

Dear Members of the FATF EU Task Force,

We are writing as a German organization with longstanding engagement in Southern Africa to raise serious concerns regarding Angola's Law No. 2/26 on Non-Governmental Organisations, adopted on 2 March 2026.

Based on direct consultations with Angolan civil society actors in February, we conclude that this law constitutes a systematic attempt to restrict civic space and silence independent voices. It significantly expands executive powers to control, suspend, and effectively neutralize NGOs, while imposing excessive administrative burdens and restricting access to international funding.

The Angolan government explicitly justifies this legislation by invoking compliance with FATF standards. We consider this justification to be unfounded and deeply concerning. There is no credible evidence that the NGOs targeted by this law are involved in money laundering or terrorist financing. Instead, FATF requirements are being instrumentalized as a political tool to delegitimize and weaken civil society.

Such misuse has implications beyond Angola. If left unchallenged, it risks establishing a dangerous precedent, whereby governments invoke FATF compliance to justify restrictions on fundamental freedoms. This not only undermines civic space globally but also threatens the credibility and normative integrity of the FATF framework itself.

We therefore urge the FATF EU Task Force to:

- Publicly clarify that FATF standards must not be used to unduly restrict civil society;
- Explicitly reject the misuse of anti-money laundering and counter-terrorism frameworks for political purposes;
- Engage with Angolan authorities to ensure that any regulatory framework for NGOs is proportionate, evidence-based, and compliant with international human rights standards.

A clear and timely response from your side is essential. It could help prevent further erosion of civic space in Angola and support ongoing efforts by civil society actors to challenge this law before the Constitutional Court without political interference.

Silence at this moment risks being interpreted as tacit approval.

We remain available for further information and exchange.

Yours sincerely,