



Beyond Small-State Leadership

A Looping Analysis of Iceland's 2019 Joint Statement on Saudi Arabia at the UN Human Rights Council

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Abstract

On March 7th 2019, Iceland delivered a joint statement at the UN Human Rights Council on behalf of 36 states, publicly condemning Saudi Arabia's detention of ten named women human rights defenders and calling for accountability in the killing of journalist Jamal Khashoggi. The intervention is widely cited as an instance of small-state leadership, but whereas the small-state diplomacy literature accounts well for the form the intervention took, it leaves its substantive content unexplained. This thesis asks to what extent Iceland's role in advancing Council scrutiny of Saudi Arabia can be understood as the outcome of a looping interaction between civil society advocacy and small state diplomacy. Drawing on Halme-Tuomisaari's ethnographic theory of looping, the analysis operationalizes the framework as a four-stage process and traces that process through the documentary record. The method is qualitative documentary analysis with a process-tracing structure, supplemented by a semi-structured interview with two Icelandic foreign service officials. The thesis shows how civil society vocabulary and framings consolidated before HRC40 migrated into the joint statement with substantial textual fidelity and were reactivated as resources for renewed mobilization afterward.

Keywords: Human Rights Council, small state diplomacy, looping, civil society advocacy, documentary analysis, Iceland, Saudi Arabia

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1. Introduction

On March 7th 2019, Iceland delivered a joint statement on behalf of 36 states at the United Nations Human Rights Council (HRC), publicly condemning the detention of ten named Saudi women human rights defenders and calling for accountability in the killing of journalist Jamal Khashoggi. It was the first time in the Council's history that Saudi Arabia had been so directly criticized by a coordinated cross-regional coalition.¹ On first notice, this is a recognizable instance of small state diplomacy. Iceland, a state with limited material power, acted as the formal convenor and spokesperson for a cross-regional coalition, using coalition-building and normative positioning to place a politically sensitive situation on the HRC agenda, in a manner consistent with existing accounts of how small states exercise influence in multilateral settings.

At the same time, much of the small state diplomacy literature approaches international outcomes primarily through the actions and strategies of states. In doing so, it tends to focus on visible diplomatic interventions while paying less attention to the broader set of actors and informal processes that often shape these outcomes. The HRC can be understood as a space where formal interventions are highly visible, but where much of the work that makes them possible happens informally, through repeated briefings, coalition letters, side events, and behind-the-scenes persuasion. Many scholars have observed the importance of such informal practices within international institutions, including in human rights settings.² In that ecology, civil society organizations (CSOs) often play a central role

¹ Government of Iceland. Joint statement on the human rights situation in Saudi Arabia. *Stjórnarráð Íslands*. 2019. <https://www.stjornarradid.is/efst-a-baugi/frettir/stok-frett/2019/03/07/Joint-statement-on-the-humanrights-situation-in-Saudi-Arabia/> (accessed 2026-04-19); MENA Rights Group. 36 UN Member States call on Saudi Arabia to improve human rights situation. *MENA Rights Group*. 2019. <https://menarights.org/en/articles/36-un-member-states-call-saudi-arabia-improve-human-rights-situation> (accessed 2026-04-18); Human Rights Watch. UN: A Call to Free Saudi Women Activists. *Human Rights Watch*. 2019. <https://www.hrw.org/news/2019/03/07/un-call-free-saudi-women-activists> (accessed 2026-04-19); N. Cumming-Bruce. Saudi Arabia Rebuked for First Time by Fellow Members of U.N. Rights Council. *New York Times*. 2019. <https://www.nytimes.com/2019/03/07/world/middleeast/saudi-arabia-human-rights-abuses.html> (accessed 2026-03-24); Creutz, K. Nordic Experiences in the UN Human Rights Council: A Tour d'Horizon of 2019 with Iceland and Denmark. *Nordic Journal of Human Rights*. 39: 1 (2021): pp. 18–32.

² See for example J.K. Cowan. The Universal Periodic Review as a public audit ritual: An anthropological perspective on emerging practices in the global governance of human rights. In H. Charlesworth & E.

in agenda formation and norm articulation, even when they cannot themselves produce the most institutionally authoritative outputs, such as resolutions or monitoring mandates. The Saudi Arabian case also sits within a longer interpretive backdrop in which scrutiny of Middle Eastern and Muslim-majority states at the Council has been politically difficult in ways that go beyond bloc voting or strategic alliance, and in which civil society has played an unusually constitutive role in producing what state engagement there has been.³

This creates incentives for what can be conceptualized as a looping process, in which civil society claims are routed through a like-minded state coalition to gain formal visibility and legitimacy, and then loop back into civil society advocacy as a resource for further mobilization. The notion of looping is drawn from Halme-Tuomisaari's ethnographic work on the UN human rights system, in which civil society and state action shape one another iteratively within international institutions rather than acting in sequence.⁴

The framing of the case as one of looping was not the starting point of this study. The thesis began as an inquiry into Iceland's role at HRC40 read through the small state diplomacy literature, which offers a developed account of why a state with limited material resources would invest in multilateral institutions, work through coalitions, and pursue influence through normative rather than coercive means. That literature accounts well for Iceland's role as convener and for the form the intervention took. What it accounts for less easily, as the documentary record accumulated, is the substantive content of what was convened: the choice of issue and the specific framings the statement reproduces from sources outside the foreign ministry. Halme-Tuomisaari's framework was adopted to address

Larking. (eds.). *Human Rights and the Universal Periodic Review*. 1. ed. (Cambridge University Press, 2015); M. Halme-Tuomisaari. Guarding utopia: law, vulnerability and frustration at the UN Human Rights Committee. *Social Anthropology*. 28: 1 (2020); J.E. Johnson & X.M. Hestermann. How Human Rights Advocates Influence Policy at the United Nations. *Human Rights Review*. 20: 2 (2019); S.E. Merry. Transnational Human Rights and Local Activism: Mapping the Middle. *American Anthropologist*. 108: 1 (2006), p. 39..

³ See A.M. Alwasil. Saudi Arabia's engagement in, and interaction with, the UN human rights system: an analytical review. *The International Journal of Human Rights*. 14: 7 (2010), p. 1072; R.A. Alhargan. The impact of the UN human rights system and human rights INGOs on the Saudi Government with special reference to the spiral model. *The International Journal of Human Rights*. 16: 4 (2012); L.K. Landolt. Rival transnational advocacy networks and Middle East politics at the UN Human Rights Council. In *Routledge handbook on human rights and the Middle East and North Africa*. (Routledge, 2017).

⁴ M. Halme-Tuomisaari. (forthcoming). *Looping for Human Rights: an Ethnographic Theory of Expansion*, p. 2-3.

that residue, drawing also on Cowan's account of the UPR as a "public audit ritual" whose effects extend well beyond its formal outputs, and on Riles's ethnography of documentary practice at UN conferences.⁵ Small state diplomacy therefore figures in this thesis as a starting frame whose limits motivate the move to looping rather than as the framework the analysis settles in. Chapter 3 develops these contexts more fully, drawing on small state and Nordic diplomacy literature for the vocabulary of why and how Iceland would convene a coalition of this kind; on the literatures on HRC group politics, Saudi engagement with the UN human rights system, and civil society advocacy for the institutional and political setting in which the statement landed; and on ethnographic and socio-legal work on rights institutions for the vocabulary in which the relationship between state diplomatic action and civil society advocacy can be tracked.

The thesis seeks to do two things. First, it reconstructs a chronology of civil society advocacy and institutional windows that preceded and followed Iceland's statement. Second, it uses that chronology to ask whether the statement can be understood not only as an instance of "small state leadership", but also as the outcome of a longer advocacy circuit in which civil society worked to make Saudi Arabia's violations institutionally legible at the HRC and to induce stronger state action than what ultimately materialized. Together, these objectives can be summarized in the following research question: *to what extent can Iceland's role in advancing HRC scrutiny of Saudi Arabia be understood as the outcome of a looping interaction between civil society advocacy and small state diplomacy?*

Methodologically, the thesis is qualitative. The primary source base is documentary, allowing reconstruction of timing, framing, and public positioning. Documentary sources are well-suited to the textual surface of advocacy and diplomacy but less able to capture backstage negotiation, so the analysis is supplemented by a semi-structured interview with two officials from the Icelandic Ministry for Foreign Affairs. Interpretations of looping are developed as readings of documentary alignment, not as causal claims about which actor influenced which.

⁵ Cowan. The Universal Periodic Review; A. Riles. Infinity within the Brackets. *American Ethnologist*. 25: 3 (1998).

2. Background

2.1 Iceland in the international human rights framework

For much of its history, Iceland occupied a marginal position in international affairs. A former dependency under the Danish crown, it gradually achieved autonomy through home rule in 1904, sovereignty in 1918, and republican status in 1944, with concerns about the fragility of sovereignty continuing to shape political discourse long after formal independence.⁶ The Second World War marked a turning point. Following the German occupation of Denmark in 1940, Iceland assumed responsibility for its own foreign affairs and established its foreign service.⁷ International engagement nevertheless remained limited and driven primarily by domestic economic interests.⁸

Iceland joined the United Nations in 1946 as its smallest member, with a population of roughly 130,000, and voted in favor of the Universal Declaration of Human Rights in 1948.⁹ Through the postwar decades, Iceland joined a series of regional and multilateral institutions but its participation remained largely passive.¹⁰

⁶ B. Thorhallsson. Can Small States Choose Their Own Size? The Case of a Nordic State — Iceland. In A. F. Cooper & T. M. Shaw. (eds.). *The Diplomacies of Small States*. (Palgrave Macmillan UK, 2009); E. Bergmann. Sense of Sovereignty: How national sentiments have influenced Iceland's European policy. *Stjórnsmál og stjórnsýsla*. 5: 2 (2009), p.211.

⁷ Utanríkisráðuneytið. Sögulegt yfirlit. *Stjórnarráð Íslands*, <https://www.stjornarradid.is/raduneyti/utanrikisraduneytid/um-raduneytid/soguvefur-utanrikisthjonustunnar/sogulegt-yfirlit/> (accessed 2026-05-14).

⁸ G. Hallgrímsson. *Skýrsla Geirs Hallgrímssonar utanríkisráðherra um utanríkismál*. Þingskjal 687. 107. löggjafarþing 1984–85 (Reykjavík: Alþingi, 1985). <https://www.althingi.is/altext/107/s/pdf/0687.pdf> (accessed 2026-05-14).

⁹ G. Baldacchino & A. Wivel. Small states: concepts and theories. In G. Baldacchino & A. Wivel. (eds.). *Handbook on the Politics of Small States*. (Edward Elgar Publishing, 2020), p. 8; Hagstofa Íslands. Yfirlit mannfjölda. <https://hagstofa.is/talnaefni/ibuar/mannfjoldi/yfirlit/> (accessed 2026-03-14); UN General Assembly. *Universal Declaration of Human Rights*. A/RES/217(III). 1948. <https://digitallibrary.un.org/record/670964> (accessed 2026-03-14).

¹⁰ Ministry for Foreign Affairs of Iceland. Iceland and NATO. *Government of Iceland*. <https://www.government.is/ministries/diplomatic-missions/permanent-delegation-of-iceland-to-nato/iceland-and-nato/> (accessed 2026-04-23); Ministry for Foreign Affairs of Iceland. Iceland and the US. *Government of Iceland*. <https://www.government.is/ministries/diplomatic-missions/washington-d-c-united-states-of-america/iceland-and-the-us/> (accessed 2026-04-23); Nordic Council. About the Nordic Council. *Norden.org*. <https://www.norden.org/en/information/about-nordic-council> (accessed 2026-04-23); European Free Trade Association. EEA EFTA States. *EFTA*. <https://www.efta.int/eea-relations-eu/eea-institutions-two-pillar-structure/eea-efta-states> (accessed 2026-04-23); Evrópuvefur. Barentsráðið. *Evrópuvefurinn*. 2026. <https://www.evropuvefur.is/svar.php?id=64134> (accessed 2026-04-23); Evrópuvefur. Eystrasaltsráðið.

By the early 1990s, Iceland's approach to international cooperation had begun to shift. Ministry reports of 1990 and 1993 signaled a move from a relatively isolated actor toward a more active multilateral participant.¹¹ A key milestone was Iceland's 1998 decision to seek a non-permanent seat on the UN Security Council for 2009–2010.¹² Although the bid was unsuccessful, the campaign represented a deliberate shift from reactive to proactive foreign policy and presented Iceland's small size as itself a credibility asset.¹³

Iceland's commitment to human rights as a structured foreign policy priority emerged gradually. By 1999, the government had decided to prioritize human rights in foreign policy, and in 2001, it adopted the goal of becoming a leading state in the promotion and protection of human rights.¹⁴ This was formalized in the 2007 policy document Human Rights in Iceland's Foreign Policy, which outlined 15 priority areas based on the principle that human rights are universal, indivisible, and interdependent.¹⁵ Iceland placed particular emphasis on gender equality, women's empowerment, children's rights, and LGBTQ+ rights, and was long among the largest contributors to UNIFEM, the predecessor of UN Women.¹⁶

Iceland's human rights work is implemented through multiple international platforms. Policy is formulated by the Ministry for Foreign Affairs and carried out through Iceland's

Evrópuvefurinn. 2013. <https://www.evropuvefur.is/svar.php?id=65506> (accessed 2026-04-23);

Utanríkisráðuneytið, Sögulegt yfirlit.

¹¹ J. B. Hannibalsson. *Skýrsla Jóns Baldvins Hannibalssonar utanríkisráðherra til Alþingis haustið 1990*. (Reykjavík: Utanríkisráðuneytið, 1990); J. B. Hannibalsson. *Skýrsla utanríkisráðherra til Alþingis um utanríkismál*. (Reykjavík: Utanríkisráðuneytið, 1993). <https://www.stjornarradid.is/gogn/rit-og-skyslur/stakt-rit/1997/11/03/Skyrsla-utanrikisradherra-til-Althingis-um-utanrikismal-10.-desember-1993/> (accessed 2026-04-22).

¹² Utanríkisráðuneytið. *Skýrsla um framboð Íslands og kosningabaráttu til sætis í öryggisráði Sameinuðu þjóðanna 2009–2010*. (Reykjavík: Utanríkisráðuneytið, 2008).

https://www.stjornarradid.is/media/utanrikisraduneyti-media/media/pdf/lokaskysrsla_um_oryggisradsframbodid_2008.pdf (accessed 2026-04-23).

¹³ B. Thorhallsson, J.S. Elínardóttir & A.M. Eggertsdóttir. A Small State's Campaign to Get Elected to the UNSC: Iceland's Ambitious Failed Attempt. *The Hague Journal of Diplomacy*. 18: 1 (2022).

¹⁴ Utanríkisráðuneytið. Ísland á alþjóðavettvangi: Samantekt úr erindum og umræðum. Háskólafundaröð 2007–2008 (Reykjavík: Utanríkisráðuneytið, 2008), p. 8.

<https://rafladan.is/server/api/core/bitstreams/3a8c2e9f-8261-4c15-9abe-cd9991b342f3/content> (accessed 2026-04-15).

¹⁵ Utanríkisráðuneytið. *Mannréttindi í íslenskri utanríkisstefnu*. (Reykjavík: Utanríkisráðuneytið, 2007). https://www.stjornarradid.is/media/utanrikisraduneyti-media/media/utgafa/mannrettindi_i_islenskri_utanrikisstefnu.pdf (accessed 2026-04-15).

¹⁶ Utanríkisráðuneytið. *Ísland í mannréttindaráði Sameinuðu þjóðanna* (Reykjavík: Stjórnarráð Íslands, 2020), p. 11-12. <https://www.stjornarradid.is/library/04-Raduneytin/Utanrikisraduneytid/PDF-skjol/Island%20i%20mannrettindaradi%20Sameinuðu%20þjóðanna.pdf>. (accessed 2026-04-15); Utanríkisráðuneytið. Ísland á alþjóðavettvangi, p. 8.

diplomatic missions and multilateral participation. Within the UN, Iceland's engagement in the General Assembly's Third Committee, which deals with social, humanitarian, and human rights issues, has been particularly significant, including chairing the Committee in 2017.¹⁷ Iceland also participates in the OSCE and the Council of Europe.¹⁸ Its 2018 election to the Human Rights Council marked a particular milestone, the subject of the section that follows.

2.2 Iceland in the Human Rights Council, 2018–2019

2.2.1 Election and groundwork

Iceland's entry into the Human Rights Council (HRC) in July 2018 was both unexpected and consequential. The opportunity arose abruptly when the United States announced its withdrawal from the Council in June 2018, citing what it described as the Council's anti-Israel bias and the continued membership of states with documented human rights violations.¹⁹ Within days of the US announcement, Iceland was approached by other states within the Western European and Others Group (WEOG) regarding the possibility of filling the vacated seat.²⁰ On July 13th 2018, the UN General Assembly elected Iceland to serve the remainder of the US term, an 18-month membership running from July 2018 through December 2019.²¹ Iceland received 172 of 178 votes cast.²² At the time of its accession, Iceland was the smallest state ever to hold membership in the HRC.²³

The speed of the campaign, from first informal soundings to General Assembly vote in a matter of weeks, was made possible by an institutional history that had been quietly accumulating. Iceland's 2007 human rights policy had identified the UN human rights machinery as a primary venue for foreign policy engagement and committed Iceland to

¹⁷ United Nations General Assembly. Third Committee. *United Nations*. <https://www.un.org/en/ga/third/> (accessed 2026-04-16); Utanríkisráðuneytið. *Ísland í mannréttindaráði*.

¹⁸ Utanríkisráðuneytið. *Ísland í mannréttindaráði*, p. 11-12.

