

The Facts and Norms Newsletter

Editorial

This new edition of the *Facts and Norms Newsletter* appears at a time of global instability and mounting threats to human dignity. While a ceasefire in Gaza offers a glimmer of hope, the UN Secretary-General's urgent warning against ethnic cleansing in the enclave — alongside rising violence in the occupied West Bank — casts a shadow over any optimism. Elsewhere, the armed conflict in DR Congo intensified; Haiti continues suffering from relentless gang violence; in Syria, systematic pillaging undermines rebuilding efforts.

We also report on the International Court of Justice, grappling with complex cases, including the Gaza advisory proceedings and counter-claims in the case concerning Ukraine. The International Criminal Court, in turn, faces direct political pressure, as exemplified by a US Executive Order threatening sanctions, a move condemned by the Court itself.

On the regional front, the European Court of Human Rights continues to deliver new judgments, holding states accountable for violations ranging from freedom of expression to the right to life, including significant rulings on Russia's suppression of dissent and Italy's failure to protect citizens from toxic pollution. The African Court on Human and Peoples' Rights emphasizes the importance of reparations in advancing justice. The Inter-American Court of Human Rights, through its judgments and provisional measures, further expands its caselaw on the prohibition of torture, labor rights, and other important human rights topics.

As always, our *Academic and Professional Opportunities'* section offers numerous opportunities for career development. We encourage readers to review these third-party opportunities with due diligence and seize any that match their aspirations.

We conclude this issue by highlighting key contributions from the Facts and Norms Institute. The Institute's amicus brief was cited in the Inter-American Court's condemnation of Brazil for the Acari Massacre. Our research on violence against women and children in sports informed a groundbreaking United Nations report. In addition, the Institute's partnership with the American Society of International Law yielded a new edition of the *Rights of Indigenous Peoples' Newsletter*.

As you read through these pages, we hope you not only gain insight into the critical issues of our time but also find renewed motivation to champion the values of dignity, justice, and human rights.

Professor Henrique Napoleão Alves
Chief Editor



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A periodical bulletin with world news,
new developments in international law and human rights,
recent rulings by international courts and tribunals and...
selected academic and professional opportunities!

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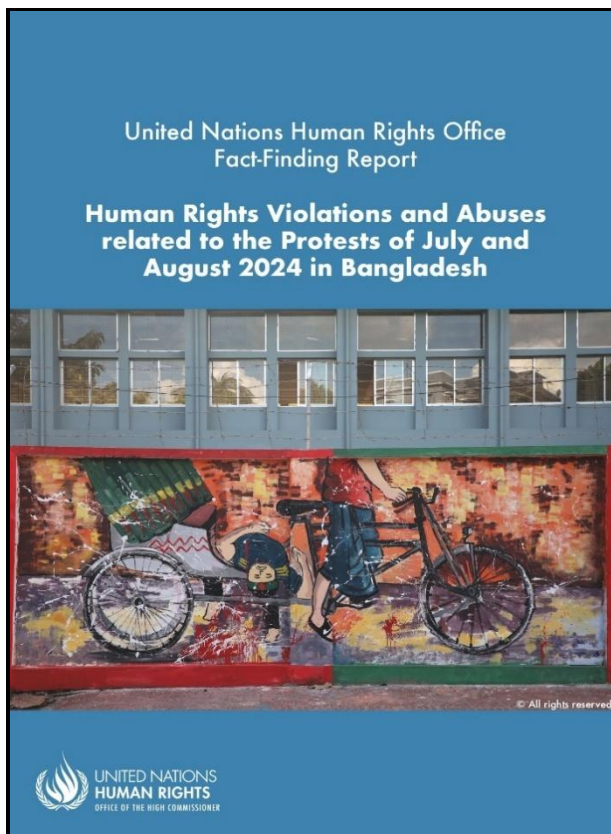
Thank you.

Universal News

UN News

BANGLADESH: UN REPORT FINDS BRUTAL, SYSTEMATIC REPRESSION OF PROTESTS (12 Feb. 2025)

The repression of mass protests in Bangladesh last year left as many as 1,400 people dead in just 46 days – the vast majority shot by security forces, according to a report by the UN Human Rights Office. Thousands were injured, including one youngster who was shot in the hand at point-blank range for throwing stones. Reported crimes against the student-led protest included extrajudicial killings, extensive arbitrary arrest and detention and torture, and ill treatment, including of children, as well as gender-based violence.



Cover of the UN Report. [Click here](#) or on the image above to download the full report.

According to the UN rights chief, Mr. Völker Türk, some of the gravest violations detailed in the report may constitute international crimes that could be heard by the International Criminal Court (ICC), as Bangladesh is a State party to the Rome Statute which created the tribunal in The Hague.

U.S. CUTS THREATEN GLOBAL HEALTH RESPONSE, WARNS WHO CHIEF (12 Feb. 2025)

The World Health Organization (WHO) has expressed deep concern over the impact of US funding cuts on critical global health initiatives, warning they pose a direct threat to public health efforts worldwide.

“The suspension of funding to PEPFAR, the President’s Emergency Plan for AIDS Relief, caused an immediate stop to HIV treatment, testing and prevention services in the 50 countries,” said WHO Director-General Tedros Adhanom Ghebreyesus.

He noted that despite a waiver for life-saving services, prevention programmes for at-risk groups remain excluded, clinics have closed, and health workers have been put on leave.

Tedros urged the US Government to reconsider its funding approach, at least until alternative solutions can be found to maintain essential health services.

MASS GRAVES IN LYBIA HIGHLIGHT DANGERS FOR MIGRANTS (10 Feb. 2025)

The International Organization for Migration reported the discovery of two mass graves in Libya containing the remains of migrants. Nineteen bodies were found near Benghazi, and at least 30 more in the Alkufra desert, with reports suggesting the latter grave may hold up to 70 bodies. While the cause of death remains unclear, some victims showed signs of gunshot wounds.

The IOM urged Libyan authorities to ensure dignified recovery and identification of the remains and to notify families. The discoveries followed a police raid on a suspected human trafficking site where hundreds of migrants were rescued. The IOM emphasized the need for enhanced data collection, search and rescue efforts, and migrant protection along land routes, where fatalities often go unreported. They also called for increased regional collaboration to protect migrants regardless of their status.

UN WARNS OF ESCALATING CRISIS IN DR CONGO (7 Feb. 2025)

The UN High Commissioner for Human Rights warned that the ongoing conflict in eastern Democratic Republic of the Congo (DRC), fueled by the M23 offensive, risks worsening significantly without international intervention.

Speaking before the Human Rights Council, the High Commissioner reported that nearly 3,000 people have been killed and 2,880 injured since January 26.



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He cited attacks by M23 and allies, including the bombing of hospitals, and reports of mass rape and killings following a prison break.



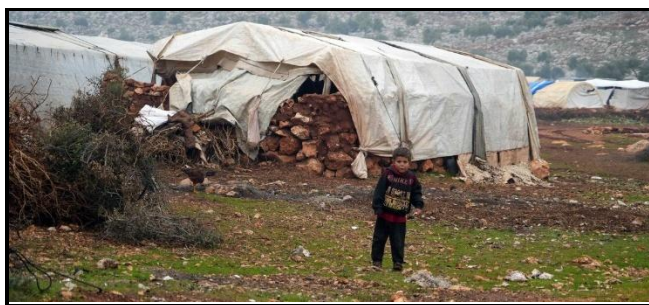
"Children gather in Goma, in the eastern Democratic Republic of the Congo" (UN Photo).

The Council adopted a resolution establishing a fact-finding mission to investigate abuses in the region. The DRC accused Rwanda of supporting armed groups. Rwanda, in turn, claimed it faced an imminent attack.

The High Commissioner emphasized the international community's implication in the conflict, noting that minerals from eastern DRC are used in many commonly consumed products, such as mobile phones.

SYRIA: UN INVESTIGATORS DEMAND ACCOUNTABILITY FOR WIDESPREAD PILLAGING (6 Feb. 2025)

Widespread pillaging and destruction of property in Syria by all parties to the conflict likely constitute war crimes, says the Independent International Commission of Inquiry on Syria.



"More than two million displaced Syrians continue to live in temporary shelters" (UNOCHA/MohanadZayat).

Reporting to the UN Human Rights Council, the Commission detailed systematic pillaging by various armed groups, including former government troops and opposition fighters, who targeted the property of political opponents and displaced communities, stealing household items, raw materials, and even dismantling buildings. Commissioners noted that members of the former

Syrian army coordinated part of the pillaging for personal gain. With near-total impunity prevailing, the investigators urge renewed efforts to protect housing, land, and property rights as paramount to the country's rebuilding efforts.

UN SECRETARY-GENERAL REJECTS ETHNIC CLEANSING IN GAZA (5 Feb. 2025)

UN Secretary-General António Guterres urged the international community to continue pushing for a full ceasefire and the release of all hostages in Gaza, and "to avoid any form of ethnic cleansing" in the enclave. The UN chief spoke in the wake of comments made by United States President Donald Trump, who suggested the US could "take over" the Gaza Strip, calling on Palestinians living there to leave.

Addressing the *UN Committee on the Exercise of the Inalienable Rights of the Palestinian People*, the Secretary-General stressed that "of course, nothing justifies the horrific Hamas attacks of October 7, [nor] what we have seen unfold in Gaza over these last many months." He pointed to "the catalogue of destruction and unspeakable horrors", with nearly 50,000 people reportedly killed, mainly women and children, and most of the civilian infrastructure in Gaza destroyed.



"Displaced Palestinians are returning to their houses following the ceasefire agreement in Gaza." (UN Photo/WHO)

HAITI HUMAN RIGHTS CRISIS WORSENS AMID GANG VIOLENCE (4 Feb. 2025)

A new UN report reveals a "very alarming" human rights situation in Haiti. At least 5,626 people were killed and over 2,213 injured in 2024 due to armed gangs. Security forces were implicated in over 250 executions. Kidnappings have surged, particularly targeting children. Sexual violence and child trafficking are also on the rise. Despite judicial appointments, progress on investigations remains slow. The UN is urging the international community to fully deploy the Multinational Security Support mission and intensify arms shipment inspections.





"Haitians displaced by violence find refuge on the streets of the capital, Port-au-Prince." (IOM/Antoine Lemmonier)

With over one million people displaced and a humanitarian catastrophe continue to unfold, urgent international intervention is seen as vital to stabilizing Haiti.

U.S. FUNDING PAUSE LEAVES MILLIONS 'IN JEOPARDY' (4 Feb. 2025)

The U.S. government announced a pause to billions of dollars of funding on 24 January affecting nearly all US foreign aid programs, pending a 90-day review.

The US Government funded around 47 per cent of the global humanitarian appeal across the world last year. Mr. Pio Smith, from the United Nations Fund for Population Activities (UNFPA), referred to the immediate impact in the world's poorest settings:

"Women give birth alone in unsanitary conditions; newborns die from preventable causes; survivors of gender-based violence have nowhere to turn for medical or psychological support," Mr. Smith explained.

UNFPA works across the world including in Afghanistan, where more than nine million people are expected to lose access to health and protection services because of the US funding crisis.

"Every two hours, a mother dies from preventable pregnancy complications, making Afghanistan one of the deadliest countries in the world for women to give birth. Without UNFPA's support, even more lives will be lost," he said.

UN MARKS 80 YEARS SINCE DEATH CAMPS WERE LIBERATED (27 Jan. 2025)

Every year on the day the concentration camps were liberated in 1945, the world unites to honor the memory of the six million Jews who perished at the hands of the Nazis and their collaborators, a commemoration that also extends to the Roma and Sinti communities, people with disabilities, LGBTIQ+ individuals, and all others who suffered

from the systemic violence, torture, and genocide of the Nazi regime.

Honoring the victims and those who survived the Nazi death camps, the UN Secretary-General António Guterres warned about the rise of antisemitism in the present:

"80 years since the Holocaust's end, antisemitism still exists – fueled by the same lies and loathing that made the Nazi genocide possible. And it is rising. We must condemn antisemitism and we must renew our resolve to defend the dignity and human rights of all."

