



Saudi Arabia

Alternative follow-up report

Report submitted to the United Nations Committee on the Elimination of Racial Discrimination in the context of the follow-up to Concluding Observations

May 2026

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1 Introduction

This alternative report is submitted by MENA Rights Group, the European Saudi Organisation for Human Rights (ESOHR), ALQST for human Rights and Reprieve as an independent assessment of the implementation of the Concluding Observations adopted by the Committee on the Elimination of Racial Discrimination (CERD) following its review of Saudi Arabia's combined tenth and eleventh periodic reports.¹

In its Concluding Observations,² CERD expressed concern about the absence of a comprehensive definition of racial discrimination in domestic legislation; persistent discrimination against non-nationals, including migrant workers; the situation of stateless persons (notably the Bidoon) and Shi'a Muslims; restrictions on freedom of expression affecting those who report discrimination; the lack of disaggregated data; and the insufficient safeguards to prevent discrimination in the judicial system; and the rise in the number of executions against minorities.

This submission focuses primarily on issues CERD requested Saudi Arabia to report on within one year,³ including: (1) the conduct of training programs for state officials to prevent racial discrimination and public education campaign on how to file complaints of racial discrimination; and (2) the adoption of a comprehensive penal code criminalising hate speech and hate crimes, in line with the Convention. The report assesses whether sufficient measures have been adopted by the State to implement these recommendations and their practical impact on individuals and communities affected by racial, ethnic, national or religious-based discrimination.

The report covers developments from the date of CERD's Concluding Observations up to January 2026, drawing on publicly available information, civil society documentation, media reporting and legal analysis.

2 General human rights situation in Saudi Arabia in 2024-2026

Since the adoption of the Concluding Observations by the CERD, Saudi Arabia has seen a dramatic and historic rise in executions, with 2024 marking a stark escalation compared to previous years.

¹ MENA Rights Group, *Uncovering racial discrimination in Saudi Arabia: findings of the CERD Committee*, 19 December 2024, available at: <https://menarights.org/en/articles/uncovering-racial-discrimination-saudi-arabia-findings-cerd-committee> (accessed on 2 December 2025).

² CERD, *Concluding observations on the combined tenth and eleventh periodic reports of Saudi Arabia*, 24 December 2024, available at: <https://digitallibrary.un.org/record/4072373?ln=fr&v=pdf> (accessed on 2 December 2025).

³ *Ibid.*, para. 59.

In 2024, Saudi Arabia carried out 345 executions, the highest number in its history, including 138 foreign nationals and 122 individuals sentenced solely for drug-related offences, most of whom were foreigners.⁴ 2024 also saw the highest number of women executed on record, with nine women put to death. Of these, four were convicted of non-lethal drug related offences, all of whom were Nigerian.

According to official data, between January 2014 and April 2026, the Kingdom executed over 2000 people, including at least 597 for drug-related offences, contradicting Crown Prince Mohammed bin Salman's 2022 statement that the death penalty would be limited to murder cases.⁵

Executions continued at an alarming pace in 2025, with 356 executions recorded by the end of 2025, including at least 240 for drug-related offences and 188 foreigners, the highest such figures on record.⁶ UN Special Procedures mandate holders repeatedly intervened, notably in December 2024 and throughout 2025, warning that executions of foreign nationals – particularly Egyptians – did not meet the “most serious crimes” threshold under international law.⁷

Amnesty International found that foreign nationals accounted for nearly 75% of the 597 people executed for solely drug-related offences between January 2014 and June 2025, despite foreign nationals making up approximately 44% of Saudi Arabia's population.⁸ Reporting by the Guardian, based on interviews with families and data shared by Reprieve, described many of the Egyptian men on death row as migrant workers or economically vulnerable individuals

⁴ European Saudi Organisation for Human Rights, *Blood Era: a historic record of executions in Saudi Arabia 2024*, 5 January 2025, pp. 2 and 9, available at: https://www.esohr.org/wp-content/uploads/2025/01/Blood_Era_A_Historic_Record_of_Executions_in_Saudi_Arabia_2024.pdf (accessed on 2 December 2025). Other statistics were documents by organisations such as Amnesty International, however the numbers provided by the European Saudi Organisation for Human Rights are the most recent ones. For statistics provided by Amnesty International, see Amnesty International, *Saudi Arabia: Highest execution toll in decades as authorities put to death 198 people*, 28 September 2024, available at: <https://www.amnesty.org/en/latest/news/2024/09/saudi-arabia-highest-execution-toll-in-decades-as-authorities-put-to-death-198-people/#:~:text=Executions%20for%20drug%20related%20offences,in%20the%20country%20in%202023> (accessed on 2 December 2025).