¹⁹ L. Koran. US leaving UN Human Rights Council – 'a cesspool of political bias'. *CNN*. 2018. <https://edition.cnn.com/2018/06/19/politics/haley-pompeo-human-rights-bias/index.html> (accessed 2026-04-16); Creutz. *Nordic Experiences*, p. 19.

²⁰ Utanríkisráðuneytið. *Ísland í mannréttindaráði*, p. 20-21.

²¹ *Ibid*, p. 21.

²² *Ibid*, p. 21.

²³ *Ibid*, p. 28.

seeking a more active role in the Council.²⁴ An Icelandic diplomat had served as vice-chair of the Third Committee in 2013, and Ambassador Einar Gunnarsson chaired it in 2017, the first time an Icelandic official had chaired any committee of the General Assembly since Thor Thors held the Fourth Committee chair in 1948.²⁵ In Geneva, Iceland had already begun delivering cross-regional interventions. In 2014, the then Permanent Representative delivered a joint statement on Egypt on behalf of more than 20 states, and in 2016, a similar statement on extrajudicial killings in the Philippines on behalf of approximately 40 states.²⁶ When the WEOG seat became available, Iceland had a relevant policy framework, prior convening experience, and personnel familiar with the relevant UN bodies.

Once elected, Iceland built on its voluntary pledge and developed concrete priorities organized around six thematic clusters: gender equality and the empowerment of women, the rights of LGBTI persons, the rights of the child, the relationship between environmental change and human rights, an efficient and effective HRC, and general engagement with the Council and UPR.²⁷ These mirrored the thematic emphases of Iceland's 2007 human rights policy.²⁸ The 18-month tenure shaped the strategic calculus from the outset. Officials describe the membership as one in which Iceland was determined, from the moment of election, to be a visible and active participant rather than a holding member finishing a vacated term.²⁹ Political support was solid across the relevant ministries, and the willingness to take on contested initiatives, including those on Saudi Arabia, was already in place before the public phase began.³⁰

2.2.2 Three flagship initiatives

Iceland served on the HRC from its 39th through its 42nd regular sessions. In Iceland's own subsequent reporting and in independent assessments, three initiatives are consistently

²⁴ Utanríkisráðuneytið. *Mannréttindi í íslenskri utanríkisstefnu*, p. 23-24.

²⁵ Utanríkisráðuneytið. *Ísland í mannréttindaráði*, p. 19.

²⁶ Utanríkisráðuneytið. *Ísland í mannréttindaráði*, p. 16-17.

²⁷ Ibid, p. 23-24.

²⁸ Utanríkisráðuneytið. *Mannréttindi í íslenskri utanríkisstefnu*.

²⁹ Interview with officials from the Ministry for Foreign Affairs. [conducted by the author via Microsoft Teams]. April 15th 2026.

³⁰ Ibid.

identified as the defining achievements of the tenure: a resolution on equal pay, a country-specific resolution on the Philippines, and the joint statement on Saudi Arabia delivered on March 7th 2019 during the 40th session.³¹

The equal pay resolution was led by Iceland with a core group of seven other states: Australia, Canada, Germany, New Zealand, Panama, South Africa, and Switzerland, and built on Iceland's domestic Equal Pay Standard. Adopted by consensus with broad cross-regional co-sponsorship, the resolution extended Iceland's thematic engagement with gender equality into a formal Council output..³²

The Philippines resolution addressed extrajudicial killings in the context of President Duterte's "war on drugs", requesting that the Office of the High Commissioner for Human Rights prepare a comprehensive written report on the human rights situation in the country.³³ The resolution passed by a narrow margin with 18 in favor, 14 against, and 15 abstentions, and drew a vehement public response from the Philippine government, including a personal attack on Iceland by President Duterte himself.³⁴

The Saudi Arabia joint statement was a cross-regional intervention of a different kind: a joint statement under Item 2 of the Council's agenda, delivered on behalf of 36 states.³⁵ Unlike a resolution, a joint statement does not bind co-signatories to a formal vote and is institutionally lighter, but it can be rhetorically powerful when assembled across regional groups. Of the three initiatives, the Saudi statement is the most widely reported, the most commented on in subsequent literature, and the most directly relevant to this thesis. Chapter 5 examines it in detail.

³¹ Utanríkisráðuneytið. *Ísland í mannréttindaráði Sameinuðu þjóðanna*; Creutz, Nordic Experiences.

³² UN Human Rights Council. *Equal Pay*. A/HRC/41/L.21. 2019. <https://documents.un.org/doc/undoc/ltid/g19/207/65/pdf/g1920765.pdf> (accessed 2026-03-24);

Utanríkisráðuneytið. *Ísland í mannréttindaráði*, p. 28.

³³ UN Human Rights Council. *Promotion and protection of human rights in the Philippines*. A/HRC/41/L.20. 2019. <https://documents.un.org/doc/undoc/ltid/g19/205/53/pdf/g1920553.pdf> (accessed 2026-03-24).

³⁴ UN Human Rights Council. *Promotion and protection of human rights in the Philippines*; A. Taylor. Iceland criticized Duterte's drug war, so he accused them of 'eating ice'. *The Washington Post*. 2019. <https://www.washingtonpost.com/world/2019/07/12/philippines-duterte-icelands-criticism-his-drug-war-they-just-go-about-eating-ice/> (accessed 2026-03-26).

³⁵ Government of Iceland. Joint statement.

3. Previous research and theory

This chapter proceeds in two parts. Sections 3.1–3.6 introduce the strands of research relevant to the case and identify the concepts the analysis will draw on. Section 3.7 develops the framework of looping.

3.1 Small state diplomacy

The literature on small states provides the most direct framework for understanding why Iceland would invest in the HRC and supplies the operational vocabulary for the small-state reading developed in Chapter 5. Once a residual category in International Relations, small states are now the subject of a substantial scholarship that takes their foreign policy seriously.³⁶ The thesis treats smallness as relational and context-dependent rather than as a fixed category, in line with recent work emphasizing the heterogeneity of small states and the difficulty of consistent definitional thresholds.³⁷ The shared starting point is that small states face structural constraints, limited administrative capacity, restricted diplomatic resources, exposure to external pressure, and reduced ability to shape outcomes unilaterally, but that these constraints do not foreclose meaningful action. They shape its form: small states invest in multilateral institutions, prioritize narrowly, work through coalitions, and pursue influence through credibility, expertise, and norm-based positioning rather than material leverage.³⁸

Within this broad consensus, the most developed framework is Thorhallsson and Steinsson's shelter theory, which holds that small states seek political, economic, and societal shelter from larger states and institutions, and their reliance on multilateral arrangements is

³⁶ I.B. Neumann & S. Gstöhl. Introduction: Lilliputians in Gulliver's world? In C. Ingebritsen, I. Neumann, S. Gstöhl, & J. Beyer (eds.). *Small states in international relations*. (University of Washington Press, 2006); G. Baldacchino & A. Wivel. *Small states: concepts and theories*.

³⁷ A. Ó. Súilleabháin. Small states at the United Nations: diverse perspectives, shared opportunities. (International Peace Institute, 2014), p. 3.

³⁸ B. Thorhallsson & S. Steinsson. Small State Foreign Policy. In B. Thorhallsson & S. Steinsson. *Oxford Research Encyclopedia of Politics*. (Oxford University Press, 2017); D. Panke. Dwarfs in international negotiations: how small states make their voices heard. *Cambridge Review of International Affairs*. 25: 3 (2012); T. Long. Small States, Great Power? Gaining Influence Through Intrinsic, Derivative, and Collective Power: Table 1. *International Studies Review*.

constitutive rather than incidental.³⁹ The framework shifts the analytical center from compensation to dependence. Small states act through institutions because institutions reduce power asymmetry and the transaction costs of diplomacy, while the shelter institutions provide impose costs that the framework treats as part of the equation. Read through this lens, Iceland's investment in the HRC is intelligible as a long-running pattern of multilateral embedding rather than a discrete strategic choice, as Creutz points out.⁴⁰

The field is not fully settled on what counts as small-state influence. Long argues that the conventional wisdom underestimates small states because it equates power with material resources and direct compulsion⁴¹, and proposes a wider taxonomy in which small states draw on derivative power through relationships with great powers, collective power through coalitions and institutions, and particular-intrinsic power through specialized assets such as identity, expertise, or geography.⁴² The argument is partly methodological: the field has been measuring small states with an instrument built for great powers. For the present case, Long's notion of collective power matters most directly, since it offers a vocabulary for treating coalition form as itself a source of influence rather than a workaround for individual weakness.⁴³ Panke operates at a different level of abstraction. Rather than reframing power, she examines how small states behave in specific negotiation settings, identifying a repertoire of capacity-building and shaping strategies, framing, causal arguing, moral arguing or shaming, legal arguing, coalition-building, and bargaining.⁴⁴ Her account is useful here for two reasons: it surfaces the texture of small state diplomacy at the level where outcomes are produced, and it includes a category, moral arguing or shaming, that captures the rhetorical move at the heart of cross-regional human rights interventions, in which delegitimizing a position contrary to shared norms is the diplomatic instrument being deployed.⁴⁵ Panke also notes that small states may have a comparative advantage in such argumentation, since

³⁹ B. Thorhallsson & S. Steinsson. A theory of shelter. In *Small States and Shelter Theory: Iceland's External Affairs*. 1. edn. (Routledge, 2018), p.24-26.

⁴⁰ Creutz. Nordic Experiences.

⁴¹ Long. Small States, Great Power?, p. 186-188.

⁴² Ibid, p. 193-200.

⁴³ Ibid, p. 198-200.

⁴⁴ Panke. Dwarfs in international negotiations, p. 318-321.

⁴⁵ Ibid, p. 320-321.

perceived absence of self-interest can lend their interventions credibility larger states find harder to project.⁴⁶

Within this broader literature, four clusters of concepts will recur in the analysis and are set out here at the level of detail needed for that reading.

3.1.1 Coalitions, burden-sharing, and group diplomacy

Because small states cannot safeguard their interests through traditional forms of power, cooperation within international institutions is central to how they shape their external environment.⁴⁷ Coalition-building is the most frequently identified strategy through which small states mitigate vulnerability and amplify their voices. Súilleabháin argues that cooperation distributes political and diplomatic burdens across like-minded partners and increases the likelihood that small-state positions will be heard.⁴⁸ Cooperation among small states is driven not primarily by shared size but by ideological affinity and overlapping policy preferences, which is why coalitions in the human rights setting frequently cut across regional groupings.⁴⁹

Henrikson distinguishes several diplomatic strategies available to small states, of which group diplomacy is most directly relevant here. Group diplomacy rests on strength in numbers and the joint articulation of a position by a coalition whose combined voice carries further than any individual member could project alone.⁵⁰ Cohen and Fontaine's microlateralism refines this. A small state convenes an issue-specific coalition that can include larger powers, drawing on their resources and reach while retaining the convening

⁴⁶ Ibid, p. 320-321; A. Björkdahl. Norm advocacy: a small state strategy to influence the EU. *Journal of European Public Policy*. 15: 1 (2008).

⁴⁷ R. Keohane. Lilliputians' dilemmas: small states in International politics. *International organization* 23: 3 (1969); P. J. Katzenstein. Small states and small states revisited. *New political economy* 8: 1 (2003).

⁴⁸ Súilleabháin. Small states at the United Nations, p. 3–5.

⁴⁹ Ibid, p. 7–8.

⁵⁰ A. K. Henrikson. *Ten Types of Small State Diplomacy*. (The Fletcher School of Law and Diplomacy, 2017), p. 6. [https://is.muni.cz/eli1423/podzim2008/MVZ157/Um/TEN TYPES OF SMALL STATE DIPLOMACY.pdf](https://is.muni.cz/eli1423/podzim2008/MVZ157/Um/TEN%20TYPES%20OF%20SMALL%20STATE%20DIPLOMACY.pdf) (accessed 2026-03-26).

role.⁵¹ Microlateralism is useful for analyzing cases in which the substantive content of a coalition is set by a small state but the political weight comes from the combined membership.

3.1.2 Niche diplomacy and norm entrepreneurship

Where coalition-building addresses the problem of voice, niche diplomacy addresses the problem of attention. By concentrating limited resources on a narrow set of issues, small states develop the expertise, credibility, and visibility that compensate for capacity constraints.⁵² Peterson, and Panke and Gurol, note that this strategy is often driven by necessity rather than choice, as small administrations cannot engage comprehensively across all policy areas.⁵³

Niche diplomacy is closely linked to norm entrepreneurship. States pursuing niche strategies often act as norm entrepreneurs, promoting underrepresented issues and seeking to embed them in international agendas.⁵⁴ Drawing on Finnemore and Sikkink, “norms do not emerge out of thin air; they are actively built by agents having strong notions about appropriate or desirable behavior”, who mobilize support, encourage diffusion through socialization, and seek internalization in state practice.⁵⁵ The Nordic countries are frequently cited as exemplars of this combined approach⁵⁶, having elevated issues such as environmental protection, peace mediation, and global welfare while competing for reputational status as

⁵¹ J. Cohen & R. Fontaine. The Case for Microlateralism: With U.S. Support, Small States Can Ably Lead Global Efforts. *Foreign Affairs*. (2021). <https://www.foreignaffairs.com/articles/world/2021-04-29/case-microlateralism> (accessed 2026-03-26).

⁵² Henrikson, *Ten Types of Small State Diplomacy*, p. 6; I. Lakatos. The Potential Role of Small States and Their Niche Diplomacy at the UN and in the Field of Human Rights, with Special Attention to Montenegro. *Pecs Journal of International and European Law* 1 (2017) p. 59; B. Thorhallsson. Small States in the UNSC and the EU: Structural Weaknesses and Ability to Influence. (Springer International Publishing, 2017), p. 37.

⁵³ M. J. Peterson. The UN General Assembly. In T. G. Weiss. & R. Wilkinson. (Eds.), *International Organization and Global Governance*. (Routledge, 2018), p. 241; D. Panke & J. Gurol. Small states as agenda-setters? The Council Presidencies of Malta and Estonia. *Journal of Common Market Studies*, 56: 1 (2018), p 144.

⁵⁴ C. Ingebritsen. Norm Entrepreneurs: Scandinavia's Role in World Politics. *Cooperation and Conflict*. 37: 1 (2002), p. 14-16; Bloomfield & Scott, Norm Antipreneurs and the Politics of Resistance to Global Normative Change.

⁵⁵ Finnemore & Sikkink, *International Norm Dynamics and Political Change*, p. 896–904.

⁵⁶ See for example Ingebritsen. Norm Entrepreneurs; Creutz. Nordic Experiences; P. Røren. Status seeking in the friendly Nordic neighborhood. *Cooperation and Conflict*. 54: 4 (2019).

“good powers”.⁵⁷

3.1.3 The credibility advantage

A further concept is Lakatos's credibility advantage.⁵⁸ Small states are often perceived as lacking a broader global agenda, which can enhance their credibility on contested issues and reduce suspicions of hidden geopolitical motives. A small state convenor can speak in a register that, from a larger state with extensive commercial or strategic exposure, would invite a more pointed reaction. This credibility advantage is conceptually distinct from the protective effect of coalition form, although the two often combine in practice.⁵⁹

3.1.4 Status, moral authority, and trailblazer roles

Finally, the literature on small-state status-seeking provides the vocabulary for the positional dimension of human rights diplomacy within a peer group. Wohlforth et. al. argue that small and middle powers face a different status-seeking environment from great powers, and that moral authority can serve as a route to standing that material competition cannot offer them.⁶⁰ Within a peer group of “fairly small, fairly wealthy, democratic” states all eager to spread moral capital, status remains positional: if all small and middle powers punch above their weight, none does.⁶¹ Røren extends this logic, showing that moral authority operates as a competitive good even among states with closely aligned values.⁶² Within such a peer group, a first-mover or trailblazer role on a politically sensitive issue offers a recognizable form of distinction.

Taken together, these concepts provide the analytical toolkit for the small-state reading of the Iceland-led joint statement developed in Chapter 5.

⁵⁷ Ingebritsen, *Norm Entrepreneurs*, p. 12-20; A. Björkdahl. *Swedish Norm Entrepreneurship in the UN. International Peacekeeping*. 14: 4 (2007), p. 539; Røren. *Status seeking*.

⁵⁸ Lakatos. *The Potential Role of Small States*.

⁵⁹ *Ibid*.

⁶⁰ W.C. Wohlforth, B. De Carvalho, H. Leira & I.B. Neumann. *Moral authority and status in International Relations: Good states and the social dimension of status seeking*. *Review of International Studies*. 44: 3 (2018).

⁶¹ *Ibid*, p. 529, 545.

⁶² Røren. *Status seeking*.

3.2 Nordic diplomacy and the politics of status

The Nordic literature narrows the focus from generic small-state behavior to a specific regional repertoire. Where small state theory explains why a state like Iceland would invest in multilateral institutions, the Nordic literature asks why Iceland, Norway, Denmark, Finland, and Sweden have come to treat human rights advocacy as a particularly suitable form of international action, and what kind of standing this advocacy produces.⁶³

The foundational claim, developed by Ingebritsen, is that the Nordic states function as “norm entrepreneurs”, working through institutions to promote particular models of international order in environmental policy, conflict resolution, and development assistance.⁶⁴ She explains the pattern structurally: limited material capabilities, peripheral geographical position, traditions of neutrality, and a domestic political culture of social-democratic institutions together produce a foreign policy disposition oriented toward the export of norms rather than the projection of force.⁶⁵ What the Nordics offer is “social power”, a capacity to influence that derives not from material resources but from the credible performance of principle.⁶⁶

Subsequent work refines this account in two directions that matter here. Björkdahl recasts norm entrepreneurship not as an expression of identity but as a “foreign policy strategy”, the construction of a morally convincing idea, its advocacy through diplomacy and coalition-building, and the search for an “organizational home” so that it becomes self-sustaining.⁶⁷ She is open about mixed motivations: states “may have an interest in becoming norm entrepreneurs so as to create a niche for themselves” in the international system.⁶⁸ Browning sharpens the strategic dimension by distinguishing Nordic identity from the “Nordic brand”, cultivated during the Cold War around peaceful societies, bridge-building,

⁶³ H. Tuominen. A louder voice for human rights: The Nordic–Baltic group at the UN Human Rights Council. *Cooperation and Conflict*. 60: 4 (2025); K. Haugevik & O.J. Sending. The Nordic Balance Revisited: Differentiation and the Foreign Policy Repertoires of the Nordic States. *Politics and Governance*. 8: 4 (2020).

