



# THE DEATH PENALTY IN BAHRAIN

A system built on torture

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Salam for Democracy and Human Rights (SALAM DHR) is an NGO that endeavours to preserve universal principles of dignity and respect by shielding democracy and human rights. In the pursuit of this vision, SALAM DHR aims to influence the international community, including UN representatives to improve the situation in the Middle East, and foster advocacy of human rights and democracy. To accomplish these goals, SALAM DHR conducts monitoring and analysis, produces reports, develops recommendations on policy and legislation, organizes advocacy campaigns, conducts training, and joins effective coalitions. For more information see: [www.salam-dhr.org](http://www.salam-dhr.org)

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## Executive Summary

The purpose of this report is to provide accessible and abridged information regarding the development of the death penalty in Bahrain. It examines how executions have expanded in both their criteria and implementation since the Arab Spring in 2011 and how this practice contradicts the Government of Bahrain's (GoB) promises of reform made following the Bahrain Independent Commission of Inquiry (BICI) that same year. Instead, the Bahraini State continues to rely on confessions coerced under torture and threats as a method of permanently silencing political prisoners. The nation's internal mechanisms of accountability have repeatedly proven themselves to be ineffective in remedying this situation and are possibly complicit. Considering these findings, and in support of those who have been victimized, Salam DHR officially recommends that the GoB abolish the death penalty, among other reforms.

## Methodology

This report has been sourced from official and communications reports from the Office of the United Nations High Commission for Human Rights on the death penalty, the Working Group on Arbitrary Detention, and the European Commission. This report also draws from the hard work of fellow human rights organizations such as Bahrain Institute of Rights and Democracy, Reprieve, Americans for Democracy and Human Rights in Bahrain and individual activists in Bahrain who have potentially placed their freedom and wellbeing in danger to provide this information. These pieces of information have been incorporated to provide a succinct, accessible piece of information.

## Introduction

The ongoing aftermath of the Pearl Uprising has been marred by a continuous crackdown in Bahrain, where freedoms and human rights have been tightly constricted over the past decade. Although the GoB and the ruling Al-Khalifa family have continuously promised accommodation and reform to their people and the international community, such pronouncements belie a system that primarily relies upon fear to regulate its communities. One of the lodestars of that culture of fear has been the death penalty, which was brought out of de-facto moratorium in January 2017. The State has since capitalized on a highly flawed legal system that enables executions and re-affirms that it holds power of life and death over all Bahraini subjects.

This short report explores how the death penalty is being implemented in Bahrain and how the process is thoroughly comprised due to a prevalence of torture, which is used to elicit confessions. It also examines the GoB has systematically failed to make meaningful reforms regarding the use of the torture, which it incorporated into its promised reforms following the BICI in June 2011. Instead, executions have been brought out of de facto moratorium and used increasingly over the past decade, despite many of these cases being the result of confessions made under torture.

## A Decade of Death

Over the past decade the rate of death sentences in Bahrain has increased by 600%, with 51 official new death sentences from 2011 to 2020.<sup>1</sup>

Executions have fallen over the past year, but this is likely due to disruption from the Covid-19 pandemic and the GoB has provided no assurances that executions will not increase again in the coming years, providing no solace or hope for prisoners awaiting execution in the country.

As of October 2021, 27 individuals, 12 of whom are political prisoners, have exhausted all legal avenues for appeal. Whilst the Bahraini Government does not publicly release the names of individuals who are on death row, the below 12 individuals have had their death sentences confirmed by the Court of Cassation, the highest court in Bahrain. Once the Court of Cassation upholds the death sentence of an individual, they can no longer appeal it and must await the final stage of the process, the king's ratification of their sentence.<sup>2</sup>