Underlying the courage of survivors in sharing their stories to ensuring that the horrors of Auschwitz-Birkenau and other concentration camps are never erased from history, Mr. Guterres added that the responsibility to ensure this history is never forgotten "belongs to every one of us". "Remembrance is not only a moral act – remembrance is a call to action", he said.

UN RAISES ALARM OVER ESCALATING VIOLENCE IN OCCUPIED WEST BANK (24 Jan. 2025)

The UN Office of the High Commissioner for Human Rights expressed grave concerns over escalating violence in the occupied West Bank, condemning the use of "unlawful lethal force" by Israel. According to OHCHR spokesperson Thameen Al-Kheetan, the Israeli military operation in and around the Jenin refugee camp had involved "disproportionate" use of force, including airstrikes and shootings that reportedly targeted unarmed residents. At least 12 Palestinians – most reportedly unarmed – have been killed and a further 40 injured, including a doctor and two nurses.



"Members of a family flee Jenin due to an escalation of violence." (UNICEF/Alaa Badarneh)

The ongoing violence has displaced over 3,000 families in Jenin, and essential services such as water and electricity have been severely disrupted for weeks.



Mr. Al-Kheetan reiterated that Israel, as the occupying power, has a responsibility under international law to protect civilians living under occupation. He stressed the need for investigations into the killings, warning that a lack of accountability risks perpetuating violence.

UN REGRETS U.S. EXIT FROM COOPERATION ON HEALTH AND CLIMATE (21 Jan. 2025)

UN agencies responded to President Trump's executive orders ending US membership of the World Health Organization (WHO) and its adherence to the Paris Climate Agreement. The U.S. joined WHO in 1948 after a joint resolution was passed by both chambers of Congress. In 2023, the U.S. was WHO's largest single donor, accounting for 18 per cent of the agency's budget.



"A polio vaccine is administered to a child in Gaza, a campaign supported by WHO" (UNRWA/Ashraf Amra)

From the UN World Meteorological Organization (WMO), spokesperson Clare Nullis reacted to President Trump's vow to quit the Paris Agreement. The need for all countries to respect the accord was "obvious", she said, given that 2024 "was the hottest year on record". "It is the defining challenge of our time," she insisted.

International Court of Justice (ICJ)

OIC AND THE LEAGUE OF ARAB STATES TO JOIN IN THE PALESTINE ADVISORY PROCEEDINGS (7 Feb. & 4 Feb. 2025)

The International Court of Justice has authorized the League of Arab States and the Organisation of Islamic Cooperation (OIC), at their request, to participate in the advisory proceedings on the *Obligations of Israel in relation to the Presence and Activities of the United Nations, Other International Organizations and Third States in and in relation to the Occupied Palestinian Territory*.

Both organizations may now present a written statement to the Court by 28 February 2025.

BELIZE TO INTERVENE IN GAZA STRIP CASE (31 Jan. 2025)

Belize has filed an application before the International Court of Justice to intervene in the case *Application of the Convention on the Prevention and Punishment of the Crime of Genocide in the Gaza Strip (South Africa v. Israel)*, citing Articles 62 and 63 of the ICJ Statute.

Belize's intervention is based on two grounds: First, under Article 62, it asserts a legal interest in Israel's compliance with the Genocide Convention, potentially affected by the Court's decision. Second, as a party to the Genocide Convention, Belize invokes Article 63, asserting its right to intervene because the case involves the interpretation of the Convention.

The Court invited South Africa and Israel to submit observations on Belize's application.



The Peace Palace at the Hague, home of the International Court of Justice (ICJ).

RUSSIA COUNTER-CLAIMS IN UKRAINE GENOCIDE ALLEGATIONS CASE (31 Jan. 2025)

The Russian Federation has filed counter-claims within its Counter-Memorial in the case *Allegations of Genocide under the Convention on the Prevention and Punishment of the Crime of Genocide (Ukraine v. Russian Federation)*.

Ukraine has objected to the admissibility of these counter-claims. In Accordance with the ICJ rules, Ukraine and Russia have been invited to submit their view on the matter by 20 May 2025 and 22 September 2025, respectively. The Court will then decide on their admissibility.

IRAN RAISES PRELIMINARY OBJECTIONS IN THE AERIAL INCIDENT CASE (22 Jan. 2025)

Iran has raised preliminary objections to the ICJ's jurisdiction and the admissibility of the application in the case *Aerial Incident of 8 January 2020 (Canada, Sweden, Ukraine and United Kingdom v.*



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Islamic Republic of Iran).

The Court has suspended proceedings on the merits. Canada, Sweden, Ukraine, and the United Kingdom have until May 16, 2025, to file a written statement responding to Iran's objections.

International Criminal Court (ICC)

ICC CONDEMNS U.S. EXECUTIVE ORDER SEEKING TO IMPOSE SANCTIONS ON THE COURT ([7 Feb. 2025](#))

The ICC issued a [Press Release](#) condemning the U.S. Executive Order seeking to impose sanctions on its officials. ICC's President Judge Tomoko Akane also [issued a Statement following the same lines](#):

"I note with deep regret the issuance by the United States of an Executive Order seeking to impose sanctions on the officials of the ICC, harm the Court's independence and its impartiality and deprive millions of innocent victims of atrocities of justice and hope."

"As atrocities continue to plague the globe affecting the lives of millions of innocent children, women and men, the Court has become indispensable. It represents the most significant legacy of the immense suffering inflicted on civilians by the world wars, the Holocaust, genocides, violence and persecutions."

"The announced Executive Order is only the latest in a series of unprecedented and escalatory attacks aiming to undermine the Court's ability to administer justice in all situations. Such threats and coercive measures constitute serious attacks against the Court's States Parties, the rule of law based international order and millions of victims."

"We firmly reject any attempt to influence the independence and the impartiality of the Court or to politicize our judicial function. We have and always will comply only with the law, under all circumstances."

"I call upon all those who share the values enshrined in the Statute to stand united in the Court's defense: our 125 States Parties, civil society and all nations of the world."



Judge Tomoko Akane, President of the International Criminal Court (ICC).

International Tribunal for the Law of the Sea (ITLOS)

ITLOS GRANTS EXTENSION IN "ZHENG HE" CASE AS LUXEMBOURG AND MEXICO ENGAGE IN NEGOTIATIONS ([3 Feb. 2025](#))

The International Tribunal for the Law of the Sea has issued an order granting an extension to the deadlines for submissions in the ongoing case between Luxembourg and Mexico, concerning the detention of the vessel "Zheng He." The order extended the time limit for Luxembourg to file its Memorial to March 24, 2025, and for Mexico to submit its Counter-Memorial to November 3, 2025. The case was initiated by Luxembourg in June 2024, stemming from the detention of the Luxembourg-flagged vessel "Zheng He" by Mexican authorities in October 2023. According to Luxembourg's claim, the "Zheng He," engaged in high seas navigation, sought to dock at the port of Tampico, Mexico, for refueling and maintenance. However, upon arrival, Mexican officials decided to impose sanctions, controversially classifying the vessel as an imported "good" and demanding customs duties proportional to its value. While a Mexican District Court later annulled the initial customs procedure in March 2024, the vessel remained detained, prompting Luxembourg to bring the case before ITLOS. Luxembourg argues that Mexico's actions violate several articles of the United Nations Convention on the Law of the Sea, including those guaranteeing freedom of navigation and the rights of flag states. Luxembourg is seeking a ruling from ITLOS that Mexico immediately cease its violations, release the "Zheng He," and provide compensation for damages incurred due to the prolonged detention.



Regional News

Africa

ACtHPR CONCLUDES PUBLIC HEARING IN *DR CONGO V. RWANDA* CASE (14 Feb. 2025)

The African Court on Human and Peoples' Rights (ACtHPR) concluded a two-day public hearing in Arusha, Tanzania, regarding Application No. 007/2023, *Democratic Republic of Congo v. Republic of Rwanda*. The DRC alleges human rights violations related to the armed conflict in eastern DRC since 2021, involving its armed forces and the M23 rebel group, which, according to the Applicant, is supported by the Republic of Rwanda. Rwanda raised objections to the Court's jurisdiction, to which the DRC responded. The Court will now deliberate. Details of the case can be accessed [here](#).



"A man carries water in a camp for displaced people in Goma [eastern DRC]" (UN News).

ACtHPR MARKS OPENING OF 2025 JUDICIAL YEAR WITH A CALL FOR REPARATIONS (4 Feb. 2025)

The African Court on Human and Peoples' Rights commenced its 2025 Judicial year in Arusha, Tanzania, with the theme of "Advancing Justice through Reparations".

H.E. José Maria Pereira Neves, President of Cape Verde, as guest of honor, highlighted the need for holistic reparations beyond mere financial compensation. African Union's Dr. Monique Nsanzabaganwa reaffirmed commitment to tangible outcomes, while Court President Hon. Lady-Justice Imani Daud About emphasized reparations as integral to justice.

ACHPR: ZERO TOLERANCE WITH FEMALE GENITAL MULTILATION (6 Feb. 2025)

The Special Rapporteur on the Rights of Women in Africa, Ms. Janet Ramatoulie Sallah-Njie, on behalf of the African Commission on Human and Peoples'

Rights (ACHPR), reaffirmed the commitment to eradicating Female Genital Mutilation (FGM) on the *International Day of Zero Tolerance for FGM*.

While acknowledging progress in criminalizing FGM, the Special Rapporteur highlighted concerns about potential reversals, such as the attempted decriminalization in The Gambia.

The ACHPR calls for robust enforcement, community engagement, and education to eliminate FGM.

ACtHPR DELIVERS SEVEN NEW JUDGMENTS (4 Feb. 2025)

The African Court on Human and Peoples' Rights announced the delivery of seven new judgments, adopted during its 75th Ordinary Session, pertaining to the following cases*:

- *Ladislau Chalula v. United Republic of Tanzania* (Application No. 003/2018);
- *Centre for Human Rights and Others v. United Republic of Tanzania* (Application No. 019/2018);
- *Boniface Alistedes v. United Republic of Tanzania* (Application No. 025/2018);
- *Brahim Ayed v. Republic of Tunisia* (Application No. 008/2019);
- *Ange Yao Nguessan v. Republic of Côte d'Ivoire* (Application No. 034/2019);
- *Houngue Eric Noudehouenou v. Republic of Benin* (Application No. 020/2020);
- *Kouadio Kobena Fory v. Republic of Côte d'Ivoire* (Application No. 004/2021).

* As of the closing date of this edition of the Facts and Norms Newsletter, the decisions were not publicly available due to instabilities on the African Court's official website.

ACHPR CONCERNED ABOUT SUB-SAHARAN MIGRANTS IN LIBYA (3 Feb. 2025)

The African Commission on Human and Peoples' Rights (ACHPR) expressed serious concern over reports of kidnapping, torture, and ill-treatment of sub-Saharan migrants by human traffickers in Libya. The Commission calls on Libya to conduct an independent investigation into these alleged violations, hold perpetrators accountable, and uphold its obligations under the African Charter on Human and Peoples' Rights. The ACHPR also recalls its *Guiding Principles on the Human Rights of Migrants* and relevant AU policies on migration and preventing migrant smuggling.

BURKINA FASO, MALI, AND NIGER OFFICIALLY WITHDRAW FROM ECOWAS (30 January 2025)

Burkina Faso, Mali, and Niger's withdrawal from the



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Economic Community of West African States (ECOWAS) is now effective, as of January 29, 2025. ECOWAS Commission President Dr. Omar Aliou Touray announced continued recognition of national IDs and passports with the ECOWAS logo, maintaining trade liberalization and visa-free movement for citizens of these countries until future relations are determined. The Commission also set up a structure to discuss future engagements with each of the three countries.

