ARTICLE 19

Tightening the Net

Iran's new phase of digital repression

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ARTICLE 19 is an international think–do organisation that propels the freedom of expression movement locally and globally to ensure all people realise the power of their voices.

Together with our partners, we develop cutting-edge research and legal and policy analysis to drive change worldwide, lead work on the frontlines of expression through our nine regional hubs across the globe, and propel change by sparking innovation in the global freedom of expression movement. We do this by working on five key themes: promoting media independence, increasing access to information, protecting journalists, expanding civic space, and placing human rights at the heart of developing digital spaces.

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Abbreviations

CRA   Communications Regulatory Authority

NCC   National Center of Cyberspace

NIN   National Information Network

SCC   Supreme Council of Cyberspace

VPN   Virtual private network

Tightening the net: Iran's new phase of digital repression

Following every national uprising, the Islamic Republic pays special heed to further centralising and tightening control over the internet, prompting a new era of digital repression. In this report, ARTICLE 19 takes a look at how the Iranian regime is strengthening its hold over the internet through its Supreme Council of Cyberspace (SCC) with ever-increasing powers and under a new hardline leadership. While the election of the new President Masoud Pezeshkian might signal potential change in personnel for the body, there is little doubt what we have documented will continue to be the trajectory. We also issue recommendations on how third-party states and private entities should react to these changes.

After the repression of the November 2019 protests, which saw one of the most severe crackdowns on the streets and online, including a week-long internet shutdown, came the era of the User Protection Bill (*Tarhe Sianat)*. While the Bill has yet to be passed by parliament or officially enforced, its main pillars have been quietly implemented. The ethos of the Bill has led to aggressive forms of censorship, introducing filtering of practically all platforms and applications that are already not under the influence of the state. The Bill also mounts an aggressive attack to disable and potentially criminalise circumvention tools. Underlying all these efforts is Iran's goal to consolidate all facets of internet use into the hands of the government and even the military.

We have previously documented the aggressive online repression that took place alongside the crackdown on protesters throughout the Mahsa Jhina Amini uprising which began in autumn 2022. While we have documented with growing concern the developments of the draconian User Protection Bill and its unlawful implementation leading up to and during the recent uprising, we also note the developments within the SCC that signal an intensifying threat to internet freedom and rights in Iran.

In this briefing we outline the growing power of the SCC, a central organ of national interest controlled by the unelected and all-powerful Supreme Leader Ali Khamenei. As Iran's central and authoritative internet policy body, the SCC has steadily edged towards a comprehensive and multifaceted campaign to further suppress freedom of expression on the internet and to complete the National Information Network (NIN), Iran's domestic

internet.[1] We also outline four key developments since the Mahsa Jhina Amini uprising that raise the alarm about the future of internet freedom in Iran:

1. **New powers for the SCC**, including:

   - A new remit and priorities for the newly appointed secretary of the SCC, hardliner and former head of the student unit of the Basij volunteer militia group, Mohammad Amin Aghamiri. The appointment is instituted by the President and enforced by the Supreme Leader.

   - New powers to control filtering through the government's Seventh Development Plan.

   - New quasi-judicial powers, ushered in by a parliamentary ruling that makes policies and regulations ordered by the SCC enforceable without parliamentary or judicial oversight.

2. **SCC decree 'Reviewing Strategies to Increase the Share of Domestic Traffic and Counter VPNs'**.

   - The decree pushes users towards domestic platforms, which are easier to place under SCC control.

   - The decree prohibits virtual private networks (VPNs).

3. **SCC plans to enact the new [Hijab and Chastity Bill](#) and increased pressure to** police women's wearing of the hijab through a [Cyberspace Monitoring System](#).

   SCC's '[Revenue Sharing of Digital Content'](#) plan to enact new monetisation programmes for government-aligned 'social media influencers'.

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[1] There are a number of contesting meanings for this, but it ultimately refers to the hosting of data centres, servers, technology, and related internet infrastructures within the borders of Iran.

