

The International Courts & Tribunals Bulletin

Centre for International Law, National University of Singapore

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INTRODUCTION

The *CIL International Courts & Tribunals Bulletin* is a bi-monthly e-publication prepared by the International Dispute Resolution Team at the Centre for International Law (CIL). It offers neutral, comprehensive, and timely updates on significant legal and institutional developments concerning major international courts and tribunals engaged in State-level dispute resolution. The *Bulletin* also tracks relevant aspects of State practice in relation to these bodies. Designed to serve policymakers, international legal practitioners, and scholars, the *Bulletin* provides valuable insights into the evolving landscape of international adjudication.

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This Bulletin is prepared by the International Dispute Resolution team at the Centre for International Law (Celine Lange, Wenlan Yang) on the basis of publicly available information. While every effort has been made to ensure the accuracy and timeliness of the information presented, readers should not rely on this Bulletin as a substitute for legal advice or official sources. The views expressed herein do not necessarily reflect those of any affiliated institutions or editors. References to specific cases, proceedings, or decisions are for informational purposes only and do not constitute endorsement or commentary.

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I. INTER-STATE COURTS

1. International Court of Justice (ICJ)



Docket

New decision: *Land and Maritime Delimitation and Sovereignty over Islands (Gabon/Equatorial Guinea)*

On 19 May 2025, the ICJ delivered its judgment in *Gabon/Equatorial Guinea* concerning the Parties' disputes over boundary delimitation and sovereignty over three uninhabited islands in Corisco Bay. By way of a Special Agreement, the Parties asked the Court not to draw boundaries but to determine whether the legal instruments each Party relied upon had the force of law between them. The Court held that the "Bata Convention" invoked by Gabon was not a legally binding treaty and thus not a valid legal title. It determined that the 1900 Convention between France and Spain constituted the relevant legal title for both the land boundary and the starting point of the maritime boundary, with each State succeeding to the colonial title held by their respective former administering powers without subsequent modifications made pursuant to the procedures established under Article VIII and Appendix No. 1 of the Convention. Regarding the disputed islands, the Court found that, before Equatorial Guinea's independence in 1968, Spain had

established continuous and uncontested authority over them as dependencies of Corisco Island, thereby vesting sovereignty in Equatorial Guinea. The Court also clarified that the United Nations Convention on the Law of the Sea and general principles of maritime delimitation do not in themselves constitute legal titles within the meaning of the Special Agreement. Several judges issued separate or dissenting opinions on the implications of relying on colonial instruments and the scope of the Court's jurisdiction.

Mr Guy Rossatanga-Rignault, Gabon's Co-Agent in these proceedings, [commented](#) that "Gabon and Equatorial Guinea have to live side-by-side, we can't move away from each other. Therefore, we will have to talk it over to solve all these problems." Equatorial Guinea subsequently [welcomed](#) this judgment and noted that it "relies on the constructive cooperation between the Parties to respect and comply with the Court's judgment".

New decision: Application of the Convention on the Prevention and Punishment of the Crime of Genocide in Sudan (Sudan v. United Arab Emirates)

On 5 May 2025, the Court rejected Sudan's request for provisional measures on the ground of the lack of prima facie jurisdiction, due to UAE's reservation to Article IX of the Genocide Convention. As there was no other basis for jurisdiction, the Court held, by fourteen to two, that it could not consider Sudan's request and, by nine votes to seven, decided to remove the case from its General List. The seven judges issued individual or joint dissents, objecting to the removal of the case. The Court reiterated, however, that irrespective of jurisdictional acceptance, all States are still bound to comply with their obligations under the Genocide Convention. Sudan brought this application in early March, alleging that the UAE was complicit in acts of genocide committed by the Rapid Support Forces in West Darfu, particularly in relation to the Masalit ethnic group amid the ongoing civil conflict in Sudan which began in April 2023.

Sudan [expressed respect](#) for the decision, noting that the Court dismissed the case on procedural grounds without absolving the UAE of its responsibility or preventing Sudan from using other legal options, and subsequently [severed diplomatic relations](#) with the UAE. The UAE [welcomed](#) this decision, calling it "a resounding rejection of [Sudanese Armed Forces'] attempt to instrumentalize the Court for its campaign of misinformation and to distract from its own responsibility."

New case: Alleged Smuggling of Migrants (Lithuania v. Belarus)

On 19 May 2025, Lithuania filed an application instituting proceedings against Belarus with regard to a dispute relating to alleged breaches by Belarus "of its obligations under the Protocol against the Smuggling of Migrants by Land, Sea and Air, supplementing the [United Nations Convention against Transnational Organized Crime \(the 'Protocol'\)](#), in relation to the large-scale smuggling of irregular migrants from Belarus into Lithuania".

The Applicant seeks to found the Court's jurisdiction on Article 36, paragraph 1, of the Statute of the Court and on Article 20, paragraph 2, of the Protocol, to which both Lithuania and Belarus are parties. This marks both States' first contentious case before the ICJ.

New case: Kohler and Paris (France v. Iran)

On 16 May 2025, France filed an application against Iran with regard to a dispute concerning "serious and repeated breaches by Iran of its obligations under the [Vienna] Convention [on Consular Relations] in the context of the arrest, detention and trial of several French nationals in Iran", particularly in relation to two French nationals, Ms Cécile Kohler and Mr Jacques Paris. The Applicant seeks to found the Court's jurisdiction on Article 36 of the Statute of the Court, read in conjunction with Article I of the Optional Protocol to the Vienna Convention on Consular Relations concerning the Compulsory Settlement of Disputes of 24 April 1963, to which both France and Iran are parties.

On the same day, France [stated](#) that it will "continue to use all leverage at its disposal to secure the release of its nationals". Iran [reportedly called](#) the application "pointless" and stated that it would "defend itself".

New decision: Arbitral Award of 3 October 1899 (Guyana v. Venezuela)

On 1 May 2025, the Court issued an order in the ongoing case between Guyana and Venezuela regarding the disputed territory of the Essequibo region, following Guyana's request to modify previous provisional measures. The Court found that Venezuela's recent actions—including legislative measures, presidential decrees, and the announcement of regional elections in the disputed area—represented a significant escalation posing a real risk of irreparable harm to Guyana's plausible rights. Consequently, the ICJ reaffirmed its previous order for both Parties to refrain from actions that would alter the current situation and, by a vote of twelve to three, specifically ordered Venezuela to refrain from conducting or preparing to conduct elections in the disputed territory.