ACHPR CONCERNED OVER PRISON TREATMENT IN SEYCHELLES (23 Jan 2025)

The African Commission on Human and Peoples' Rights expressed deep concern regarding the deaths and injuries of detainees at Montagne Posée Prison in Seychelles on December 5, 2024. The Commission urges the Seychelles government to conduct an independent investigation, provide access to remedies for victims' families, ensure due process for detainees, and improve detention conditions in accordance with the African Charter on Human and Peoples' Rights and the *Luanda Guidelines on the Conditions of Arrest, Police Custody, and Pre-Trial Detention*.

Americas

INTER-AMERICAN COURT OF HUMAN RIGHTS CONCLUDES 172ND SESSION: NEW JUDGES, KEY HEARINGS, AND INITIATIVES (14 Feb. 2025)

The Inter-American Court of Human Rights (IACHR) concluded its 172nd Ordinary Session, held from January 27 to February 12, 2025.

The session began with the Inauguration Ceremony of the Inter-American Judicial Year 2025. Two new judges, Alberto Borea Odría and Diego Moreno Rodríguez, were sworn in for the 2025-2030 term. A key highlight of the opening ceremony was the presentation of the *American Convention on Human Rights Interpreted and Illustrated For, and By, Children and Adolescents* (in Spanish).

The IACHR also held public hearings in eight contentious cases: *García Romero et al. v. Ecuador*, *Lalinde et al. v. Colombia*, *Ascencio Rosario et al. v. Mexico*, *Rodríguez Pighi v. Peru*, *Silva Reyes et al. Vs. Nicaragua*, *Chirinos Salamanca et al. Vs. Venezuela*, *Zapata et al. Vs. Colombia*, and *Hernández Norambuena Vs. Brazil*.

The hearing for the *Ascencio Rosario et al. v. Mexico* case marked the first time the Court

provided psychological support to an alleged victim through its Victims Assistance Fund, and the first time a hearing was fully interpreted into an indigenous language (Nahuatl).



Cover of the book. [Click here](#) or on the image above to download the full book.

The Court also held a public hearing on the implementation of provisional measures in the *Juan Sebastián Chamorro et al. v. Nicaragua* case, subsequently expanding these measures to include an additional beneficiary and their family. The Court further approved resolutions on the supervision of compliance with judgments in the following cases: *Valle Ambrosio et al. v. Argentina*, *Rodríguez Revolorio et al. v. Guatemala*, *Inhabitants of La Oroya v. Peru*, and *De La Cruz Flores v. Peru*. Four private hearings were also held to supervise compliance in cases concerning traditional communities in Suriname and Panama: *Indigenous Peoples Kuna of Madungandí and Emberá of Bayano and their members v. Panama*, *Moiwana Community v. Suriname*, *Saramaka People v. Suriname*, and *Kaliña and Lokono Peoples v. Suriname*.

INTER-AMERICAN COURT FINDS ECUADOR RESPONSIBLE FOR THE TORTURE AND DEATH OF MR. AGUAS ACOSTA (11 Feb. 2025)

The Inter-American Court of Human Rights found the State of Ecuador internationally responsible for the torture and subsequent death of Aníbal Alonso Aguas Acosta.

The case concerns Mr. Aguas Acosta's death on March 1, 1997, following his arrest after an incident at a commercial establishment. He resisted arrest, and several officers subdued him. Upon arrival at the police station, he was unconscious and bleeding, and was later pronounced dead at a hospital. The autopsy revealed he died from a cerebral hemorrhage and a dislocated neck joint, caused by



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multiple traumas, including the separation of his head from his body. Although two officers received eight years of prison due to corporal torment, they never served the prison sentence. In 2019, The sentence was prescribed. Since January 2021, the Prosecutor's Office keeps the file opened for torture, without dismissing the existence of an alleged crime of extrajudicial execution. The Court dismissed a preliminary objection raised by the State. The Court found that Mr. Aguas Acosta was subjected to abusive and lethal force while in police custody, resulting in severe injuries and death from head trauma. The Court concluded that the State violated his rights to life and personal integrity. The autopsy confirmed that Mr. Aguas Acosta died from multiple injuries and a dislocation that separated his head from his body. The Court classified these acts of intentional violence while the victim was in custody as torture and held the State responsible for violating Mr. Aguas Acosta's right to personal integrity and to not be subjected to torture.

Furthermore, the Court observed that Ecuador had failed to demonstrate the existence of specific internal regulations on the use of force at the time of the events, thus breaching its obligation to adopt domestic legal provisions in accordance with the American Convention.



Judge Nancy Hernández López, President of the Inter-American Court (IA Court).

The Court also determined that the investigation into Aguas Acosta's death lacked independence and impartiality due to the involvement of the police jurisdiction. It highlighted that the conviction of the police officers was never enforced due to their non-appearance and lack of state diligence, leading to the statute of limitations expiring on the sentence. This violated the family's right to access justice. Furthermore, the Court determine at the time of the events, Ecuador did not have typified torture as a

crime.

Finally, the Court ruled that Mr. Aguas Acosta's death significantly impacted his children, violating their rights to family protection and childhood, and that the State violated the family's right to personal integrity.

As a result, the Court ordered various reparation measures, including continuing the criminal investigations, providing medical and psychological treatment to the victims, and issuing a public acknowledgment of responsibility.

INTER-AMERICAN COURT HOLDS ECUADOR RESPONSIBLE FOR VIOLATING JUDICIAL AND LABOR RIGHTS OF FORMER FISHERIES INSTITUTE EMPLOYEE ([30 Jan. 2025](#))

In the case of *Peralta Armijos v. Ecuador*, the Inter-American Court of Human Rights found the State of Ecuador internationally responsible for violating the rights to judicial guarantees, judicial protection, and work of Félix Humberto Peralta Armijos, a former employee of the National Fisheries Institute.



The Court's headquarters in San Jose, Costa Rica (IA Court).

The Court determined that Ecuador failed to comply with a 2003 Ecuadorian Supreme Court ruling that favored Peralta Armijos. This 2003 ruling overturned an administrative decision to appoint another individual to a human resources analyst position for which Peralta Armijos had applied and met the requirements. The IACHR found that the Ecuadorian Supreme Court had recognized Peralta Armijos's right to the promotion based on his qualifications and seniority, but the National Fisheries Institute (INP) effectively ignored the ruling by holding a new, closed competition and re-appointing the same individual.

Further, the Court found that Ecuadorian courts acted arbitrarily in refusing to order payment of lost wages to Peralta Armijos in a separate legal action challenging his 2005 dismissal from the INP,



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which followed a disciplinary proceeding initiated in 2004. The dismissal was later deemed illegal by Ecuadorian courts, and Peralta Armijos was reinstated in 2009, but without back pay. As a consequence, the IACHR ordered Ecuador to pay Peralta Armijos a specific sum for lost wages incurred during his wrongful dismissal and to regularize his pension, accounting for missed contributions during that period. The Court also ordered Ecuador to publish the official summary of the judgment in the Official Registry, publish the full judgment on the websites of the Public Institute for Research on Aquaculture and Fishing and the National Court of Justice, and disseminate the judgment on those institutions' social media accounts.

Judges Humberto Antonio Sierra Porto and Patricia Pérez Goldberg issued individual, partially dissenting opinions. Judge Pérez Goldberg argued that the Court should have found a violation of Article 23.1(c) (Right to Participate in Government) of the Convention under the *iura novit curia* principle, instead of Article 26 (Progressive Development of Economic, Social, and Cultural Rights). Judge Sierra Porto reiterated his long-standing objection to the Court's direct justiciability of economic, social, cultural, and environmental rights under Article 26 (Progressive Development of Economic, Social, and Cultural Rights). The full text of the judgment can be accessed [here](#).

Europe

EUROPEAN COURT CONDEMNS RUSSIA'S CRACKDOWN ON ANTI-WAR DISSENT (11 Feb. 2025)

The case of *Novaya Gazeta and Others v. Russia* (applications nos. 11884/22 and 161 others) concerned legislation introduced after the 2022 invasion of Ukraine making it an offence to "discredit the military" or spread "fake news" about its actions. As a result, 178 individual applicants in the case were criminally or administratively convicted and media outlets Novaya Gazeta and Dozhd TV were shut down. Criminal and administrative penalties included hefty fines, pre-trial detention, and lengthy prison sentences, for actions ranging from displaying "No to War" signs to reporting on alleged war crimes.

The European Court of Human Rights (Third Section) held, unanimously, that there had been a violation of Article 10 (freedom of expression) of

the European Convention on Human Rights, concluding that Russia engaged in a deliberate, systemic effort to suppress dissent and enforce the Kremlin's "special military operation" narrative. Domestic courts failed to justify restrictions on applicants' rights or balance them against the public interest in information about the conflict. The severity of the punishments, including a 25-year prison sentence for opposition politician Vladimir Kara-Murza, demonstrate an intention to intimidate the wider public and foster self-censorship. The Court also found a violation of Article 34 (right of individual application) because Russia ignored the Court's interim measures by revoking Novaya Gazeta's publication license and blocking its websites.

Lastly, regarding five individual applicants, the Court identified additional violations: Article 3 (prohibition of inhuman treatment) concerning confinement to a metal cage and narrow glass cabin during hearings about detention; Article 5 (right to liberty) concerning arrests, pre-trial detention and delays in examining appeals against detention orders; and Article 8 (right to privacy) concerning unjustified home searches.

In a concurring opinion, Judge Darian Pavli reflected on the Court's role in safeguarding democracy, questioning whether the Court had "sounded the alarm loudly enough, and early enough" in response to Russia's dismantling of democratic freedoms.

NO VIOLATION FOUND IN CASE OF TURKISH SOLDIER'S SELF-INFLICTED WOUND (11 Feb. 2025)

The case of *Aydoğan v. Türkiye* (application no. 7355/20) concerned a conscript, Mr. Harun Aydoğan, who sustained a serious gunshot wound after using his service weapon against himself during his mandatory military service in 2013. He was saved by medical intervention but declared unfit for further military service.

The European Court of Human Rights (Second Section) held, unanimously, that there had been no violation of Article 2 (right to life) of the European Convention on Human Rights.

The Court concluded that there was no evidence that military authorities knew or should have known of a real and immediate risk of the applicant harming himself. There was no prior indication of mental health issues, and, although he spoke to fellow soldiers about his unhappiness with military service, his general complaints, and even comments



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about a dream of self-harm, were not deemed sufficient to trigger a duty on the part of his superior officers to take specific preventative measures. The applicant had not informed his superior officers directly of any statements expressing a desire to commit suicide. Although an administrative investigation found some shortcomings in the admission and training process (e.g. a brief orientation, a lack of a full medical check-up before being assigned to armed guard duty, and insufficient steps to ascertain his personality), the Court held that there was no causal link between these faults and the applicant's self-inflicted injury. Imposing responsibility on the authorities, in this instance, was held to be an excessive burden.

The Court also found that the procedural aspect of Article 2 was not violated. It determined that the criminal investigation, initiated *ex officio*, was adequate, prompt, thorough, and independent. The investigation included witness interviews, medical and ballistic reports, and a site examination. The applicant had sufficient opportunity to participate in the proceedings. The Court similarly found no arbitrariness or manifest unreasonableness in the High Military Administrative Court's decision to reject the applicant's compensation claim, finding the court's assessment of the evidence and conclusions to be well-reasoned. The fact that the applicant did not appeal the prosecutor's decision not to prosecute anyone was also a factor.



Courtroom of the European Court of Human Rights (Wiki Images).

ITALY'S TAX INSPECTION VIOLATES RIGHT TO PRIVACY (6 Feb. 2025)

The European Court of Human Rights (First Section) has ruled that Italy's system for accessing and inspecting business premises for tax purposes violates Article 8 of the European Convention on

Human Rights (right to respect for home and correspondence).

The case, *Italgomme Pneumatici S.r.l. and Others v. Italy* (applications nos. 36617/18 and 12 others), involved thirteen applications from twelve Italian companies and one individual, Mr. Terrenzio, who lodged his application on behalf of a company of which he is the sole proprietor.

The applicants challenged the broad powers granted to Italian tax authorities to access business premises, inspect documents, and in some cases, seize accounting records, company books, invoices, and other materials for tax assessment purposes. The applicants argued that the legal framework lacked sufficient safeguards against abuse and arbitrariness.