Background on the SCC

The SCC was formed by order of Supreme Leader Ali Khamenei on 7 March 2012. While legislation according to the Constitution of the Islamic Republic is the exclusive domain of the Islamic Consultative Assembly, the government wields executive power held by Ali Khamenei through the activity of the Supreme Councils such as the Supreme Council of the Cultural Revolution and the SCC. Over the years, Khamenei has expanded the powers of these councils so that they have authority over policy-making, legislation, and enforcement without normal judicial or parliamentary processes.

In his 2012 decree creating the body, Khamenei described the SCC as a 'centralised focal point for policy-making, decision-making, and coordination in the country's cyberspace'. He instituted experts and members of various government institutions as members of the SCC, aiming to consolidate the power of the Council through the presence of powerful members.

On 5 September 2015, Khamenei appointed members of the SCC for another term. Their membership has continued for nearly nine years.

In a 2015 decree, Khamenei emphasised the need to dissolve councils operating in parallel to the SCC and stated that the National Center of Cyberspace (NCC) as the arm of the SCC should also be 'consolidated and strengthened'.

He also tasked the SCC and the NCC with the accelerated launch of the NIN and with 'sanitisation and comprehensive security of the country's cyberspace' against 'the intrusion and encroachment of foreigners'.

The SCC has 27 members, 18 of whom are governing institutional heads and 9 of whom are industry experts. Among the 18 institutional members, 7 are from institutions under the supervision of the Supreme Leader. This, in addition to the support from the 9 experts he appoints directly, ensures he wields strong influence over the SCC.

Khamenei's direct intervention in dealing with the internet dates back to 1998 when he issued the 'general policies of computer information networks'. Here he established that access to the global internet can only be authorised through certain government

institutions. This highly centralised access to the global internet has been previously mapped out by ARTICLE 19 in the _Tightening the Net 2020_ report.[2] The dependence on Internet Service Providers to gain licences from the government to access global connections has proven a major hurdle to connectivity and the maintenance of the health of the network in Iran.

After that, from 2001 to 2010, Khamenei issued orders imposing restrictions on access to the internet and increasing control over cyberspace through the Supreme Council of the Cultural Revolution and the Supreme Council of Information Exchange Security (later dissolved in 2016). From 2012 onwards, with the formation of the SCC and its executive arm, the NCC, Khamenei has continued to pursue these repressive restrictions.

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[2] See our map of internet infrastructure in the _Tightening the Net 2020_ report, as well as our 2021 report which indicates a refusal by former President Ebrahim Raisi's government to issue licences to Internet Service Providers for access to the international internet.

New powers for the SCC

The power and authority of the SCC and the NCC have been continuously increasing since their establishment in 2012. Most recently, this power has been directly linked to the rise of hardliner Mohammad Amin Aghamiri, the new secretary of the SCC. ARTICLE 19 has noted with concern three new developments in the increasing draconian powers of the SCC:

1. Through its **new hardline leadership**, it is tasked with new responsibilities (as listed previously) and powers, with blessing from the Supreme Leader.

2. The **Seventh Development Plan** adds more authority to the SCC.

3. There are new **exemptions from judicial scrutiny** for regulations issued by the SCC.

New hardline leadership

Appointing a hardline secretary to direct this new phase of digital repression

In 2023, Mohammad Amin Aghamiri was appointed as secretary of the SCC and head of its executive arm, the NCC, in the midst of the uprising following the death of Mahsa Jhina Amini. Aghamiri is a 37-year-old hardline regime figure with deep family ties to the elites of the Islamic Republic.

Aghamiri's first official position dates back to 2009 and his student days at Sharif University of Technology, Tehran, when he was appointed as head of the student unit of the Basij at the university. Iran's Basij are a unit within Iran's Islamic Revolutionary Guard Corps, and are often known as the state's 'iron fist' because of how they oppress dissidents and protesters, often through violent, and even fatal, means. The role of the Basij in suppressing student protests on campuses during the 2009 protests is well known, and Aghamiri played a central role in those efforts.

Prior to joining the government of former President Ebrahim Raisi in 2021,[3] Aghamiri held various positions within science and technology institutions. As Raisi began his presidency, Aghamiri was appointed as Deputy Minister for Technology and Innovation in the Ministry of Communications, and was among those tasked to 'facilitate the domestication of equipment needed for the NIN within the country'.