⁶⁴ Ingebritsen. *Norm Entrepreneurs*, p. 13.

⁶⁵ *Ibid*, p. 13–14.

⁶⁶ *Ibid*, p. 13.

⁶⁷ Björkdahl. *Swedish Norm Entrepreneurship*, p. 540.

⁶⁸ *Ibid*, p. 540.

internationalist solidarity, and an egalitarian social-democratic model.⁶⁹ Brands, he notes, are “intrinsically more strategic, primarily targeted at external audiences, [and] relatively stable”.⁷⁰ Together, Björkdahl and Browning open space within an otherwise descriptive literature for a more strategic reading of what Nordic rights diplomacy is doing.

Wohlforth et. al. offer the most systematic articulation of why this diplomacy works as a route to international standing.⁷¹ Small and middle powers face a different status-seeking environment from great powers, and “moral authority” can serve as a route to status that material competition cannot offer.⁷² The relevant peer group is the Utstein Group of “fairly small, fairly wealthy, democratic” states “all eager to spread their moral capital”, or Canada, the Netherlands, Norway, Sweden, Switzerland, Finland, and Denmark.⁷³ Within such a peer group, status remains positional. The claim is not that Nordic rights diplomacy is really about status, but that being recognized as a “good state” is itself a position that can be competed for, and the competition produces observable effects in coalition behavior, niche specialization, and the cultivation of trademarked policy concepts.⁷⁴

This body of work supports a reading of Iceland's 2019 statement as a recognizable instance of Nordic rights diplomacy that combines principled multilateralism with the positional pursuit of standing. Tuominen shows how collective drafting, coordination, and shared messaging have become routine practices through which Nordic states amplify their voices.⁷⁵ Creutz's study of the unprecedented year of double Nordic representation at the Council in 2019, when both Iceland and Denmark held seats, places the Iceland-led statement on Saudi Arabia at the center of an account in which Iceland was a “bold and visible actor” willing to “speak out when others stay silent”.⁷⁶ On Creutz's reading, the statement was a turning point, supported by thirty-six countries and described in the international press as an

⁶⁹ C.S. Browning. *Branding Nordicity: Models, Identity and the Decline of Exceptionalism*. *Cooperation and Conflict*. 42: 1 (2007).

⁷⁰ *Ibid*, p. 31.

⁷¹ Wohlforth et al. *Moral authority*.

⁷² *Ibid*, p. 532–534.

⁷³ *Ibid*, p. 529.

⁷⁴ *Ibid*, p. 540.

⁷⁵ Tuominen. *A louder voice*.

⁷⁶ Creutz. *Nordic Experiences*, p. 20-21.

unusually strong rebuke of a major UN power.⁷⁷ Iceland's position inside this literature is, however, structurally marginal: foundational accounts of Nordic norm entrepreneurship are built around the four other Nordic states, with Iceland rarely the empirical focus, and Iceland's 2019 entry to the Council came on short notice, replacing the United States after its withdrawal, with no extended campaign.⁷⁸ The 36-country coalition behind the Saudi statement was cross-regional rather than Nordic. The case fits the Nordic frame, but as performed by an actor at the margin of the literature's working scope.

3.3 The Human Rights Council as a field of group politics

The third strand narrows further. Where small state theory asks how a state with limited capabilities acts in multilateral settings, and Nordic scholarship asks why human rights diplomacy is a regional repertoire, the literature on HRC group politics asks what kind of place the Council is, and how speech in it is organized. Laatikainen is the anchor: group politics is “pervasive” in UN multilateralism but systematically obscured by dominant frames, multilateralism scholarship works at the systemic level, negotiation theory at the level of atomistic actors, and both levels of analysis obscure the operation of political groups.⁷⁹ Groups, on Laatikainen's account, are not scaffolding around individual state action but how speech at the UN is produced. Herz reinforces the institutional scope: clustering through groups is a “variable geometry” operating across the General Assembly, Security Council, specialized agencies, and conference diplomacy, not a feature peculiar to one body.⁸⁰

Laatikainen's typology fits Iceland's 2019 coalition uneasily. Her four categories distinguish regional electoral groups, regional organizations, regional and cross-regional

⁷⁷ Creutz. *Nordic Experiences*, p. 21.

⁷⁸ On Iceland's marginal position in the foundational accounts: Browning's substantive analysis is built around the four NATO/EU-affiliated Nordics: Browning. *Branding Nordicity*, p. 32–36, where Iceland appears once in passing; Ingebritsen lists Iceland among the five Scandinavian states: Ingebritsen. *Norm Entrepreneurs*, p. 11, but the empirical material is overwhelmingly drawn from the other four. On Iceland's 2019 entry: Creutz. *Nordic Experiences*, p. 20.

⁷⁹ K.V. Laatikainen. Conceptualizing Groups in UN Multilateralism: The Diplomatic Practice of Group Politics. *The Hague Journal of Diplomacy*. 12: 2–3 (2017), p. 113.

⁸⁰ M. Herz. Formal and Informal Groups. In T. G. Weiss & S. Daws. (eds.). *The Oxford Handbook on the United Nations*. 2. ed. (Oxford University Press, 2018).

political groups, and single-issue political groups.⁸¹ The Nordic Group sits in the third; Iceland's 36-state coalition is closer to the fourth, though the boundary is porous. The “fluidity” of informal political groups, emergence, evolution, and shifting membership, is part of Laatikainen's point. Which group is doing what is itself a question, not a given.⁸²

Smith adds a terminological correction. “Politicization”, the standard charge leveled at the Council, misdescribes what is actually happening: states “do argue over principles and norms, but because these are seen as irreconcilable, and because groups help to solidify positions, polarization occurs”.⁸³ The distinction preserves the seriousness of the disagreement while naming the way group form hardens it. Smith's empirical contribution is to document a shift. Since around 2009, contested rights initiatives at the HRC have increasingly been advanced through “cross-regional core groups” rather than formal bloc confrontation, with bridge-builders deliberately working to “break the blocs”.⁸⁴ Tuominen traces one developed instance: the Nordic-Baltic Eight (NB8) has moved from one joint statement at HRC37 in 2018 to roughly thirty to forty per session by 2021–2024, explicitly preferring joint statements over resolutions and reaching outward cross-regionally rather than presenting as a bloc.⁸⁵ This sits inside a wider pattern Herz describes, in which the expanding scope of multilateral negotiations makes coalition form a workload-management strategy as well as a political one. The joint statement, in this account, is not a lesser instrument than a resolution but a different one, suited to assembling broader support around contested issues.

3.4 Middle east and human rights

The Middle East and Muslim-majority states have occupied a particular position in international human rights discourse that exceeds their status as cases of contested compliance. Mutua argues that the rhetorical structure of human rights depends on a triad of “savages, victims, and saviours”, in which non-Western states are recurrently positioned as

⁸¹ Laatikainen. *Conceptualizing Groups*, p.116.

⁸² *Ibid*, p. 120-121.

⁸³ K.E. Smith. Group Politics in the Debates on Gender Equality and Sexual Orientation Discrimination at the United Nations. *The Hague Journal of Diplomacy*. 12: 2–3 (2017), p. 139.

⁸⁴ *Ibid*, p. 140-141.

⁸⁵ H. Tuominen. A louder voice, p. 856, 860.

the cultural and political other against which a universal rights subject is constructed, with Muslim-majority states often the paradigmatic example.⁸⁶ This has shaped and been shaped by debates over whether the human rights project is a Western inheritance or a universal achievement, and over whether Islamic legal traditions are compatible with international human rights norms.⁸⁷ Recent scholarship emphasizes the active rather than passive character of Middle Eastern engagement with this discourse. Kayaoglu shows how Muslim-majority states and the Organization of Islamic Cooperation have worked at the UN to reshape debates around religion and civilizational difference, sometimes contesting the universalist frame and sometimes operating within it strategically⁸⁸, while Mokhtari traces how human rights claims have been transformed by, and at times powerfully mobilized within, Middle Eastern political contexts.⁸⁹

A focused literature on Saudi Arabia's engagement with the UN human rights system reaches a striking common conclusion: the puzzle of Saudi exceptionality at the Council is not one of absence but of managed presence. Alwasil documents a marked expansion of Saudi interaction after the mid-1990s, such as treaty ratification, periodic reporting, responses to special procedures, election to the Council, describing the trajectory as a shift from “limited involvement to a tendency to be part of the international human rights arrangements”⁹⁰, while showing the conditional character of that engagement through broad Shari'a-based reservations, reporting delays, and the technical and religious defence of practices including corporal punishment.⁹¹ Alhargan tracks a roughly decade-long phase of denial followed by tactical concessions beginning in the early 2000s, driven in part by EU-GCC dialogue pressure, while finding no evidence of substantive internalization in domestic

⁸⁶ M.W. Mutua. Savages, Victims, and Saviors: The Metaphor of Human Rights. *Harvard International Law Journal*. 42 (2001), p. 201-204.

⁸⁷ See for example A.E. Mayer. *Islam and human rights: tradition and politics*. 5th ed. (Westview Press, 2013).

⁸⁸ T. Kayaoglu. Giving an Inch Only to Lose a Mile: Muslim States, Liberalism, and Human Rights in the United Nations. *Human Rights Quarterly*. 36: 1 (2014), p. 67-68, 82-83.

⁸⁹ S. Mokhtari. Human rights and power amid protest and change in the Arab world. *Third World Quarterly*. 36: 6 (2015), p. 1214-1215.

⁹⁰ A.M. Alwasil. Saudi Arabia's engagement in, and interaction with, the UN human rights system: an analytical review. *The International Journal of Human Rights*. 14: 7 (2010), p. 1072.

⁹¹ *Ibid*, p. 1078-1083.

practice.⁹² Çalı, Ghanea and Jones extend this to the GCC, showing that ratification and institutional participation across the bloc have served international standing more reliably than they have produced enforceable domestic change.⁹³ UPR scholarship by Schimmel and Nazir shows Saudi delegations using the procedure to defend, downplay, and deny rather than engage critically, relying on Shari'a- and sovereignty-based justifications and accepting only narrow recommendations.⁹⁴ The Saudi Arabian case is one of sustained but conditional engagement that produces incremental rather than substantive change.

Within this institutional environment, Landolt argues that Middle East human rights politics at the Council are best understood as competition between “rival transnational advocacy networks”.⁹⁵ Critical NGOs work to expose abuse and preserve strong rights language, while government-sympathetic NGOs and allied states crowd speaking time, redirect debate, and recast rights claims through frames of security, stability, and sovereignty, with liberal states often hesitant to press hard against strategic partners in the region.⁹⁶ The Saudi Arabian case sits inside this wider pattern rather than alongside it.

3.5 Civil society advocacy and human rights

A substantial scholarship treats civil society actors, NGOs, advocacy networks, and the experts and consultants circulating among them, as constitutive rather than secondary participants in UN human rights politics. Weiss, Carayannis and Jolly capture this with their notion of a “third UN”, or networks of nongovernmental actors with no formal link to states or the secretariat who nevertheless shape policy through information, expertise, and

⁹² R.A. Alhargan. The impact of the UN human rights system and human rights INGOs on the Saudi Government with special reference to the spiral model. *The International Journal of Human Rights*. 16: 4 (2012).

⁹³ B. Çalı, N. Ghanea & B. Jones. Big Promises, Small Gains: Domestic Effects of Human Rights Treaty Ratification in the Member States of the Gulf Cooperation Council. *Human Rights Quarterly*. 38: 1 (2016), p. 39, 53-54.

⁹⁴ A. Nazir. A UPR Perspective on Capital Punishment and the Kingdom of Saudi Arabia. *Muslim World Journal of Human Rights*. 19: 1 (2022); N. Schimmel. THE UN HUMAN RIGHTS COUNCIL'S UNIVERSAL PERIODIC REVIEW AS A RHETORICAL BATTLEFIELD OF NATIONS: Useful Tool or Futile Performance? *World Affairs*. 186: 1 (2023).

⁹⁵ L.K. Landolt. Rival transnational advocacy networks and Middle East politics at the UN Human Rights Council. In *Routledge handbook on human rights and the Middle East and North Africa*. (Routledge, 2017), p. 156.

⁹⁶ Ibid, p. 158-159, 165.

persistent presence.⁹⁷ Within human rights specifically, Tsutsui, Whitlinger and Lim argue that the post-war rights regime is best understood as the ongoing outcome of tension between civil society's push for stronger norms and state actors' defense of sovereign prerogative.⁹⁸ The conceptual backbone remains Keck and Sikkink's transnational advocacy network framework, in which networks operate through “voluntary, reciprocal, and horizontal patterns of communication and exchange”⁹⁹, leveraging outside-insider positioning through the boomerang dynamic in which domestic actors enlist transnational allies to apply pressure on otherwise unresponsive governments.¹⁰⁰ The framework foregrounds civil society as the actual enforcement mechanism for treaties that states are reluctant to take seriously.

Recent work complicates the network framework's more horizontal assumptions. Carpenter argues that advocacy networks are better described as “scale-free networks dominated by a few major hubs” than as distributed networks of equal exchange, and that a small number of gatekeeping organizations effectively determine which issues emerge.¹⁰¹ Pruce and Budabin extend this critique: transnational NGOs remain headquartered in the global North and translate the claims of distant stakeholders for outside audiences, often without input from those being translated.¹⁰² The picture is not horizontal solidarity but structured selection, issues reach the agenda because particular gatekeepers in particular institutional positions have reasons to adopt them.

A second line of complication concerns the actual practice of advocacy at intergovernmental forums. Johnson and Hestermann, drawing on participant observation of a transnational network campaigning for a country-specific resolution, find that human-rights-focused networks at the UN overwhelmingly adopt “insider” tactics, what one network

⁹⁷ T.G. Weiss, T. Carayannis & R. Jolly. The “Third” United Nations. *Global Governance*. 15: 1 (2009).

⁹⁸ K. Tsutsui, C. Whitlinger & A. Lim. International Human Rights Law and Social Movements: States’ Resistance and Civil Society’s Insistence. *Annual Review of Law and Social Science*. 8: 1 (2012), p. 370.

⁹⁹ M.E. Keck & K. Sikkink. Transnational advocacy networks in international and regional politics. In *Activists beyond Borders: Advocacy Networks in International Politics*. (Cornell University Press, 1998).

¹⁰⁰ *Ibid*, p. 91.

¹⁰¹ R.C. Carpenter. Setting the Advocacy Agenda: Theorizing Issue Emergence and Nonemergence in Transnational Advocacy Networks. *International Studies Quarterly*. 51: 1 (2007), p. 114.

¹⁰² J.R. Pruce & A.C. Budabin. Beyond naming and shaming: New modalities of information politics in human rights. *Journal of Human Rights*. 15: 3 (2016), p. 417-418.

director describes as “quiet diplomacy”.¹⁰³ They document how networks construct tiered targeting lists, prioritizing swing states on the HRC because membership “confers the informal powers of being more influential within the geographic groups on human rights-related resolutions”.¹⁰⁴ They describe their case as deploying “a version of Keck and Sikkink's boomerang”, with more diverse member states than the classic dynamic anticipates and without public naming and shaming.¹⁰⁵ Pruce and Budabin reach a similar diagnosis. The field has reduced civil society practice to “naming and shaming” when in fact advocacy operates across multiple modalities, including a juridical mode of fact-finding and quiet engagement aimed at legitimacy and objectivity rather than public exposure.¹⁰⁶ Insider, non-confrontational, information-based advocacy is not a marginal style but a central one in contemporary rights work at the UN.

3.6 Ethnographic and socio-legal work on rights institutions

The ethnographic and socio-legal literature on human rights institutions offers the strongest reframing of how a case like Iceland's 2019 statement can be read. Rather than treating rights as stable objects originating in international law, this scholarship asks how rights gain force through practice, document work, translation, ritualized procedure, and the relationships that connect actors across institutional categories. Merry's work is the most cited anchor for this shift. She displaces the older universalism–relativism debate in favor of an inquiry into “where and how human rights concepts and institutions are produced, how they circulate, and how they shape everyday lives and actions”.¹⁰⁷ Rights do not move from a global center outward but are remade in transit, by translators who work “up and down”, reframing local grievances as rights violations and translating transnational ideas into terms that fit specific situations.¹⁰⁸ Drawing on Rottenburg, Merry develops this into the idea of “chains of

¹⁰³ J.E. Johnson & X.M. Hestermann. How Human Rights Advocates Influence Policy at the United Nations. *Human Rights Review*. 20: 2 (2019), p. 152.

¹⁰⁴ Ibid, p. 153.

¹⁰⁵ Ibid, p. 157.

¹⁰⁶ Pruce & Budabin. Beyond naming and shaming, p. 417-418.

¹⁰⁷ S.E. Merry. Transnational Human Rights and Local Activism: Mapping the Middle. *American Anthropologist*. 108: 1 (2006), p. 39.

