

17 September 2026

To: the Members of the House of Representatives and the Cabinet

Re: Protecting European organisations against foreign sanctions pressure

Dear Members of Parliament, dear Members of the Cabinet,

Since 1848, freedom of expression, including freedom of the press and freedom of printing, has been enshrined in the Dutch Constitution. It is a fundamental right in the Netherlands to express views and ideas publicly or make them known. A democratic society can only function properly if these freedoms are well safeguarded, as they are among the most important conditions for a well-functioning rule of law.

It is therefore deeply troubling that the US government is using sanctions to silence ideological opponents. Sometimes directly, as with the judges of the International Criminal Court, and sometimes indirectly, as with the supporting internet service A/I. These are no longer isolated incidents. They undermine the rule of law, freedom of expression and the open and free internet.

These sanctions have far-reaching effects. Beyond those sanctioned, they also hit thousands of European citizens, organisations and businesses that face the effects of secondary sanctions, or the fear of them. This painfully exposes how dependent Europe is on the US for both our digital and our financial infrastructure. This dependence undermines the sovereignty of Europe, its businesses and its citizens.

The undersigned ask you to prioritise becoming independent of the US as quickly as possible, to speak out against disproportionate US sanctions, and to protect European internet services and their users against foreign sanctions pressure. We call on you to take five measures:

1. Make building an independent European digital infrastructure a priority
2. Take diplomatic action against disproportionate sanctions
3. Arrange European legal protection and practical support
4. Protect banking services for organisations and businesses
5. Secure digital and financial services for the International Criminal Court

Background

On 26 August, the US sanctions authority OFAC added the Italian internet provider Autistici/Inventati (A/I) to a sanctions list. A/I provides web hosting and email to some 20,000 activist groups worldwide. The Trump administration claims that A/I provides the digital infrastructure for violent anti-fascist groups. A/I rejects these accusations. Sanctioning an internet provider is an unusual and disproportionate measure. Procedures already exist for taking down websites or accounts with harmful content. The underlying digital infrastructure has traditionally been regarded as neutral.

US citizens and companies are prohibited from assisting or doing business with people or organisations on the US sanctions list. As a result, on 28 August autistici.org was blocked by Public Interest Registry (PIR), the US operator of the .org domain. On 8 September, Banca Etica, an Italian bank that does not fall under US law, then announced it would terminate A/I's services within 10 days. It feared being cut off from the US Visa payment system itself if it did not.¹

A/I has since ceased its activities. This was not mainly because it lost its bank account, since just before closing the organisation prepaid as many cloud services as possible two years in advance. The decisive factor was the fear of secondary sanctions for “material support” being imposed on other organisations and individuals connected to it. The chilling effect therefore falls precisely on parties that are not on any sanctions list themselves. In addition, an organisation without a bank account cannot survive in the long run.

The judges of the International Criminal Court, which is based in the Netherlands, likewise found that once they were placed on a US sanctions list, no bank anywhere in Europe would give them an account.² This is a consequence of the European payment system's heavy dependence on the US. We see this in the Netherlands too: every Dutch bank uses the networks of the American companies Visa and Mastercard. The US sanctions list thus has chilling side effects with far-reaching consequences for citizens, businesses and organisations in Europe.

Dutch internet companies are concerned that they too may be affected by measures taken in the US, or by their side effects. That concern is no longer hypothetical. Following the US intervention against the Italian internet provider, one Dutch provider says it no longer accepts work from the International Criminal Court.³ On 14 September, MPs Kathmann and El Boujdaini submitted written questions on this matter to the State Secretary for Economic Affairs and Climate Policy and the Minister of Foreign Affairs.⁴ We support those questions, and with this letter we widen the picture. What is happening to the Court is happening just as much to civil society organisations, to their hosting and domain names, and to their payments.