A year later, in 2022, in another decree, the Minister of Communications appointed Aghamiri as Deputy Minister and head of the Communications Regulatory Authority (CRA). As ARTICLE 19 has previously outlined, the CRA is deeply integral to surveillance and censorship operations, as well as internet shutdowns in Iran, and its head works closely with intelligence authorities.

Then, in February 2023, former President Raisi appointed Aghamiri as secretary of the SCC and head of the NCC. This came a few months after the CRA's suppression of internet access in order to quash the Mahsa Jhina Amini uprising under Aghamiri's leadership. Aghamiri was initiated, with the full support of the Supreme Leader, to lead internet policy at this new crucial juncture for internet repression in Iran.

On 24 April 2023, the US Treasury Department issued sanctions against Aghamiri, among others, for his involvement in 'widespread filtering and blocking of news platforms' and the use of 'digital technology to spy on and harass journalists and opponents'.

The EU, on 22 May 2023, and the UK, on 6 July 2023, sanctioned Aghamiri for 'serious human rights violations in Iran' and 'violating the right to freedom of expression'.

In the decree appointing Aghamiri, he was tasked with several priorities as the secretary of the SCC, including:

- Network transformation in the secretariat and the NCC using the capacity of 'young, elite, faithful, and revolutionary forces'.

- Strengthening 'Iranian-Islamic cultural content' to counter the 'cultural invasions of the enemy'.

- Establishing strong Iranian platforms nationally and globally.

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[3] President Ebrahim Raisi was killed in a helicopter crash on 19 May 2024. At the time of writing this report, President-elect is Masoud Pezeshkian had not yet taken office and Aghamiri remained at the helm of the SCC.

- Using diplomacy and international ties to strengthen the Iranian IT industry.

- Updating filtering policies to reflect present-day challenges and threats.

The decree also emphasised that all governmental agencies and institutions must have 'maximum coordination' with the SCC and NCC during the implementation of these missions. These priorities indicate how central the mission of the SCC, and thus controlling the internet, is to the future of the Islamic Republic.

This also highlights how senior officials, including as high up as the Supreme Leader, further consolidate their power to determine the shape of digital repression in the hands of the SCC. Ensuring the SCC is helmed by a hardline personality such as Aghamiri, who has a history within the Islamic Republic's extremely repressive Basij forces, reinforces this new direction.

The decree's mention of seeking international presence of national technology platforms also indicates a general move towards China's model of attracting international users to their national applications. Platforms that are known to be surveilled and censored by the Chinese government, such as WeChat, have attained international popularity. It also elucidates former President Raisi's government's efforts to support companies such as Abr Arvan – which will likely continue throughout the presidency of Masoud Pezeshian – especially in pledging financial support for the Iranian technology company to legally contest its European sanctions to reinstate a large share of their international customers. While Pezeshkian made campaign promises of free access to the internet, his pursuit of NIN and adherence to the core tenets of the internet policy set out by the Supreme Leader indicate continuity. Similar promises had been made during former President Hassan Rouhani's election campaign, but his tenure included some of the most brutal years for internet policy in Iran.

Seventh Development Plan and the NCC's new filtering powers

Following Aghamiri's appointment, the legislative commission behind the Seventh Development Plan[4] in parliament pushed through a decree in August 2023 and assigned the 'command of cyberspace security and its leadership' to the NCC.

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[4] This is the five-year development plan set out by each presidential government for their vision of economic growth. This plan is voted on in parliament.

Mohsen Zanganeh, the spokesperson for this commission, said that in this parliamentary decree the NCC is obliged to approve all policies and requirements for regulating cyberspace platforms and the digital economy. Everything they decide will be ratified by the SCC and all the regulators that fall under it. The associated industries, including all digital platforms, are obligated to comply with their policies.

According to the spokesperson for the Seventh Development Plan Bill Commission, with the finalisation of this decree, 'any blocking and filtering of platforms is under the authority of the National Center of Cyberspace'. The centre will also be responsible for formulating and implementing the 'system for prevention of and response to cyberspace incidents'.

