sup>th</sup> Session of the Universal Periodic Review, October 2024.

<sup>&</sup>lt;sup>17</sup> Le Figaro, "Deemed too 'confessional and proselytizing,' the advertising campaign for the film Sacré-Cœur banned by SNCF and RATP," 30 September 2025.

<sup>&</sup>lt;sup>18</sup> ECLJ, *The Persecution of Ex-Muslim Christians in France and in Europe*, 2021.

crosses, statues or nativity scenes (the Virgin of La Flotte-en-Ré, Saint Michael in Les Sables-d'Olonne, ceremonies of Saint Geneviève), thereby contributing to the erasure of common Christian references.

25. Finally, **far-left activists** also target Christianity, perceived as bearing conservative values, particularly on issues of life. Examples include the harassment of worshippers in Barcelona by pro-abortion activists in September 2023; the case *Bouton v. France*, concerning a Femen activist who appeared topless in the Church of La Madeleine in Paris in 2013, before simulating an abortion and urinating on the altar steps (ECtHR, 2022);<sup>19</sup> and the case concerning consecrated hosts profaned for a so-called work of art in Spain in 2015 (ECtHR, 2023).<sup>20</sup> The motivations are diverse, but the dynamic is the same: to marginalize Christianity and foster a hostile climate affecting believers and Christian symbols.

### VI. Asymmetrical European Legal Protections to the Detriment of Christians

- 26. Freedom of religion or belief is guaranteed by Article 18 of the International Covenant on Civil and Political Rights (ICCPR) (faith, change of religion, worship, teaching, observance, in public or in private), further clarified by General Comment No. 22 of the Human Rights Committee (inalienable right, protection against any coercion by the State or by third parties). Restrictions are permissible only if they are prescribed by law, pursue a legitimate aim, and are necessary and proportionate. The UN framework protects the collective dimension (assemblies, faith-based schools, places of worship) and condemns religious intolerance (Article 20 ICCPR on the prohibition of advocacy of hatred, and the 1981 Declaration on the Elimination of All Forms of Intolerance and of Discrimination Based on Religion or Belief).
- 27. **The European Union** guarantees freedom of religion (Article 10 of the Charter of Fundamental Rights of the European Union) and prohibits discrimination based on religion (Article 21 of the Charter), in line with Article 9 of the European Convention on Human Rights. In practice, however, only two coordinators have been appointed (on antisemitism and on anti-Muslim hatred), while Christians benefit from no dedicated post; the "dialogue" under Article 17 TFEU remains the main interface. Externally, in 2013 the EU adopted Guidelines on the promotion and protection of freedom of religion or belief and, in 2016, appointed a Special Envoy for the promotion of freedom of religion or belief outside the EU, whose mandate and budget remain limited and whose position has been vacant for significant periods (occupied for only about five of the last ten years). Internally, no specific institutional mechanism monitors freedom of religion within the Member States, which limits action in the face of violations occurring within EU territory.
- 28. **The European Court of Human Rights** protects freedom of religion (Article 9), freedom of expression (Article 10), equality (Article 14) and parental rights (Article 2 of Protocol No. 1), subject to legality/necessity/proportionality review. However, it has admitted very offensive expressions against Christianity under Article 10 (for example *Bouton v*.

<sup>&</sup>lt;sup>19</sup> ECLJ, "Femen: ECHR supports anti-Christian blasphemy," 13 October 2022.

<sup>&</sup>lt;sup>20</sup> ECLJ, "'Hosts Case': The European Court of Human Rights will not deliver justice to Christians," 29 January 2024.

France, 2022; Rabczewska v. Poland, 2022; Vereinigung Bildender Künstler v. Austria, 2007; Mariya Alekhina and Others v. Russia, 2018), while upholding restrictions on criticisms of Islam (I.A. v. Turkey, 2005; Le Pen v. France, 2010; E.S. v. Austria, 2018; Zemmour v. France, 2022) in the name of combating hatred. Furthermore, Article 17 (abuse of rights) is invoked against antisemitism and Islamophobia (as well as hatred of non-Muslims by Muslims) in the Court's doctrine, without any explicit reference to Christianophobia.