¹⁰⁸ Ibid, p. 42.

translation” along which facts are gathered, classified, and reclassified at each stage, such that “underlying fragility and unreliability is converted into an appearance of stability and solidity”.¹⁰⁹ The image is portable beyond Merry's own cases: it describes how claims acquire formal weight as they pass through successive documentary stages.

Halme-Tuomisaari's ethnographic work sharpens this for the institutional settings most relevant here. Her account of the Human Rights Committee insists that the formal apparatus of treaty body work, legal technicalities, covenant-like document aesthetics, the language of “jurisprudence” and “constructive dialogue”, is not empty ritual but constitutive of how authority is produced and contested.¹¹⁰ Her central move is to treat the duality of this work as productive: the same features that give a treaty body its legal seriousness leave it vulnerable to states pushing back, and practitioners navigate this tension actively. She is also explicit that human rights monitoring is sustained by “genuine belief and believers” rather than reducible to bureaucratic ritualism.¹¹¹ Her most useful observation for thinking about diplomatic acts is the contrast between “the legal fiction of difference governing UN treaty bodies' operations and the empirical sameness of participants in different formal categories as a shared community of practice of human rights lawyers”.¹¹² State delegates, NGO advocates, and committee experts may share educational backgrounds, professional networks, and substantive commitment to advancing rights, even as the procedural form holds them apart. State representatives in particular may possess a “dual allegiance” to both the state they embody and the international human rights regime they are invested in expanding.¹¹³

Cowan's work on the UPR extends this practice perspective. The UPR, she argues, is best understood as a “public audit ritual” whose effects exceed its stated outputs. The formal moments in Geneva are the tip of an iceberg of preparatory and follow-up practice that “stretches across time and across space” and enrolls a wide range of actors into a new political

¹⁰⁹ Ibid, p. 42-43.

¹¹⁰ M. Halme-Tuomisaari. Guarding utopia: law, vulnerability and frustration at the UN Human Rights Committee. *Social Anthropology*. 28: 1 (2020), p. 36, 41.

¹¹¹ Ibid.

¹¹² M. Halme-Tuomisaari. Toward Rejuvenated Inspiration with the Unbearable Lightness of Anthropology. *AJIL Unbound*. 115 (2021), p. 286.

¹¹³ Ibid, p. 287.

field.¹¹⁴ The repetitive performance of states' constructive criticism of each other produces what she calls "other-auditing sovereignty", in which states become peer-reviewers of one another's rights conduct.¹¹⁵ This lets the literature ask, of any formally bounded diplomatic act, what political field surrounds and produces it. Reiners makes a complementary point from a socio-legal angle: looking at three episodes of norm development at CESCR, she shows that organizational reputation and resources are often outweighed by pre-existing interpersonal ties between individual advocates and individual committee members.¹¹⁶ Norms get made by people who already know each other, whose trajectories overlap, and whose ties cut across the formal categories of state, NGO, and expert.

Together, these strands change the unit of analysis. The question becomes not only what Iceland did as a state, but how a claim moved through documents, institutions, advocacy networks, and diplomatic relationships before and after the statement, and how it returned to advocacy fields once it had acquired formal institutional voice. That is the terrain on which a looping perspective becomes analytically plausible. Diplomacy does not cease to be diplomacy, but it may be one stage in a wider chain through which claims gain formal visibility and circulate back into advocacy with renewed legitimacy.

3.7 The ethnographic theory of looping

This section turns to the framework the analysis ultimately settles in. Drawing on Miia Halme-Tuomisaari's ethnographic work on the UN human rights system, looping refers to a process in which ideas, claims, and forms of advocacy circulate between civil society and state actors within international institutions, producing feedback dynamics in which civil society helps shape agendas that states then formalize, and those formal outputs in turn feed back into further advocacy.¹¹⁷ The framework foregrounds the iterative, reciprocal relationship between non-state and state actors. Rather than positioning either as the primary

¹¹⁴ Cowan. *The Universal Periodic Review*, p. 45, 56.

¹¹⁵ *Ibid*, p. 58.

¹¹⁶ N. Reiners. The power of interpersonal relationships: A socio-legal approach to international institutions and human rights advocacy. *Review of International Studies*. 50: 2 (2024), p. 265, 268.

¹¹⁷ M. Halme-Tuomisaari. *Looping for Human Rights*, p. 2-3.

driver, looping treats them as participants in a single circulatory process that no single actor controls.¹¹⁸

Conventional accounts of state behavior at the HRC center state leadership as the explanatory variable, missing the extent to which “state leadership” often crystallizes around civil society agenda work that has preceded and shaped the intervention. Looping describes an interaction pattern rather than a fixed actor type; it does not deny state agency but repositions it within a wider field of advocacy and circulation.

For analytical purposes, looping diplomacy is operationalized in this thesis as a process with four recurring stages. First, civil society agenda-building, in which civil society organizations produce sustained documentation, naming practices, frames, and concrete demands, often in coalitions whose breadth amplifies legitimacy. Second, state formalization, in which a like-minded state, or a coalition of states, channels those claims into an authoritative institutional artifact such as a joint statement, a resolution, or a UPR recommendation. Third, legitimacy and visibility effects, in which the issue acquires a new kind of existence within the institutional setting once placed on the formal record. Fourth, loop back into advocacy, in which civil society actors cite the state-produced artifact to sustain mobilization, demand follow-up, and move the issue across institutional fora. The incentives are reciprocal. Civil society routes its claims through a like-minded state coalition to gain formal visibility that NGO advocacy alone cannot produce, while like-minded states draw on civil society documentation, case lists, and framings to assemble interventions difficult to construct from state resources alone. Neither side fully authors the outcome, and each treats the other's outputs as resources for further action.¹¹⁹

Looping extends Ian Hacking's earlier theorization of the looping effects of human kinds.¹²⁰ Hacking proposed that classifications in the social and human sciences differ from natural-science classifications: the people being classified are aware of it, respond to it, and in doing so change the classification itself. As he put it, “classifying people works on people, changes them, and can even change their past... The people of a kind themselves are changed.

¹¹⁸ Ibid, p. 2-3.

¹¹⁹ Ibid, p. 2-3.

¹²⁰ I. Hacking. The looping effects of human kinds. In D. Sperber, D. Premack & A. J. Premack. (eds.). *Causal Cognition*. (Oxford University Press, 1996).

Hence 'we', the experts, are forced to rethink our classifications".¹²¹ Human kinds are subject to feedback effects in which "the known may overpower the knowers".¹²² Halme-Tuomisaari's contribution is to translate the underlying insight, that classifications and their objects co-produce one another in iterative cycles, into the analysis of international human rights advocacy, where the feedback runs between civil society organizations, state representatives, and the institutional artifacts they jointly produce.

The shift in domain matters for how looping is identified and traced. Where Hacking's looping is mediated through self-awareness, the looping Halme-Tuomisaari describes in the human rights context is mediated through documents. Joint statements, urgent appeals, letters to foreign ministers, UPR recommendations, and Special Procedures communications are the medium through which civil society claims and state interventions circulate. Making looping visible therefore requires close attention to how framings, vocabulary, and case selections recur or transform as they travel across documents.

This documentary character connects looping to a wider anthropological literature on how international institutional documents circulate. Annelise Riles's ethnography of the negotiations leading to the 1995 Beijing Platform for Action remains foundational. She argued that international legal instruments are characterized by practices of replication, layering, and quotation that operate "from one document to the next, and in the mechanics of the conference at which documents are negotiated".¹²³ Drafts produced at the national level are taken to regional conferences and incorporated into regional documents, which are then taken to global negotiations, in such a way that "successive drafts were incorporated into preceding ones" and documents at each level "mirrored the others in form and function".¹²⁴ The most striking of these practices, for the present analysis, is the quotation: borrowing language verbatim from one document into another, often without acknowledgement, in such a way that "the quotation collapsed all levels of conferences or documents into a single text".¹²⁵

¹²¹ Ibid, p. 369.

¹²² Ibid, p. 352, 360.

¹²³ Riles. *Infinity within the Brackets*.

¹²⁴ Ibid, p. 386.

¹²⁵ Ibid, p. 392.

Riles is not developing a theory of looping, but her account of textual replication is methodologically valuable here. It grounds the notion of circulation in observable textual practices. When a case list assembled by an NGO coalition reappears in a state-led joint statement, when civil society vocabulary on accountability surfaces in diplomatic interventions, or when state-produced outputs are cited by NGOs as foundations for further advocacy, what one is observing is the inter-documentary movement Riles describes, put to work here on how civil society and state action shape one another within the HRC.

4. Method

4.1 Research design

The thesis adopts a single instrumental case study design. Stake distinguishes case studies that are intrinsic, in which the case is studied for its own sake, from those that are instrumental, in which the case is examined to understand a broader research question.¹²⁶ The Iceland-led joint statement on Saudi Arabia at HRC40 is treated here as a case of the second kind. The interest of the thesis is not in the statement as an isolated event but in what it can reveal about the interaction between civil society advocacy and small state diplomacy at the Council, and the extent to which that interaction can be described as looping. Following Stake, the aim is particularization rather than generalization, in line with what Yin describes as the case study's distinctive ability to investigate "a contemporary phenomenon in depth and within its real-world context".¹²⁷

The case has been selected purposively for three reasons: the documentary record is unusually rich and publicly accessible, Iceland's HRC tenure remains a reference point in ongoing scholarship on small state engagement¹²⁸, and the case offers an institutional setting in which civil society advocacy and state diplomacy can be examined as related rather than

¹²⁶ R. E. Stake. *The Art of Case Study Research*. (Sage Publications, 1995), p. 3–4.

¹²⁷ Ibid, p. xi; R.K. Yin. *Case Study Research and Applications: Design and Methods*. 6th ed. (Sage Publications, 2018), p. 15.

¹²⁸ See Creutz. Nordic Experiences; V.B. Gunnarsdóttir. *Iceland in the UNHRC 2018-2019: Power potential of small states in the global community*. MA thesis. (University of Iceland, 2021).

parallel processes.

4.2 Documentary analysis with a process-tracing structure

The primary method is qualitative documentary analysis. Bowen describes document analysis as a systematic procedure that combines content review with interpretive engagement, attending not only to what documents say but to how they were produced, by whom, for what audience, and in what relation to other documents.¹²⁹ Documents are not transparent windows onto events but artifacts whose authorship, genre, timing, and addressees are themselves analytically significant. They are non-reactive, stable across readings, and, in the case of public advocacy materials and formal UN instruments, designed to circulate, which makes the circulation observable. Their limits are equally clear: they show the textual surface of a process but rarely its backstage, they reflect the strategic interests of their authors, and the absence of a document is not evidence that an action did not take place.¹³⁰

The choice of documentary analysis is not incidental to the framework. As set out in section 3.7, looping in the human rights setting is, on Halme-Tuomisaari's account, mediated principally through documents, and on Riles's account the formal practices of replication, layering, and quotation across institutional documents are themselves analytically significant.¹³¹ Documents are not only one possible source among others but the artifacts through which the loop is constituted, which is what justifies close attention to specific vocabulary and framings as an empirical undertaking rather than a merely literary one.

Within this documentary frame, the analysis is built using a process-tracing structure. Process tracing, developed primarily within qualitative political science, examines sequences

¹²⁹ G. A. Bowen, Document Analysis as a Qualitative Research Method. *Qualitative Research Journal* 9: 2 (2009), p. 27, 31-32.

¹³⁰ P. A. Atkinson & A. Coffey. Analysing documentary realities. In D. Silverman (ed.). *Qualitative Research: Theory, Method and Practice*, 2nd ed. (Sage Publications, 2004), pp. 56-75; Bowen. Document Analysis, p. 31-32.

¹³¹ Riles. Infinity within the Brackets.

of events with the aim of identifying the mechanisms by which an outcome is produced.¹³² In Beach and Pedersen's typology, the variant most directly relevant here is "explaining-outcome process-tracing", which aims to account for a particular historical outcome rather than to test or build general theory, and which can productively combine elements of theory-testing and theory-building in the service of a single case.¹³³ The analysis moves chronologically through the relevant advocacy interventions, institutional moments, and diplomatic outputs of 2018–2019, tracking how the issue moved through institutional channels and how framings traveled across actors over time. The use of process tracing here is deliberately bounded. The documentary record can show alignment of vocabulary, reproduction of materials across documents, and temporal proximity of outputs, but it does not, on its own, establish that particular documents reached particular decision-makers or that they were the operative reason for the form a state output ultimately took. The analysis is therefore mechanism-oriented rather than effect-oriented. The question is not whether one document caused another but whether the sequence of documents is consistent with the kind of interactive mechanism the framework describes.

The close-reading work proceeds in a register that draws on discourse analysis without committing to its more formal versions. Attention is paid to the specific vocabulary used to characterize events, to which individuals are foregrounded and which are not, to the categories through which detainees and incidents are described, and to the rhetorical work each text performs in relation to its audience. This belongs to what is sometimes called frame analysis, the study of how actors construct and circulate interpretive packages that make sense of events in particular ways.¹³⁴ What the analysis looks for is not a single dominant frame but the movement of frames between actors over time.

¹³² A. Bennett & J.T. Checkel (eds.). *Process Tracing: From Metaphor to Analytic Tool*. 1. ed. (Cambridge University Press, 2014); D. Collier. Understanding Process Tracing. *PS: Political Science & Politics*. 44: 4 (2011).

¹³³ D. Beach & R. B. Pedersen. *Process-Tracing Methods: Foundations and Guidelines*. 2nd ed. (University of Michigan Press, 2019), Ch. 10.

¹³⁴ D. Snow & R. Benford. Ideology, Frame Resonance and Participant Mobilization. *International Social Movement Research* 1 (1988), p. 197-217.

4.3 Semi-structured interview

The documentary record cannot address all of the questions the thesis pursues. It can show patterns of public advocacy and diplomatic output, but it cannot show how those interventions were received inside the foreign ministry, how state actors understood their own role in the process, or what considerations shaped the choice between different institutional instruments. To address these questions, the documentary analysis is complemented by interview material.

A single semi-structured interview was conducted over Microsoft Teams with two officials from the Icelandic Ministry for Foreign Affairs whose work placed them inside Iceland's HRC engagement during the 2018–2019 membership. Although I initially anticipated speaking with the officials separately, they preferred to be interviewed together, on the grounds that they had worked closely during the relevant period and a joint conversation would allow them to corroborate and refine recollections of events that had taken place several years earlier. The interview was guided by a thematic outline rather than a fixed set of questions.

The joint format has both advantages and limitations. The two officials had collaborated on the substantive work of Iceland's HRC engagement, and at several points they corrected one another's recollections or supplied detail that the other had not initially recalled, improving the accuracy of the account. The format also allowed them to talk to one another, not only to me, which surfaced considerations that emerged from their professional dialogue rather than from direct questioning. On the other hand, a joint interview compresses what would otherwise have been two separate accounts into a single conversational record, and can make it harder to identify points at which the officials might have given different accounts had they been interviewed alone. I have tried to mitigate this by attributing observations to "Official A" or "Official B" where the speaker is identifiable, and to "the officials" where the point was jointly developed, and by reading the interview material against the documentary record rather than as a free-standing authoritative account.

The interview was conducted with the informed consent of both participants, who agreed to be quoted on the understanding that they would not be identified by name. It was

recorded with their permission, and notes were taken from the recording for use in the analysis. The recording and notes are stored on a password-protected device accessible only to the researcher and will be deleted following the conclusion of the examination process. Identifying details have been omitted where they would not affect the analytical point being made. The interview procedure was designed in accordance with the principles for good research practice set out by the Swedish Research Council, in particular the requirements of informed, voluntary, specific, and withdrawable consent, and with the ALLEA Code's principles of respect for research participants and accountability for the conduct of the research.¹³⁵

4.4 Source base

The source base consists of four overlapping bodies of material. The first is public advocacy material produced by international human rights organizations active on Saudi Arabia during the period under examination, including joint statements, open letters, urgent appeals, press releases, briefings to the Council, and end-of-session assessments. Within this body of material, Amnesty International is treated as a tracer organization, both because its engagement on Saudi Arabia in this period is sustained and well-documented and because Amnesty operates simultaneously as a coalition partner, as an independent advocate, and as an interpreter of Council outputs in subsequent advocacy. Tracking Amnesty's documents across the chronology makes it possible to follow a single organizational actor across the phases of the case. Coalition documents involving larger sets of organizations are drawn on at moments when claims about coordination across the sector are at issue.

The second body consists of UN documentation relevant to the trajectory of the case, including the relevant UPR documentation, CEDAW concluding observations, Special Procedures materials, and the text of the joint statement. The third consists of Icelandic government documents and policy statements. The fourth is the interview described in the previous section. Selection within each body has been guided by the chronology of the case

¹³⁵ Swedish Research Council. *Good Research Practice* (Stockholm: Vetenskapsrådet, 2024), esp. §§ 2.2, 5.3.1, 5.3.3.

rather than by a pre-specified sampling frame. Documents marking moments in the trajectory were read closely and compared with others in their vicinity, with new actors incorporated as they entered the record.

4.5 Analytical procedure

The analytical procedure unfolded in three overlapping phases. The first was close reading, in which each document was read with attention to the vocabulary used to characterize events, the individuals named, the genre and apparent audience of the document, and the rhetorical work it performed at the institutional moment of its production. The second was comparison, where documents were compared across sequences to identify points at which vocabulary, named individuals, or framings consolidated in one type of document subsequently appeared in another. Such instances were treated not as evidence that one document directly produced another but as patterns to be interpreted in light of the framework. The third phase was chronological organization, where the documents were assembled into a sequence, with their temporal proximity to scheduled Council moments treated as part of the evidence to be considered.