⁵ Reprieve, *Saudi Arabia hits 2000 executions under King Salman and MBS*, 15 April 2026, available at: <https://reprieve.org/uk/2026/04/15/saudi-arabia-hits-2000-executions-under-king-salman-and-mbs/> (accessed on 6 May 2026).

⁶ The number of executions is monitored and documented by ESOHR and Reprieve and is the most recent one at the time of publication of this report, see Reprieve, *The Saudi regime executed at least 356 people in 2025 – the most ever in the modern era*, 1 January 2026, available at: <https://reprieve.org/uk/2026/01/01/the-saudi-regime-executed-at-least-356-people-in-2025-the-most-ever-in-the-modern-era/> (accessed on 14 January 2026). For earlier statistics, you may consult: Human Rights Watch, *Saudi Arabia: Executions surge in 2025, execution of journalist suggests use of death penalty to crush dissent*, 11 August 2025, available at: <https://www.hrw.org/news/2025/08/11/saudi-arabia-executions-surge-in-2025> (accessed on 2 December 2025); Reprieve, *Record number of executions in Saudi Arabia in first six months of 2025 – mostly for drugs*, 7 July 2025, available at: <https://reprieve.org/uk/2025/07/07/record-number-of-executions-in-saudi-arabia-in-first-six-months-of-2025-mostly-for-drugs/> (accessed on 2 December 2025).

⁷ UN Special Procedures, *UA SAU 5/2024*, 3 December 2024, p.4, available at: <https://spcommreports.ohchr.org/TMResultsBase/DownloadPublicCommunicationFile?gld=29550> (accessed on 2 December 2025). OHCHR, *UN expert urges Saudi Arabia to halt imminent execution of 26 Egyptian nationals for drug-related offences*, 10 June 2025, available at: <https://www.ohchr.org/en/press-releases/2025/06/un-expert-urges-saudi-arabia-halt-imminent-execution-26-egyptian-nationals> (accessed on 2 December 2025).

⁸ Amnesty International, *“If we had money and a lawyer, maybe my brother would be alive”: Saudi Arabia's execution crisis*, July 2025, pp. 26-27, available at: <https://www.amnesty.de/sites/default/files/2025-07/Amnesty-Bericht-Saudi-Arabien-Todesstrafe-Juli-2025.pdf> (accessed on 11 May 2026).

accused of non-violent drug offences, with families alleging forced confessions, torture and inability to afford lawyers.⁹ Amnesty International's review of cases of foreign nationals from Egypt, Ethiopia, Jordan, Pakistan and Somalia further identified intersecting vulnerabilities, including poverty, abusive recruitment dynamics, lack of effective legal representation, inadequate consular assistance, and the risk that alleged coercion or exploitation by traffickers was not meaningfully considered by Saudi courts.¹⁰ Fair-trial concerns are compounded for non-Arabic-speaking foreign nationals, as Amnesty International documented cases in which interpretation was absent or ineffective, including the case of a Pakistani national who reported that the interpreter did not accurately explain proceedings or communicate his account to the judge.¹¹

International bodies have also documented a disproportionate and discriminatory use of the death penalty against the Shi'a minority, primarily for alleged terrorism offences. In November 2024, the UN Working Group on Arbitrary Detention (UN WGAD) found that death sentences imposed on five Shi'a individuals for acts committed as minors reflected a pattern of persecution linked to their participation in the 2011 protests in the Eastern Province, a concern echoed by the CERD.¹² Despite these findings and explicit UN recommendations, Saudi authorities executed Jalal Labbad on 21 August 2025 and Abdullah al-Derazi on 20 October 2025.¹³ On 9 April 2026, Saudi Arabia executed Ali Al-Subaiti, convicted for acts allegedly committed as a child on "terrorism charges"¹⁴ and on 1 April 2026, Shi'a businessman Saud al-Faraj was executed.¹⁵