Guyana [calls on](#) Venezuela to "comply fully" with the orders and "refrain from any actions that violate Guyana's territorial integrity or disrupt the peace and security of the Latin American and Caribbean region". Venezuela [continues](#) to contest the Court's jurisdiction and refuse to comply with the orders, and calls for direct bilateral negotiation with Guyana as the "sole valid path" to settlement.

States' Response

Chagos Advisory Opinion

On 22 May 2025, the United Kingdom signed [an agreement with Mauritius](#) which, *inter alia*, would return the Chagos Archipelago to Mauritius and allow the UK and USA to

maintain the military base on the Diego Garcia Island for 99 years. The agreement includes safeguards such as UK's veto power and financial incentives for Mauritius, and it has received support from allies including the US.

In 2019, the ICJ issued its advisory opinion in *Legal Consequences of the Separation of the Chagos Archipelago from Mauritius in 1965* in response to a request of the General Assembly. The ICJ opined that the United Kingdom is under an obligation, *inter alia*, to end its administration of the Chagos Archipelago as rapidly as possible. Many international bodies, such as the [General Assembly](#), called for UK's compliance. After years of UK resistance, this UK-Mauritius agreement came up as some [UK ministers feared](#) that, without a deal, the International Telecommunication Union could deprive the UK and the US of access to the radio spectrum associated with Chagos; contractors might be discouraged from servicing the Diego Garcia base due to fear of lawsuits; and UK and US military overflight and maritime rights in the region could be challenged.

Cambodia May Bring Border Dispute with Thailand to ICJ

On 23 June 2025, Cambodia's Foreign Minister Prak Sokhonn [chaired](#) the inaugural meeting of the Commission for the Preparation of Documents for Submission to the International Court of Justice, which was established on 6 June to handle Cambodia's ICJ case against Thailand concerning the Mom Bei area and three temples – Tamoan Thom, Tamoan Tauch, and Ta Krabei. The meeting formulated a strategic work plan, which includes selecting legal experts and representing Cambodia before the ICJ. The jurisdictional basis of the application is not clear; Cambodia may be invoking *forum prorogatum*, whereby the Court's jurisdiction is established through Thailand's subsequent acceptance. Thailand has not recognised the Court's jurisdiction in this matter (see [here](#)).

Following a fatal border clash on 28 May 2025, Cambodia and Thailand have reinforced troops and tightened border controls. While the Joint Boundary Commission between the two States was [convened](#) to negotiate troop positioning and ease tensions, Cambodia has reportedly notified the International Court of Justice of an upcoming application against Thailand.

The dispute is rooted in unresolved colonial-era boundary demarcations and has resurfaced periodically, most notably during military confrontations in 2008 and 2011. The latest incident has led to the reduction of operating hours at multiple border crossings, reflecting ongoing security concerns. Notably, Cambodia and Thailand previously resolved their dispute concerning the *Temple of Preah Vihear* case before the Court.

Bench

President Iwasawa Delivered Speech for the 80th Anniversary of the UN Charter

On 26 June 2025, President Iwasawa delivered a [speech](#) commemorating the 80th anniversary of the United Nations Charter, highlighting its enduring significance as the ‘constitution’ of the international community. He emphasised the Charter’s transformative role in recognising human rights as a matter of international concern, establishing the right of self-determination, and prohibiting the threat or use of force. President Iwasawa also underscored the ICJ’s vital function as the principal judicial organ of the UN, resolving disputes and interpreting Charter provisions to uphold the rule of law. Concluding, he called for continued commitment to the Charter’s principles to address global challenges in pursuit of international peace, security, and justice for all peoples.

Resignation of Judge Yusuf

On 11 June 2025, the ICJ announced that Judge Abdulqawi Ahmed Yusuf will resign with effect from 30 September 2025. He has been a judge since 6 February 2009 and has served as Vice-President and President of the Court. The reasons for his resignation have not been disclosed. The Security Council will next fix the date – likely in late 2025 – for the election of a successor to complete Judge Yusuf’s term, which expires on 5 February 2027.

Notably, at least eight candidates have been floated to run for the triennial election scheduled to take place in late 2026 for the five seats to be vacant in 2027: Professor Dapo Akande ([UK](#)), Ambassador François Alabrune ([France](#)), Dr Olufemi Elias ([Nigeria](#)), Professor Charles Jalloh ([Sierra Leone](#)), Ambassador Rena Lee ([Singapore](#)), Professor Phoebe Okowa ([Kenya](#)), Judge Paik Jin-Hyun ([Republic of Korea](#)), and Mr Abubacarr M. Tambadou ([The Gambia](#)).

Election of Ambassador Mahmoud Daifallah Hmoud of Jordan

In an unopposed election at the United Nations on 27 May 2025, Ambassador Mahmoud Daifallah Hmoud of Jordan was elected as an ICJ Judge with immediate effect. Judge Hmoud succeeds Judge Nawaf Salam, who resigned on 14 January 2025, and will serve the remainder of Judge Salam’s term until 5 February 2027.

Judge Hmoud is also serving on the [CIL International Advisory Panel](#), together with Judges Xue Hanqin and Hilary Charlesworth.

2. Permanent Court of Arbitration (PCA)

Docket

Indus Waters Treaty Proceedings

On 27 June 2025, the Court of Arbitration constituted to decide Pakistan's complaints against India's designs of two hydroelectric projects, issued a unanimous [Supplemental Award on Competence](#), finding that neither the Indus Waters Treaty nor customary international law allows a Party to unilaterally hold in abeyance or suspend either the arbitration proceedings or the below-mentioned Neutral Expert proceedings. This decision came amid recent heightened tension between the two Parties, as India put the treaty "[in abeyance](#)" in April 2025, following the armed attack in India-administered Jammu and Kashmir. Previously, on 16 May 2025, noting its "continuing duty" to "satisfy itself that it has jurisdiction over the dispute", the Court of Arbitration [invited](#) the Parties to address any effect of these recent developments on matters before the Court or the Neutral Expert, including their respective competence, but only received response from Pakistan.