1. Maher Abbas al-Khabbaz – sentenced: 29 January 2018.
2. Hussein Ibrahim Ali Hussein Marzouq – sentenced: 26 February 2018.
3. Sayed Ahmed Fawad Abbas al-Abbar – sentenced: 21 May 2018.
4. Hussein Ali Mahdi Jasim – sentenced: 21 May 2018.
5. Salman Isa Ali Salman – sentenced: 4 June 2018.
6. Mohamed Radi Abdullah Hasan – sentenced: 25 February 2019.
7. Hussein Abdullah Marhoun – sentenced: 20 May 2019.
8. Mousa Abdullah Mousa Jaafar – sentenced: 3 June 2019.
9. Hussein Abdullah Khalil Rashid – sentenced: 15 June 2020.
10. Zuhair Ibrahim Jasim Abdullah – sentenced: 15 June 2020.
11. Mohamed Ramadhan Issa Ali Hussain – sentenced: 13 July 2020.
12. Hussein Ali Mousa Hasan Mohamed – sentenced: 13 July 2020

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<sup>1</sup> Bahrain Institute of Rights and Democracy, Reprieve, and the European Commission, *From Uprising to Executions: The Death Penalty in Bahrain, Ten Years on From the Arab Spring*, 2021, pp 7-8; Official executions do not count other instances of lives lost in police custody, such as prisoners who died injuries inflicted via torture (often referred to euphemistically as 'kidney failure' in official documents) and enforced disappearances, where the person cannot be accounted for.

<sup>2</sup> Salam for Democracy and Human Rights, *Campaign Against the Death Penalty in Bahrain*, October 2021.

Under the current system, these people could be executed at any moment with no warning, a practice that violates both international law and Bahrain's Constitution. Executions have occurred this way in 2017 and 2019.<sup>3</sup> Historically, many such prisoners have been buried in unmarked graves, their treatment in both life and death being an act of collective punishment against their families. These State practices are usually political in nature, where dissidents and their families are primarily targeted under broad and ambiguously worded counter-terrorism legislation.

## Tainted Evidence

International human rights law provides two key safeguards against evidence obtained by torture from being admitted in criminal proceedings, these are particularly important where the death penalty is utilised:

1. A prompt and impartial investigation by a competent authority, wherever there is reasonable ground to believe that an act of torture has been committed.<sup>4</sup> The United Nations Manual on the Effective Investigation and Documentation of Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment ('Istanbul Protocol') provides international standards for states to carry out their international obligations to investigate torture promptly and impartially.<sup>5</sup>
2. States must ensure that any statements made from torture are not invoked as evidence in any proceedings.<sup>6</sup>

Under international law and Bahraini law, evidence and/or confessions obtained through torture are considered tainted and are therefore inadmissible in a court of law. It is something, however, that Bahraini law enforcement and courts continue to ignore with impunity.

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<sup>3</sup> Testimony of families of executed prisoners, on file with Reprieve and BIRD. International human rights law requires that individuals on death row are provided with timely notification about the date of their execution and that the families of death row prisoners are notified of their execution, see General comment no. 36, Article 6 (Right to Life), para. 40, available at UN Human Rights Committee (HRC), General comment no. 36, Article 6 (Right to Life), 3 September 2019, CCPR/C/GC/35, available at: <https://www.refworld.org/docid/5e5e75e04.html> and Human Rights Committee, Mariya Staselovich v. Belarus, Communication No. 887/1999, UN Doc. CCPR/C/77/D/887/1999, 3 April 2003, para. 9.2, available at: [www.hrlibrary.umn.edu/undocs/887-1999.html](http://www.hrlibrary.umn.edu/undocs/887-1999.html)

<sup>4</sup> Convention against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment art. 12, 10 Dec. 1984, 1465 U.N.T.S. 24841, <https://www.ohchr.org/EN/ProfessionalInterest/Pages/CAT.aspx>

<sup>5</sup> Principles on the Effective Investigation and Documentation of Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment, recommended by G.A. Res. 55/89 (4 Dec 2000), available at: <https://www.ohchr.org/EN/ProfessionalInterest/Pages/EffectiveInvestigationAndDocumentationOfTorture.aspx>.

<sup>6</sup> Convention Against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment art. 15, 10 December 1984, 1465 U.N.T.S. 24841, <https://www.ohchr.org/EN/ProfessionalInterest/Pages/CAT.aspx>.