In November 2025, the UN WGAD found that the death sentence imposed on two Shi'a individuals was also linked to their religious affiliation¹⁶ and that the detention, and following execution, of three Egyptian nationals for drug-related crimes was arbitrary as it is based on their foreign nationality.¹⁷

⁹ The Guardian, 'I'll be executed on Tuesday': families reveal panicked last calls from foreigners on Saudi's death row, 12 November 2025, available at: <https://www.theguardian.com/global-development/2025/nov/12/foreign-prisoners-killed-saudi-arabian-jail-tabuk-prison-egyptians-executed-non-violent-drug-crimes-mohammed-bin-salman> (accessed on 11 May 2026).

¹⁰ Amnesty International, "If we had money and a lawyer, maybe my brother would be alive": Saudi Arabia's execution crisis, July 2025, pp. 26-27, available at: <https://www.amnesty.de/sites/default/files/2025-07/Amnesty-Bericht-Saudi-Arabien-Todesstrafe-Juli-2025.pdf> (accessed on 11 May 2026).

¹¹ *Ibid.*

¹² UN WGAD, Opinion No. 71/2024 concerning Abdullah al-Derazi, Jalal al-Labbad, Yusuf Muhammad Mahdi al-Manasif, Jawad Abdullah Qureiris and Hassan Zaki al-Faraj (Saudi Arabia), 15 November 2024, UN Doc. A/HRC/WGAD/2024/71, available at: <https://www.ohchr.org/sites/default/files/documents/issues/detention-wg/opinions/session101/a-hrc-wgad-2024-71-saudi-arabia-advance-edited.pdf> (accessed on 15 August 2025).

¹³ MENA Rights Group, *Young Saudi protester executed for acts committed as a minor*, 14 June 2023, available at: <https://menarights.org/en/case/abdullah-al-derazi> (accessed on 2 December 2025); *Young Saudi dissident executed by Saudi authorities for protesting while he was a minor*, 14 June 2023, available at: <https://menarights.org/en/case/jalal-al-labbad> (accessed on 2 December 2025).

¹⁴ ALQST for Human Rights, *Saudi Arabia executed third child offender in eight months*, 10 April 2026, available at: <https://www.alqst.org/en/post/saudi-arabia-executes-third-child-offender-in-eight-months> (accessed on 6 May 2026).

¹⁵ MENA Rights Group, *Shi'a Saudi businessman executed after refusing to collaborate with Saudi government*, available at: <https://menarights.org/en/case/saud-al-faraj> (accessed on 6 May 2026).

¹⁶ UN WGAD, Opinion No. 60/2025 concerning Mohammad Labbad and Mohammad Abdulah al-Faraj (Saudi Arabia), 10 November 2025, UN Doc. A/HRC/WGAD/2025/60, available at: <https://docs.un.org/en/A/HRC/WGAD/2025/60> (accessed on 13 April 2026).

¹⁷ UN WGAD, Opinion No. 71/2025 concerning Mr. E. (whose name is known to the Working Group), Farhat Fathi Abdel Maksoud Abu al-Saud and Mohamed Kamel Salah Kamel (Saudi Arabia), 14 November 2025, UN Doc.

3 Implementation of priority recommendations

3.1 Recommendations under paragraphs 18 (a) and (b): complaints of racial discrimination

In its Concluding Observations, the CERD recommended as a matter of priority that Saudi Arabia:

- (a) conduct comprehensive and regular training for police, prosecutors and other law enforcement officials on identifying and recording incidents of racial discrimination and the situation of groups exposed to such discrimination;
- (b) undertake public education campaigns on the rights enshrined in the Convention and on how to file complaints of racial discrimination, particularly targeting ethno-religious minorities, people of African descent, migrants, asylum-seekers and stateless persons.