Pakistan [welcomes](#) the Supplemental Award, noting that the "high priority" between the Parties is "a meaningful dialogue" on "all outstanding issues, including Jammu & Kashmir, water, trade and terrorism". India has consistently refused to formally participate in the arbitration proceedings, arguing that the Court of Arbitration was illegally constituted. India [considers](#) the Supplemental Award to be its "latest charade at Pakistan's behest" and "illegal and per se void".

To recap, two PCA-administered proceedings under the Indus Waters Treaty are currently underway, namely the Court of Arbitration and the Neutral Expert proceedings.

On 19 August 2016, Pakistan initiated [arbitration](#) against India, alleging that the designs of the Kishenganga and Ratle hydroelectric projects violate the Treaty. The Court of Arbitration—comprising Professor Sean D. Murphy (Chair), Professor Wouter Buytaert, Professor Jeffrey P. Minear, Judge Awn Shawkat Al-Khasawneh, and Dr Donald Blackmore—found on 6 July 2023 that it is competent to hear the case. The Court of Arbitration proceeded with a [site visit](#) of the Neelum-Jhelum Hydro-Electric Plant in the Kashmir and Jammu region administered by Pakistan, and concluded the [hearing](#) for the First Phase on the Merits on 16 July 2024. Pakistan initially requested interim measures in 2016 but withdrew them in 2023.

Separately, on 6 September 2016, India initiated [neutral expert proceedings](#) under Annexure F of the Treaty concerning the same projects. Mr. Michel Lino was appointed as the Neutral Expert on 13 October 2022. He conducted the [first site visit](#) with both Parties on the Kishenganga/Neelum and Chenab Rivers in June 2024, and on 7 January 2025, determined that he has competence. It is [reported](#) that India has recently requested the

Neutral Expert to suspend his proceedings and vacant the work programme, to which Pakistan has opposed. According to the [work programme](#) revised on 11 March 2025, Pakistan is scheduled to submit its Counter-Memorial in August 2025, and the Fourth Meeting with the Parties is scheduled in November, followed by a second site visit in December 2025.

The Indus Waters Treaty, signed in 1960 by Prime Minister Jawaharlal Nehru and President Ayub Khan, governs the water distribution between India and Pakistan in the Indus River and its tributaries. Indian Home Minister Amit Shah recently [stated](#) that while India cannot unilaterally annul the 1960 Indus Waters Treaty, the suspended agreement will “never be restored”. He added that water flowing to Pakistan will be diverted to Rajasthan via a new canal, and Pakistan will be “starved of water that it has been getting unjustifiably”.

Ukrainian Naval Vessels and Servicemen (Ukraine v. Russia)

On 6 May 2025, the PCA released [a decision dated 11 April 2025](#) of the tribunal in the *Ukrainian Naval Vessels and Servicemen (Ukraine v. Russia)* concerning Russia’s attempt to disqualify Judge James L. Kateka. Russia’s challenge cited Judge Kateka’s involvement in the [Institut de droit international \(IDI\) declaration](#) which condemned Russia’s actions in Ukraine, his repost of a social media post, and his prior participation in a provisional measures order at the International Tribunal for the Law of the Sea. The [IDI Declaration](#), which “firmly denounce[s] the aggression for which the Russian Federation is responsible through its massive military intervention in Ukraine”, was adopted on 1 March 2022. Russia has sought to challenge the arbitrators who supported this declaration in various investor-State and inter-State proceedings. The tribunal majority—comprising Judge Christopher Greenwood and Judge Gudmundur Eiriksson—found these grounds insufficient to undermine Judge Kateka’s impartiality, stressing, inter alia, that he abstained from voting on the IDI declaration, proposed editorial changes to soften its language, and that the repost in question predated Russia’s full-scale invasion. Professor Alexander Vylegzhanin dissented, arguing that Judge Kateka’s conduct reflected bias and prior engagement with the substance of the dispute. The arbitration continues, with Russia’s further procedural objections deferred to a later phase.

Previously, Russia [succeeded in disqualifying](#) Professor Donald McRae, presiding arbitrator, and Judge Rüdiger Wolfrum from the same tribunal on the basis of their support of the IDI Declaration. President Tomas Heidar of ITLOS, acting as appointing authority, [initially appointed](#) Judge James Kateka (Tanzania) and Professor Joanna Mossop (New Zealand) as replacement arbitrators. Following Professor Mossop’s resignation one week later, President Heidar made [a new appointment](#) of Judge Kathy-Ann Brown (Jamaica) to the tribunal.

UK-Sandeel (European Union v. United Kingdom)

On 2 May 2025, the PCA published the ruling rendered by the arbitral tribunal constituted under the EU-UK Trade and Cooperation Agreement in the arbitration brought by the European Union against the United Kingdom regarding the UK's prohibition on sandeel fishing in English and Scottish waters since 26 March 2024. The tribunal, consisting of Dr. Penelope Jane Ridings, MNZM (Chair, New Zealand), Professor Hélène Ruiz Fabri (France) and the Hon. Justice Mr. David Unterhalter (South Africa), unanimously upheld one of the EU's claims, finding that the ban in English waters failed to have regard to the principle of applying a proportionate measure under Articles 496(1) and 494(3)(f) of the Agreement, and consequently breached the UK's obligation to grant full access to its waters for sandeel fishing. All other claims were dismissed, including those relating to scientific advice, proportionality in Scottish waters, and non-discrimination. The tribunal ordered the UK to take necessary measures to comply with the ruling. See [here](#).

The EU "[welcomes](#)" the final ruling, and the UK [notes](#) that it succeeded in the majority of its arguments, despite a "procedural error in the decision to close English waters" as identified by the Tribunal. The UK intends to "undertake a process in good faith to bring the UK into compliance" but understands that it is not legally obliged to reverse the closure of English waters. Relatedly, on 19 May 2025, the EU-UK Specialised Committee on Fisheries (SCF) established after Brexit [adopted](#) a decision "setting out long-term arrangements between the EU and the UK, granting full reciprocal access to waters for fishing activities until 30 June 2038".