The Court held, unanimously, that there had been a violation of Article 8. It found that the Italian legal framework did not meet the "quality of law" requirements under the Convention. The law gave authorities excessive discretion regarding the scope and conditions of inspections, with insufficient limits on their power. The authorizations for the measures often lacked specific reasoning, allowing for potentially exploratory searches. There was no requirement for prior judicial authorization for inspections of business premises, and the available *ex post* judicial review was deemed ineffective. Tax courts offered limited and delayed recourse, and civil court remedies were uncertain and lacked practical effectiveness. The Taxpayer's Guarantor, a body intended to protect taxpayers' rights, lacked binding decision-making power. The Court also indicated there was a systemic problem, noting that the shortcomings identified "are liable to give rise to further justified applications in the future" and that the breach of Article 8 "resulted from the content of the relevant domestic law, as interpreted and applied by the domestic courts".

The Court did not find it necessary to separately examine the complaint made by the Applicants under Article 6 § 1 (right to a fair trial/access to justice), as the Court had already dealt with the main legal questions raised by the case.

Under Article 46 (binding force and execution of judgments), the Court called on Italy to take general measures to bring its legislation and practice into line with the judgment. It emphasized the need for specific rules in domestic law, indicating clear circumstances for access and inspections, establishing safeguards, and providing for effective judicial review of those measures.



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UKRAINE VIOLATED FAIR TRIAL IN SUPREME COURT'S REINTERPRETATION OF LAW (6 Feb. 2025)

The case of *Ukrkava, TOV v. Ukraine* (application no. 10233/20) concerned the Ukrainian Supreme Court's reinterpretation of a statutory time-limit, specifically a provision of the Notary Act.

The law stated a one-year limitation to notarize endorsements of mortgage documents in disputes between two businesses. Ukrkava, a limited liability company, contested a bank's notarization of a mortgage document, arguing it was done outside this one-year limit. The lower courts agreed, but the Supreme Court's Grand Chamber reversed this, reinterpreting the law to impose a three-year limit, regardless of the parties' status.

The European Court of Human Rights (Fifth Section) held, unanimously, that there had been a violation of Article 6 § 1 (right to a fair trial) of the European Convention on Human Rights. The European Court found that the Supreme Court's reinterpretation of a clear and unambiguous legal provision was unforeseeable and undermined the principle of legal certainty.

The European Court emphasized that while case-law can evolve, the Supreme Court's action in this instance resembled a legislative amendment rather than a clarification of existing law. The Constitutional Court of Ukraine had confirmed the clarity of the original provision, leaving no room for judicial interpretation. The Supreme Court's attempt to harmonize the Notary Act with the Civil Code, while perhaps well-intentioned, overstepped its judicial role and failed to provide compelling reasons for such a drastic change, or to consider its effects on legal certainty.

The European Court did not find it necessary to separately examine the complaint under Article 1 of Protocol No. 1 (protection of property), as the main legal issue was addressed under Article 6. The applicant made no claim for damages.

EUROPEAN COURT FINDS POLAND VIOLATED ROMA FAMILIES' RIGHTS IN ENCAMPMENT DEMOLITION (6 Feb. 2025)

The case of *Caldarar and Others v. Poland* (application no. 6142/16) concerned the 2015 demolition of an encampment built by five Romanian Roma families, without planning permission, in Wrocław. The families (sixteen individuals) were not made parties to the administrative proceedings leading to the

demolition orders, nor were they formally notified of the decisions.

The European Court of Human Rights (First Section) held, by five votes to two, that there had been a violation of Article 8 (right to respect for private and family life) of the European Convention on Human Rights. The Court found that Polish authorities failed to ensure a fair decision-making process that complied with convention standards. Crucially, the applicants were not given the opportunity to participate in the proceedings or have the proportionality of the demolition orders, and the consequent risk of their becoming homeless, examined by the domestic courts. While acknowledging that alternative accommodation and financial aid were offered, the Court highlighted the applicants' vulnerability as members of a marginalized minority and the lack of formal safeguards in the process. The demolition's impact on the families' community lifestyle was also considered.



Courtroom of the European Court of Human Rights (Grand Chamber) (Wiki Images).

The applicants also alleged discrimination based on their Roma ethnicity in relation to the violation of their right to private and family life (Article 8). The Court, having already considered their vulnerability as a minority in its Article 8 analysis, found that no separate issue arose under Article 14 (discrimination) in conjunction with Article 8.

A separate complaint regarding the destruction of their belongings (under Article 1 of Protocol No. 1, concerning property rights, combined with Article 14, concerning discrimination) was declared *inadmissible* because the applicants had not exhausted domestic remedies.

In conclusion, the complaint that article 13 (right to an effective remedy), in conjunction with Article 8, had been breached, was declared admissible; however, having regard to the reasons that led the



court to its finding of a violation of Article 8, the European Court considered that it was not necessary to examine the complaint under Article 13 separately.

In a joint dissenting opinion, Judges Krzysztof Wojtyczek and Alena Poláčková argued that the application was inadmissible because the applicants had failed to exhaust available domestic remedies that could have offered redress *ex post facto*. They also disagreed with the finding of a violation of Article 8, believing the demolition was justified and that sufficient alternative housing options had been offered.

UKRAINIAN COURT OF APPEAL ACTIVELY SOUGHT NEW EVIDENCE IN BREACH OF THE PRINCIPLE OF IMPARTIALITY (6 Feb. 2025)

The case of *Gaydashevskyy v. Ukraine* (application no. 11553/21) concerned a Ukrainian national, Mr. Gaydashevskyy, convicted of driving under the influence of drugs. The conviction was upheld by the Khmelnytskyi Court of Appeal, where the applicant argued that the evidence used against him was inadmissible because it did not meet the regulatory requirement for laboratory testing of intoxication.

The European Court of Human Rights (Fifth Section) held, unanimously, that there had been a violation of Article 6 § 1 (right to a fair trial by an impartial tribunal) of the European Convention on Human Rights. The core issue was the *absence* of a prosecuting party (either a prosecutor or the police officer who issued the initial report) at the Court of Appeal hearings. This situation, combined with other factors, raised serious doubts about the court's objective impartiality. Critically, the Court of Appeal did *not* simply review existing evidence. Instead, it *actively sought out* new evidence detrimental to the applicant. The Court of Appeal, on its own motion, requested additional information from the medical center that had initially tested the applicant. This information, stating that a quick test constituted "laboratory testing" and specifying the drugs detected (amphetamine and marijuana), was then used to *contradict* the applicant's defense that proper procedures weren't followed. The original test document didn't specify drug type.

The European Court found that by taking this active role in gathering evidence against the accused, in the absence of any prosecuting party to present that side of the case, the Court of Appeal created an

"impression of confusion" between the roles of prosecutor and judge. This raised justifiable doubts about the court's objective impartiality.

The European Court distinguished the situation from that in the recent *Figurka v. Ukraine*, where the Court found no violation, highlighting that in that case, the domestic court, despite the absence of a prosecuting party in the proceedings, had not taken the steps of defining what constituted a key issue, and of further collecting on its own motion evidence to establish that the applicant had committed the incriminated acts.

The Court made no award of just satisfaction, as the applicant did not submit a claim.

SPAIN VIOLATED RIGHTS OF WOMAN DETAINEE WITH MENTAL ILLNESS (6 Feb. 2025)

The case of *M.B. v. Spain* (application no. 38239/22) concerned the detention of a Moroccan national with a history of mental health problems, who was acquitted of aggravated arson on grounds of diminished responsibility. Following her acquittal, she was subjected to a security measure of continued detention for a period of between five and fifteen years.

The European Court of Human Rights (Fifth Section) held, unanimously, that there had been a violation of Article 5 § 1 (right to liberty and security) of the European Convention on Human Rights. The Court found that the imposition of the security measure fell short of the guarantees against arbitrariness required by the Convention. The domestic courts' assessment of the applicant's mental health was limited to the day of the offence (setting fire to her flat), almost two years before the security measure was imposed. The domestic courts failed to establish, at the time of imposing the continued detention, whether her mental condition had improved, whether she posed a danger to herself or others, or what her therapeutic or medical needs were. There was no assessment, as required by Spanish law, of whether a prediction of her future behavior would reveal the likelihood of her committing further offences.

The lack of a sufficiently reasoned decision establishing both the existence of a "true mental disorder" warranting compulsory confinement at the time of the order, and the necessity of that confinement, meant that the detention was not "lawful" under Article 5 § 1 (e).

The European Court declared complaints about the length and conditions of pre-trial detention



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inadmissible because the applicant had failed to exhaust domestic remedies.

The European Court ultimately awarded 20,000 EUR for non-pecuniary damage.

EUROPEAN COURT FINDS MALTA'S REMOVAL OF UIGHUR COUPLE TO CHINA WOULD VIOLATE HUMAN RIGHTS [\(4 Feb. 2025\)](#)

The case of *A.B. and Y.W. v. Malta* (application no. 2559/23) concerned the planned removal to China of two Uighur Muslims, A.B. and Y.W., a married couple, who arrived to Malta in 2016.

Their initial asylum claim, made in that same year, was rejected in 2017. In 2022, after they applied for a residence permit, Maltese authorities discovered that the applicants were staying in Malta without permission, and ordered their return to China. The couple challenged the removal before the Immigration Appeals Board (IAB), arguing that their removal from Malta would constitute a violation of the principle of *non-refoulement*.

The IAB relied on the 2017 assessment and confirmed the removal, stating that the couple had "failed to produce further evidence to substantiate the principle of *non-refoulement* post judgment" of the asylum appeal.

The European Court of Human Rights (Fourth Section) held, unanimously, that there would be a violation of Article 3 (prohibition of inhuman or degrading treatment) of the European Convention on Human Rights if the applicants were removed to China without a new, rigorous risk assessment. The European Court found that Malta had failed in its procedural obligation to properly assess the risk of ill-treatment, because the IAB simply confirmed a six-year-old assessment. Domestic authorities were obliged to consider the current situation in the Xinjiang Uighur Autonomous Region (XUAR), where evidence exists (including from the UN Office of the High Commissioner for Human Rights, the European Parliament, and other bodies) of human rights violations against Uighurs and other Muslim minorities, including arbitrary detention, torture, and forced labor.

The European Court rejected Malta's argument that the applicants should have lodged a *subsequent* asylum application. It found that the couple exhausted the relevant remedy, the IAB appeal, which had the competence to examine the removal under the *non-refoulement* principle, but failed to carry out a fresh assessment *ex nunc*. The Court also held that it was not necessary to rule

separately on the complaints under Article 13 (right to an effective remedy) in conjunction with Article 3. This was because the Court's finding of a procedural violation of Article 3 – namely, the State's failure to conduct a proper risk assessment – inherently addressed the lack of an effective remedy to challenge that risk.



The European Court of Human Rights (Wiki Images).

RUSSIA DISCRIMINATED AGAINST GAY MEN IN DATA BREACH CASE [\(4 Feb. 2025\)](#)

The case of *Bazhenov and Others v. Russia* (applications nos. 8825/22 and 19130/22) concerned the non-consensual online publication of private information, including the sexual orientation, of three gay men. The data, which included names, photographs, and addresses, was posted on Russian social media platform VKontakte, with some posts originating from explicitly homophobic groups. One of the applicants was also targeted in posts by a notorious "gay basher" activist. The applicants, who are in a same-sex marriage registered in Europe, reported the data breaches to Russian authorities, requesting criminal investigations.

The European Court of Human Rights (Third Section) held, unanimously, that there had been a violation of Article 14 (prohibition of discrimination) in conjunction with Article 8 (right to respect for private and family life) of the European Convention on Human Rights. The Court found that Russian authorities failed to fulfill their positive obligation to protect the applicants' private lives. The investigation into the data breaches was inadequate and superficial. Investigators did not take obvious steps to identify the perpetrators, repeatedly refused to open a criminal case, and ignored the applicants' complaints that the breaches were motivated by homophobia. The Court noted that, given the openly homophobic context of the posts, a proper investigation required consideration of a possible



discriminatory motive.