Exemptions from judicial scrutiny

In May 2023, the Islamic Consultative Assembly approved the amendment to the Administrative Justice Court Organization and Procedure Law, explicitly ensuring that decrees issued by the SCC cannot be challenged before the Administrative Justice Court.

This is an exemption to the Administrative Justice Court Law, which gives the Court the competence to 'revie[w] complaints and grievances and objections from natural or legal persons regarding governmental and municipal departments as well as regulations from public non-governmental institutions', and to determine whether these regulations lead to 'abuse or misuse of powers or violations in the implementation of laws and regulations or refusal to perform duties' and also 'cause the violation of individuals' rights'.

This means that in addition to increasing the power of the SCC, its decrees are also immune from being challenged for disregarding citizen rights.

Government officials' actions to increase the power and immunity of the SCC have taken place because the main mission of this council is to complete the NIN, referred to as the 'national internet' in Iran. It is a priority for the regime that this is shielded from any challenges despite its negative impact on individual rights and internet freedoms.

Although the initial brief for NIN was the development of a communication infrastructure for separating domestic and foreign network traffic, today an important indicator for the success and completion of the NIN is 'increasing the ratio of domestic to foreign traffic as much as possible' and 'transferring all servers and data storage centres so that they are

based within the country'. These are now considered to be the main pillars of the 'national internet'.

The collection of decrees and actions set out by the SCC and its executive arm NCC, especially in the past year, are numerous and underpin these nationalisation efforts for the NIN.

SCC decree 'Reviewing Strategies to Increase the Share of Domestic Traffic and Counter VPNs'

Intensification of efforts to push users towards domestic platforms

The Islamic Republic's efforts over the past decade to impose domestic platforms on Iranian users have failed, and a February 2024 government centre survey demonstrated that, despite censorship, Instagram, Telegram, and WhatsApp remain the most popular and widely-used platforms among Iranian users.

The Iranian Government has now implemented a new round of measures to push users onto domestic platforms in a bid to control and surveil platforms through the SCC and the NCC. Generally, national platforms have no rigid privacy protocols to protect users, leaving Iranians vulnerable to government decisions about how it will use their data. The dangers of what data these applications can collect is very real, as significant precedent exists for this kind of behaviour from Iranian authorities where data from communications has been used to monitor and arrest users. Examples range from collecting information on whether internet users have banned applications on their phones, as seen through the application Snapp, to, more recently, the SnappFoods application being used during the Mahsa Jhina Amini protests to geolocate and arrest activists.

In November 2023, the SCC approved a decree titled 'Reviewing Strategies to Increase the Share of Domestic Traffic and Counter VPNs' which shows the multi-pronged approach to nationalise the internet both through suppression of VPNs and coercion of users onto national applications. VPNs are ubiquitous in Iran and the majority of Iranians use VPNs to access the international internet because many popular applications are already censored.

On 9 January 2024, the Supreme Leader approved the SCC's decree, indicating imminent enforcement. This point was emphasised by Aghamiri, Secretary of the SCC, in his letter dated 19 February, 2024, stating: 'the decree … is now being communicated for implementation'.

According to the SCC decree, the 'Ministry of Culture and Islamic Guidance, in cooperation with the Ministry of Economy and the Ministry of Communications' are tasked to 'transfer content producers and businesses active on foreign platforms to domestic platforms.' It added that the three ministries must bring 50% of content producers onto domestic platforms, forcing them to halt their activities on foreign platforms within 6 months.

Authorities have consistently pushed for Iranian users to rely on the domestic internet for government services. Already existing for banking and most government online administrative purposes, this SCC decree will ensure it also extends to public institutions such as municipalities and their subsidiaries.

If this section of the SCC's decree is fully implemented, it is likely that even Iranians residing abroad needing to interact with government bureaucracy will also be forced to install domestic platforms originating in Iran for administrative and personal matters such as obtaining or exchanging birth certificates and national ID cards, renewing passports, marriage and divorce affairs, property registration, and other similar matters.