Institutional Development

Host Country Agreement with Bahrain

On 17 June 2025, the PCA signed a Host Country Agreement with Bahrain, under which Bahrain will provide free hearing facilities and extend privileges and immunities to arbitrators and participants in PCA-administered proceedings. This marks the PCA's 19th such agreement, following similar agreements with Argentina, Austria, Brazil, Chile, China, Costa Rica, Djibouti, Ecuador, India, Ireland, Malaysia, Mauritius, Paraguay, Portugal, Singapore, South Africa, Uruguay, and Viet Nam. See [here](#).

Annual Report 2024

On 14 May 2025, the Permanent Court of Arbitration released its Annual Report for 2024, when the PCA administered 243 cases, including 51 newly initiated cases. In 2024, the PCA celebrated its 125th Anniversary and included Vanuatu and Timor-Leste as its new contracting parties. The Report and summary can be accessed [here](#).

3. International Tribunal for the Law of the Sea (ITLOS)

35th Meeting of UNCLOS States Parties

At the 35th Meeting of States Parties to UNCLOS, Judge Tomas Heidar, President of ITLOS, [presented](#) the Tribunal's Annual Report 2024 and updated delegates on its ongoing judicial and administrative work. He highlighted two pending cases: *The M/T "Heroic Idun"* (No. 2) between the Marshall Islands and Equatorial Guinea, set for hearing in October 2025, and *The "Zheng He" Case* concerning Luxembourg's request for provisional measures following the detention of its dredger by Mexico, which the Tribunal declined in July 2024. He also drew attention to the Tribunal's Advisory Opinion on climate change and international law, commended for reaffirming the UNCLOS as a living instrument. On the administrative front, he announced the re-election of Registrar Ximena Hinrichs Oyarce and Deputy Registrar Antoine Ollivier, each for a term of five years. Finally, he emphasised ITLOS's continued commitment to capacity-building through various training initiatives and expressed gratitude to supporting governments and institutions.

Ms Hinrichs Oyarce, Registrar of the Tribunal, [presented](#) the Tribunal's reports on budgetary and financial matters for 2023–2024. She noted that while total expenditure exceeded the approved budget—largely due to costs associated with Case No. 31, these overruns were authorised and financed through prior cash surpluses. The Tribunal also achieved savings in several budget areas and received a clean audit opinion for its 2024 financial statements.

ITLOS Case No. 31 is the *Advisory Opinion on Climate Change*, where six judges whose term of office had expired on 30 September 2023 continued to sit in the case until its completion, because they had participated in a preliminary meeting under Article 68 of the Rules of the Tribunal.

Thailand, Vietnam and Indonesia nominated candidates for ITLOS bench

Thailand has launched Judge Kriangsak Kittichaisaree's [re-election campaign](#) for a second term at ITLOS, where he has served since 2017 and presided over the Chamber for Fisheries Disputes since October 2023. Judge Kittichaisaree has been a member of the CIL International Advisory Panel.

Indonesia and Vietnam have both nominated candidates for the ITLOS bench for the 2026–2035 term. Professor Eddy Pratomo, Dean of the Law Faculty at the University of Pancasila, was [nominated by Indonesia](#), while Dr Nguyen Thi Lan Anh, Vice President of the Diplomatic Academy of Vietnam, was [nominated by Vietnam](#). While Indonesia has previously sought to elect Ambassador Hasjim Djalal and Vice Minister Arif Havas Oegroseno, this marks Vietnam's first nomination to the ITLOS bench.

According to ITLOS Statute, there shall be no fewer than three members from each geographical group as established by the General Assembly of the United Nations (African States, Asian States, Eastern European States, Latin American and Caribbean States and Western European and Other States). In 2026, Judge Neeru Chadha's and Judge Kriangsak Kittichaisaree's term will expire.

II. ISDS INSTITUTIONS AND TRIBUNALS

1. International Centre for Settlement of Investment Disputes (ICSID)

Docket

In May—June 2025, ICSID registered 20 new cases, among which 11 are administered under the ICSID Arbitration Rules, three are under the ICSID Additional Facility Rules, and six are post-award proceedings.

In [*Webuild S.p.A. \(formerly Salini Impregilo S.p.A.\) v. Argentine Republic*](#) (ICSID Case No. ARB/15/39), the Claimant requests for rectification of the Award, and the Respondent requests for a supplementary decision and rectification of the Award. [*Ahron G. Frenkel seeks to annul the award from its arbitration against Croatia*](#) (ICSID Case No. ARB/20/49). Peru seeks to annul the Award in [*ENAGÁS S.A. \(España\) and ENAGÁS Internacional S.L.U. \(España\) v. Peru*](#) (ICSID Case No. ARB/18/26). Colombia also seeks to annul the Award in [*South32 SA Investments Limited v. Colombia*](#) (ICSID Case No. ARB/20/9), following a decision of the Tribunal on rectification in January 2025. Kazakhstan also requests to annul the award in [*AS Windoor v. Kazakhstan*](#) (ICSID Case No. ARB/18/32). In [*Energía y Renovación Holding, S.A. v. Guatemala*](#) (ICSID Case No. ARB/21/56), the Tribunal declare the proceeding closed after the Parties' submissions on rectification and costs.