The Court emphasized the vulnerability of the LGBTI community in Russia and their need for special protection, referencing the Russian Supreme Court's 2023 decision labelling the "international LGBT public movement" an "extremist organization".

The Court concluded that the applicants were the subject of discrimination, and chose not to examine the remaining complaints of the Applicants – under Article 8 alone and Article 13 (right to an effective remedy) –, as the issues raised by those complaints were already fully addressed within the finding of discrimination in the context of a privacy breach.



Piece of Berlin Wall in front of the European Court of Human Rights (Wiki Images).

EUROPEAN COURT RULES AGAINST RUSSIA'S "GAY PROPAGANDA" LAW (4 Feb. 2025)

The case of *Klimova and Others v.*

Russia (applications nos. 33421/16 and 6 others) involved Russia's law prohibiting the "promotion of non-traditional sexual relationships" to minors. Six applicants were either fined or had their online content (websites, social media groups) blocked for allegedly violating this law. The content in question included support resources for LGBT teenagers, personal stories, information on LGBT rights, and

online groups for meeting and socializing.

The European Court of Human Rights (Third Section) held, unanimously, that there had been a violation of Article 10 (freedom of expression) of the European Convention on Human Rights in all six applications. The Court found that the restrictions were based solely on considerations of sexual orientation, without any evidence that the material was harmful to children. The restrictions reinforced stigma and prejudice, clashing with core principles of equality, pluralism, and tolerance.

Regarding two of the applicants, whose convictions were for content posted by users (without pre-moderation) the Court found the interference was not "in accordance with the law," because domestic law gave no ability for the administrators to foresee the consequences of failing to delete third-party content.

In one application, the Court also found a violation of Article 8 (right to private life). Security services had collected extensive personal data from a social networking platform, including sensitive information about an applicant's political opinions. The collection lacked sufficient legal safeguards and was disproportionate, particularly given that it was used for investigating a minor administrative offense.

The Court applied principles previously outlined in cases like *Bayev and Others v. Russia* (2017) and *Macatė v. Lithuania* (2023), which highlighted the discriminatory nature and harmful effects of laws restricting information about same-sex relationships. It stressed the importance of protecting online anonymity, as means of avoiding reprisals.

LITHUANIA VIOLATED PROPERTY RIGHTS IN PROTECTED AREA CASE (4 Feb. 2025)

The case of *Skučai v. Lithuania* (application no. 60969/21) concerned the annulment of the applicants' title to a house built in the Curonian Spit National Park, a UNESCO World Heritage site, despite having obtained all necessary permits. The applicants, Mr. Juozas Skučas and Ms. Indrė Skučienė, subsequently filed compensation claims against the State, portions of which were dismissed as time-barred by domestic courts.

The European Court of Human Rights (Second Section) held, unanimously, that there had been a violation of Article 1 of Protocol No. 1 (protection of property) of the European Convention on Human Rights. The Court found that the domestic courts, in dismissing some of the applicants' compensation



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claims as time-barred, had deprived them of a reasonable opportunity to effectively present their case. This was despite prolonged negotiations with the authorities concerning a possible settlement and the authorities' own actions staying the order to return the property.

The Court's judgment highlighted that domestic law allowed for extensions of statutory limitation periods for good reason, and the Supreme Administrative Court's case-law emphasized avoiding a mechanical application of such periods. The dismissal had not struck a fair balance.

Although the applicants were compensated some amount in separate proceedings during the liquidation of the seller (a private company), there are ongoing domestic proceedings regarding the payment of additional compensations to them from the State, following a claim lodged by the prosecutor in the public interest. Part of the applicants' claims relating to the difference between the sum originally ordered by the national courts and the increased market value of their property, had been declared inadmissible for being lodged too late.

The Court did not examine separately the applicants' claims regarding Article 6 § 1 (right to a fair trial) and Article 8 (right to respect for private and family life), as they also relate to the lack of compensation and the way the courts handled it – an aspect that the Court examined while addressing the complaint under Article 1 of Protocol No. 1. Furthermore, the Court declared that the other claims by the applicants, apart the tax claims and non-pecuniary claim, were inadmissible. These other claims are composed of

- i) compensation for the purchase price of the house (the Court considered this claim "premature" because the Lithuanian courts hadn't finished dealing with it); and
- ii) compensation for the increased market value of the house (a similar claim was made by the Applicants in earlier domestic proceedings, which was dismissed in 2013; they tried to raise it again, but the ECtHR ruled that they had missed the six-month deadline to bring that specific issue to the European Court after the 2013 domestic decision). The Court ultimately awarded the applicants EUR 8,749 for pecuniary damages (specifically for taxes and expenses incurred related to the property) and EUR 8,000 for non-pecuniary damage.

ITALY VIOLATED RIGHT TO LIFE IN
LANDMARK POLLUTION CASE ([30 Jan. 2025](#))

The case of *Cannavacciuolo and Others v. Italy* (applications nos. 51567/14 and 3 others) concerned the long-standing and widespread pollution in the Campania region of Italy, known as "Terra dei Fuochi" (Land of Fires), caused by decades of illegal dumping and burning of hazardous, special, and urban waste, often by organized crime groups. The applicants, individual residents and environmental associations from the affected area, argued that the Italian authorities had failed to protect their lives and health from this environmental catastrophe.

The European Court of Human Rights (First Section) held, by a majority, that there had been a violation of Article 2 (right to life) of the European Convention on Human Rights in respect of the individual applicants. The Court found that the Italian authorities had failed to approach the "Terra dei Fuochi" problem with the diligence required by its seriousness and had not taken all necessary steps to protect the applicants' lives from the genuine and imminent risk posed by the ongoing pollution.

The Court highlighted the lack of a systematic, coordinated, and structured response from the Italian authorities to address the decade-long pollution phenomenon.

The Court noted the existence of a sufficiently serious, genuine, ascertainable, and imminent risk to life due to the widespread pollution, emphasizing that the absence of complete scientific certainty about the pollution's precise health effects did not negate the State's protective duty emanating from the human right to life.

To address the systemic nature of the problem, the Court issued a pilot judgment, indicating detailed general measures that Italy must implement within two years. These measures include a comprehensive strategy to tackle the "Terra dei Fuochi" issue, bringing together existing and planned actions with an independent monitoring mechanism and a public information platform. While finding a violation of Article 2 for individual applicants, the Court declared the complaints of the applicant associations inadmissible *ratione personae*, finding they lacked "victim status" as they were not directly affected by the alleged violations in a way that engaged Article 2 or Article 8 rights. The Court also deemed inadmissible certain applications who could not sufficiently demonstrate residence within the affected areas or failed to comply with the six-month time limit.

In a concurring opinion, Judge Frédéric Krenç



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expressed reservations regarding the Court's restrictive stance on the *locus standi* of environmental associations. He questioned the sharp distinction drawn between climate change cases, where association standing was recently broadened (v.g. in the *KlimaSeniorinnen* case), and other environmental pollution cases, arguing that both types of cases concern the fundamental right to a healthy environment and deserve equal consideration. He suggested that the Court's approach of *locus standi* should be re-evaluated in light of the vital role associations play in environmental protection and access to justice. In a partly concurring, partly dissenting opinion, Judge Georgios A. Serghides further dissented from the inadmissibility ruling concerning the applicant associations. He contended that the distinction between climate change and environmental pollution for *locus standi* purposes was overly technical and not substantive. He emphasized the widespread and intergenerational impact of the "Terra dei Fuochi" pollution, arguing it presented "special features" akin to climate change. He stressed that the term "victim" in Article 34 should be interpreted broadly and evolutively to include these associations, crucial "watchdogs" in environmental crises. Judge Serghides also disagreed with the Court's decision not to separately examine the complaints under Articles 8 and 13, and procedural Article 2, referencing his separate opinion in *Adamčo v. Slovakia* (no. 2) for a detailed explanation of his reasoning on this point.



"Fire on the area of Pascarola-Caivano (Italy) appeared the 18th of June 2012. In this area, nicknamed the Land of Fires, many wastes are burned without control by the authorities in the middle of the lands." (Wiki Images).

FRANCE CONDEMNED IN "MARITAL DUTY" DIVORCE CASE (23 Jan. 2025)

The European Court of Human Rights (Fifth Section) has condemned France for violating a woman's right to privacy after she was divorced for "fault" due to refusing sexual relations with her husband. The case, *H.W. v. France* (application no. 13805/21), centered on the French legal concept of

"devoir conjugal" (marital duty), which has traditionally been interpreted to include an obligation for spouses to engage in sexual relations. The French Court of Appeal had previously granted the divorce to the husband, finding that the wife's refusal of intimacy constituted a "serious and repeated violation" of her marital obligations. The woman, identified only as H.W., argued that this violated her fundamental rights.

The European Court, ruling unanimously, held that the French courts' application of the "marital duty" concept, without considering the crucial element of *consent*, violated Article 8 (right to respect for private and family life) of the European Convention on Human Rights. The Court strongly emphasized that any non-consensual sexual act, even within marriage, is a form of violence.

The judgment highlighted that the French legal framework, in this instance, imposed a prescriptive obligation on spouses concerning their sexual lives, contrary to principles of sexual freedom and bodily autonomy. The Court pointed out that France, as a signatory to the European Convention, has a positive obligation to protect individuals from domestic and sexual violence – an obligation that the "marital duty" concept directly undermined. The Court observed that the husband had other legal options available to him to seek a divorce, specifically citing the grounds of "definitive alteration of the marital bond." The ruling highlights that the state must strike a fair balance between the rights of individuals in divorce proceedings, and in this case, that balance was not achieved.

The European Court did not award financial compensation, as the applicant sought only symbolic recognition of the violation. The Court deemed the finding of a violation itself to be sufficient just satisfaction.



The European Court of Human Rights (Source: Council of Europe).



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EUROPEAN COURT FINDS UKRAINE VIOLATED LAWYER'S RIGHTS IN HOME SEARCH (23 Jan. 2025)

The case of *Reznik v. Ukraine* (application no. 31175/14) concerned the search of a lawyer's home in 2013 in the context of criminal proceedings against his client, a state-owned IT company. Police seized documents and data storage devices during the search. The lawyer, Mykhaylo Reznik, argued the search lacked sufficient safeguards to protect legal professional privilege.

The European Court of Human Rights (Fifth Section) held, unanimously, that there had been a violation of Article 8 (right to respect for private and family life, home and correspondence) of the European Convention on Human Rights. The Court found that, despite improvements to Ukrainian law since a previous judgment (*Golovan v. Ukraine*), serious doubts remained about the quality of procedural safeguards protecting legal privilege.

The search warrant was overly broad, lacking sufficient reasoning, and authorized the seizure of electronic devices without adequate safeguards for potentially privileged material. The seizure, removal and access by officials to the lawyer's electronic devices, potentially containing privileged information, without the required safeguards, amounted to a disproportionate interference. Also, the devices were held for an extended period without justification, and the representatives of the Bar Association, that were present during the search, did not have the power to stop it. The Court concluded the interference was not "necessary in a democratic society" because procedural safeguards were not effectively implemented in practice.

The Court also found a violation of Article 13 (right to an effective remedy) in conjunction with Article 8. Ukrainian law did not provide an effective means for the lawyer to challenge the search's lawfulness or the handling of potentially privileged materials, beyond reclaiming the seized items themselves.

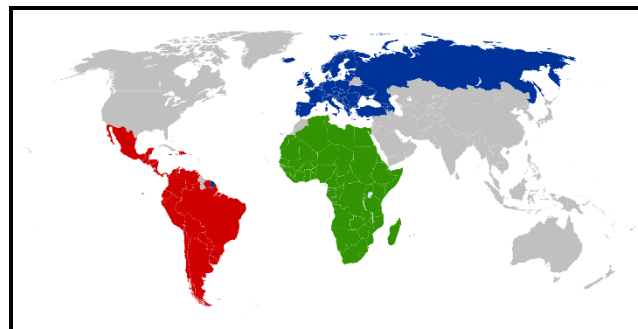
The Court did not find a violation of the rights of the lawyer's family members who resided in the same flat. Their complaints did not demonstrate distress beyond what is commonly experienced during a search.