The SCC has also issued a (separate) but complementary [decree](#) authorising the creation of ['shells' of existing applications](#), sometimes known as 'clients'. In 2018, as the Iranian judiciary ordered Telegram Messenger to be blocked, [Telegram clients](#) became a new way for the authorities to try to monitor and censor use of Telegram. Telegram offers an open Application Programming Interface where developers can create their own clients to access Telegram. The authorities developed controlled 'forks' called ['Telegram Talaee'](#) that could bypass the Telegram censorship, whereby user data was monitored by the Ministry of Intelligence and censorship of content was enabled. The SCC has announced its intention to use its experience in creating and offering [Telegram clients](#) to transfer millions of Iranian users to these new fake shells for other platforms. However, it is not clear how this would work for platforms beyond Telegram. This action, if implemented, will put the privacy and information of millions of Iranian users at the disposal of government agencies.

ARTICLE 19 has repeatedly [warned](#) of the privacy and surveillance implications of domestic platforms. With no adequate protections within existing laws that abide by international human rights standards, and a plethora of cases of users' data and

information used for arrests and prosecution, this poses a risk to free expression and privacy of all those needing to interact with the state.

Prohibition of VPNs

According to the 'Reviewing Strategies to Increase the Share of Domestic Traffic and Counter VPNs' decree, 'the use of VPNs is only possible in cases where it is legally permitted; otherwise, it is prohibited and a crime'. In an internet environment where the majority of internet services, websites, and platforms not controlled or cooperating with the state are filtered, VPNs are ubiquitous and access to them in contexts like Iran are synonymous with access to the free internet. The concept of 'legal VPNs' has also been workshopped by authorities who asked users to sign up with their personal details to receive different tiers of access based on their needs. This project has generally been rejected by users. Fears of internet surveillance and monitoring, in addition to the announcements that censorship of 'immoral content' will be upheld unless there are professional reasons for exemptions, have left many sceptical of the service.

The decree states that a seven-member working group, chaired by the head of the NCC, currently Aghamiri (who is also secretary of the SCC), will be formed to 'review the regulation of VPN tools'. Members of this working group, whose practical mission is to combat VPNs and create restrictions on access to the global internet, include the Attorney General of the country, the Minister of Information, the Minister of Communications, a representative of the Islamic Revolutionary Guard Corps, and two members of the SCC.

The decree was met with widespread opposition from internet users, lawyers, internet and communications experts, and also a number of media outlets in Iran, leading officials to backtrack.

Aghamiri claimed on 21 February 2024 that 'regarding Section 6 of the recent decree, the interpretations of VPNs are incorrect; the decree's target [is] government agencies' and 'not the people'.

However, on 20 February 2024 Aghamiri contradicted this and expressed regret over the increase in people using VPNs: 'Unfortunately, the use of these tools has increased, and we are investigating the issue of VPNs in the Supreme Council of Cyberspace's decree to

consider mechanisms to solve the problem within the framework of the law and regulations'. This indicates that they are indeed looking for ways to limit VPN usage.

Despite the statements by the government spokesperson and the secretary of the SCC, [Section 6 of the SCC's decree](#) on 'the prohibition of the use of VPNs' has so far not been amended. No SCC representative has denied the real meaning of the different elements of the decree. Instead, the SCC has [issued statements about the public misinterpreting](#) the decree or, as in the case of Ali Bahadori Jahromi, [spokesperson](#) for former President Ebrahim Raisi's government, that government agencies were looking for a 'suitable time' to implement the general and nationwide ban on VPNs, adding that the initial timing of the announcement was a 'mistake'.

The SCC's lack of clarity, inconsistency, and transparency sparks widespread alarm for internet rights in Iran. Access to VPNs is that last frontier for access to a free internet.

Open-source hijab and chastity policy integrated into the Cyberspace Monitoring System

The Ministry of Culture and Islamic Guidance has been trying to launch the Cyberspace Monitoring System since February 2021. This system is a tool for peer reporting on people's use of social networks, websites, and online media, and is now being aligned with aggressive new policies, including the Hijab and Chastity Bill.