Twelve tribunals have been constituted in the following matters: [*Maritime Archaeology Consultants Switzerland AG v. Republic of Colombia*](#) (ICSID Case No. ARB/25/4), [*European Solar Farms A/S v. Kingdom of Spain*](#) (ICSID Case No. ARB/18/45), [*Naftiran Intertrade Co. \(NICO\) Limited v. Kingdom of Bahrain*](#) (ICSID Case No. ARB/22/34), [*Nexo AG, NDS EOOD and Mirastar EOOD v. Republic of Bulgaria*](#) (ICSID Case No. ARB/24/2), [*Itochu Corporation v. Kingdom of Spain*](#) (ICSID Case No. ARB/18/25), [*Société Industrielle de Viande de Côte d'Ivoire v. Republic of Côte d'Ivoire*](#) (ICSID Case No. ARB/24/47), [*Ngondo Mining SARL v. Democratic Republic of the Congo*](#) (ICSID Case No. ARB/25/3), [*Metro de Lima Línea 2 S.A. v. Republic of Peru*](#) (ICSID Case No. ARB/17/3), [*Unión de Cervecerías Peruanas Backus y Johnston S.A.A., Cervecería San Juan S.A. and AB InBev Southern Investment Ltd. v. Republic of Peru*](#) (ICSID Case No. ARB/24/53), [*Société des Mines de Loulo S.A. and Société des Mines de Gounkoto S.A. v. Republic of Mali*](#) (ICSID Case No. ARB/25/2), [*Petrochemical Holding GmbH v. Romania*](#) (ICSID Case No.

[ARB/19/21](#)), and [ENCORE Investment Group Limited v. Republic of Türkiye](#) (ICSID Case No. ARB/24/46).

Institutional Development

On 29 May 2025, ICSID signed a cooperation agreement with the Madrid International Arbitration Center - Ibero-American Arbitration Center (CIAM-CIAR). The agreement allows ICSID hearings to be held at CIAM-CIAR's facilities, and establishes a framework for collaboration on public outreach, knowledge sharing, and support for proceedings administered by either institution. This marks the 10th cooperation that ICSID has signed with Western Europe-based institutions. See [here](#) and [here](#).

2. Permanent Court of Arbitration (PCA)

The PCA has published the existence of two new investor-State arbitrations under its administration.

[Mr Rinat Akhmetov \(Ukraine\) v. Russia](#) (PCA Case No. 2025-02) was initiated under the Ukraine-Russia Bilateral Investment Treaty of 1998 and is being administered under the UNCITRAL Arbitration Rules 1976. Seated in Hong Kong, the Tribunal comprises Mr. Ricardo Ramírez-Hernández (Presiding Arbitrator), Mr Stephen L. Drymer, and Professor Silvina González Napolitano. Mr Akhmetov is a Ukrainian oligarch and has pursued several claims against Russia, either by himself ([Akhmetov and Investio v. Russia](#) (PCA Case No. 2019-34)) or through the entities he controls ([SCM v. Russia](#); [DTEK Krymenergo v. Russia](#) (PCA Case No. 2018-41)).

[ETC Group \(Mauritius\) v. Mozambique](#) (PCA Case No. 2025-10) was initiated under the Mozambique-Mauritius Bilateral Investment Treaty and is being administered under the UNCITRAL Arbitration Rules 2021. Seated in France, the Tribunal comprises Mr Eric A. Schwartz (Presiding Arbitrator), Mr Stanimir Alexandrov, and Professor Albert Jan van den Berg. This marks the fifth investor-State arbitration with Mozambique as the Respondent, and the first case under the Mozambique-Mauritius Treaty.

3. Advisory Centre on International Investment Dispute Resolution

On 6-8 May 2025, the 2nd meeting on the operationalisation of the Advisory Centre on International Investment Dispute Resolution was convened in Yerevan, Armenia to advance discussions on establishing the Advisory Centre. Attended by participants from 57 States, regional economic integration organisations, and international organisations, the meeting addressed key operational issues, including modalities for establishing the Advisory Centre within the United Nations system, criteria for selecting the location of its headquarters and regional offices, classification of its Members, budgetary requirements

and financing mechanisms—including Member contributions and payment methods—and thresholds for membership and contributions required for the Statute’s entry into force. These deliberations were conducted in line with the Commission’s mandate at its 57th session and build upon continued efforts to ensure an inclusive, efficient, and sustainable operationalization process for the Advisory Centre. The Advisory Centre was developed through discussions within UNCITRAL Working Group III on investor-State Dispute Settlement (ISDS) Reform, which have been ongoing since 2017. More information can be found [here](#).

III. HUMAN RIGHTS COURTS

1. African Court on Human and Peoples’ Rights (AfCHPR)

Docket

26 June: Eleven Decisions Released at the 77th Ordinary Session

On 26 June 2025, the AfCHPR delivered a series of decisions on a wide range of matters.. Four cases were declared inadmissible due to non-exhaustion of local remedies (*XYZ v. Republic of Benin, Guillaume Kigbafori Soro and Others v. Republic of Côte d’Ivoire, Ajaye Jogoo v. United Republic of Tanzania and XYZ v. Republic of Benin*).

In *Democratic Republic of the Congo v. Republic of Rwanda* (Application No. 007/2023), the first inter-State case before the African Court, the Court affirmed its jurisdiction to hear the case. It confirmed its jurisdiction over the DRC’s allegations of human rights violations by Rwanda, without requiring the existence of a dispute. The Court also rejected Rwanda’s argument that the Pact of the Great Lakes Region does not qualify as a human rights instrument. It was further held by the Court that it can assume territorial jurisdiction where a State exercises extraterritorial control, such as through armed intervention, in another State.

On admissibility, the Court also rejected Rwanda’s objections and ordered the proceedings to continue. The Court ruled that procedures outside the AfCHPR system cannot be invoked to defeat its proceedings, and that the scale and systematic nature of the alleged violations made exhaustion of local remedies impractical. As to abuse of process, the Court concluded that multiple applications do not necessarily indicate bad faith, and that mere failure to disclose all facts does not render an application abusive. The DRC accuses Rwanda of widespread human rights violations under a series of human rights treaties in the context of military intervention and support for armed groups on Congolese territory.

Two cases concern Tanzania’s death penalty laws. In *Tembo Hussein v. United Republic of Tanzania* (Application No. 001/2018), the Applicant, having been convicted of murder and sentenced to death by hanging, claimed violations of his rights to fair trial and to equal protection in domestic proceedings. The Court affirmed its jurisdiction and found the application admissible. Although the Claimant did not make direct submissions in that respect, the Court held that the mandatory imposition of the death penalty by

hanging violated the right to life and dignity. The Court found that Tanzania's mandatory death penalty allows no consideration of the offence or offender's circumstances, and that death by hanging constitutes cruel, inhuman or degrading punishment and treatment. Accordingly, Tanzania was ordered to revoke the death sentence, amend relevant laws, and report on implementation. In *Emmanuel Yusuf alias Noriega v. United Republic of Tanzania* (Application No. 013/2018), the Applicant, on death row, alleged violations of equality, dignity, and fair trial rights. The Court found Tanzania had violated the right to dignity by failing to investigate police brutality and not providing legal assistance, and that the mandatory death penalty and hanging as an execution method violated the African Charter. The Applicant was awarded compensation for moral damages, but not released, as the conviction itself was not found flawed.