Torture and terrorism offences are intrinsically linked in the Bahraini justice system. Over the past decade, there have been multiple instances of individuals confessing to the crime of terrorism under torture. On 29 December 2014, Mohammed Ramadhan and Husain Ali Moosa were sentenced to death by a Bahraini criminal court for their alleged involvement in a February 2014 bomb explosion that killed a police officer. Both defendants state that Bahraini authorities tortured them into confessing. Moosa was allegedly hung from a ceiling for three days, beaten, and on several occasions, told by authorities that they would harm his relatives if he did not confess. Ramadhan was allegedly arrested without a warrant and violently beaten on his genitals until he agreed to confess.

These confessions, made under torture and threats against family members, were used to convict and sentence Ramadhan and Moosa to death, breaching international law. Both men have subsequently had their sentences upheld by the Court of Cassation on 16 November 2015, despite having recanted their confessions and affirming that they confessed under torture. Their allegations have not been investigated by Bahraini authorities.<sup>7</sup> Ramadhan and Moosa have exhausted all legal options and now face imminent execution via firing squad.<sup>8</sup> This follows a well-established precedent in the Bahraini legal system.

On 15 January 2017, Bahrain executed Ali Al-Singace, Abbas Al-Samea and Sami Mushaima.<sup>9</sup> United Nations human rights experts raised concerns that Bahraini authorities had reportedly coerced all three men into confessions with electric shocks and sexual humiliation, for which they were convicted and executed.<sup>10</sup> The courts dismissed their lawyers' arguments and refused to investigate their allegations of torture. They were executed less than a week after their sentences were upheld, with no prior notification given to the men or their families.<sup>11</sup> The UN Special Rapporteur on Executions described their executions as 'extrajudicial killings' given the illegality of how the information was obtained.<sup>12</sup>

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<sup>7</sup> Death Penalty in Bahrain, Press Release, Action des chretiens pour l'abolition de la torture, Americans for Democracy and Human Rights, Bahraini Center for Human Rights, Bahrain Institute for Rights and Democracy, Center for Civil and Political Rights, Center for Constitutional Rights, Center for Prisoners' Rights, European Bahraini Organisation for Human Rights, European Centre for Democracy and Human Rights, Hands Off Cain, International Federation for Human Rights, Le Centre d'Observation des Droits de l'Homme et d'Assistance Sociale, No Peace Without Justice, Palestinian Centre for Human Rights, Reprieve, Sentinel HRD, World Coalition Against the Death Penalty.

<sup>8</sup> Bahrain Institute of Rights and Democracy, Reprieve, and the European Commission, *From Uprising to Executions: The Death Penalty in Bahrain, Ten Years on From the Arab Spring*, 2021, p 17.

<sup>9</sup> BBC, *Bahrain executes three Shia men over 2014 police killing*, 15 January 2017, <https://www.bbc.co.uk/news/world-middle-east-38627679>

<sup>10</sup> UN Human Rights, *Urgent Appeal to the Government of Bahrain to Stop New Executions – UN Rights Experts*, 25 January 2017, <https://www.ohchr.org/EN/NewsEvents/Pages/DisplayNews.aspx?LangID=E&NewsID=21118>

<sup>11</sup> Americans for Democracy and Human Rights in Bahrain, *Updated: Bahrain and the Death Penalty*, 16 April 2019, <https://www.adhrb.org/2019/04/bahrain-and-the-death-penalty/>

<sup>12</sup> Agnes Callamard (@AgnesCallamard), Twitter (15 Jan. 2017, 2:27 AM), <https://twitter.com/agnescallamard/status/820532830744772608?lang=en>

On 6 June 2017, Bahraini's 4th High Criminal Court sentenced Sayed Ahmed Al-Abbar and Husain Ali Mohamed to death. Both men were tortured into signing prepared confessions. On 29 January 2018, Bahrain's Court of Cassation confirmed the death sentence against Maher Abbas Al-Khabbaz. In detention he was tortured until he provided a confession.