Two forms of methodological self-discipline shape the analysis. The first is to avoid treating any textual similarity between civil society and state documents as evidence of looping, since some convergence between actors working on the same issue is expected on independent grounds. The analysis, therefore, attends to the density, specificity, and patterning of textual movement, not just whether vocabulary recurs, but whether it recurs in distinctive forms, across multiple instances, or in a sequence consistent with the four-stage process the framework describes. The second is to remain explicit about what the evidence can and cannot establish. It can support a reading of the case as looping rather than a proof that looping caused the outcome.

4.6 Limitations

Several limitations should be acknowledged. The first concerns the documentary record itself. Documents reveal the textual surface of a process but rarely its backstage, and the

analysis cannot, on its own, distinguish between direct adoption of civil society framings by state actors, independent convergence on a shared vocabulary developed across overlapping networks, or some combination of the two. The interview material partially addresses this limitation by providing perspective from one side of the process, but it cannot fully resolve it. The second concerns the interview itself. A single interview, even with two well-placed officials, is a limited evidentiary base, and the limits of recall several years after the events are significant. The interview material is therefore used in a complementary register rather than as an independent basis for stronger claims than the documents themselves support. The third concerns case selection. The cases at the Council in which a process of this kind can be reconstructed in this kind of detail are likely to be a non-representative subset of the larger universe; the reading developed here does not, on its own, demonstrate that the same process operates with similar regularity across other cases. The fourth concerns the position of the researcher. The thesis is sympathetic to the analytical framework it employs, and the reflexive commitment to surfacing complications is not a guarantee that other interpretive priorities would not have produced a different account.

5. Analysis and discussion

This chapter proceeds in two interleaved stages. Sections 5.1–5.3 develop a reading through small state diplomacy and identify what that frame leaves untouched. Sections 5.4–5.5 develop the looping analysis, tracing the four stages set out in section 3.7 through the documentary record around the statement and discussing what the reading delivers.

5.1 The case read as small state diplomacy

The HRC has long been criticized for its reluctance to address violations by its own member states, and Saudi Arabia had been raised in previous sessions without being directly condemned.¹³⁶ The 2019 statement was the first instance of such direct and coordinated criticism of the Kingdom in the Council's practice.¹³⁷

¹³⁶ ¹³⁶ P.R. Baehr. The Human Rights Council: A Preliminary Evaluation. *Netherlands Quarterly of Human Rights*. 28: 3 (2010), p. 329.

¹³⁷ Utanríkisráðuneytið. *Ísland í mannréttindaráði*, p. 30.

The murder of Saudi Arabian journalist Jamal Khashoggi in the Saudi consulate in Istanbul in October 2018 marked a turning point. The killing intensified scrutiny of Saudi Arabia's human rights record and created political momentum among states that had long been concerned about its use of counter-terrorism and national security legislation against human rights defenders. Yet it was initially unclear which state would articulate that criticism publicly.¹³⁸ Icelandic officials describe the Khashoggi killing as a decisive trigger that, combined with the ongoing detentions of women human rights defenders, made Council intervention feel necessary in a way earlier patterns of violation had not.¹³⁹ Conversations among a small group of seven to ten states began in Geneva in early 2019, conducted, as one official put it, behind closed doors and tightly guarded against premature disclosure: only states Iceland trusted were initially brought into the inner circle.¹⁴⁰

Iceland's convening role can be situated in a broader pattern the foreign service itself describes directly. There is, as one official put it, a form of burden-sharing among like-minded states: not every state can lead every initiative, and the question of who fronts a particular joint statement is partly a question of whose turn it has become.¹⁴¹ A second feature reinforces this rotational pattern. By 2018, most like-minded states had developed identifiable thematic profiles in the Council, whereas Iceland, having only recently scaled up its engagement, came in with what the official described as a comparatively clean slate.¹⁴² The combination of institutional readiness, prior convening capacity, and the absence of an established niche allowed Iceland to take on initiatives that, for other states, would have sat uncomfortably with longer-standing thematic commitments.

A further feature of the convening role is worth noting, since the officials articulate it with unusual directness. As Official A put it, the advantage of Iceland leading was that, in practice, it did not particularly matter to Iceland how many co-signatories the final statement attracted. Had a mid-sized European state taken the lead, the question of whether a particular threshold had been reached would have become a kind of “staring contest” among states

¹³⁸ Ibid, p. 30.

¹³⁹ Interview with officials.

¹⁴⁰ Ibid.

¹⁴¹ Ibid.

¹⁴² Ibid.

unwilling to move first. Iceland had decided to deliver the statement regardless.¹⁴³ This indifference to coalition size at the point of decision became, in retrospect, part of what allowed the coalition to grow as it did.

On March 7th 2019, during the 40th session, Iceland delivered the joint statement on behalf of 36 states. The number of supporting states was not confirmed until the morning of delivery, underscoring the sensitivity of the issue and the diplomatic effort involved.¹⁴⁴ The coalition covered all EU member states then in the Council, together with Australia, Canada, Liechtenstein, Monaco, Montenegro, New Zealand, Norway, and the United Kingdom, five G7 members alongside states from the Pacific, the Caribbean, and Latin America. In the final 24 hours, several hesitating states joined, including some larger European states, recognizing that being publicly absent from a 36-state coalition would carry its own reputational costs.¹⁴⁵

The substantive content of the statement is worth examining in some detail. It opened by acknowledging “the spirit of modernization and reform embodied by the Saudi Vision 2030”, a deliberate gesture toward Saudi Arabia's own reform agenda, before expressing “significant concerns about reports of continuing arrests and arbitrary detentions of human rights defenders in the Kingdom of Saudi Arabia, including women's rights activists”.¹⁴⁶ It further declared:

We are particularly concerned about the use of the counter-terrorism law and other national security provisions against individuals peacefully exercising their rights and freedoms.¹⁴⁷

The statement then called explicitly for the release of named detainees, including Loujain al-Hathloul, Eman al-Nafjan, Aziza al-Yousef, Nassima al-Sadah, Samar Badawi, Nouf

¹⁴³ Ibid.

¹⁴⁴ Utanríkisráðuneytið. *Ísland í mannréttindaráði*, p. 31; See also Amnesty International, ‘UN member states must demand release of women human rights defenders in Saudi Arabia’, *Amnesty International*, 2019, <https://www.amnesty.org/en/latest/news/2019/03/un-member-states-must-demand-release-of-women-human-rights-defenders-in-saudi-arabia/> (accessed 2026-03-20).

¹⁴⁵ Interview with officials.

¹⁴⁶ Government of Iceland. Joint statement.

¹⁴⁷ Ibid.

Abdelaziz, Hatoon al-Fassi, Mohammed Al-Bajadi, Amal Al-Harbi, and Shadan al-Anezi.¹⁴⁸ The naming was a significant step: it personalized the issue, signaled that the Council was no longer prepared to address the situation in abstract terms, and committed all 36 co-signatories to a list of specific cases by name. The statement also condemned “in the strongest possible terms the killing of journalist Jamal Khashoggi”, insisting that investigations be “prompt; effective and thorough; independent and impartial; and transparent”, and that those responsible “must be held to account”.¹⁴⁹ It called on Saudi Arabia to cooperate fully with investigations, including the human rights inquiry conducted by the UN Special Rapporteur on extrajudicial, summary or arbitrary executions.¹⁵⁰ This was the first time that Saudi Arabia had been so directly criticized in the Council or its predecessor, the Commission on Human Rights.¹⁵¹

Iceland's initiative was consistent with the rhetoric Minister for Foreign Affairs Guðlaugur Þór Þórðarson had been advancing across earlier sessions. At HRC37, before Iceland's membership, Þórðarson had emphasized that “States which join the Council should lead by example and expect their own human rights record to be subject to particular scrutiny during their time as members”.¹⁵² Upon accession, Iceland pledged to uphold the requirement that members “uphold the highest standards in the promotion and protection of human rights”.¹⁵³ The March 2019 initiative gave operative form to a position Iceland had been articulating rhetorically for over a year.

Council scrutiny of Saudi Arabia continued in subsequent sessions. Norway delivered a joint statement on behalf of the NB8 countries at HRC41 in June 2019, and Australia delivered a similar statement at HRC42 in September.¹⁵⁴ Iceland's foreign service describes

¹⁴⁸ Ibid.

¹⁴⁹ Ibid.

¹⁵⁰ Ibid.

¹⁵¹ Cumming-Bruce. Saudi Arabia Rebuked for First Time.

¹⁵² Government of Iceland. HRC37: High level segment - Mr. Guðlaugur Thor Thordarson's statement. *Stjórnarráð Íslands*. (2018). <https://www.government.is/publications/statements/statement/2018-02-26-Minister-for-Foreign-Affairs-Mr.-Guðlaugur-Thor-Thordarsons-statement-during-the-High-Level-Segment-of-the-37th-session-of-the-Human-Rights-Council> (accessed 2026-04-24).

¹⁵³ UN General Assembly. *Human Rights Council*. A/RES/60/251. (2006). <https://docs.un.org/en/a/res/60/251> (accessed 2026-03-28).

¹⁵⁴ Permanent Mission of Norway to the UN in Geneva. HRC41: Nordic-Baltic Joint Statement: Interactive Dialogue with the Special Rapporteur on Extrajudicial, Summary or Arbitrary Executions. *Norway in Geneva*. 2019. <https://www.norway.no/en/missions/wto-un/nig/statements/hr/hrc/HRC41/sr-on-summary-executions/>

the sequence in trailblazer terms: as one official put it, “we cleared the path, and after our statement there were others”.¹⁵⁵

5.2 Discussion of the statement as small state diplomacy

The Saudi statement is, in many respects, a textbook instance of small-state diplomacy. It is convened by a small state operating within the UN's institutional architecture, takes the form of a multilateral coalition rather than a unilateral intervention, is framed in normative rather than coercive terms, and produces what subsequent commentary has read as a successful normative outcome. The Nordic strand of the literature adds further specificity: it shows why a state like Iceland would treat the HRC as a suitable arena for rights-based diplomacy, and why the form such diplomacy takes, coalition statement-drafting, principled visibility, cross-regional coalition-building, is part of a recognizable Nordic repertoire that combines issue advocacy with the cultivation of moral standing in a relevant peer group.

The first thing the literature accounts for is why Iceland, rather than another like-minded state, was the one to convene. Súilleabháin describes a pattern of issue-by-issue rotation among like-minded states in which who fronts a particular intervention is partly a question of whose turn it has become.¹⁵⁶ Iceland's convening role fits this pattern closely; the rotational dynamic described in section 5.1 corresponds to Súilleabháin's account almost exactly. The clean-slate effect the officials identify adds a consideration the literature touches on only obliquely. Where most like-minded states arrive at the Council with established thematic profiles that constrain what they can credibly take on, Iceland's late and rapidly scaled-up engagement left it without such a profile, and therefore with room to take on initiatives that, for other states, would have sat uncomfortably with longer-standing commitments. Burden-sharing, on this reading, is not only the distribution of diplomatic effort, but the matching of initiatives to states whose existing positions least constrain them.

(accessed 2026-03-26); Australian Government Department of Foreign Affairs and Trade. *HRC42 joint statement on Saudi Arabia*. 2019. (Document).

¹⁵⁵ Interview with officials.

¹⁵⁶ Súilleabháin. *Small States at the United Nations*, p. 7-8.

The form the intervention took is also legible through the literature. In Henrikson's vocabulary, the 36-state joint statement is group diplomacy in a familiar register: a small state convening a coalition whose combined voice carries the intervention further than any individual member could project alone.¹⁵⁷ What is distinctive here is not coalition as such but cross-regional composition. The coalition was held together not by regional proximity but by a shared willingness to call out a politically sensitive case. This pattern fits Cohen and Fontaine's microlateralism, in which a small state convenes an issue-specific coalition including large powers, drawing on their resources and reach while retaining the convening role.¹⁵⁸ The case adds a small refinement: the “staring contest” dynamic described in section 5.1 makes visible the convening state's relative indifference to coalition size at the point of decision. A mid-sized European state attempting the same intervention would have faced reputational exposure if the coalition did not reach a politically meaningful threshold. Iceland did not, and the absence of that constraint is itself part of what gave the coalition room to grow.

The cross-regional composition also helps account for the muted reaction. The relative absence of retaliation against Iceland illustrates the credibility advantage small states can enjoy on contested issues. Lakatos has argued that small states are often perceived as lacking a broader global agenda, which can enhance their credibility on contested issues and reduce suspicions of hidden geopolitical motives.¹⁵⁹ That logic fits the contrast in part. Iceland could speak in a register that, coming from a larger state with extensive commercial or strategic exposure to Saudi Arabia, would have invited a more aggressive response. But the contrast also reflects the protective effect of the coalition itself. The intervention was institutionally Iceland's, but politically it belonged to 36 states, and retaliating against the convening state alone would have done little to constrain the underlying dynamic. Coalition form and small-state convenor function together rather than separately, and this is a point at which the standard account can be sharpened: the credibility advantage is not simply a property of smallness, but of the combination of small-state convening with a coalition large

¹⁵⁷ Henrikson. *Ten Types of Small State Diplomacy*, p. 6.

¹⁵⁸ Cohen & Fontaine. *The Case for Microlateralism*.

¹⁵⁹ Lakatos. *The Potential Role of Small States*, p. 68.

enough to make retaliation against the convener strategically pointless.

The normative register of the statement is legible through the literature on niche diplomacy and norm entrepreneurship. Iceland's framing of the statement as a defence of the Council's normative integrity, articulated through the language of members holding themselves to the highest standards, fits the Nordic norm-entrepreneurship pattern in which moral authority functions as a route to international standing that material competition cannot offer small and middle powers.¹⁶⁰ The continuity between Iceland's prior ministerial rhetoric and the language of the statement matches norm entrepreneurship in its developed form: a state articulating a normative position in successive interventions over time and eventually committing to it in operative diplomatic action.¹⁶¹ Read in this register, the statement on Saudi Arabia is the moment at which Iceland's rhetorical position became something more than rhetoric.

The aftermath gestures toward what may be an emerging Icelandic trailblazer niche: opening debate on politically sensitive issues and then allowing other states to sustain the momentum. The sequence following March 2019, the NB8 statement in June and the Australia-led statement in September, suggests that the Saudi statement was understood by other states as a reusable template.¹⁶² Within a Nordic peer group in which moral authority functions as a positional good, this first-mover role offers a recognizable form of distinction.¹⁶³ The “we cleared the path” formulation quoted in section 5.1 captures the self-understanding in the officials' own words.¹⁶⁴

5.3 The limits of a state-centered frame

The reading just developed is consistent and, on its own terms, persuasive. What it does not explain is the substantive content of the statement: the specific selection of issues,

¹⁶⁰ Ingebritsen. Norm Entrepreneurs, p. 14-16; Røren. Status seeking.

¹⁶¹ Finnemore & Sikkink. International Norm Dynamics and Political Change; Bloomfield & Scott. *Norm Antipreneurs and the Politics of Resistance to Global Normative Change*.

¹⁶² Permanent Mission of Norway. HRC41: Nordic-Baltic Joint Statement; Australian Government Department of Foreign Affairs and Trade. *HRC42 joint statement on Saudi Arabia*.

¹⁶³ Røren. Status seeking.

¹⁶⁴ Interview with officials.

the particular vocabulary in which they are framed, and the temporal relationship between civil society advocacy and Iceland's diplomatic output.

Several features of the statement remain undertheorized on this account. The choice of Saudi Arabia rather than another contested case, the specific wording around counter-terrorism legislation and national security provisions, the case list of ten named detainees, and the gesture toward Vision 2030 are each features of the intervention but not explained by it. The statement concerned a state that had been the subject of sustained civil society documentation for years. It named ten individual detainees, a case-list practice that originates not in diplomatic drafting but in advocacy reports and urgent appeals. And it deployed a rhetorical move, accountability framed as Council members holding themselves to higher standards, that draws on a long-running discourse around HRC member responsibility cultivated by both states and rights organizations.¹⁶⁵ None of these features was produced from scratch inside the Icelandic foreign ministry.

To ask why Iceland would convene a coalition is one kind of question, and the small-state reading answers it well. To ask why this issue, this framing, this case list, and this moment is another, and answering it requires resources the framework does not supply. The remainder of the chapter takes up that question.

5.4 The case read as looping

5.4.1 Constructing the agenda

The documentary record indicates that civil society organizations were not merely reacting to developments in Saudi Arabia but were actively engaged in a coordinated effort to bring the issue of detained women human rights defenders onto the agenda of the HRC. I call this work as agenda construction: the deliberate practice through which non-state actors translate a domestic situation into terms recognizable to a multilateral institution, identify that institution as the appropriate venue of response, and supply the categories, vocabulary, and case material that subsequent state action can draw on. The process can be examined by

¹⁶⁵ Creutz. *Nordic Experiences*.

looking at the actions undertaken by these actors, the timing of their interventions, the audiences they targeted, and the ways in which they framed the issue.

Evidence from 2018 suggests a shift from generalized criticism of Saudi Arabia's human rights record to a more focused international advocacy campaign centered on the repression of women human rights defenders. The arrests of prominent activists beginning in May 2018 appear to have functioned as a critical trigger, enabling civil society organizations to consolidate a shared narrative linking gender activism, restrictions on civic space, and state repression. This emerging narrative is visible across a series of seemingly coordinated public statements issued by international human rights organizations.¹⁶⁶

An early marker of this agenda-building process is a joint statement issued on June 6th 2018 and co-signed by 34 organizations, among them Amnesty International, Human Rights Watch (HRW), FIDH, CIVICUS, Front Line Defenders, the International Service for Human Rights (ISHR), and the Gulf Centre for Human Rights (GCHR), which framed the situation as a “crackdown on Saudi women human rights defenders” that “sets off alarms” and called for the detainees’ “immediate and unconditional release”.¹⁶⁷ The statement does not present the May arrests as isolated incidents. It identifies “at least 12 named human rights defenders” detained “since 15 May 2018”, including Loujain Al-Hathloul, Eman Al-Nafjan, and Aziza Al-Yousef, and links them by name to the #Oct26driving, #Right2Drive, and #IAmMyOwnGuardian campaigns, locating the arrests within an established trajectory of women's rights advocacy.¹⁶⁸ The signatories further situate these detentions within “a larger crackdown on human rights defenders that has escalated over the past years”, reaching back to the November 2017 sentencing of Naimah Al-Matrod and to earlier arrests verified in January 2018.¹⁶⁹ The arrests, in other words, are presented not as a discrete law-enforcement matter but as the most visible moment of a continuous and intensifying pattern of repression.