In *Bahati Mtega and Flowin Mtwewe v. United Republic of Tanzania* (Application No. 009/2019), the Applicants, imprisoned for gang rape and sentenced to caning, alleged rights violations during domestic proceedings. The Court found the case admissible and determined that Tanzania had violated their right to dignity (due to corporal punishment) and to a fair trial (for failure to provide legal representation). The corporal punishment sentence was set aside, compensation awarded, and Tanzania was instructed to repeal laws allowing such punishment.

In *Salif Traore and Sekou Oumar Coulibaly v. Republic of Mali* (Application No. 020/2018), the Applicants claimed discrimination after being refused enrolment in the National Police Academy. The Court found no violations of equality, non-discrimination, public service access, or education rights, as the criteria applied were found to be public and impersonal and the Applicants did not meet the requirements. All claims for reparations were dismissed.

Laurent Gbagbo v. Republic of Côte d'Ivoire (Application No. 025/2020) concerned Former President Laurent Gbagbo's exclusion from electoral lists due to a criminal conviction. The Court found no evidence of unequal treatment, violation of the presumption of innocence, or infringement of the right to participate in public affairs, and dismissed all claims. Each party was to bear its own costs.

In *Al-Assad Milad v. Republic of Tunisia* (Application No. 032/2018), the Applicant claimed loss of property at a public auction and a violation of the right to a fair trial. The Court found no substantive violation regarding the auction but determined that failure to publicly deliver two judgments breached Article 7(1) of the African Charter (right to a fair trial). The Applicant was awarded a modest sum for moral damages, and orders for publication and reporting on the judgment were made.

17 June: Jurisdiction Ruling in Chief Festus A. Ogwuche et al v. Côte d'Ivoire et al

Chief Festus A. Ogwuche & 25 Others V. The Republic of Cote D'Ivoire & 14 Others (Application No. 005/2024) concerns complaints lodged by 25 nationals of Member States of the Economic Community of West African States (ECOWAS), and a non-governmental organization, Campaign for Social Justice and Constitutional Democracy in Africa. The Respondents were 15 ECOWAS Member States. The Applicants challenge a proposed amendment to the ECOWAS Community Court of Justice Protocol, which

would require exhaustion of domestic remedies before bringing cases, alleging it would deprive them of fundamental rights under the African Charter and other international instruments.

The Court noted that the NGO does not have observer status before the African Commission and thus must be struck out a party. With respect to the Respondents, the Court noted that only Burkina Faso, Ghana, Niger, The Gambia, Mali and Guinea-Bissau are parties to the Protocol to the African Charter and have deposited a Declaration under Article 34(6) of the Protocol (which allows cases directly brought by individuals). Therefore, the Court found it has personal jurisdiction over these States. Noting that Nigeria, Togo, Senegal, Côte d'Ivoire and Benin are parties to the Protocol without a valid Declaration, and that Cabo Verde, Sierra Leone, Liberia, and Guinea are not parties to the Protocol, the Court struck out these States as Respondents.

4 June 2025: Hearing on the enforcement of the judgments concerning the rights of the Ogiek indigenous people

The Court held a public hearing in *African Commission on Human and Peoples' Rights v Kenya*, concerning Kenya's compliance with its earlier judgments issued in 2017 and 2022, where the Court found that Kenya violated several provisions of the African Charter on Human and Peoples' Rights, and ordered Kenya to provide pecuniary and non-pecuniary reparations, including ensuring the Ogiek community's access to their ancestral lands and implementing legislative and policy reforms to protect indigenous peoples' land rights.

During the hearing, Kenya acknowledged challenges in fulfilling all aspects of the Court's judgments, particularly those related to land demarcation and restitution, and requested more time to progressively implement the judgment. The African Commission expressed concern over the slow pace of implementation, argued that the ongoing displacement and marginalisation of the Ogiek people amounted to continued denial of justice, and urged the Court to take decisive steps to ensure compliance. Having heard all parties, the Court adjourned the matter for deliberation and will issue a decision at a later date.



[4 June 2025 hearing](#) on the enforcement of the judgments concerning the Ogiek community

Previously on [12 November 2024](#), the Court held its first-ever compliance hearing under Rule 81 of its 2020 Rules of Court, which was to monitor compliance with its decisions. Following Kenya’s request, the Court adjourned the hearing and granted Kenya an opportunity to file reports on its compliance by 11 February 2025. See [here](#).

2 June 2025: Re-openings of pleadings in two cases against Tanzania

In 2019, Tanzania withdrew its declaration accepting the AfCHPR’s jurisdiction to receive cases from individuals and NGOs. In the [Andrew Ambrose Cheusi v. United Republic of Tanzania](#) judgment of 26 June 2020, the Court ruled that this withdrawal had no bearing on pending cases and new cases filed before the day on which the withdrawal took effect, which was on 22 November 2020, being a period of one year after its deposit.

- *Moses Amos Mwakasindile v. United Republic of Tanzania*

The Applicant alleges a violation of his right to a fair trial after being convicted and sentenced to life imprisonment for drug trafficking by the High Court of Tanzania, with his subsequent appeal dismissed by the Court of Appeal. His application to the AfCHPR was filed in 2019, but Tanzania failed to respond. In February 2025, Tanzania filed its Response and a request for time extension, explaining that it had to seek different information from various stakeholders. On 2 June 2025, the Court granted the extension requested by Tanzania to respond and ordered that the pleadings be reopened. See [here](#).