3.1.1 Assessment of the government of Saudi Arabia

In its follow-up report,¹⁸ the State highlights that the Ministry of Interior conducted 163 training courses including modules on “racial discrimination” for 28,367 security personnel since 2024, and that the Public Prosecution conducted 9 training programmes on racial discrimination for 190 prosecutors since December 2024. It also reported that the Saudi Human Rights Commission (SHRC) organised 78 events (workshops, lectures, trainings) on human rights, including elimination of racial discrimination, since December 2024 and launched a specialised training program in partnership with universities and international organisations, including the Office of the High Commissioner for Human Rights (OHCHR). These trainings are reportedly aimed at raising awareness on how to file complaints to the SHRC. Since 2023, this institution has reportedly received 25 complaints relating to issues of non-discrimination, and the Ministry of Human Resources and Social Development received 1228 complaints from 2024 to July 2025 resulting in fines against 21 establishments.

3.1.2 Independent assessment

3.1.2.1 Regarding trainings

Despite setting up training programs and educational initiatives to implement the CERD’s recommendation, we consider that such implementation remains largely formalistic and state-controlled.

A/HRC/WGAD/2025/71, available at: <https://www.ohchr.org/sites/default/files/documents/issues/detention-wg/opinions/sessions104/a-hrc-wgad-2025-71-saudi-arabia.pdf> (accessed on 13 April 2025).

¹⁸ The State’s follow-up report is available at: https://tbinternet.ohchr.org/_layouts/15/TreatyBodyExternal/FollowUp.aspx?Lang=en&Treaty=CERD (accessed on 10 December 2025).

First of all, the State lists large numbers of training activities, but provide no information on curricula, evaluation or concrete impact of these trainings in terms of better identification, registration and prosecution of racial discrimination cases. The State simply provides numerical data but there is no evidence of the content of these trainings and specifically whether it addresses the mechanisms and provisions found in the Convention on the Elimination of Racial Discrimination (hereinafter “the Convention”). More specifically, there is no information on whether the training included the identification of racial discrimination against vulnerable groups such as Shi’a Muslims, members of the Howeitat tribe, African migrants, Bidoon, and other communities.

We would also like to note that despite training programs, Saudi Arabia still lacks comprehensive anti-discrimination legislation with an explicit definition of racial discrimination covering all grounds in article 1 of the Convention. The CERD noted this deficiency in paragraphs 15-16 of its Concluding Observations.

3.1.2.2 Regarding the SHRC and the complaints allegedly received

The SHRC which handles complaints relating to issues of non-discrimination, is a controversial institution as it has been found to lack independence.¹⁹ It operates under executive authority, serves as head of government delegations to UN bodies (contradicting Paris Principles), and has been criticised for “whitewashing” the Kingdom’s human rights record rather than holding authorities accountable. In a 2025 report from MENA Rights Group, ALQST for Human Rights and the European Saudi Organisation for Human Rights, the organisations qualify the SHRC’s portrayal of human rights as “consistently selective and misleading”, and find that the complaint mechanism was chronically dysfunctional and complainants were usually left with no answer.²⁰

While numbers of “discrimination” complaints are cited, no disaggregated statistics are provided on the nature of the complaints, the grounds of discrimination (race, ethnicity, national origin, religion), or the profile of victims and perpetrators. The 25 complaints figure provided by the SHRC is suspiciously low given Saudi Arabia hosts 15.7 million expatriates (44.4% of population), according to latest available data.²¹ Additionally, it is claimed that the Ministry of Human Resources received 1,228 discrimination complaints in similar period, of which only 583 were confirmed valid. This corresponds to a 47.4% validation rate, which raises questions about the assessment criteria. Finally, there are no disaggregated data by victim demographics, type of discrimination, or outcomes.