Husain Abdulla Marhoon Rashid and Moosa Abdulla Moosa Jaafar, who were tortured into providing confessions, had their death sentences confirmed by the court of appeals on 20 May and 3 June 2019. Mohammad Radhi Abdulla Hassan, Ahmed Isa Ahmed Isa Al-Malali, and Ali Mohamed Ali Mohamed Hakeem Al-Arab also had their death sentences confirmed by the Court of Cassation. Al-Malali and Al-Arab were both sentenced in absentia.<sup>13</sup>

On 26 July 2019, Bahrain executed Ali Al-Arab, Ahmed Al-Malali<sup>14</sup>, as well as an unnamed Bangladeshi national. They did not receive fair trials, despite calls from UN human rights experts for Bahrain to halt the executions amid concerns that Ali and Ahmed were coerced into making confessions through torture.<sup>15</sup> The Office of the UN High Commissioner for Human Rights 'strongly condemn[ed]' the executions and reiterated its concerns that both Ali and Ahmed had been coerced into confessing to crimes they had not committed'.<sup>16</sup> Ali, Abbas, Sami, Ali Al-Arab and Ahmed all had connections to or were affiliated with the political opposition in Bahrain, which was banned in the aftermath of the Arab Spring. This was likely the reason for their torture, death sentences and subsequent executions.<sup>17</sup>

## No Accountability

Attempts at monitoring and policing torture in Bahrain have been met with systematic inertia from its institutions. Bahrain's internal mechanisms of accountability, such as the Ombudsman for the Ministry of Interior and the Special Investigation Unit (SIU), are largely unable or unwilling to conduct investigations into torture and coerced confessions. This has been regularly cited by the UN.

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<sup>13</sup> Americans for Democracy and Human Rights in Bahrain, Updated: Bahrain and the Death Penalty, 16 April 2019, <https://www.adhrb.org/2019/04/bahrain-and-the-death-penalty/>

<sup>14</sup> Amnesty International, Three Men Executed by Firing Squad in Bahrain: Ali Mohammed Hakeem Al-Arab and Ahmed Isa Ahmed Isa Al-Malali, 1 August 2019, <https://www.amnesty.org/en/documents/mde11/0830/2019/en/>

<sup>15</sup> Press Release, Office of the UN High Commissioner on Human Rights, UN Experts Call on Bahrain to Halt Executions of Two Individuals Amid Torture Allegations, UN Press Release, 21 May 2019, <https://www.ohchr.org/EN/NewsEvents/Pages/DisplayNews.aspx?NewsID=24635&LangID=E>

<sup>16</sup> Press Briefing, Office of the UN High Commissioner for Human Rights, Press Briefing Note on Bahrain, UN Press Release, 30 July 2019, <https://www.ohchr.org/en/NewsEvents/Pages/DisplayNews.aspx?NewsID=24863&LangID=E>; Bahrain Institute of Rights and Democracy, Reprieve, and the European Commission, From Uprising to Executions: The Death Penalty in Bahrain, Ten Years on From the Arab Spring, 2021, p 9.

<sup>17</sup> Bahrain Institute of Rights and Democracy, Reprieve, and the European Commission, From Uprising to Executions: The Death Penalty in Bahrain, Ten Years on From the Arab Spring, 2021, p 9.



In 2017, the UN Committee Against Torture reviewed Bahrain's compliance with the Convention Against Torture, to which Bahrain is a signatory. They warned that the Ombudsman and SIU, along with other oversight bodies, are incapable of carrying out torture investigations that comply with Bahrain's international obligations. These concerns relate both to structural flaws inherent in Ombudsman and the SIU as well as their daily activities.

The UN Committee Against Torture further noted that since their establishment in 2012, as promised by the GoB as an act of reform following the 2011 crackdown, the Ombudsman and SIU 'have had little or no effect, and that the authorities [have] provided negligible information regarding the outcome of their activities.'<sup>18</sup> They concluded that '[the Ombudsman and the SIU, among other bodies,] are not independent, that their mandates are unclear and overlapping and that they are not effective given that complaints ultimately pass through the Ministry of the Interior,' the very institution it is meant to regulate.<sup>19</sup>

The UN Committee Against Torture also raised concerns about 'the widespread acceptance by judges of forced confessions' in Bahrain and it recommended that judges 'should review cases of convictions based solely on confessions, since many may have been based on evidence obtained through torture and ill-treatment.'<sup>20</sup>