EUROPEAN COURT FINDS IMPARTIALITY VIOLATION IN ARMENIAN JUDGE'S DISMISSAL (23 Jan. 2025)

The case of *Suren Antonyan v. Armenia* (application no. 20140/23) concerned the dismissal of a judge,

Mr. Suren Antonyan, from the Civil and Administrative Chamber of the Court of Cassation, following disciplinary proceedings before the Supreme Judicial Council (SJC). The SJC, established after 2015 constitutional amendments, has exclusive competence to decide on disciplinary measures against judges, including dismissal. The European Court of Human Rights (Fifth Section) held, unanimously, that there had been a violation of Article 6 § 1 (right to a fair trial by an impartial tribunal) of the European Convention on Human Rights. The Court found that the applicant's doubts about the impartiality of the SJC's Chair, K.A., were objectively justified. The then Minister of Justice, G.M., who brought the disciplinary proceedings, was K.A.'s former deputy, a close friend, and had shared business interests with K.A.s' wife. This close relationship, undisclosed by K.A. at the beginning of the procedure, raised legitimate concerns. The SJC failed to address these concerns properly when rejecting the applicant's request for K.A.'s recusal.

The court conclude, however, that the SJC, composed equally of judicial and non-judicial members, qualified as a "tribunal" and fulfilled the requirements for institutional independence. The appointment process, though potentially open to greater transparency, includes safeguards. The Court also held that the lack of opportunity to appeal the SJC's decision to an ordinary court, did not, in itself, violate the applicant's right of access to a court, since the SJC fulfilled a judicial function. The Court awarded the applicant EUR 3,600 in respect of non-pecuniary damage, and EUR 1,420 in respect of costs and expenses. Most importantly, the Court indicated that the most appropriate form of redress would be the reopening of the disciplinary proceedings, if requested by the applicant, to ensure compliance with Article 6 § 1.



Countries that have ratified a regional human rights instrument – v.g., the European Convention on Human Rights (Council of Europe), the American Convention on Human Rights (OAS), and the African Charter on Human and Peoples' Rights (OAU) (Wiki Images).



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MEDIA AND INFORMATION LITERACY COURSE (ONLINE)

The North-South Centre of the Council of Europe offers a free [online course on Media and Information Literacy](#) (MIL). The course, running from March 3-30, 2025, will be conducted in

English. It aims to enhance knowledge of human rights and freedom of expression, develop critical thinking skills in the digital sphere, and build resilience against information disorder. It is open to young people (aged 18-30) from Europe, Africa, and the Middle East engaged in civil society. Apply by February 18, 2025.

CALL FOR ABSTRACTS: THICKER NOTIONS OF HUMAN RIGHTS ACCOUNTABILITIES CLOSING CONFERENCE

The [Future Proofing Human Rights research project invites abstracts](#) for its closing conference, "Thicker Notions of Human Rights Accountabilities," to be held in Brussels, Belgium, from November 19-21, 2025. The conference explores the concept of human rights accountability across five themes: Change, Knowing, Duties, Harm, and Remedy. Contributions from various disciplines are welcome. Apply by April 20, 2025.

CALL FOR PAPERS: SPECIAL SECTION OF TORTURE JOURNAL: ISRAEL & OCCUPIED PALESTINE

Torture Journal invites submissions for a special section on torture, ill-treatment, and associated human rights violations in Israel and Occupied Palestine. Interdisciplinary papers are encouraged, focusing on areas such as the definition of torture and its prevalence, impacts on specific groups (e.g., children, health workers, detainees), psychosocial and community interventions, forensic assessment, rehabilitation practices, and transitional justice. Opinion pieces without data or academic analysis will not be accepted. For questions, contact Editor-in-Chief Pau Pérez-Sales (pauperez@runbox.com) or Editorial Assistant Berta Soley (bs@irct.org). Submit by April 30, 2025.

CALL FOR BOOK CHAPTER PROPOSALS: "DEPORTATION OF NON-CITIZENS: A COMPARATIVE STUDY ON COUNTRIES' LAW AND PRACTICE"

This [book project seeks chapter proposals](#) examining the law and practice of non-citizen deportation across Africa, the Americas, Asia, Oceania, and Europe. The project aims to analyze laws, policies, and practices in various countries, as well as the role of international institutions. Abstracts (500-800 words) should explain the chosen country/region and its relation to the project and include a biographical note (100-250



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words) and contact information. Submit abstracts to sanzhuan.guo@flinders.edu.au with the subject line "deportation book project abstract." Submit by March 10, 2025.

CALL FOR PROPOSALS: JUSTICE PROGRAMME (JUST) ACTION GRANTS FOR TRANSNATIONAL JUDICIAL TRAINING PROJECTS

The European Commission, DG Justice and Consumers (DG JUST), invites [proposals for action grants under the Justice Programme \(JUST\)](#) to support transnational projects focusing on training justice professionals in civil law, criminal law, or fundamental rights. Projects should target members of the judiciary, judicial staff, trainees, trainers, and/or facilitate cross-professional training, proposals addressing other training needs related to EU law application are also eligible. Apply by March 26, 2025.

ROTARY PEACE FELLOWSHIPS FOR MASTER DEGREES

Rotary awards up to 130 [fully funded fellowships for master degrees](#) or professional development certificates in peace and conflict studies at Rotary Peace Centers worldwide. Master's degree programs (15-24 months) are available at universities in Asia, Australia, Europe, and the U.S., while certificate programs (one year) are offered in Africa and Türkiye. Fellowships cover tuition, fees, room and board, transportation, and internship/field study expenses. Applicants for master's programs need 3+ years of experience, a bachelor's degree, and English proficiency. Certificate program applicants need 5+ years of experience and should have ties to Africa or the Middle East. Apply by May 15, 2025.

PHD RESEARCHERS IN MIGRATION LAW (2 POSITIONS), MAASTRICHT UNIVERSITY

Maastricht University's Faculty of Law seeks two full-time [PhD researchers](#) for a four-year ERC-funded project on EU migration law enforcement. The researchers will focus on the project's sub-strands on steering and supervising policy implementation. Responsibilities include conducting empirical qualitative research, contributing to project publications and events, and completing a PhD thesis within four years. A Master's degree in Law or a related field (e.g., Political Science) is required, along with demonstrable expertise in socio-legal approaches

and/or empirical qualitative methods. Fluency in English is essential. The positions are based in Maastricht, starting September 1, 2025, with a salary ranging from €2901.00 to €3707.00 gross per month. Apply by March 9, 2025.

PHD POSITION IN LAW, TECHNOLOGY, AND SOCIETY, UNIVERSITY OF ST. GALLEN

The University of St. Gallen seeks a [PhD candidate to collaborate on research projects](#) regarding Law, Technology and Society, assist in teaching, contribute to the Digital Policy Leadership Program, and support academic events. A Master's degree in law (meeting all doctoral admission requirements of the University of St.Gallen) and research experience or strong interest in law and technology are required. Fluency in English is essential. Knowledge of Portuguese and/or experience in Brazil/Latin America is a plus. The position is full-time, starting August 1, 2025 (or later), for at least three years, with a competitive salary and flexible/remote work options. Apply by March 10, 2025.

DOCTORAL RESEARCH POSITIONS (12 POSITIONS), IDP BHR

The [International Doctorate Program Business and Human Rights \(IDP BHR\)](#) is accepting applications for 12 doctoral research positions. The program focuses on governance challenges in a complex world, with research areas including law, management, social sciences, and sustainability within the Business & Human Rights field. Positions are based at FAU Erlangen-Nürnberg, University of Bayreuth, or University of Würzburg, starting November 1, 2025. Funding is provided for four years (~€3000/month before taxes). Applicants must have a Master's degree in law, management, or social sciences, strong English skills, and submit a research proposal (max. 5000 words) along with other required documents. Apply by June 1, 2025.

RESEARCH ASSOCIATE / PHD STUDENT, IFHV

The Institute for International Law of Peace and Armed Conflict (IFHV) at Ruhr-Universität Bochum seeks a [Research Associate/PhD student](#) to support a project focused on enhancing the Academy for Humanitarian Action. Responsibilities include developing training programs, conducting research, supporting digitalization efforts, establishing training hubs abroad, and assisting with public relations. A university degree in social sciences,



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humanities, or geography with a focus on humanitarian action, development policy, or international relations is required. Experience in project management, training, and humanitarian work is desirable. Excellent English and German skills are required. This is a three-year, part-time position. Apply by March 3, 2025.

GORDON F. HENDERSON POSTDOCTORAL FELLOWSHIP, UNIVERSITY OF OTTAWA

The Human Rights Research and Education Centre at the University of Ottawa offers the [Gordon F. Henderson Postdoctoral Fellowship](#) (CAD\$45,000 plus benefits) for researchers with promising projects in human rights. Multidisciplinary approaches are preferred. Applicants must have received their doctorate within five years of December 31, 2025 (and defended by April 30, 2025), but not from the University of Ottawa. The fellowship is for one year (starting September 1, 2025), requires full-time presence at HRREC, and includes managing the Canadian Yearbook of Human Rights. Foreign applicants must demonstrate their ability to reside in Canada. Apply by March 31, 2025.

JIM RUBIN INTERNATIONAL FELLOWSHIP, ELI

The Environmental Law Institute offers two [Jim Rubin International Fellowships](#) for rising environmental lawyers from developing countries. The fellowships (up to three months, based in Washington, D.C.) provide a stipend (up to \$7,500), mentorship, and networking opportunities. Fellows conduct legal research and analysis on a focused project. Applicants must have a law degree, be eligible to volunteer in the U.S. (ELI does not sponsor visas), and preferably be within five years of graduation. Apply by February 28, 2025.

SENIOR RESEARCH SPECIALIST, UNRISD

The United Nations Research Institute for Social Development seeks a [Senior Research Specialist](#) (consultant) to contribute to its work on environment and climate justice, focusing on just transition. Responsibilities include developing research projects, engaging with the UN system, managing research projects, producing publications, fundraising, and providing policy advice. An advanced degree (PhD preferred) in social sciences or economics with expertise in environment/climate change and development is required, along with ten years of experience in

development research, a strong publication record, and experience in developing countries. Fluency in English is required. This is a six-month, home-based consultancy with a possibility of extension. Remuneration is USD 6,000-8,000 monthly. Apply by March 9, 2025.

HUMAN RIGHTS AND THE ENVIRONMENT INTERNSHIP, RWI

Raoul Wallenberg Institute offers an [unpaid internship](#) (full-time if part of academic studies, otherwise part-time up to 50%) at its Lund headquarters for Spring or Fall 2025, focusing on human rights and the environment. The intern will contribute to research, data analysis, and outreach materials related to biosphere defenders and the DEFEND-BIO project. A strong knowledge of international human rights and environmental law and current or recent enrollment in an LLM program in a related field are required. Fluency in English is essential, and Spanish is a plus. RWI is not responsible for visa applications. Apply by February 19, 2025.

SUMMER INTERNSHIPS (LAW STUDENTS), SABIN CENTER FOR CLIMATE CHANGE LAW

The Sabin Center seeks [law student interns](#) for Summer 2025 (8-10 weeks, full-time) to work on climate change, energy, and environmental law topics. While the internship is unpaid, CLS students may qualify for funding and pro bono credit. Non-CLS students may also apply. Submit a resume, cover letter, and transcript to vmn2106@columbia.edu and ong2107@columbia.edu with "law student" in the subject line. Apply by: Roll in (February).