Furthermore, the government's follow-up report claims that the SHRC complaint mechanism “is available to everyone without exception.” This directly contradicts documented findings that the mechanism operates with a restricted list of only 60 eligible nationalities, thereby excluding individuals from countries not included in the list as well as stateless persons from seeking assistance through the mechanism, and impacting mainly migrant workers who may

¹⁹ MENA Rights Group, ALQST for Human Rights, European Saudi Organisation for Human Rights, *The Saudi Human Rights Commission, 20 years of whitewashing the Kingdom’s human rights record*, 11 September 2025, available at: <https://menarights.org/en/documents/saudi-human-rights-commission-20-years-whitewashing-kingdoms-human-rights-record> (accessed on 2 December 2025).

²⁰ *Ibid.*

²¹ Saudi General Authority for Statistics, *Population estimates publication 2024*, available at: <https://www.stats.gov.sa/documents/20117/2435273/Population+Estimates+Statistics+2024+EN.pdf>

face significant human rights violations and who are thereby *de facto* excluded from lodging a complaint with the SHRC.

3.2 Recommendation under paragraph 20 (a): Hate speech and hate crimes

In its Concluding Observations, the CERD recommended as a matter of priority that Saudi Arabia expedite the codification and adoption of a Penal Code and ensure that it explicitly criminalises racist hate speech and hate crimes in line with article 4 of the Convention, covering all grounds of discrimination in article 1.

3.2.1 Assessment of the government of Saudi Arabia

In its follow-up report, the State indicates that it launched, in February 2021, a “package” of specialised legal reforms, including a draft Penal Code, said to define crimes and penalties in line with international human rights standards, including the Convention. The draft Penal Code allegedly defines crimes and penalties, considering international human rights standards including CERD.

Hate speech is said to be prohibited “in all forms”, including in public and “virtual” spaces. The State cites the Public Decorum Regulation (prohibiting speech or acts that harm others in public places); and media and publishing regulations, monitored by the Ministry of Media and the General Authority for Media Regulation; and the Cybercrime Law’s article 3, which criminalises “defamation and causing harm to others” online. The Public Prosecution has instructed prosecutors to request aggravated penalties where crimes are motivated by “bigotry”, which the State presents as covering racist motives.

3.2.2 Independent assessment

3.2.2.1 Regarding the draft Penal Code

As of late 2025, the new Penal Code has not been publicly enacted. The follow-up report of the government of Saudi Arabia provides no information on the status of implementation and updated information on where the adoption of the Penal Code stands. The SHRC confirmed in February 2024 that the draft is “currently undergoing legislative review”.²² A leaked 116-page draft Penal Code was however circulated in 2022-2024 and authenticated by Saudi legal experts and later thoroughly analysed by Amnesty International. The analysis of the draft reveals that the draft Penal Code criminalises protected rights rather than hate speech.²³

For instance, freedom of expression is heavily restricted through offenses like “defamation”, “insult”, “questioning judiciary integrity”, and vague terms like “indecent acts” and “words affecting honour”. Additionally, the leaked draft codifies the use of the death penalty as a primary punishment., it continues to permit corporal punishments (flogging), to criminalise “illegitimate” consensual sexual relations, homosexuality, and abortion, and fails to protect

²² Amnesty International, *Saudi Arabia: Repressive draft penal code shatters illusions of progress and reform*, March 2024, available at: <https://www.amnesty.org/en/latest/news/2024/03/saudi-arabia-repressive-draft-penal-code-shatters-illusions-of-progress-and-reform/> (accessed on 10 December 2025).

²³ *Ibid.*

women and girls from gender-based violence.²⁴ The drafting process of the Penal Code has been marked by a complete lack of transparency and has involved no meaningful consultation with civil society or independent legal experts.²⁵

In the absence of a codified Penal Code, current Saudi legislation relies on vague concepts such as “undermining public order”, “public morals”, and “defamation”, which are used primarily to repress dissent and criticism, including criticism of discriminatory practices.²⁶ These laws are not used to protect minorities and migrants from racist hate speech as such, but rather to silence human rights defenders and peaceful critics.²⁷ Any protection ostensibly afforded by these legal provisions appears to be limited to Saudi nationals, effectively excluding migrants and stateless persons from protection against hate speech and discrimination.