This intervention illustrates the work of agenda construction in three respects. First, the statement's vocabulary translates the events into the register of international human rights

¹⁶⁶ Amnesty International. Saudi Arabia: Crackdown on Saudi women human rights defenders sets off alarms: Joint Statement. MDE 23/8549/2018. *Amnesty International*. 2018, p. 1-4. <https://www.amnesty.org/en/documents/mde23/8549/2018/en> (accessed 2026-04-27).

¹⁶⁷ *Ibid*, p. 1.

¹⁶⁸ *Ibid*, p. 1.

¹⁶⁹ *Ibid*, p. 2.

law. By describing several detainees as held “incommunicado” with “whereabouts... unknown”, and by characterizing Loujain Al-Hathloul's detention as “an act of reprisal for her engagement with international human rights mechanisms, including UN human rights bodies”, the signatories move the arrests out of the domain of domestic policing and into a vocabulary that international institutions are equipped to respond to.¹⁷⁰ The category of “reprisal” is particularly consequential. It positions the UN system not only as an appropriate forum for addressing the situation but as itself a target of Saudi retaliation, a claim that gives international institutions a direct stake in responding.

Second, the statement designates the venue. Across 34 organizations producing coordinated messaging, the repeated emphasis on the peaceful and legitimate character of the detainees' work, the invocation of international legal categories, and the explicit naming of UN human rights bodies as both forum and target establish the HRC, rather than bilateral diplomacy or domestic Saudi legal process, as the arena in which redress should occur.

Third, the statement constructs a particular relationship between the events and the broader political environment in Saudi Arabia. The juxtaposition of these repressive measures with the imminent lifting of the driving ban, and the observation that “officials in the royal court specifically warned women human rights defenders to remain silent”, does not describe two parallel processes but presents them as a single contradiction. The lifting of the driving ban and the silencing of those who had campaigned for it are operating in tandem rather than in tension.¹⁷¹ The reformist image of Vision 2030 is, on this account, not undermined accidentally but used as the cover under which the silencing occurs.

These three moves do not simply describe events in Saudi Arabia. They construct those events as an international human rights problem for which the UN human rights system, and the HRC in particular, is the appropriate arena of response. This is the work that the chapter's later sections will track as it travels into state diplomatic instruments and is reactivated by civil society in subsequent advocacy.

¹⁷⁰ Ibid, p. 2.

¹⁷¹ Ibid, p. 2.

5.4.2 Escalation and institutional diffusion

Once civil society's agenda began to circulate, it escalated through diffusion. The looping process became textually visible in 2018 across multiple UN procedures. First in the CEDAW review of Saudi Arabia in February and March, then in the Khashoggi advocacy beginning in October, then in the Universal Periodic Review in November. Across these procedures, the same pattern recurs. A category, a demand, or a procedural specification is consolidated in civil society documents. Then, within weeks, the same language reappears in the formal output of a UN body or in the recommendations of states acting within one. In several cases, the textual proximity is close enough to read as near-verbatim transposition.

Two further developments reshape the political environment in which this circulation occurs. The May 2018 arrests of women human rights defenders made the issue acutely actionable; the October 2018 murder of Jamal Khashoggi broadened the advocacy narrative and intensified scrutiny. Both raised the issue's salience, but neither initiated the looping dynamic. The framework, women human rights defenders as a category, the Specialized Criminal Court as a venue of repression, and Vision 2030 as a cover for silencing, was already consolidated in civil society advocacy and entering UN instruments before either event.

An early instance of civil society vocabulary entering a UN procedural output appears in the CEDAW review of Saudi Arabia at the Committee's 69th session, from February 19th to March 9th 2018. A joint shadow report by ALQST, the Gulf Centre for Human Rights, and FIDH, drawing on the FIDH/OMCT report *Condemned to Silence: The Situation of Women Human Rights Defenders in Saudi Arabia*¹⁷², asked the Committee to “end the repression of women human rights defenders” and named the Anti-Terrorism Law, Royal Decree 44, and the Anti-Cybercrimes Law as the specific instruments by which that repression was carried out.¹⁷³

¹⁷² International Federation for Human Rights and World Organization Against Torture. *Condemned to Silence: The Situation of Women Human Rights Defenders in Saudi Arabia*. (Observatory for the Protection of Human Rights Defenders, 2018).

¹⁷³ ALQST, Gulf Centre for Human Rights and International Federation for Human Rights. *Joint Submission on Saudi Arabia*. 69th Session of the Committee on the Elimination of Discrimination against Women. 2018, p. 14-15. <https://www.gc4hr.org/joint-submission-on-saudi-arabia-69th-session-committee-on-the-elimination-of-discrimination-against-women/> (accessed 2026-05-11).

The Committee's concluding observations, issued on March 14th 2018, adopted both elements. Paragraph 56 recommended that Saudi Arabia “refrain from reprisals against women human rights defenders and their relatives” and ensure that women activists could “exercise their right to freedom of expression and association”.¹⁷⁴ In the same paragraph, the Committee further recommended that “the Counter-Terrorism Law (2014), the Anti-Cybercrime Law (2007) and Executive Regulation for Electronic Publishing (2011) are not invoked abusively to criminalize women human rights defenders”.¹⁷⁵

The mirroring is unusually exact. The Committee names the same specific statutes the shadow report had named. It uses the verb “criminalize” to frame the counter-terrorism apparatus in the shadow report. And it places the legal-framework critique in the same numbered recommendation as the recommendation on women human rights defenders, treating the two as a single integrated problem. What appears in the concluding observations is not a general expression of concern about civic space, but a specific legal vocabulary critique that follows the contours of the shadow report's analysis.

The procedural moment matters. The CEDAW review at which this mirroring occurred is the same review at which Loujain al-Hathloul personally engaged with the Committee on February 27th 2018, two weeks before her transfer to Saudi Arabia and ten weeks before her arrest.¹⁷⁶ The charge of “engagement with international human rights mechanisms” later leveled at her refers, in part, to this very review. The category that travels from the shadow report into the concluding observations is not abstract but is consolidated in the same procedural moment at which one of the women named under it is being personally exposed to the reprisal the Committee would, days later, ask Saudi Arabia to refrain from.

A second instance of the same migratory dynamic appears in the international response to the murder of journalist Jamal Khashoggi in October 2018. Within days of his

¹⁷⁴ Committee on the Elimination of Discrimination against Women. *Concluding observations on the combined third and fourth periodic reports of Saudi Arabia*. CEDAW/C/SAU/CO/3-4. 2018, paras. 55–56.

¹⁷⁵ CEDAW. *Concluding observations*, para. 56(c).

¹⁷⁶ Al-Hathloul attended a public meeting with the Committee on February 27th 2018, two weeks before her transfer to Saudi Arabia and ten weeks before her arrest on May 15th 2018. See Office of the United Nations High Commissioner for Human Rights. Saudi Arabia: UN women's rights committee urges Loujain Al-Hathloul's release from detention. 2020. <https://www.ohchr.org/en/press-releases/2020/02/saudi-arabia-un-womens-rights-committee-urges-loujain-al-hathloul-release> (accessed 2026-05-11).

disappearance, four major international organizations, Amnesty International, Human Rights Watch, the Committee to Protect Journalists, and Reporters Without Borders, issued a joint call for Turkey to “enlist the UN to initiate a timely, credible, and transparent investigation”, arguing that “UN involvement is the best guarantee against a Saudi whitewash”.¹⁷⁷ The framing is significant. By characterizing alternative investigative routes as susceptible to “whitewash” and naming the UN as the only forum with sufficient “credibility and independence”, the signatories preemptively closed off bilateral and domestic accountability tracks and designated international human rights mechanisms as the appropriate venue. Subsequent interventions reinforced this position. Human Rights Watch dismissed Saudi Arabia’s “internal investigation” as not credible and reiterated the demand for a UN-led inquiry¹⁷⁸, and by February 2019, a narrower coalition issued a further joint statement calling specifically for “an effective, independent, international investigation”, consolidating the demand into a sustained advocacy program.¹⁷⁹

Importantly, the Khashoggi case was not treated as an isolated event. It was incorporated into the existing narrative of repression that civil society organizations had been constructing since the May 2018 arrests. Human Rights Watch’s statement in October 2018, while ostensibly focused on Khashoggi, used the occasion to demand the release of “all peaceful Saudi critics and human rights advocates imprisoned solely for their human rights work”, opening with a list that named Loujain al-Hathloul, Aziza al-Yousef, and Eman al-Nafjan, the same women human rights defenders whose May 2018 arrests had triggered the joint coalition statement four months earlier.¹⁸⁰ The list extended further to Nouf Abdelaziz, Mayaa al-Zahrani, Hatoon al-Fassi, Samar Badawi, and Nassema al-Sadah, reflecting the wave of additional arrests during the summer of 2018.

¹⁷⁷ Amnesty International. Turkey: Seek UN Inquiry on Khashoggi; Saudi, Turkish Cooperation Essential to Credibility. *Amnesty International*. 2018, <https://www.amnesty.org/en/latest/press-release/2018/10/turkey-seek-un-inquiry-on-khashoggi-saudi-turkish-cooperation-essential-to-credibility/> (accessed 2026-04-27).

¹⁷⁸ Human Rights Watch. World Leaders Should Reject Saudi Whitewash. *Human Rights Watch*. 2018. <https://www.hrw.org/news/2018/10/22/world-leaders-should-reject-saudi-whitewash> (accessed 2026-04-28).

¹⁷⁹ Human Rights Watch. Joint NGO Statement on Accountability for the Murder of Jamal Khashoggi. *Human Rights Watch*. 2019. <https://www.hrw.org/news/2019/02/07/joint-ngo-statement-accountability-murder-jamal-khashoggi> (accessed 2026-04-28).

¹⁸⁰ Human Rights Watch. World Leaders Should Reject Saudi Whitewash.

This textual move works in both directions. The Khashoggi case is positioned within an established pattern of repression, which lends it the weight of a systemic problem rather than a single incident. At the same time, the visibility generated by Khashoggi's killing is harnessed to elevate the cases of the women human rights defenders, which had been receiving less international attention. Civil society organizations link the killing to the detention of activists and the broader deterioration of civic space, expanding the scope of concern from individual cases to patterns of abuse and impunity, and increasing the reputational and political stakes for international actors who might otherwise have remained silent.

The third instance, in which the migratory dynamic is most densely documented, appears in Saudi Arabia's Universal Periodic Review on November 5th 2018. The UPR provided a framework for states to articulate concerns developed in civil society advocacy, and the record is textually revealing.

Two parallel migrations are visible: one concerning women human rights defenders, the other the Khashoggi investigation. First, the WHRD framing. The June 2018 coalition statement had called on Saudi Arabia to “release all persons detained solely for peacefully exercising their rights to freedom of expression, association and peaceful assembly” and to end “the harassment of women human rights defenders”. Five months later, Iceland recommended that Saudi Arabia “unconditionally release anyone imprisoned solely for exercising their rights to freedom of association and peaceful assembly, including women human rights defenders”.¹⁸¹ The grammatical structure, listed rights, and the category itself are transposed directly from the coalition document into the state recommendation.

This is not an isolated echo. The category “women human rights defenders”, consolidated through the civil society messaging traced in section 5.4.1 and already adopted by CEDAW eight months earlier, recurs across recommendations by Germany, Montenegro, Norway, and the Netherlands. Germany called on Saudi Arabia to “immediately release all human rights defenders, in particular women”, and the Netherlands asked it to “reconsider

¹⁸¹ United Nations Human Rights Council. *Report of the Working Group on the Universal Periodic Review: Saudi Arabia*. A/HRC/40/4. United Nations. 2018, p. 19, recommendation 122.163. <https://documents.un.org/doc/undoc/gen/g18/446/49/pdf/g1844649.pdf> (accessed 2026-04-30). See for comparison Amnesty International. Crackdown on Saudi Women, p. 3, recommendations 1 and 4.

the charges against prisoners who were convicted for their commitment to promoting and protecting women's rights".¹⁸²

Second, the migration of the Khashoggi framing. The October 2018 joint call had urged the UN to initiate an investigation "timely, credible, and transparent", arguing that "UN involvement is the best guarantee against a Saudi whitewash". The civil society framing was specific in two respects. It located accountability inside the UN system rather than in domestic Saudi or bilateral processes, and it specified the qualities, credibility, transparency, independence, any acceptable investigation would have to meet.

At the UPR, less than a month later, at least 15 state recommendations addressed the killing directly, and they did so in vocabulary closely tracking these civil society demands. Costa Rica called on Saudi Arabia to "collaborate with the Human Rights Council to establish a hybrid mechanism for an impartial and independent investigation". Iceland recommended the participation of "a team of international experts", aligning the Saudi review with the position taken by the UN High Commissioner for Human Rights.¹⁸³ The institutional venue specified by civil society, which would be the UN, the procedural qualities demanded, independence, impartiality, expert participation, and the rejection of purely domestic accountability are all reproduced in the state recommendations.

The pattern of state preparation reinforces this reading. Austria, Switzerland, and the United Kingdom, three of the states that subsequently delivered Khashoggi-focused interventions during the interactive dialogue, had submitted detailed advance questions in preparation for the review.¹⁸⁴ Whatever the precise pathways of influence, states arriving at the UPR with prepared positions were already operating within a vocabulary that civil society had spent the previous month consolidating.

Across the three procedures, CEDAW in March 2018, the Khashoggi advocacy from October 2018, and the UPR in November 2018, the same pattern recurs. A category produced in civil society discourse is transposed, with minimal modification, into the formal output of a UN body or the recommendations of states acting within one. Procedural qualities specified

¹⁸² United Nations Human Rights Council. *Report of the Working Group on the Universal Periodic Review: Saudi Arabia*, p. 7 and 18, recommendations 80, 122.141, 122.142 and 122.143.

¹⁸³ *Ibid*, p. 18-19, recommendations 122.168 and 122.173.

¹⁸⁴ *Ibid*, p. 2.

by civil society are reproduced as the standard for acceptable response. The vocabulary travels, and it travels intact. This is the first half of the loop, visible at the level of the page.

The chronology reframes how the May 2018 arrests and the October 2018 murder should be understood. They did not initiate the looping process but activated and intensified a process that was already operating. By the time the May 2018 arrests occurred, the CEDAW concluding observations had already adopted the category of “women human rights defenders”, the structural critique of counter-terrorism legislation, and the framing of reprisals against defenders and their relatives. By the time of the Khashoggi murder, the Specialized Criminal Court critique had been articulated at the treaty body level for six months and had entered civil society advocacy in standardized form. The acceleration visible at HRC40 in March 2019 is the visible surface of an underlying process that the documentary record locates eighteen months earlier.

Civil society organizations actively sought to leverage these institutional moments. Ahead of the UPR, Amnesty International issued a statement urging member states to end what its Middle East director of campaigns described as their “deafening silence” on Saudi Arabia and to “do their duty of scrutinising the cruelty in the kingdom”.¹⁸⁵ By framing inaction as “silence” rather than as a calculated diplomatic posture, the statement converted non-engagement into a moral failing visible to publics and parliaments at home. The same statement characterized the Khashoggi murder as “exemplified” of “long-standing repression of critics” that had “until recently been wilfully ignored by UN member states”, positioning both the Saudi authorities and the wider international community as objects of critique.¹⁸⁶ This double address, to perpetrator state and to bystander states alike, shows that civil society advocacy was directed not only at Saudi Arabia but also explicitly at UN member states, seeking to transform the issue into a matter of diplomatic concern within multilateral settings.

The developments traced in this section show how the agenda constructed in 5.4.1 began to travel. By embedding the issue within ongoing UN processes, linking specific cases to broader patterns of repression, and demanding that international mechanisms be the venue

¹⁸⁵ Amnesty International. Saudi Arabia: UN member states must end deafening silence on the cruelty in the kingdom. *Amnesty International*. 2018, <https://www.amnesty.org/en/latest/news/2018/11/saudi-arabia-un-member-states-must-end-deafening-silence-on-the-cruelty-in-the-kingdom-2/> (accessed 2026-04-27).

¹⁸⁶ Ibid.

of accountability, civil society lowered the political threshold for state engagement. Once the issue was already circulating within the UN system, visible in CEDAW concluding observations, UPR recommendations, and the eventual mandate of Agnès Callamard, governments could raise concerns as part of an ongoing institutional conversation rather than as a sudden politicized intervention. The agenda was on the table, in vocabulary states themselves had begun to use.

5.4.3 The pre-session push and joint statement

In the weeks before the Council's 40th session, the looping dynamic became more concentrated and strategic. Civil society organizations targeted specific state actors, proposed specific institutional outputs, and recalibrated their public demands as diplomatic negotiations unfolded. The clustering of advocacy outputs, the precision of their timing, and the textual relationship between civil society demands and the joint statement Iceland eventually delivered make this the most analytically dense moment of the looping process the chapter examines.