The International Rehabilitation Council for Torture Victims also reviewed a court judgment in the same case and concluded that it was 'critically flawed' and should be vacated because it is based on insufficient and ineffective torture investigations by the SIU, and therefore violates the international legal obligations to investigate torture effectively and exclude evidence that arises from torture.<sup>21</sup>

Given that the GoB has had a decade to improve its mechanisms of accountability and has instead chosen to continue obscuring information from the UN, having prevented the UN Special Rapporteur on Torture from visiting the country since 2006, it is possible that the institutions such as the Ombudsman and the SIU are, at best, superficial organisations meant to provide the GoB the barest

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<sup>18</sup> UN Commission Against Torture, Concluding Observations on the Second and Third Periodic Reports of Bahrain, UN Doc. CAT/C/BHR/CO/2-3 (29 May 2017) <http://docstore.ohchr.org/SelfServices/FilesHandler.ashx?enc=6QkG1d%2fPPRiCAqhKb7yhsqYPuFZC34VM6MoD0MvS%2bS%2bhcJI3TUOrOvvF%2fGuWWUtDMNTj4IYASRqLw7nbC8lcS25V04LGI8FMQttufqvlxyVSqBsgx3LVgIkCx%2bAgXg%2bL> ; Letter from International Rehabilitation Council for Torture Victims to Reprieve, 1 July 2020, <https://www.thetimes.co.uk/article/foreign-secretary-urged-to-stop-execution-of-bahraini-pro-democracy-activists-qklg2p6j8>

<sup>19</sup> Ibid.

<sup>20</sup> UN Commission Against Torture, Concluding Observations on the Second and Third Periodic Reports of Bahrain, UN Doc. CAT/C/BHR/CO/2-3 (29 May 2017) <http://docstore.ohchr.org/SelfServices/FilesHandler.ashx?enc=6QkG1d%2fPPRiCAqhKb7yhsqYPuFZC34VM6MoD0MvS%2bS%2bhcJI3TUOrOvvF%2fGuWWUtDMNTj4IYASRqLw7nbC8lcS25V04LGI8FMQttufqvlxyVSqBsgx3LVgIkCx%2bAgXg%2bL> ; Letter from International Rehabilitation Council for Torture Victims to Reprieve, 1 July 2020, <https://www.thetimes.co.uk/article/foreign-secretary-urged-to-stop-execution-of-bahraini-pro-democracy-activists-qklg2p6j8>

<sup>21</sup> Letter from International Rehabilitation Council for Torture Victims to Reprieve, 1 July 2020, on file at Reprieve.

credentials of human rights reform, or at worst, dysfunctional and ineffective by design: being an organisation that protects perpetrators of torture rather than policing them.

There is no independent civil society in Bahrain and all members of the opposition have been purged from positions in the courts. Consequently, there is currently little incentive for individuals within the Bahraini system to seriously review these matters, for the aftermath of the Arab Spring has sent a clear message to them that loyalty to the State and the system brings success and stable career, whilst going against it can cost you everything, including your life. This culture of patronage and fear in Bahrain's courts and civil society allows this system to perpetuate itself and even expand. Under the tenure of these courts, executions have continued to increase on a yearly basis, and they have allowed expansion into lesser crimes.

## Expansion of the Death Penalty

The GoB continues to maintain that it imposes the death penalty 'in accordance with international law and human rights standards including the United Nations Safeguards.'<sup>22</sup> However, the imposition of the death penalty for non-lethal offences is explicitly prohibited under international law.<sup>23</sup> Despite this, Bahraini authorities are increasingly implementing the death penalty for non-lethal offences, in direct violation of international law.<sup>24</sup>

Bahrain began imposing the death penalty for non-lethal drug offences in 2018, the first legislation of its kind in the country's history. Among prisoners facing imminent execution in Bahrain as of this report, 3 (12%) are on death row for non-lethal drug offences. Bahrain has not yet executed anyone for a non-lethal drug offence but the current laws state that can do so if they wish.<sup>25</sup>

Of those sentenced to death for 'terrorism-related' offences during the review period, 9 (29%) were convicted of non-lethal offences. 37 Bahraini nationals were sentenced to death in the review period; 12 of them (32%) were convicted of non-lethal offences.<sup>26</sup>

In application, this current interpretation of the death penalty does not appear to single out perpetrators for non-lethal drug offenses. Instead, it is used to strengthen cases against defendants whose charges are political in nature. Aware that the charge of terrorism is a far reaching and vague

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<sup>22</sup> Embassy of the Kingdom of Bahrain London, Statement, 8 July 2020, on file at Reprieve.