SUMMER INTERNSHIPS (UNDERGRADUATE/MASTER'S STUDENTS), SABIN CENTER FOR CLIMATE CHANGE LAW

The Sabin Center seeks [undergraduate and master's student interns](#) for Summer 2025 (8-10 weeks, full-time) to work on climate change, energy, and environmental policy issues. The internship is unpaid. Preference is given to Columbia/Barnard students. Submit a resume, cover letter, and transcript to vmn2106@columbia.edu and ong2107@columbia.edu with "undergraduate/master's student" in the subject line. Apply by: Roll in (February).



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OCHA STAND-BY PARTNERS INTERN

The Office for the Coordination of Humanitarian Affairs is [offering an internship in Geneva to support the Stand-by Partners \(SBP\) team](#). The intern will assist with deployments, data management, and communication activities. Applicants must be pursuing or have completed a degree in political science, international studies, public administration, or a related field. Fluency in English is required, and knowledge of French is desirable. The internship is unpaid and lasts from April 7, 2025, to October 6, 2025. Apply by February 18, 2025.

INTERN - HUMANITARIAN AFFAIRS, UNMAS

The United Nations Mine Action Service (UNMAS) in Geneva is [offering a six-month internship](#). The intern will support the organization of the 28th International Meeting of Mine Action National Directors and United Nations Advisers, conduct research, draft documents, and engage with humanitarian and human rights communities. Applicants must be pursuing or have completed a degree in a related field. Fluency in English and French is required. This internship is unpaid and full-time, based in Geneva, and designed to be in person. Apply by February 21, 2025.

INTERN - HUMANITARIAN AFFAIRS, OCHA

The UN Office for the Coordination of Humanitarian Affairs in New York [is offering a six-month internship in the Pooled Funds Management Branch](#). The intern will support humanitarian response efforts, including monitoring developments, reviewing funding applications, and managing data. Applicants should be pursuing or have recently completed a degree. Fluency in English is required; knowledge of French or other UN languages is an advantage. This is an unpaid internship, in person, with possibility for remote work. Apply by December 18, 2025.

HUMAN RIGHTS INTERN, OHCHR

The Office of the High Commissioner for Human Rights [is offering internships in Geneva, supporting the Human Rights Treaties Branch](#). Interns will assist with treaty body meetings, legal analysis, research, and capacity-building activities. Applicants must be enrolled in or have completed a graduate or final-year undergraduate program, preferably in law, political science, or a related field.

Fluency in English or French is required. Apply by March 30, 2025.

INTERN, SPECIAL PROCEDURES, OHCHR

The OHCHR's Special Procedures Branch in Geneva [is seeking interns to support thematic human rights mandates](#). Duties include contributing to reports, assisting with country visits, analyzing cases, and supporting meetings. Applicants must be enrolled in or have completed a graduate or final-year undergraduate program, preferably in law, political science, or a related field. Fluency in English or French is required. Apply by December 30, 2025.

HUMAN RIGHTS INTERN, OHCHR

The Office of the High Commissioner for Human Rights (OHCHR) [offers internships in Geneva with the Human Rights Treaties Branch](#). Duties include supporting treaty body meetings, legal analysis, research, handling communications, and assisting with capacity-building. Requires enrollment in or completion of a graduate or final-year undergraduate program, preferably in law or related fields. Fluency in English or French required. Apply by February 28, 2025.

INTERN IN HUMAN RIGHTS, OHCHR

OHCHR Cameroon [is offering an internship focused on monitoring human rights developments in the Central Africa region](#). The intern will assist with report preparation, analysis, and workshop organization. Applicants should be enrolled in or have completed a graduate or final-year undergraduate program. Fluency in English or French is required. Apply by March 13, 2025.

INTERN - HUMAN RIGHTS, OHCHR

OHCHR's Regional Office for South-East Asia (SEARO) in Bangkok [seeks an intern to support human rights monitoring, analysis, and communication](#). Responsibilities include drafting reports, preparing news updates, and assisting with events. Applicants must be enrolled in or have completed a relevant degree program. Fluency in English is required. Apply by October 7, 2025.

INTERN - HUMAN RIGHTS AND GENDER MAINSTREAMING, UN-HABITAT

UN-Habitat's Human Rights and Social Inclusion Unit in Nairobi [offers an internship supporting human rights and gender mainstreaming](#). Tasks include developing capacity-building materials,



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research, and event support. Requires enrollment in or completion of a law, human rights, or gender studies program. Fluency in English is required. Apply by February 27, 2025.

HUMAN RIGHTS INTERN, UNOCT

The United Nations Office of Counter-Terrorism [offers a flexible \(hybrid, all remote or in-person\) internship in New York](#). The intern will perform various tasks such as drafting and preparing documents in the field of human rights in preventing and countering terrorism, taking notes at the relevant meetings, assisting in conducting research and analysis on topics related to human rights and violent extremism. Applicants are required to be enrolled in a graduate school programme, or in the final year of a first-level university degree programme. Fluency in English is required. Apply by February 26, 2025.

HUMAN RIGHTS INTERNSHIP, OHCHR

The OHCHR in Geneva [is offering a six-month internship to support the Business and Human Rights Section](#). The role involves researching, analyzing, and drafting reports on thematic and regional human rights issues. Applicants should be enrolled in or have completed a graduate or final-year undergraduate program, preferably in law or a related field. Fluency in English is required. Apply by February 23, 2025.

CONSULTANT – CORRUPTION RISK IN PRISONS, UNODC

The United Nations Office on Drugs and Crime is looking for a [consultant](#) to draft a guide on corruption risk management in prisons. The consultant will conduct research, lead expert consultations, and develop the publication. Candidates need an advanced degree in a relevant field and ten years of experience in criminal justice, anti-corruption, or related areas. Fluency in English is required. Apply by February 23, 2025.

CONSULTANT ON CARE AND SUPPORT METHODOLOGY, OHCHR

OHCHR Geneva [is seeking a consultant to develop an online training session based on existing in-person training materials on care and support methodology](#). Requires an advanced degree in a relevant field and 7+ years of experience in human rights education. Fluency in English and Spanish is required. Apply by February 23, 2025.

CONSULTANCY REGARDING MAURITANIA, OHCHR

OHCHR Dakar [seeks a consultant to conduct a study on the situation of irregular migrant women in Mauritania](#). The consultant will document human rights violations, analyze the legal and policy environment, and propose recommendations. Requires an advanced degree in law, political science, or a related field, and 7+ years of experience in human rights. Fluency in French is required. Apply by February 21, 2025.

ADMINISTRATIVE ASSISTANT, INTERNATIONAL COMMISSION OF JURISTS

The International Commission of Jurists seeks an [Administrative Assistant for its Europe and Central Asia Programme](#), based in Brussels. Responsibilities include office management, HR support (including recruitment and payroll), logistical support for events, and financial support. A higher education diploma in a relevant field and two years of administrative experience are required. Fluency in English (C1) and an advanced level of French (B2) are essential. Strong organizational and communication skills, proficiency in Microsoft Office, and a commitment to human rights are also required. This is a six-month, full-time contract with the possibility of extension. No relocation package is offered. Send a CV and cover letter to europa-recruitment@icj.org with "Administrative Assistant" in the subject line. Apply by: Roll in (February).

ASSOCIATE HUMAN RIGHTS OFFICER, OHCHR

OHCHR Liberia [is seeking an Associate Human Rights Officer to support transitional justice processes and accountability](#). Duties include research, legal analysis, training, and advocacy. Requires an advanced degree in law or a related field and 2 years of relevant experience. Fluency in English is required. This is a temporary position, open to Liberian nationals only. Apply by February 18, 2025.

ASSOCIATE HUMAN RIGHTS ANALYST (JPO, P2), IIIM SYRIA

IIIM-Syria seeks an [Associate Human Rights Analyst \(P2 level\)](#) based in Geneva to support its Judicial Support and Cooperation Section. Responsibilities include developing research strategies, conducting evidence analysis, managing databases, and



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participating in briefings. This is a one to two-year renewable fixed-term position (80-100%) within the Swiss JPO Programme. Swiss nationality, fluency in English and a second UN language, a Master's degree, and a driving license are required. Apply by February 20, 2025.

PROGRAMME MANAGEMENT OFFICER, UNJSPF

The United Nations Joint Staff Pension Fund is hiring a [Programme Management Officer](#) in New York to coordinate secretariat conference management for the Pension Board. Candidates need an advanced degree and seven years of experience in program management or related areas. Fluency in English is required. Apply by February 26, 2025.

ASSOCIATE HUMAN RIGHTS OFFICER, OHCHR
OHCHR Geneva [is hiring an Associate Human Rights Officer to support the UN Voluntary Funds for Victims of Torture and Contemporary Forms of Slavery](#). Responsibilities include grants management, outreach, and research. Requires an advanced degree in law or a related field and 2 years of experience (or passing the YPP/NCRE/G to P exam). Fluency in English or French is required. Apply by February 26, 2025.

RECOVERY, RETURN AND REINTEGRATION OFFICER, UNMISS

The United Nations Mission in South Sudan [is seeking a Recovery, Return and Reintegration Officer \(P-3\) in Juba](#). The officer will support protection, early recovery, and reintegration initiatives. An advanced degree in political science, social science, or a related field, and five years of relevant experience are required. Proven experience in information and data management, and analysis to support integrated evidence-based protection planning and responses is required. Fluency in English is required. This is a temporary position for six months, with a possible extension. Apply by February 17, 2025.

HUMAN RIGHTS OFFICER, OHCHR
OHCHR Geneva [is seeking a Human Rights Officer \(P-3\) for its Strategic Planning, Program Management, Evaluation and Change Service](#). The role involves evaluating program performance, conducting research, and providing support to human rights bodies. Requires an advanced degree

in law or a related field and 5 years of experience. Fluency in English is required. Apply by March 8, 2025.

HUMAN RIGHTS OFFICER, OHCHR
OHCHR [is hiring a Human Rights Officer \(Gender/Sexual and Gender-Based Violence Specialist\) \(P-3\) in Kalemie, DRC](#). Responsibilities involve advising on gender dimensions of human rights violations, collecting and analyzing data, conducting training, and providing expertise. Requires an advanced degree, five years of experience, and fluency in French; English is desirable. This is a temporary position. Apply by February 18, 2025.

UN PUBLIC ORDER OFFICER, UNGSC

The United Nations Global Service Centre in Brindisi, Italy, [is seeking a Public Order Officer \(P-3\) for the Standing Police Capacity \(SPC\)](#). The officer will provide expertise on crowd management and riot control, supporting UN peace operations and host-state law enforcement. An advanced degree (or a first-level degree with two additional years of experience) and five years of relevant law enforcement experience, including public order management and policy implementation, are required. Experience with the UN, and in data analytics are desirable, as is peacekeeping or other international experience. Fluency in English is required; knowledge of French is desirable. This position is for one year, with a possible extension. Apply by February 25, 2025.

LEGAL OFFICER, UNJSPF

The United Nations Joint Staff Pension Fund [is hiring a Legal Officer \(P-4\) for its Office of Investment Management in New York](#). The position involves handling legal issues related to investments. Candidates must have an advanced law degree, admission to practice law in a UN Member State, and seven years of experience in transactional law. Fluency in English is required. Apply by March 1, 2025.

MILITARY ADVISER, OHCHR

The Office of the High Commissioner for Human Rights (OHCHR) [is seeking a Military Adviser \(P-4\) for the Fact-Finding Mission for Sudan, based in Nairobi](#). The adviser will collect and analyze information on military matters, advising the mission on security sector structure, weapons used,



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and related issues. A graduate of a National Command and Staff College or National War/Defense College is required, with an advanced degree in a related field being highly desirable. Seven years of military experience and knowledge of international humanitarian law are required. Experience in conflict settings and the region is desirable. Fluency in English is required; fluency in Arabic is desirable. This is a temporary position until March 31, 2025, with possible extension. Apply by February 19, 2025.

HUMAN RIGHTS OFFICER (HUMAN RIGHTS & TECHNOLOGY), OHCHR

OHCHR Geneva [seeks a Human Rights Officer \(P-4\) specializing in human rights and digital technology](#). The role involves developing policies, supporting treaty bodies, and organizing consultations. Requires an advanced degree in law or a related field and 7 years of experience. Fluency in English is required. This is a temporary position. Apply by February 27, 2025.