The undersigned therefore make the following calls to policymakers:

¹De Koning, M. (2026, 1 September). *Als de Amerikaanse regering je tot terrorist heeft bestempeld: deze Italiaanse internetprovider kwam vorige week op de sanctielijst* [When the US government has labelled you a terrorist: this Italian internet provider was added to the sanctions list last week]. NRC. <https://www.nrc.nl/nieuws/2026/09/01/vs-zetten-italiaanse-internetprovider-op-terrorisraelijst-burgerrechtenorganisaties-bezorgd>

²Lash, T. (2026, 10 September). *Als Trump het op je gemunt heeft, kun je ook in Europa niet meer pinnen* [If Trump is after you, you can't use your bank card in Europe either]. De Correspondent. <https://decorrespondent.nl/17244/als-trump-het-op-je-gemunt-heeft-kun-je-ook-in-europa-niet-meer-pinnen>

³De Koning, M. (2026, 8 September). *Amerikaanse sanctiebeleid jaagt Europese internetsector angst aan* [US sanctions policy strikes fear into the European internet sector]. NRC. <https://www.nrc.nl/nieuws/2026/09/08/amerikaanse-sanctiebeleid-jaagt-europese-internetsector-angst-aan>

⁴Parliamentary questions from MPs Kathmann (GroenLinks-PvdA) and El Boujdaini (D66) on the consequences of US sanctions policy for Dutch internet providers, 14 September 2026.

1. Invest in independent European digital infrastructure

Make building an independent European digital infrastructure a high priority. Stimulate the development of open-source Dutch and European alternatives for essential digital services: cloud (including domain names, hosting and email), social media and payments. Support organisations in migrating data and services. Lead by example as a government by hosting government services (such as the VAT administration) within the EU. Reduce dependence on any single supplier or state, while preserving open standards and one global internet.

2. Take diplomatic action

Speak out against the disproportionate consequences of extraterritorial foreign sanctions for European service providers and their users. Raise this matter urgently with the US government, preferably at the European level. Ask for safeguards on communication, the right of appeal, independent review, and protection of users who are not themselves subject to sanctions. In doing so, assess what role the European Anti-Coercion Instrument can play in countering pressure on the European internet sector.

3. Arrange European legal protection and practical support

Together with the European Commission, put forward proposals to protect lawful activities in Europe. Examine extending the Blocking Statute, which currently only covers certain US measures relating to Cuba and Iran. Also examine enforcing it against parties that apply extraterritorial sanctions without a European legal basis on their own initiative. As long as precautionary compliance remains the safest option, protection exists only on paper. Set up a point of contact, legal assistance and practical support to keep essential services running.

4. Protect banking services for organisations and businesses

Provide additional protection for organisations and businesses that lose banking services because of foreign sanctions. In *Jenec* (C-81/24, 11 June 2026), the Court of Justice of the EU ruled that an OFAC listing alone is not sufficient grounds to refuse a consumer a basic payment account. This consumer right does not automatically apply to organisations and businesses. Work with banks and supervisory authorities to ensure individual assessment, stated reasons and a fast objection procedure. Identify any necessary legislative amendments, while keeping the sanctions and anti-money laundering and counter-terrorist financing rules that apply here.

5. Secure digital and financial services for the International Criminal Court

In keeping with the Netherlands' responsibility as host state, draw up a plan to keep digital and financial services available to the International Criminal Court. Involve the Court, banks and Dutch suppliers. Organise this as a single interministerial task under a coordinating minister, with at least Foreign Affairs, Justice and Security, Finance, and Economic Affairs and Climate Policy at the table. Arrange alternative services in case of imminent disruption, and legal support for suppliers. Report on the results of earlier measures and on the risks that remain.

We ask the Cabinet to respond on immediate assistance in the event of imminent service disruption. This response should come together with the answers to the parliamentary questions of 14 September, and in any case before the committee debate on Digital

Government and Oversight on 30 September. Within six weeks we ask for a plan setting out measures, responsible ministers and timelines. We ask the House to include this letter in that debate.

Yours sincerely,

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 Internet Society
Netherlands Chapter

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internet

waag  futurelab

SETUP

 Dutch Cloud
Community

**FRAMER
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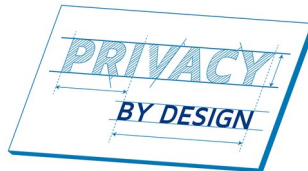
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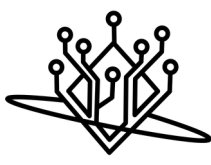
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