A central piece of documentary evidence is a letter dated February 19th 2019, circulated publicly by Amnesty International on March 1st 2019, addressed to more than 30 Ministers of Foreign Affairs and signed by 52 organizations, including Amnesty International, Human Rights Watch, FIDH, the International Service for Human Rights, ALQST, and the Gulf Centre for Human Rights.¹⁸⁷ The letter framed the Khashoggi murder as having “increased public scrutiny of the repressive environment that exists for human rights defenders in Saudi Arabia”, and asked recipients to “initiate Council action by presenting a resolution at the 40th session of the Council establishing a monitoring mechanism over the human rights violations in the country and calling explicitly for the immediate and unconditional release of the detained Saudi women human rights defenders”.¹⁸⁸ The letter named ten specific detainees: Loujain Al-Hathloul, Aziza Al-Yousef, Eman Al-Nafjan, Nouf

¹⁸⁷ Amnesty International. Saudi Arabia: Over 50 Human Rights Groups Call for Immediate Release of Women's Rights Defenders. MDE 23/9948/2019. *Amnesty International*. 2019. <https://www.amnesty.org/en/documents/mde23/9948/2019/en/> (accessed 2026-04-27).

¹⁸⁸ Ibid, p. 1-2.

Abdelaziz, Hatoon Al-Fassi, Samar Badawi, Nassima Al-Sadah, Mohammed Al-Bajadi, Amal Al-Harbi, and Shadan Al-Anezi, providing states with a concrete and pre-assembled case list that could, in principle, be adopted directly into a diplomatic instrument.¹⁸⁹

Five features of this letter are significant. First, the choice of audience matters. By addressing foreign ministers in national capitals rather than diplomatic missions in Geneva, the signatories targeted the political tier of state authority rather than its routine multilateral channel. The letter was designed to reach actors who could take policy decisions, not only those who would execute them.

Second, the letter went beyond expressing concern and proposed a specific institutional outcome, which was a resolution at HRC40 establishing a monitoring mechanism. Civil society actors were attempting to shape not merely the Council's agenda but its procedural outputs, providing states with a concrete instrument to adopt rather than a problem to address.

Third, the letter's report of torture intensified the moral stakes of inaction. Detainees, the signatories reported, had been “subjected to electric shocks, flogging, sexual threats and other forms of torture”, and “at least one of them has attempted suicide multiple times”,¹⁹⁰ The issue was no longer civic space in the abstract but specific bodies in specific cells.

Fourth, the letter framed Saudi Arabia's counter-terrorism apparatus as itself the mechanism of repression. Detainees, the signatories noted, “risk being tried and sentenced before the Specialized Criminal Court, the country's counter-terrorism court”, and the letter cited the 2016 UN Committee Against Torture's concern that terrorism legislation applied through this court “enables the criminalisation of acts of peaceful expression considered as ‘endangering national unity’ or ‘undermining the reputation or position of the State’”.¹⁹¹ This structural critique reaches beyond named individuals to the legal-institutional environment in which detention and prosecution occur, a framing states can adopt without commenting on individual cases. It is also a framing civil society had been working through UN

¹⁸⁹ Ibid, p. 1.

¹⁹⁰ Ibid, p. 1.

¹⁹¹ Ibid, p. 1; United Nations Committee against Torture. *Concluding Observations on the Second Periodic Report of Saudi Arabia*. CAT/C/SAU/CO/2. 2016. <https://docs.un.org/en/CAT/C/SAU/CO/2> (accessed 2026-05-04).

procedural venues, as discussed in section 5.4.2, where CEDAW had already named the specific counter-terrorism statutes and adopted the criminalization framing the shadow report supplied.

Fifth, the letter invokes Saudi Arabia's status “as a member of the UN Human Rights Council” obligated to “uphold the highest standards”.¹⁹² This reframes Council inaction as a credibility problem for the institution itself, not only a policy choice for member states.

These features show civil society organizations behaving as drafters of diplomatic instruments rather than as petitioners. They identified the political audience, proposed the institutional output, supplied the moral content, embedded a structural critique states could adopt, and constructed a credibility argument that bound the Council's authority to its response. The timing reinforces this: issued less than three weeks before the joint statement and published in final form less than a week before, the letter appears calibrated to influence state positions while diplomatic negotiations were ongoing.

A second intervention followed shortly thereafter, and the difference between the two is itself analytically revealing. On March 6th 2019, the day before Iceland delivered the joint statement, Amnesty International issued a news release urging UN member states, “including key allies of Saudi Arabia”, to support what it now described as “a UN Human Rights Council statement” expected the following day.¹⁹³ The release framed the Council session as offering “a rare opportunity for states to take a strong public stand”, with MENA Regional Director Heba Morayef warning that “states who stay silent risk abdicating responsibility at a crucial moment”.¹⁹⁴

The shift in vocabulary between these two interventions is the point. The letter from February 19th had called for a resolution establishing a monitoring mechanism, a binding institutional output. The release from March 6th speaks of a statement and frames the immediate task as ensuring that states “use the joint statement to demand the immediate and unconditional release” of the named defenders.¹⁹⁵ In less than three weeks, civil society's

¹⁹² Amnesty International. Saudi Arabia: Over 50 Human Rights Groups Call for Immediate Release of Women's Rights Defenders, p. 2.

¹⁹³ Amnesty International. UN member states must demand release of women human rights defenders in Saudi Arabia.

¹⁹⁴ Ibid.

¹⁹⁵ Ibid.

public demand has moved from the binding language of resolutions and mechanisms to the deliberative language of statements.

This downward adjustment is not a failure but evidence that civil society organizations were tracking diplomatic developments in real time. The documentary record does not reveal how this information was obtained, but the recalibration shows they were attuned to the diplomatic reality that a resolution would not be tabled, and adjusted their public messaging to the contours of what states were willing to deliver.

This matters because it shows the loop operating in both directions even before the joint statement is delivered. Civil society is not simply pushing demands outward to states. It is also receiving signals back about what states will accept, and modulating its public position accordingly. The interaction is reciprocal, and it is happening in the documentary record itself.

On March 7th 2019, Iceland delivered the joint statement at the HRC's 40th session under Item 2 of the agenda, the interactive dialogue with the High Commissioner, on behalf of a coalition of 36 states drawn predominantly from Europe, alongside Australia, Canada, and New Zealand.¹⁹⁶ The text makes the looping process unusually visible at the level of vocabulary and case selection.

Most strikingly, Iceland and the supporting states named the same ten detained human rights defenders, Loujain al-Hathloul, Eman al-Nafjan, Aziza al-Yousef, Nassima al-Sadah, Samar Badawi, Nouf Abdelaziz, Hatoon al-Fassi, Mohammed Al-Bajadi, Amal Al-Harbi, and Shadan al-Anezi, as had appeared in the Amnesty-coordinated letter weeks earlier.¹⁹⁷ The case list is not paraphrased, summarized, or restricted to a few illustrative examples. It is reproduced in full, in a state instrument delivered at the United Nations.

What the documentary record cannot show is how the reproduction of this case list became practically possible. Naming individuals in a multilateral instrument is not a frictionless act of citation. It exposes the named detainees and their families to retaliation within the state under criticism, and the conventional practice in human rights diplomacy is

¹⁹⁶ Government of Iceland. Joint statement.

¹⁹⁷ Ibid. See for comparison Amnesty International. Saudi Arabia: Over 50 Human Rights Groups Call for Immediate Release of Women's Rights Defenders, p. 1.

that individuals are not named in such instruments unless their consent, or that of their legal representatives, has been obtained in advance.

The interview material allows the picture to be filled in at this point. Iceland's officials describe this operational work as belonging to the civil society organizations rather than to the foreign service. It was the organizations advocating on the detainees' cases that secured the necessary consents and coordinated the case list across actors so that the names appearing in the joint statement matched the names appearing in the public appeals. As delivery approached, the same actors moved from background advocacy into what might be described as an advisory function on outreach, coordinating with Iceland on the practical questions that arise once an institutional output is imminent, timing, sequencing, and the alignment of public messaging.¹⁹⁸

This is a more demanding form of civil society involvement than the agenda-construction work in section 5.4.1. Where that work translated a domestic situation into international vocabulary and designated the UN as the venue of response, the work here is coordination of a particular instrument at a particular moment, in which the legal protections owed to named individuals depend on civil society infrastructure rather than on the diplomatic apparatus alone.

The statement's framing similarly tracks vocabulary that civil society documents had been consolidating during the preceding nine months. Four migrations are textually visible: the Vision 2030 juxtaposition, the counter-terrorism critique, the credibility-and-independence vocabulary on Khashoggi, and the language of reprisal.

The opening acknowledges “the spirit of modernization and reform embodied by the Saudi Vision 2030” while expressing concern about “continuing arrests and arbitrary detentions of human rights defenders... including women's rights activists”.¹⁹⁹ The juxtaposition of Vision 2030 reformism with arbitrary detention had been a recurring move in civil society documents since the June 2018 coalition statement, which had observed that “officials in the royal court specifically warned women human rights defenders to remain silent” even as the driving ban was being lifted.

¹⁹⁸ Interview with officials.

¹⁹⁹ Government of Iceland. Joint statement.

Iceland's identification of “the use of the counter-terrorism law and other national security provisions against individuals peacefully exercising their rights” picks up the precise legal framework critique that civil society documents had developed in response to the use of the Specialized Criminal Court against detained activists.²⁰⁰

The statement's framing of accountability for the Khashoggi murder draws on the credibility-and-independence vocabulary that civil society had deployed since October 2018. Investigations, the statement insists, “must be prompt; effective and thorough; independent and impartial; and transparent”, and Saudi Arabia is called on to “fully cooperate with all investigations into the killing, including the human rights inquiry by the Special Rapporteur on extrajudicial, summary or arbitrary executions”.²⁰¹ Naming Agnès Callamard's mandate reflects the institutional outcome civil society had been advocating since the October 2018 joint call for a UN-led inquiry, and locates accountability inside the UN human rights system rather than in domestic Saudi or bilateral Saudi-Turkish processes. Finally, the statement's closing call for individuals to exercise their rights “without fear of reprisals” invokes the vocabulary of reprisal that had run through civil society documents since the June 2018 characterization of Loujain al-Hathloul's detention as “an act of reprisal for her engagement with international human rights mechanisms”.²⁰²

What civil society did not obtain is equally visible in the text. The letter from February 19th had called for a resolution establishing a monitoring mechanism. What was delivered was a joint statement under Item 2, an instrument that creates no formal institutional follow-up and binds Saudi Arabia to nothing. The supporting coalition, 36 states drawn predominantly from Europe with no representation from Saudi Arabia's regional environment, further bounds the political signal of the intervention.

The joint statement is best read not as the success of civil society advocacy or as a unilateral diplomatic achievement, but as the negotiated point where a transnational advocacy network and a coalition of like-minded states met. Civil society raised the issue, supplied the case list and vocabulary, made the case list deliverable, and pressed for a binding instrument.

²⁰⁰ Ibid. See for comparison Amnesty International. Saudi Arabia: Over 50 Human Rights Groups Call for Immediate Release of Women's Rights Defenders, p. 1.

²⁰¹ Government of Iceland. Joint statement.

²⁰² Ibid. See for comparison Amnesty International. Crackdown on Saudi Women, p. 2.

Like-minded states adopted the case list and most of the vocabulary, but settled on the lighter instrument the diplomatic situation could bear.

5.4.4 Reactivation

After delivery, the statement was taken up by civil society and folded back into advocacy that recycled its specific language and framings; the loop closing back on itself.

Two features of this phase are worth noting. First, the cast narrows: the broad coalition of 52 organizations that signed the February 19th letter gives way to a more specialized constellation organized around the Free Saudi Women Coalition and joined by Human Rights Watch, MENA Rights Group, and, in a different register, Amnesty International. Second, the genre shifts. Where the pre-statement phase produced open letters and joint statements pushing for institutional outputs, the post-statement phase produces reception statements, briefings, and end-of-session assessments that read the joint statement back as evidence of what is now diplomatically possible.

In the immediate civil society reception, the statement was widely described as unprecedented. MENA Rights Group framed it as an “unprecedented condemnation” of Saudi Arabia's rights record at the Council and reproduced its core demands.²⁰³ The International Service for Human Rights, one of the lead organizations in the Free Saudi Women Coalition, alongside the Gulf Centre for Human Rights, CIVICUS, Equality Now, Women's March Global, the MENA Women Human Rights Defenders Coalition, and Americans for Democracy and Human Rights in Bahrain, characterized the statement as “the first time ever that States at the Council collectively condemned human rights violations committed inside Saudi Arabia, a country that has until now escaped Council scrutiny despite being a Council member with an appalling human rights record”.²⁰⁴ ISHR's framing is analytically pointed. It situates the statement as ending a period of Council exception, in which Saudi Arabia's membership had functioned as a shield against scrutiny rather than as

²⁰³ MENA Rights Group. 36 UN Member States call on Saudi Arabia to improve human rights situation.

²⁰⁴ International Service for Human Rights. HRC40: Human Rights Council stands with Saudi women human rights defenders. *International Service for Human Rights*. 2019. <https://ishr.ch/latest-updates/hrc40-human-rights-council-stands-saudi-women-human-rights-defenders/> (accessed 2026-04-29).

a constraint, and converts the statement from a discrete diplomatic act into a precedent against which future Council practice can be measured.

Human Rights Watch likewise characterized the statement as “a landmark step toward justice and accountability”.²⁰⁵ Two features of HRW's framing are worth noting. The press release foregrounds what the statement had not yet achieved, observing that it “remains open for further endorsement until at least the end of the session on March 22”, a framing that reopens the diplomatic moment and invites additional states to join, rather than closing it as a completed event.²⁰⁶ It also anchors the statement to specific bodies in specific cells, leading with photographs of “Loujain al-Hathloul, Eman al-Nafjan, and Aziza al-Youssef” with captions noting their continued detention.²⁰⁷ HRW's John Fisher then frames the next move explicitly: states should “press for their immediate release and maintain scrutiny of Saudi Arabia until there is substantial improvement in its rights record”.²⁰⁸ The statement is thus reframed not as a culmination but as an opening position from which further pressure can be exerted.

The Gulf Center for Human Rights performed perhaps the most explicit looping move in its International Women's Day post. The Center described the statement as sending a “strong message” that the Council would hold members accountable, noted the timing as “critical” given the Saudi public prosecutor's announcement six days earlier that the detainees would be referred to trial, and then narrated the loop directly. Organizations in the Free Saudi Women Coalition “have been advocating for the immediate and unconditional release” of the defenders, and “ahead of the 40th session... over 50 NGOs called on UN Member States to adopt a resolution... and establish a monitoring mechanism”.²⁰⁹ The structure of the GC4HR text is essentially a public narration of a loop. Prior advocacy is invoked to explain the

²⁰⁵ Human Rights Watch. UN: A Call to Free Saudi Women Activists.

²⁰⁶ Ibid.

²⁰⁷ Ibid.

²⁰⁸ Ibid.

²⁰⁹ Gulf Centre for Human Rights. On International Women's Day, HRC40 | Human Rights Council Stands with Saudi Women Human Rights Defenders. *Gulf Centre for Human Rights*. 2019. <https://www.gc4hr.org/on-international-womens-day-hrc40-human-rights-council-stands-with-saudi-women-human-rights-defenders/> (accessed 2026-04-29).

statement, and the statement is then mobilized to justify renewed demands. The post functions as proof that pressure worked and as a platform for demanding more.

The shift in cast is itself meaningful. Pre-statement, the coalition was wide and the demand institutional, or a resolution with a monitoring mechanism. Post-statement, the coalition narrows to organizations specializing in Saudi Arabia and women human rights defenders, while the demand bifurcates between immediate amplification of the joint statement and renewed pressure for the binding instrument. This is consistent with how looping operates. An institutional moment generated by broad coalition advocacy gives rise to a focused field of follow-up actors who circulate the output and translate it into specialized advocacy.

Amnesty International's voice does not disappear in this period, but rather shifts genre. Amnesty co-signs the HRC40 end-of-session joint NGO statement of March 25th 2019, in which 11 organizations, including ISHR, Human Rights Watch, FIDH, and ARTICLE 19, treat the joint statement as a baseline from which to escalate: “The Council sent a strong message of support to human rights defenders in Saudi Arabia through the joint statement by 36 States, led by Iceland... We urge the Saudi authorities to respond fully to these calls, and States to follow up with a resolution at the June session to maintain attention to the situation until meaningful progress, including the release of defenders, is made”.²¹⁰ The passage shows civil society organizations, including those that had originally sought a resolution rather than a joint statement, treating the lighter instrument they received as a step toward, rather than a substitute for, the binding instrument they had requested.

By June 2019, the loop turns again. 40 civil society organizations, including Amnesty International, ISHR, the Gulf Centre for Human Rights, and the broader Free Saudi Women Coalition, sent a public letter to 48 foreign ministries timed to coincide with the presentation of Special Rapporteur Agnès Callamard's report on the killing of Jamal Khashoggi at HRC41 on June 26th 2019, urging states “to establish a mechanism to report on the human rights

²¹⁰ Amnesty International. HRC40: Joint NGO End of Session Statement. IOR 40/0192/2019. *Amnesty International*. 2019, p. 1. <https://www.amnesty.org/en/documents/ior40/0192/2019/en/> (accessed 2026-04-28).

violations in the country” and to demand the immediate and unconditional release of those arbitrarily detained.²¹¹

Crucially, the letter cites the joint statement and the provisional release of seven detained women human rights defenders as evidence that “HRC scrutiny can contribute to positive human rights outcomes on the ground, particularly with respect to the cases of detained women human rights defenders”, and argues that “for this scrutiny to remain effective, it must be sustained”.²¹² This argumentative structure, partial state action treated as proof of concept, then mobilized to demand the full institutional output originally requested, is the loop turning a second time. Civil society does not abandon the demand for a resolution with a monitoring mechanism after receiving a joint statement. It uses the joint statement as evidence in support of the demand it had not yet won.