HUMAN RIGHTS OFFICER, OHCHR

OHCHR Geneva [is hiring a Human Rights Officer \(P-4\) focused on child rights in the digital environment](#). Responsibilities include monitoring, organizing consultations, and developing training programs. Requires an advanced degree and 7 years of experience, with at least 3 years in child rights. Fluency in English is required. This is a temporary position. Apply by February 27, 2025.

HUMAN RIGHTS OFFICER, OHCHR

OHCHR [is seeking a Human Rights Officer \(P-4\) in Amman, Jordan](#), to monitor and evaluate human rights implementation. The role involves supervising a team, supporting treaty bodies, and preparing reports. Requires an advanced degree and 7 years of experience. Fluency in English is required. Apply by February 27, 2025.

HUMAN RIGHTS OFFICER, OHCHR

OHCHR Geneva [seeks a Human Rights Officer \(P-4\) for its Petitions Section](#). The role involves overseeing intake of individual communications, developing guidelines, and coordinating with treaty bodies. Requires an advanced degree in law or related field, and 7 years of experience, including legal advice and case management. Fluency in English or French is required. Apply by March 6, 2025.

HEAD GENDER SECTION, UNRWA

The United Nations Relief and Works Agency [is hiring a Head of Gender Section \(P-4\) to provide leadership in gender equality, GBV protection, and gender mainstreaming](#). Responsibilities include policy development, program coordination, and capacity building, with emphasis in emergency context. Requires an advanced degree, seven years of experience, and fluency in English. Knowledge of French or Arabic is desirable. Apply by March 4, 2025.

HUMAN RIGHTS OFFICER, OHCHR

The Office of the High Commissioner for Human Rights [seeks a Human Rights Officer \(P-4\) for its office in Monrovia, Liberia](#). This role is a temporary job opening. The incumbent will coordinate the project on transitional justice, provide technical support and strategic advice to the Government entities and a variety of associations and organizations. Requires an advanced university degree (Master's degree or equivalent) in law, human rights, political science, international relations, social sciences or related field. A minimum of seven years of progressively responsible experience is also required, together with fluency in English. Apply by February 18, 2025.

SENIOR HUMAN RIGHTS OFFICER, IIMP

The Independent Institution on Missing Persons in the Syrian Arab Republic in Geneva [is seeking a Senior Human Rights Officer \(P-5\)](#). Responsibilities include coordinating forensic operations, formulating strategies, negotiating with stakeholders, and managing a team. Requires an advanced degree and 10 years of experience, including work with victims of conflict and forensic search operations. Fluency in English is required. This is a temporary position. Apply by February 18, 2025.

CHIEF OF SECTION, HUMAN RESOURCES MANAGEMENT, OHCHR

The Office of the High Commissioner for Human Rights [is seeking a Chief of Section \(P-5\) for Human Resources Management in Geneva](#). Candidates need an advanced degree and ten years of experience, including five within the UN. Fluency in English is required, and another UN language is also required. Apply by February 23, 2025.



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News from the Facts and Norms Institute

FACTS AND NORMS INSTITUTE AND THE AMERICAN SOCIETY OF INTERNATIONAL LAW ANNOUNCE NEW EDITION OF "THE RIGHTS OF INDIGENOUS PEOPLES' NEWSLETTER"

WASHINGTON DC., U.S., January 21, 2025 – The Facts and Norms Institute (FNI) and the American Society of International Law (ASIL) are pleased to announce the release of the latest edition of the Rights of Indigenous Peoples Interest Group (RIPIG) Newsletter, covering the period from July to December 2024.

This issue marks another significant step in the ongoing collaboration between FNI and ASIL, dedicated to providing critical insights into the evolving landscape of indigenous rights worldwide. This edition is spearheaded by Editor Henrique Napoleão Alves, with the support of Co-chairs Jonathan Liljeblad and Yuri Mantilla. Assistant editors Bruno José Fonseca, Felipe Martins Anawate, Laura Esteves Teixeira, Sarah Ebram Alvarenga, and Thiago Fernandes C. de Castro have contributed their knowledge and effort to this comprehensive issue.

"This Newsletter arrives at a crucial moment, highlighting both the enduring resilience and the persistent challenges faced by indigenous peoples globally," stated Alves.

Alves further emphasized the newsletter's role in informing action, adding,

"Through meticulous gathering and analysis, this issue equips scholars, practitioners, and advocates with the knowledge necessary to engage meaningfully with the ongoing struggles and advancements in indigenous rights."

Key highlights of this issue include:

Indigenous Rights Developments: This section presents a wide array of global developments, ranging from the addition of the Tamazight language to Google Translate and initiatives to

empower Aboriginal teachers in Australia, to the struggles of indigenous communities against deforestation in Honduras and the impact of mining on the Hongana Manyawa people in Indonesia. It also covers legal battles for treaty rights in Canada, investigations into historical abuses in US boarding schools, and the use of indigenous knowledge in climate action recognized by the IPCC.

Recommendations from UN Treaty Bodies: The newsletter provides key recommendations from various UN committees concerning the rights of indigenous peoples across the globe. This includes calls from the UN Human Rights Committee for Suriname and India to strengthen indigenous rights protections, recommendations from the UN Committee on the Elimination of Racial Discrimination for the UK and Ukraine, and guidance from the UN Committee on the Rights of the Child for Mexico, Israel, Argentina, and Denmark, addressing issues from data collection to inclusive education and violence prevention.

UN Statements and Reports: This section features statements from UN Special Rapporteurs and experts addressing pressing issues faced by indigenous communities worldwide. Highlights include calls to safeguard indigenous territorial rights in Brazil, reports on the rights of mobile indigenous peoples and indigenous persons with disabilities, concerns over the situation in New Caledonia and Viet Nam, and expert warnings about the impact of tourism projects in Indonesia and the need for climate finance to reach vulnerable populations, including indigenous peoples.

Regional Bodies' Recommendations and Reports: The newsletter offers updates from regional human rights bodies in Africa and the Americas. Coverage includes decisions from the African Commission on Human and Peoples' Rights regarding the Batwa people in the DRC and resolutions promoting indigenous languages and knowledge. From the Inter-American Commission on Human Rights, highlights include hearings on the Yanomami people and indigenous groups in Nicaragua, precautionary measures for indigenous leaders, and concerns over violence against indigenous peoples in Brazil.

Selected Publications and Reports: A curated selection of recent texts, books, and other publications offers deeper analysis and scholarly



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perspectives on indigenous rights, environmental justice, and related fields. This section includes academic articles, book chapters, and reports covering diverse topics from settler colonialism and climate remedies to indigenous knowledge systems and legal education through an indigenous lens.



This is the cover of the Rights of Indigenous Peoples' Newsletter. [Click here or on the image above to download the full issue of the Newsletter for free!](#)

The RIPIG Newsletter continues to serve as an indispensable resource for fostering informed dialogue and action within the global community dedicated to the protection and advancement of indigenous peoples' rights.

INTER-AMERICAN COURT CONDEMNS BRAZIL FOR THE ACARI MASSACRE AND CITES THE FACTS AND NORMS INSTITUTE

SAN JOSÉ, COSTA RICA, December 4, 2024 - The Inter-American Court of Human Rights (IACtHR) has condemned Brazil for the forced disappearance of 11 young people from the Favela de Acari, in Rio de Janeiro, in 1990.

The IACtHR's decision takes into account the context of police violence and the actions of death squads and militias in Rio de Janeiro, especially in communities living in poverty, where a scenario of

structural racism and discrimination against people of African descent prevails, as pointed out by the [amicus curiae brief presented by the Facts and Norms Institute \(FNI\)](#), prepared by Professor Roberta Cerqueira Reis and lawyer Sofia Viegas Duarte.

The FNI's brief, which focused on police violence, the limits of transitional justice, and the dehumanization of poor and Afro-descendant populations, was cited in the judgment as support for understanding the context in which the disappearances occurred. The IACtHR highlighted the importance of the document in demonstrating that the violence committed by state agents is a structural and persistent problem in Brazil.

In the brief, the FNI argued that *"the violence committed by state agents denounced in the Case of Leite de Souza et al. is a present issue"* and that *"[t]here are continuities between lethal police action during the 1964-1985 dictatorship and during democratic times,"* in addition to *"a system that guarantees impunity for these violations."* The brief also highlighted that there is *"an unequal distribution of deaths caused by police officers – these are concentrated in poor suburbs and favelas."*

The IACtHR's judgment reflected this analysis, stating that *"[a]t least since the 1960s, the actions of militias, death squads, or extermination groups [...] composed of police officers involved in criminal activities have been observed."* The judgment also recognized that *"the violence of the militias is directed mainly against people of African descent, young people, and individuals in situations of poverty and socioeconomic vulnerability."*



The FNI's brief also highlighted how *"[e]xtrajudicial executions and forced disappearances represent the denial of the human condition of the victims; their legal personality is taken away."* This aspect is also present in the IACtHR's judgment when it



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recognizes that "*conduct related to the forced disappearance of persons generates the violation of the rights to recognition of legal personality*," among others.

The judgment also incorporated several recommendations from the FNI's brief, including the need to adopt structural measures to combat police violence and impunity. Among these measures are conducting a diagnosis of the actions of death squads and militias in Rio de Janeiro and strengthening investigative capacities according to human rights criteria.

Furthermore, the IACtHR ordered Brazil to adopt measures of reparation for the victims and their families, such as the continuation of investigations into the disappearances, the search for the remains of the victims, the issuance of death certificates, a public apology, the creation of a memorial in the Acari neighborhood, and the payment of compensation for material and non-material damages.

The IACtHR's judgment is an important step towards holding the Brazilian state accountable for the human rights violations committed in the case of *Leite de Souza et al.* and a recognition of the important work carried out by the "Mothers of Acari" in the search for justice and in the defense of human rights. The decision also reinforces the need to combat police violence and impunity in Brazil, problems that disproportionately affect the Afro-descendant and poor population of the country, especially those who live in favelas and peripheries.

The Court's decision takes into account the arguments presented by the FNI, demonstrating the relevance of the work of academic organizations in the defense of human rights and the promotion of justice. The judgment represents a victory for the victims and their families, and an important step towards building a more just and egalitarian Brazil, where human rights are respected and protected, regardless of social origin, race, or place of residence.

UN REPORT ON VIOLENCE AGAINST WOMEN AND GIRLS IN SPORTS CITES FACTS AND NORMS INSTITUTE'S CONTRIBUTION

The United Nations has released a trailblazer report on violence against women and girls in sports, citing the contributions of the Facts and Norms

Institute and its director, Professor Henrique Napoleão Alves. The report, "Violence against women and girls in sports" (A/79/325), was prepared by Special Rapporteur Reem Alsalem and presented to the UN General Assembly. The UN report directly references FNI's input three separate times:

I. Economic Violence. The UN report highlights economic violence as a significant barrier to the participation and advancement of women and girls in sports.

Citing FNI's input, the report discusses how young female athletes are often excluded from the transparent management of their finances. This lack of financial autonomy can manifest in various ways, including exploitative contracts, denial of financial resources, and economic sabotage that prevents athletes from pursuing educational or career opportunities outside of sports.

II. Online Violence. The report also addresses the pervasive issue of online violence against women and girls in sports.

FNI's research was cited in the context of female athletes being disproportionately subjected to hostile threats, harassment, and abusive behaviors in virtual spaces.

The UN report acknowledges FNI's contribution that such online violence affects the mental health and sense of personal safety of female athletes, impairing their performance and potentially having long-term career repercussions.

III. Coercive Control. The UN report further discusses coercive control as a form of violence used to restrict communication, enforce social isolation, and severely limit athletes' behavioral independence.

Referencing FNI's input, the report highlights how coercive control in sports diminishes career options for female athletes through, *inter alia*, financial control, interference with education, and psychological manipulation involving extreme criticism and gaslighting.

[Click here](#) to download the Facts and Norms Institute's report for free.

[Click here](#) to download the UN Report.



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