- *Legal and Human Rights Centre and Liberatus Mwang’ Ombe. v. United Republic of Tanzania*

In this case, the Applicants allege that Tanzanian law restricts three categories of Tanzanian citizens from registering and voting in the Presidential and National Assembly elections: those sentenced to more than six months' imprisonment, those sentenced to death, and those living in the diaspora. The application was filed on 19 November 2020, and after Tanzania failed to respond by the Court's set deadline, pleadings were closed on 9 February 2022. In May 2025, Tanzania requested a re-opening of pleadings and an extension of time, because it required "more time to enable it to verify information from different institutions of government". On 20 May 2025, the Court, noting that the case concerns alleged violations of political participation and elections, found it in the interest of justice to allow Tanzania to file its defence and granted its request to reopen pleadings, giving it seven days to submit a response. See [here](#).

2 May 2025: Petition for an advisory opinion on climate

The Pan African Lawyers Union and the African Climate Platform, a coalition of African civil society organisations, has filed a request for an Advisory Opinion from the African Court, under Article 4 of the Protocol to the African Charter (advisory opinions) to clarify the human rights obligations of African states in addressing the climate crisis. It focuses on protecting vulnerable populations and ensuring equitable climate action. It seeks to establish legal standards for mitigation, adaptation, and reparations. See [text of the Petition](#). The petition does not appear under the list of pending advisory opinions on the AfCHPR's website.

Court

2 June 2025: Election of a New President and Vice President

Honourable Justice Sacko Modibo (Mali), elected as President, takes over from Honourable Lady Justice Imani Daud Aboud (President from 2021 to 2025). Honourable Lady Justice Bensaoula Chafika (Algeria), elected as Vice-President, takes over from Honourable Justice Sacko.

They will both serve a two-year term from 2025 to 2027. The President and Vice-President are elected for a term of two years and may be re-elected once (Rule 9(1) of the 2020 Rules of Court). The judges of the Court elect the President and Vice-President from among their members. Prior to the election, the judges draw up a list of nominees for election or re-election to the respective offices (Rules 11 and 12 of the 2020 Rules of Court).

2. European Court of Human Rights (ECHR)

Docket

23 July 2025: deadline for the Government of the Russian Federation to submit their observations in the case *Ukraine v. Russia (IX)*. The application, lodged on 19 February 2021, concerns Ukraine's allegations of political-assassination operations ordered by Russia and attempts to cover them up. Among the assassinations or attempted assassinations cited by the Ukrainian authorities are Umar Israilov (in Austria), Vladimir Kara-Murza, Alexei Navalny and Anna Politkovskaya (in Russia) and Alexander Litvinenko and Sergei Skripal (in the United Kingdom).

See [Press Release](#).

31 July 2025: deadline for the Government of the Russian Federation to submit their observations in the case *Ukrainian Helsinki Human Rights Union on behalf of ten Ukrainian children v. Russia*. The case concerns ten Ukrainian children who were in childcare in Crimea in 2014 when Russia asserted jurisdiction over the peninsula. According to the association Ukrainian Helsinki Human Rights Union (UHHRU) acting on their behalf, Russian nationality was forced on the children, and they were put up for adoption and may have been adopted. There has been no information on their whereabouts since 2014, despite the Ukrainian authorities' repeated requests.

See [Statement of facts and questions to the parties](#), and [Press Release](#).

10 July 2025: the Court will be delivering a Grand Chamber ruling in the case of *Semenya v. Switzerland*.

The case concerns an international-level athlete, specialising in middle-distance races, who complained about certain regulations of the International Association of Athletics Federations (now called World Athletics) requiring her to take hormone treatment to decrease her natural testosterone level in order to be able to take part in international competitions in the female category. Having refused to undergo the treatment, she was no longer able to take part in international competitions. In 2023, a Chamber of the Court held that there had been a violation of the prohibition of discrimination, of the right to respect for private life and of the right to an effective remedy. The Swiss Government requested a referral of the case to the Grand Chamber, and a panel of the Grand Chamber granted the request. A number of third parties (including the United Kingdom Government, the United Nations High Commissioner for Human Rights and World Athletics) were granted leave to intervene in the written procedure. A hearing took place on 15 May 2024.

See [Press Release](#) and [Webcast](#) of the 2024 hearing.

9 July 2025: the Court will be delivering a Grand Chamber ruling in the inter-State case of *Ukraine and the Netherlands v. Russia*. A Grand Chamber hearing was held in

this case on 12 June 2024. This inter-State case covers complaints concerning the Russian military operations in Ukraine since 24 February 2022 and the conflict in eastern Ukraine involving pro-Russian separatists which began in 2014, including the downing of Flight MH17. The delivery will also be broadcast live on the European Court's [YouTube channel](#). See [Press Release](#).



[Grand Chamber Hearing in Ukraine and the Netherlands v. Russia](#), 12 June 2024

Decided cases

25 June 2025: Delivery of the Court's conclusions (inadmissibility) in a case concerning elections requirements in Bosnia and Herzegovina (Grand Chamber)

The Court delivered the operative provisions (conclusions) of its judgment in the case of *Kovačević v. Bosnia and Herzegovina*, which concerned the Applicant's allegation that the requirements applicable to elections for the House of Peoples of the Parliamentary Assembly and for the Presidency of Bosnia and Herzegovina were discriminatory against him and prevented him from voting for candidates of his choice in those elections in 2022.

The Court upheld Bosnia and Herzegovina's objection to the admissibility of the application on the grounds that the Applicant had abused the right of application under the European Convention on Human Rights and that he lacked victim status under the Convention. The complete text of the Grand Chamber's judgment will be published at a later stage.

See [Press Release](#) and [Delivery of the ruling](#).

24 June 2025: Judgment in a case concerning collective expulsions in Hungary

In *H.Q. and Others v. Hungary* concerning the removal from Hungary to Serbia of three asylum-seekers under Hungary's State Border Act without examination of their individual circumstances, and their alleged lack of access to the international-protection procedure. The Court held that there had been a violation of the prohibition of collective expulsion of aliens and, in conjunction, a violation of the right to an effective remedy. It also held that there had been a violation of the procedural aspect of the prohibition of inhuman or degrading treatment in respect of two Applicants.