Most worryingly, the statements from the Minister of Culture and Islamic Guidance indicate that the Cyberspace Monitoring System is similar to the Nazer (Observer) app, which the Law Enforcement Command of the Islamic Republic has used to target women not wearing hijab.

Hijab enforcement forces and the Basij, upon observing women without hijab in streets, vehicles, and commercial, cultural, and even historical places, use the Nazer app to send reports to law enforcement command centres. Since the launch of this system, thousands of people in Iran have received reminder text message warnings about not observing hijab, thousands of vehicles have been confiscated, and many cafes, restaurants, bookstores, recreational centres, and other commercial and cultural places have also been sealed for not ensuring their patrons maintain 'proper' hijab.[5]

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[5] Office of the United Nations High Commissioner for Human Rights, Detailed findings of the independent international fact-finding mission on the Islamic Republic of Iran, 1250, 1270; Amnesty International, Iran: International community must stand with women and girls suffering intensifying oppression, 26 July 2023.

'Revenue sharing' of digital content: A tool for transforming influencers into government advertisers

In its new campaign, the Islamic Republic is not only focusing on suppressing and censoring the internet and social networks; it is also looking to turn internet influencers into government advertising tools by implementing a plan called 'Revenue Sharing of Digital Content'.

According to Aghamiri, the SCC's decree on 'Revenue Sharing of Digital Content' will involve paying producers of online content using revenue from internet traffic in Iran and engagement metrics. The layout of payments is unclear, but already influencers tied to the state have been promoting how the Rubika app can provide people with an income. One state influencer used Instagram to advertise that her Rubika page has made her 801 million tomans, approximately USD 1,400, a considerable sum in a country where the average monthly income is USD 200. While there was no explanation on how the application monetised usage, it is an effort to onboard more users onto the national platforms.

Prior to this, government bodies in Iran, especially the Ministry of Culture and Islamic Guidance, used the allocation of paper quotas (there is a paper shortage in Iran), cash subsidies for media, and government advertisement revenue as tools to control newspapers towards regime-friendly content if not outright state propaganda. This system deteriorated trust, and audiences have largely turned away from reading the newspapers that benefitted from the scheme. It has also left little room for even semi-independent newspapers to compete. Similar policies were also enacted on online news websites throughout the 2010s.

While the exact mechanisms of monetisation are not clear from the decree, it appears evident that through the decree appointing Aghamiri, the regime is seeking to incentivise new users, especially youth loyal to the regime, onto national platforms, while simultaneously creating government propagandists through their 'revenue sharing' plan.

Recommendations

The Islamic Republic must dismantle its systems of internet control in flagrant violation of international human rights standards and laws. These systems of digital repression lead to real-life human rights atrocities and must be removed.

We make the following recommendations to states and private companies located outside Iran:

- The international community must **prioritise addressing how these new SCC decrees will impact human rights in Iran** with urgent consideration to the real-world harm created by these systems. In particular, they should **condemn efforts to prohibit VPNs**, whether through legal criminalisation or technical means, which will result in the erosion of the last means for access to a free internet.

- Given the plans of the SCC to promote Iranian platforms beyond Iran, third states should **prohibit Iranian technology businesses** that are, or have been, **complicit in Iran's digital repression and the building of the NIN**, from operating within their jurisdiction and from acquiring users and customers.

- Similarly, third states should **sanction non-Iranian entities exporting or aiding in these systems inside Iran**. Some of the applications mentioned in this report include the Nazer app, the infrastructure behind the Cyberspace Monitoring System, and the Rubika app.

- Social media platforms should **remove content creators or content** that **promotes either state propaganda proven to be part of these 'revenue sharing schemes'** or a move onto domestic applications.

- Research and technology companies must **invest in secure and censorship-resilient VPNs** to counter Iran's efforts to disable and disband them under the 'Reviewing Strategies to Increase the Share of Domestic Traffic and Counter VPNs' decree.

- We encourage both states and private companies to **research and invest in satellite internet technology** to counteract Iran's efforts to build a nationally controlled internet that is draconian and repressive in nature.