### VII. Victims of Anti-Christian Acts: Why and How to Report Them

- 29. **Reporting** any anti-Christian act, whether experienced or witnessed, is essential. Such acts should be declared to the competent national authorities (police, judicial bodies, institutions) as well as to specialized organizations, such as the European Centre for Law and Justice and the Observatory on Intolerance and Discrimination against Christians in Europe. It is important to explicitly state the anti-Christian motive of the assault, threat, or discrimination: this qualification ensures proper statistical recording, informs public decision-makers, facilitates the opening of investigations and the prosecution of perpetrators, and may lead to recognition of the act as a hate crime or hate speech on religious grounds. In France, for example, religious motivation constitutes an aggravating circumstance under Article 132-76 of the Penal Code.
- 30. In practice, incidents should be **documented** (photographs, videos, testimonies, preservation of messages), reported to the police or gendarmerie, and, in cases involving violations of fundamental rights, brought before national courts and, as a last resort, the European Court of Human Rights. It is also useful to alert the relevant administrative authorities (ombudsman, labor inspectorates, education authorities) and to contribute to the OSCE hate crime reporting system (at: <a href="mailto:hatecrimereport@odihr.pl">hatecrimereport@odihr.pl</a>), as well as to report hateful online content through national reporting mechanisms (such as PHAROS in France).
- 31. **Support** can be obtained from non-governmental organizations, both for documentation and for legal assistance: the ECLJ, OIDAC, the *Observatorio para la Libertad Religiosa y de Conciencia* (Spain), the *Laboratorium Wolności Religijnej* (Poland), and the Commission of Inquiry into Discrimination Against Christians (United Kingdom). Emphasizing the anti-religious motive when reporting is not a mere detail: it is an act of defending fundamental rights that protects the victim, strengthens deterrence, and serves the Christian community as well as society as a whole.

### VIII. Concrete Proposals to Combat Anti-Christian Hatred in Europe

- 32. The ECLJ recommends that the High Commissioner support a number of concrete measures to strengthen the protection of Christians in Europe and to address anti-Christian hatred more effectively. These proposals are grounded in the principles of equality, freedom of religion or belief, and non-discrimination.
  - Adopt a clear definition of anti-Christian hatred: Develop, at the international level, a reference definition to identify and qualify anti-Christian acts, facilitating data collection, trend analysis, and public action.

- Publicly acknowledge the seriousness of incidents and condemn them swiftly: Demonstrate political will, condemn each incident without delay, and explicitly include Christian communities among the "vulnerable targets" to be protected.
- Explicitly integrate anti-Christian acts into European and national frameworks: Recognize such acts as a specific form of religious discrimination in legal texts, strategies and action plans, ensuring visibility, monitoring and an appropriate response.
- Appoint a European Coordinator and national focal points: Designate within the European Commission a coordinator dedicated to combating anti-Christian hatred, supported by national contact points in each Member State for coordination, reporting, and dialogue with communities.
- Collect and share reliable, harmonized and published data: Establish national inquiry commissions and a robust system of statistical monitoring; distinguish hate crimes from other offences and, within religious hate crimes, isolate an "anti-Christian crimes" category; promote cooperation between authorities, civil society and communities to improve reporting, recording and regular publication.
- Build trust between authorities and Christian communities: Create permanent dialogue mechanisms (consultative forums, inter-institutional working groups), with targeted and transparent funding for security and prevention measures.
- Train key actors: Provide training modules for law enforcement, prosecutors, judges, administrations, teachers and local officials (on qualification of offences, victim reception and referral, cooperation with Christian communities).
- Work with Christian communities on security and protect religious sites and events: Jointly develop tailored protection plans, strengthen the security of churches, cemeteries and gatherings, and apply dissuasive sanctions in cases of desecration or damage.
- Ensure clear and rapid reassurance after incidents: Communicate transparently following a crime, provide reassurance to Christian communities, reinforce security presence, and engage in useful lessons learned.
- **Provide tailored victim support:** Offer needs assessment, guidance, follow-up, and legal and psychological assistance, while avoiding secondary victimization.
- Refocus legal protection on objective criteria of worship: The protection of freedom of religion should rely less on subjective notions (such as "religious feelings") and more on objective criteria: the integrity of places of worship, the freedom of celebrations, and the security of worshippers.
- Guarantee conscientious objection in sensitive professions: Ensure a clear, effective and non-stigmatizing legal right (in health, education, justice, public service), with safeguards against sanctions or professional discrimination.

• Recognize the historical and cultural contribution of Christianity in Europe: Protect Christian symbols and sites, and integrate this heritage into cultural and educational policies to strengthen social cohesion and pluralism.