Amnesty International's post-session briefing on HRC41, issued in July 2019, articulates this looping argument explicitly. The briefing characterizes HRC41 as “the third consecutive session with meaningful scrutiny of the Human Rights situation in Saudi Arabia”, sequencing HRC39, with a renewal of the Group of Eminent Experts on Yemen, HRC40, with the joint statement led by Iceland, and HRC41, with the Callamard report, into a single trajectory of accumulating Council attention.²¹³ The briefing's central interpretive claim is that “there is momentum building to put Saudi Arabia itself on the HRC's agenda”, a phrasing that names what is at stake in the loop: the cumulative effect of three Council sessions is being read as an institutional vector that can be extended further.²¹⁴ Amnesty then “reiterate[s] our call for a resolution on Saudi Arabia and urge[s] states to fully support this

²¹¹ Amnesty International. Saudi Arabia: 40 Human Rights Groups Call on States to Stand Up for Human Rights in the Kingdom. MDE 23/0511/2019. *Amnesty International*. 2019, p. 1. <https://www.amnesty.org/en/documents/mde23/0511/2019/en/> (accessed 2026-04-29); International Service for Human Rights. HRC41: 40 Organisations Urge the HRC to Hold Saudi Arabia Accountable. *International Service for Human Rights*. 2019. <https://ishr.ch/latest-updates/hrc41-40-organisations-urge-hrc-hold-saudi-arabia-accountable/> (accessed 2026-04-29).

²¹² International Service for Human Rights. HRC41: 40 Organisations Urge the HRC to Hold Saudi Arabia Accountable.

²¹³ Amnesty International. Amnesty International Assessment of Outcomes at the 41st Session of the UN Human Rights Council and Recommendations to UN Member States for Follow Up. IOR 40/0813/2019. *Amnesty International*. 2019, p. 2. <https://www.amnesty.org/en/documents/ior40/0813/2019/en/> (accessed 2026-04-30).

²¹⁴ Amnesty International. Amnesty International Assessment of Outcomes at the 41st Session of the UN Human Rights Council and Recommendations to UN Member States for Follow Up, p. 2.

effort”, anchoring the renewed demand in the same instrument originally sought in February 2019.²¹⁵

The pre-HRC42 briefing of August 2019 makes the looping logic completely explicit at the level of recommendation. Amnesty calls on states to “support the establishment of a monitoring mechanism on the Human Rights Situation in Saudi Arabia by building on the joint statement of 36 states at HRC40 and the Special Rapporteur on Summary Execution's report on Jamal Khashoggi in HRC41”.²¹⁶ The grammatical construction is important. Two distinct institutional outputs, the joint statement and the Special Rapporteur's report, are positioned as the foundation for the next move, a monitoring mechanism, with civil society advocacy directing states toward a particular reading of what those outputs collectively imply. The joint statement is no longer an event to be welcomed or critiqued. It has become an institutional resource that civil society can cite to argue that further state action is the consistent next step.

This stage shows the joint statement functioning as a legitimacy resource. The statement does not in itself create a monitoring mechanism, but it becomes a symbol and an instrument. Civil society can point to it as evidence that states have collectively acknowledged the issue, and press for follow-up consistent with states' own words. The loop is not only circulation but the transformation of diplomatic output into a resource for renewed pressure. An Australia-led joint statement at HRC42 in September 2019, which extended Council scrutiny of Saudi Arabia for a second consecutive session and was framed by ISHR as continuing “the work started by Iceland”, represents the next institutional output in this trajectory.²¹⁷

Across these interventions, civil society actors shaped how the issue was understood as much as which states acted on it. The detention of women human rights defenders was

²¹⁵ Amnesty International. Amnesty International Assessment of Outcomes at the 41st Session of the UN Human Rights Council and Recommendations to UN Member States for Follow Up, p. 2.

²¹⁶ Amnesty International. Amnesty International Briefing to UN Member States on Amnesty International's Concerns Ahead of the 42nd Session of the UN Human Rights Council. IOR 40/0932/2019. *Amnesty International*. 2019, p. 1. <https://www.amnesty.org/en/documents/ior40/0932/2019/en/> (accessed 2026-04-30).

²¹⁷ International Service for Human Rights. HRC42: States Call on Saudi Arabia to Improve its Human Rights Record. *International Service for Human Rights*. 2019. <https://ishr.ch/latest-updates/hrc42-states-call-saudi-arabia-improve-its-human-rights-record/> (accessed 2026-04-30).

consistently framed as part of a broader pattern of repression, linked to the Khashoggi murder as evidence of systemic impunity, with UN member states themselves positioned as responsible. The clustering of advocacy outputs before HRC40, HRC41, and HRC42 is unlikely to be coincidental: these interventions appear temporally calibrated to influence ongoing multilateral processes.

The picture that emerges from the documents, then, is not a one-way translation of civil society framing into state-led intervention but a reciprocal process. NGOs articulated the issue, supplied case lists and vocabulary, and pressed for binding institutional outputs. States adopted parts of the case list and most of the vocabulary while delivering a lighter instrument than civil society had requested. Civil society then treated the state output as a baseline for renewed pressure toward the original demand. The temporal proximity and textual mirroring between civil society and state documents are striking, but the available evidence does not, on its own, establish a direct causal link.

The limits of the documentary record must be acknowledged. The documents show that civil society organizations sought to influence state behavior and treated state outputs as resources for further advocacy. They cannot show whether specific interventions reached decision-makers, how they were received, or how state actors understood their own role. To address these questions, I draw on an interview with two officials from the Icelandic Ministry for Foreign Affairs whose work placed them inside the convening of the statement. The analysis in 5.4.5 uses their testimony to confirm features of the loop the documents support but cannot fully establish, and to surface dimensions the documents are not well-positioned to show: the operational coordination behind the case list, civil society's role in shaping the visibility of states' positions on co-signing, and the state-side reasoning behind the choice of instrument.

5.4.5 Triangulating the loop: the view from the foreign service

The interview material adds three observations to the picture developed in the previous sections. The first confirms civil society's role in agenda construction. The second refines its role in reactivation. The third surfaces a friction the documentary analysis registers only indirectly.

The first observation concerns how civil society documentation reaches the states that act on it. The officials described a dense, continuous dialogue with human rights organizations: organizations produce briefings, flag violations, and present cases to states they consider most likely to act.²¹⁸

This is agenda construction told from the state side. The case list and underlying framings did not appear in the Icelandic foreign ministry as autonomous policy outputs; they arrived through the same channels civil society was using with other potentially receptive states.

At the same time, the decision to convene a coalition and deliver a particular instrument was Iceland's, taken on the basis of political judgment at home and consultation in Geneva. The loop is not a process in which civil society delegates a task to the state, but one in which civil society's documentation supplies the substantive material on which the state chooses whether, when, and in what form to act.

The second observation concerns civil society's work during coalition assembly, which the documentary record gestures toward but does not fully register. Once an Iceland-convened joint statement looked likely, civil society organizations began shaping the visibility of states' positions on co-signing. One official noted that at that stage, the more telling story was a state's absence from the coalition, not its presence, and that organizations would call out hesitating or absent states publicly.²¹⁹

This adds nuance to the reactivation account developed in section 5.4.4. Civil society's reactivation of state-produced outputs is directed not only at the issue and the state under criticism but at other states in the system. The formalized coalition becomes a register against which absence is legible as a stance..

The artifact not only carries the issue forward; it restructures the visibility of every other state's position in relation to it. The convening state benefits from this without authoring it: costs of standing outside the coalition are imposed by civil society reception, not by Iceland.

²¹⁸ Interview with officials.

²¹⁹ Ibid.

The third observation concerns the most consequential point at which the looping process registers friction. The documentary record shows civil society organizations calling, throughout the pre-session period and again in subsequent months, for a resolution establishing a monitoring mechanism on Saudi Arabia.²²⁰ What was delivered was the lighter joint statement.

Sections 5.4.3 and 5.4.4 characterized this gap as the negotiated point where transnational advocacy and a coalition of like-minded states met, the lighter instrument representing what the diplomatic situation could bear. The interview develops that characterization further.

The choice of instrument was not a default to whatever could be assembled most easily. It reflected a substantive assessment of what a resolution with a monitoring mechanism would actually deliver, given the available majorities, procedural constraints on whose votes would count, the cost of operating the mechanism, and the uncertainty surrounding its effects on Saudi Arabia. On the officials' professional reading, the joint statement exerted real political pressure in ways that mattered. A contested vote on a monitoring mechanism risked producing an output that would not change the underlying situation and might weaken, rather than reinforce, the Council's standing.²²¹

This is not criticism of the civil society demand. The officials note that civil society's role in such advocacy is precisely to maintain continuous pressure and refuse lighter outputs as substitutes for the binding instruments the situation calls for. The documentary record confirms this: civil society did not stop calling for a resolution and a monitoring mechanism after receiving the joint statement, treating the lighter instrument as a step toward, not a substitute for, the binding instrument it had requested.

What the interview adds is a recognition that this asymmetry of demand is not a malfunction of the loop but part of its structure. Civil society and like-minded states operate under different time horizons and constraints, and the choice of instrument reflects a settlement between what civil society can sustainably press for and what states can responsibly carry through. Each cycle's settlement is more substantive than the silence

²²⁰ See sections 5.4.3 and 5.4.4.

²²¹ Interview with officials.

preceding it and more modest than the demand driving it. Each output becomes the resource against which the next demand is articulated.

5.5 Discussion of the statement as a looping process

The looping reading delivers what the small-state reading in section 5.2 could not: an account of how the substantive content of the statement was assembled before it was delivered. The case list, the rhetorical move on member-state credibility, the counter-terrorism critique, the Vision 2030 juxtaposition, and the reprisal language each have traceable origins in civil society documentation, and the documentary record shows them migrating into the joint statement, into other states' UPR recommendations, and back into civil society advocacy in subsequent sessions. The reciprocal character of this circulation, civil society raising the issue and supplying the substantive material, the Icelandic-led coalition formalizing it in a state instrument, and civil society reactivating the instrument as a resource for renewed pressure, is the part of the case that the small-state literature is not designed to register, and that the looping framework was adopted to make visible.

Reading the case through looping also brings into view what the other strands surveyed in chapter 3 could not by themselves complete. The HRC group politics literature gives the conceptual frame for treating coalition form as part of the meaning of a diplomatic act, and locates the cross-regional joint statement as a recognizable practice rather than an isolated event.²²² It does not address how the substantive content of such statements, the cases, the framings, and the language is actually assembled. The looping reading shows that this content was not produced inside the convening foreign ministry but circulated into it through documentary channels that civil society had spent months consolidating. The literature on the Middle East at the Council supplies an account of why Iceland's 2019 statement was institutionally exceptional, with a pattern in which Saudi and GCC performance of cooperation reliably outpaced substantive change, and critical voices were systematically counter-balanced at the Council.²²³ Behind this sits a longer interpretive

²²² Laatikainen. Conceptualizing Groups in un Multilateralism; Smith. Group Politics; H. Tuominen. A louder voice.

²²³ Landolt. Rival transnational advocacy networks.

backdrop in which any specific rights claim about Saudi Arabia is read through accumulated disputes over cultural authority, double standards, and the geopolitics of universality. This is part of what makes country-specific scrutiny politically difficult in ways that go beyond bloc voting or strategic alliance.²²⁴ What this literature does not address is who produces the documentation, framings, and case-lists on which critical interventions depend, and what role civil society plays in breaking patterns of institutional shielding the literature treated as durable. The looping analysis answers this question empirically for the case at hand.

The civil society advocacy literature poses a related problem. The transnational advocacy network framework is principally about NGOs lobbying states.²²⁵ It theorizes states as targets, occasionally as allies, but rarely as protagonists. When small states themselves become the visible drivers of an initiative, like sponsoring a joint statement or leading group action, the literature has fewer tools. Recent refinements sharpen the account of how civil society itself operates but do not close this gap.²²⁶ The Iceland case sits exactly on this seam. A small state acted as the public face of a coordinated effort that almost certainly involved civil society organizing in its background, but the relationship between state initiative and civil society advocacy remains undertheorized in either body of work taken alone. Holding both literatures in view at once, as the looping reading does, is what allows the case to be described accurately. Civil society did not lobby a state into action it would otherwise not have taken, and the state did not act on the basis of independently developed positions. Rather, the two operated within a reciprocal documentary process in which neither side fully authored the outcome and each treated the other's outputs as resources for further action.

Toward the socio-legal and ethnographic literature that informs the looping framework, Cowan, Halme-Tuomisaari, and Reiners, the analysis is harmonious in spirit. It shares their argument that formal interventions sit inside an ecology of informal practice.²²⁷ The contribution here is methodological. Where that literature has worked from ethnographic immersion, this thesis shows that the looping process can be made empirically traceable

²²⁴ Mutua. *Savages, Victims, and Saviors*; Kayaoglu. *Giving an Inch Only to Lose a Mile*; Mokhtari. *Human rights and power*.

²²⁵ Keck & Sikkink. *Transnational advocacy networks*.

²²⁶ Carpenter. *Setting the Advocacy Agenda*; Pruce & Budabin. *Beyond naming and shaming*.

²²⁷ Halme-Tuomisaari. *Guarding utopia*; Cowan. *The Universal Periodic Review*; Reiners. *The power of interpersonal relationships*.

through close attention to documents alone. The interview in section 5.4.5 partially compensates for the lack of immersive access, but the bulk rests on inter-documentary movement. If the documentary character of UN human rights practice is as central as this literature has argued, the looping should be visible from the documents themselves, and the analysis is offered as that evidence.

6. Conclusion

This thesis began as an inquiry into the joint statement Iceland delivered on behalf of 36 states at the Human Rights Council's 40th session on March 7th 2019, the intervention that publicly called on Saudi Arabia to release ten named women human rights defenders and to cooperate with accountability mechanisms in the killing of Jamal Khashoggi. Its purpose was to reconstruct the chronology of civil society advocacy and institutional windows that preceded and followed the statement, and to ask whether the statement could be understood not only as an instance of "small state leadership" but also as the outcome of a longer advocacy circuit in which civil society worked to make Saudi Arabia's violations institutionally legible. The research question was the extent to which Iceland's role in advancing Council scrutiny of Saudi Arabia could be understood as the outcome of a looping interaction between civil society advocacy and small state diplomacy.

The investigation proceeded in two analytical stages. Sections 5.1–5.3 read the case through the small state diplomacy literature. The reading was internally consistent: Iceland's convening role, its choice of a cross-regional coalition format, its normative framing, the credibility advantage it brought, and the trailblazer dynamic that followed all align with what the literature would predict. The case also permitted a small refinement: the credibility advantage that allowed Iceland to act with limited retaliation was not a property of smallness alone but of the combination of small-state convening with a coalition large enough to make retaliation against the convener strategically pointless. What the small state reading could not reach was the substantive content of what was being convened. The choice of issue, the case list of ten named detainees, the counter-terrorism critique, and the Vision 2030 juxtaposition did not originate inside the Icelandic Ministry for Foreign Affairs. They came from

somewhere else, and the small-state frame could neither identify where nor explain why those particular elements were the ones that traveled.

Sections 5.4–5.5 took up that residue. Reading the documentary record around the statement through the four-stage operationalization of looping set out in section 3.7, the analysis traced how civil society agenda construction in the months before HRC40 produced a vocabulary and a case list that entered UN procedural outputs through the CEDAW review, the Khashoggi advocacy, and the Universal Periodic Review; how that vocabulary was then taken up in the pre-session period and reproduced, with substantial textual fidelity, in the joint statement itself; and how the statement, once delivered, was reactivated by civil society as a resource for further mobilization in subsequent sessions. The interview with two officials from the Icelandic Ministry for Foreign Affairs triangulated this documentary picture at one point in the loop, confirming that civil society documentation and direct briefings entered the drafting process even as ownership of the final text remained with the convening state.

The headline answer to the research question is therefore that Iceland's role can usefully be understood as the outcome of a looping interaction, with one analytical qualification. Looping in this case names the form of the relationship between civil society and state actors rather than a causal claim about who influenced whom. The mechanism is reciprocal, textually mediated, and traceable through the documentary record, even where the underlying influence dynamics remain partly hidden from view.

The most significant move the thesis has made is the move it almost did not make. The study began as a reading through small state diplomacy, and that framing was not abandoned as wrong but recognized as accounting for only one stage of a longer process. The broader analytical contribution is that the two frameworks are best read as complementary rather than competing. Small state diplomacy describes how the intervention was carried out. Who convened, in what form, with what credibility advantage, and to what subsequent effect. Looping describes how its substantive content was assembled before delivery and how the diplomatic act circulated back into the advocacy field that produced it. Together, they describe a case in which civil society and state action shape one another iteratively within the institutional setting of the Council, are mediated through documents, and produce outcomes that neither set of actors would produce alone. A methodological contribution

accompanies this. The thesis has shown that the looping process can be made empirically traceable through close attention to documents alone, with interview material used in a complementary register.

Two limitations should be acknowledged. The reading developed here is one of documentary alignment, not a causal demonstration of which actor influenced which. The source base does not support that level of granularity. And the cases in which a process of this kind can be reconstructed in this detail are likely to be a non-representative subset of the larger universe of Council interventions, so the analysis does not, on its own, demonstrate that the same process operates with similar regularity elsewhere. Both limitations open directions for further research. Comparative work across cases in which a small state convened a politically sensitive intervention at the Council, and work that combines documentary tracing with sustained ethnographic access to the civil society side of the loop, would together test how far the reading developed here travels beyond the Saudi Arabia case.

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