3.2.2.2 Regarding the Anti-Cybercrime Law

The Saudi government claims to rely on the use of the Anti-Cybercrime Law to criminalise hate speech. Saudi Arabia’s Anti-Cybercrime Law defines a range of offenses tied to using “information networks” and computers, and it is written broadly enough to cover many forms of online speech. A core provision often implicated in speech cases is Article 6(1).²⁸ Because key terms like “public order” and “religious values” are not concretely defined, the law creates wide discretion for authorities to treat peaceful expression (tweets, retweets, commentary, advocacy posts) as a cybercrime. In practice, this breadth is reinforced by Saudi Arabia’s broader online control environment, including surveillance, content regulation, and prosecutions, which makes the boundary between “cybercrime” and dissent enforcement especially thin.²⁹

The same legal framing has also been reported in cases affecting minorities and marginalised groups, including prosecutions tied to posting or sharing material about protests and state violence (which disproportionately affect communities in restive regions), where courts have cited “violating Article 6” based on online advocacy or documentation.³⁰ Recent reporting by rights monitors describes a continuing pattern of extremely harsh punishments for peaceful online expression in Saudi Arabia, creating a chilling effect that falls heavily on women,

²⁴ *Ibid.*

²⁵ MENA Rights Group, *The Saudi Human Rights Commission: 20 years of whitewashing the Kingdom’s human rights record*, 2025, available at: <https://menarights.org/en/documents/saudi-human-rights-commission-20-years-whitewashing-kingdoms-human-rights-record> (accessed on 10 December 2025).

²⁶ UN Committee on the Elimination of Racial Discrimination, *Concluding observations on the combined tenth and eleventh periodic reports of Saudi Arabia*, September 2023, UN Doc. CERD/C/SAU/CO/10-11, available at: <https://docstore.ohchr.org/SelfServices/FilesHandler.ashx?enc=MmyrPvAEju55eJ3jtzsU7h50cv3Z5pEILhrZFEZAa6GJY94fGEEFnbtqdh6bE3x6W7oKDEtza%2FC71mj7jnSATGQiYNpAEYIX%2FgltZqqsDAM%3D> (accessed on 10 December 2025).

²⁷ UN Human Rights Council, *Report of the Special Rapporteur on the promotion and protection of the right to freedom of opinion and expression on Saudi Arabia*, 2023, UN Doc. A/HRC/53/25, available at: <https://documents.un.org> (accessed on 10 December 2025).

²⁸ Article 6(1) criminalizes producing, preparing, transmitting, or storing online material deemed to impinge on public order, religious values, public morals, or privacy, and it authorizes penalties of up to five years’ imprisonment and/or a fine (commonly cited up to SAR 3 million). See Saudi Bureau of Experts, *Anti-Cyber Crime Law (Royal Decree No. M/17)*, 2007, available at: <https://laws.boe.gov.sa> (accessed on 10 December 2025).

²⁹ Freedom House, *Freedom on the Net 2024: Saudi Arabia*, 2024, available at: <https://freedomhouse.org/country/saudi-arabia/freedom-net/2024> (accessed on 10 December 2025).

³⁰ Amnesty International, *“Prisoners of conscience”: Saudi Arabia’s relentless crackdown on peaceful expression*, 2023, available at: <https://www.amnesty.org> (accessed on 10 December 2025).

dissidents, and Shi'a communities who rely on online spaces to organise or speak about discrimination.³¹

Notably, the Saudi government's follow-up report makes no reference to the Counter-Terrorism Law and its use against members of the Shi'a minority and the Howeitat tribe, despite the Committee having specifically recommended in its Concluding Observations that Saudi Arabia ensure this law is not used to prosecute those working on the rights of these groups.

3.2.2.3 Regarding the prosecution of hate speech

Reports from international NGOs indicate a pattern of systematic hate speech by public figures in Saudi Arabia that goes unpunished, particularly targeting the Shi'a minority.³² In its Concluding Observations, the Committee noted credible allegations of racist and sectarian rhetoric by officials and religious figures, yet the State provided no information on investigations, prosecutions, or convictions related to such speech. This absence of accountability suggests not merely neglect but a level of state tolerance, or indirect participation, in hate speech against minorities, especially when such rhetoric aligns with dominant political or religious narratives.