<sup>23</sup> General comment no. 36, Article 6 (Right to Life), 3 September 2019, CCPR/C/GC/35, available at: <https://www.refworld.org/docid/5e5e75e04.html>

<sup>24</sup> General comment no. 36, Article 6 (Right to Life), 3 September 2019, CCPR/C/GC/35, available at: <https://www.refworld.org/docid/5e5e75e04.html>; Bahrain Institute of Rights and Democracy, Reprieve, and the European Commission, From Uprising to Executions: The Death Penalty in Bahrain, Ten Years on From the Arab Spring, 2021, p 14.

<sup>25</sup> Bahrain Institute of Rights and Democracy, Reprieve, and the European Commission, From Uprising to Executions: The Death Penalty in Bahrain, Ten Years on From the Arab Spring, 2021, p 14.

<sup>26</sup> Ibid.

in Bahrain, drug charges can add to the severity of a defendant's cases, as well as smear their reputations in the national and international press. The practice sends a clear message to those who are accused in Bahrain: charges will be labelled against you, no matter how flimsy the evidence.

## Conclusion and Recommendations

On 3 May 2021, the UN Working Group on Arbitrary Detention (WGAD) set out the opinion that a credible case can be made that death-row prisoners Mohammed Ramadhan and Husain Moosa have been unfairly and unlawfully arrested and detained, and that they have been subjected to torture and tried based on confession made under torture. Given that the WGAD believes Ramadhan and Moosa's arrest and detention took place in violation of international law, they stated that the two men should never have been tried in the first place and has called for their immediate and unconditional release.<sup>27</sup>

The call for their release is made only more urgent by the current context of the Covid-19 pandemic and the threat that it poses in places of detention, including Jau Detention Center, where Ramadhan and Moosa are currently detained.<sup>28</sup> In September 2021 the GoB promised greater human rights reforms to the international community. There are multiple ways it can quickly provide tangibility to these claims.

- Abolish the death penalty in Bahrain, given that it has proven time and again to have been implemented under highly flawed legal circumstances and that because there are no reliable means to internally regulate practices such as torture at this time;
- Commute all capital sentences against individuals whose trials were marred by due process violations, such as allegations of torture. These prisoners should either be released on humanitarian grounds or their cases re-tried in accordance with standards set by international law;
- Launch an investigation into the cases of individuals sentenced to death who have alleged due process violations and torture during their trial and detention. This should be an independent and impartial commission of inquiry, which has no association or hierarchical relationship with the Public Prosecutor's Office or Ministry of Interior and is entirely separate from the Ombudsman and SIU;

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<sup>27</sup> WGAD Opinion No.4/2021 p. 16

<sup>28</sup> Saeed Al-Shehabi, Covid-19 is Spreading among Bahrain's Prisoners of Conscience, Open Democracy, 26 April 2021, <https://www.opendemocracy.net/en/north-africa-west-asia/covid-19-is-spreading-among-bahrains-prisoners-of-conscience/> ; Bahrain Institute of Rights and Democracy, Reprieve, and the European Commission, From Uprising to Executions: The Death Penalty in Bahrain, Ten Years on From the Arab Spring, 2021, p 17.

- Bahrain should ratify the Optional Protocol to the UN Committee Against Torture and invite and allow visits from the UN Special Rapporteur on Torture;
- King Hamad bin Isa Al Khalifa of Bahrain should send a message that he is indeed serious about human rights reforms by using his executive power to pardon Mohammed Ramadhan and Husain Moosa, allowing them to be immediately released from detention in accordance with WGAD Opinion No.4/2021 which calls for their 'immediate and unconditional release'.



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