Crucially, there is no evidence that Saudi Arabia systematically prosecutes genuine hate speech or hate crimes. While the State referenced 36 judicial decisions, it provided no details on the nature of these cases, the penalties imposed, or whether they concerned actual hate speech as opposed to legitimate criticism. Nor has it published statistics on hate crimes as distinct from speech offenses, a gap specifically highlighted by the Committee, which noted the "lack of detailed information on complaints or cases involving hate crimes and hate speech." There is no indication that acts against minorities and marginalised communities are investigated or prosecuted as hate crimes, underscoring a disparity between the repression of peaceful expression and the impunity afforded to violence and hatred against marginalised groups.

4 Conclusion and recommendations

This alternative report demonstrates that Saudi Arabia has failed to meaningfully implement the priority recommendations issued by the Committee in its Concluding Observations. While the government of Saudi Arabia has reported a range of training activities, awareness initiatives and legal reforms, these measures remain largely formalistic, opaque and ineffective in practice.

The dramatic escalation in executions during 2024–2025, including a disproportionate number of foreign nationals and members of the Shi'a minority, further underscores the

³¹ Human Rights Watch, "They Fired on Us Like Rain": Digital repression and punishment of peaceful speech in Saudi Arabia, 2024, available at: <https://www.hrw.org> (accessed on 10 December 2025); ALQST for Human Rights and partners, *New assault on freedom of expression, thought and belief as Saudi authorities put football fans on trial for chants*, 27 March 2024, available at: <https://alqst.org/en/post/new-assault-on-freedom-of-expression-thought-and-belief-as-saudi-authorities-put-football-fans-on-trial-for-chants> (accessed on 15 January 2026).

³² Human Rights Watch, Saudi Arabia: Grand mufti should back religious tolerance new official has incited hatred against Shia minority, 29 October 2025, available at: <https://www.hrw.org/news/2025/10/29/saudi-arabia-grand-mufti-should-back-religious-tolerance> (accessed on 15 January 2026).

systemic and discriminatory nature of Saudi Arabia's criminal justice system. Taken together, these findings indicate a widening gap between Saudi Arabia's international obligations under the Convention and the reality experienced by racial, ethnic, national and religious minorities in the Kingdom.

In light of the above, the Committee is invited to recommend that Saudi Arabia:

1. Adopt comprehensive anti-discrimination legislation that includes an explicit definition of racial discrimination fully aligned with article 1 of the Convention, covering race, colour, descent, and national or ethnic origin, and applicable to both nationals and non-nationals.
2. Ensure the prompt adoption of a Penal Code that explicitly criminalises racist hate speech and hate crimes in accordance with article 4 of the Convention, with clear definitions, proportional penalties, and safeguards to protect freedom of expression, and following transparent and inclusive consultations with civil society.
3. Cease the use of the Anti-Cybercrime Law, including Article 6, and the Counter-Terrorism Law, to criminalise peaceful expression, and ensure that these laws are not used to silence those reporting discrimination, advocating for minority rights, or documenting human rights violations.
4. Guarantee the independence, accessibility and effectiveness of complaint mechanisms, including by reforming the Saudi Human Rights Commission in line with the Paris Principles, publishing disaggregated data on discrimination complaints and outcomes, removing restrictions on the nationalities eligible to file complaints, and ensuring protection against reprisals for complainants.
5. Collect, publish and report disaggregated data on racial discrimination, hate speech, hate crimes, prosecutions, sentencing and executions, disaggregated by nationality, ethnicity, religion and gender, and ensure that discriminatory patterns—particularly affecting Shi'a communities, migrants and stateless persons—are promptly investigated and remedied.
6. Establish an immediate moratorium on the death penalty with a view to its abolition, and pending abolition, ensure full transparency regarding death sentences, executions and commutations, including by publishing disaggregated data by nationality, ethnicity, religion and gender. Ensure that the death penalty is not imposed or carried out in a discriminatory manner, including against Shi'a individuals, migrants and stateless persons, and guarantee full due process and fair trial rights in all capital cases, in line with the Convention and relevant international standards.