The Court found that the expulsions had been "collective" in nature and that Hungary's "embassy procedure" for seeking international protection was unclear and lacked safeguards. It underlined the urgent need for the Hungarian authorities to take immediate and appropriate measures to prevent any further instances of collective expulsions and to ensure genuine and effective access to the international-protection procedure.

12 June 2025: S.S. and Others v. Italy declared inadmissible

The case concerned a maritime operation to rescue a rubber dinghy transporting some 150 people which had left Libya with a view to reaching European shores. The Applicants complained that the Rome Maritime Rescue Coordination Centre (MRCC) had placed them at risk of ill-treatment and death by allowing a Libyan ship to take control of the rescue operations. The Court found that the criteria for concluding that a State Party had exercised extraterritorial jurisdiction for the purposes of Article 1 of the Convention had not been met in the circumstances of the case. The Court, however, emphasised that this situation was nonetheless governed by other rules of international law, in particular those regarding the rescue of persons at sea, the protection of refugees and State responsibility. See [Press Release](#).

10 June 2025: Judgment in a case concerning property proceedings brought by Greek Cypriots in the "Turkish Republic of Northern Cyprus"

The case *K.V. Mediterranean Tours Limited v. Türkiye* concerned the effectiveness of the Immovable Property Commission (IPC) as a legal avenue for compensation claims brought by Greek Cypriots in the "Turkish Republic of Northern Cyprus".

In this case, the Court held that there had been a violation of protection of property (Article 1 of Protocol No. 1 to the European Convention on Human Rights). While the Court acknowledged the progress made by the IPC, it found that it had not acted coherently, diligently and quickly enough in examining this claim. The Court found that further efforts were required to expedite proceedings and to establish a remedy offering genuinely effective redress for delays. See [Legal Summary](#).

Court

Elections: New President of the ECHR and two new Judges

On 30 May 2025, the newly elected President of the European Court of Human Rights took up office. Mattias Guyomar (judge elected in respect of France) succeeds retiring Judge Marko Bošnjak (judge elected in respect of Slovenia). The President of the European Court of Human Rights is elected by the plenary Court, i.e. the 46 judges elected in respect of the 46 Member States of the Council of Europe. The President is elected for a three-year term and may be re-elected once (Rule 8 of the Rules of Court).

On 2 June 2025, the newly elected judge in respect of Slovenia, Vasilka Sancin, was formally sworn in. On 24 June 2025, Hugh Mercer was elected judge in respect of the United Kingdom. ECHR Judges are elected for a non-renewable term of nine years by the Parliamentary Assembly of the Council of Europe from a list of three candidates nominated by each State which has ratified the European Convention on Human Rights. Although they are elected in respect of a State, they hear cases as individuals and do not represent that State. See more on the elections process [here](#).

New Rules of Court concerning inter-State applications

-There has been a notable rise in the number of inter-State applications brought before the European Court of Human Rights. Beginning with the first inter-State application in 1956, there were 10 such applications lodged between 1956 and 1994, and more than twice that number between 1994 and 2024.

There are currently 15 inter-State cases pending before the European Court (five cases against Russia). They include *Ireland v. the United Kingdom (III)*, *Georgia v. Russia (IV)*, *Liechtenstein v. the Czech Republic*, three cases *Ukraine v. Russia*, *Ukraine* and *the Netherlands v. Russia*, as well as three cases concerning the conflict between Armenia and Azerbaijan/Nagorno Karabakh.

-The following Rules of the [Rules of Court](#) concerning inter-State applications were amended in April 2025 (amendments adopted by the Plenary Court):

- Under Rules 51 and 58, the Court now has the discretion to accept or decline the request from a party to hold a hearing (a hearing “shall be held if the Chamber so decides” in the 2025 version of the Rules versus, in the 2024 version: a hearing shall be held “if one or more of the Contracting Parties concerned so requests or if the Chamber so decides of its own motion”).
- Introduction of a new requirement for the translation of submitted documents - in particular decisions relating to the object of the application - into one of the official languages of the Court (Rule 46).

Report on the first effects of Protocol No. 16 (advisory opinions) to the European Convention on Human Rights

Protocol No. 16 to the Convention allows the highest courts and tribunals of a State Party to request the Court to give advisory opinions on questions of principle relating to the interpretation or application of the rights and freedoms defined in the Convention or its protocols.

The report by the Steering Committee for Human Rights (CDHD) on Protocol No. 16 assesses its initial impact since its entry into force in 2018, noting its aim to enhance judicial dialogue and strengthen the implementation of the Convention through non-binding advisory opinions from the highest national courts. To date, 24 member States have ratified, often citing reasons like promoting dialogue, efficiency, and preventing future violations, while some non-ratifying States express concerns about resource strain or the non-binding nature. The Court has accepted seven and rejected four requests, providing guidance on "questions of principle" for novel or complex legal issues, distinct from well-established case law. Opinions are generally delivered within six to ten months. These opinions have been relevant to domestic case determination, influencing national jurisprudence and legislation, and contributing to the execution of prior Court judgments. These opinions are integrated into the Court's case law and have further elucidated specific legal areas. Protocol No. 16 has demonstrated a qualitative, rather than quantitative, impact on the volume of new applications.

More on the CDDH [here](#); Report available [here](#).

3. Inter-American Court of Human Rights (IACtHR)

Docket

3 July 2025: Notification of Advisory Opinion on climate emergency

Advisory Opinion OC-32/25 of 29 May 2025 was notified by the IACtHR and publicly read by the Court's President Judge Nancy Hernández López. This Advisory Opinion was requested by Colombia and Chile in January 2023. The Court was asked to clarify the obligations of States under the American Convention on Human Rights, in context of the climate emergency.

Advisory Opinion OC-32/25 follows IACtHR Advisory Opinion OC-23/2017, requested by Colombia in 2016, on the right to a healthy environment under the American Convention.

Notably, the Inter-American Court made several references to the ITLOS Advisory Opinion, in particular on the standard of due diligence, and took note of the relevant proceedings

pending before other courts. In 2022, ITLOS delivered an advisory opinion at the request of the Commission of Small Island States on Climate Change and International Law, and the ICJ advisory opinion on the obligations of States in respect of climate change will be delivered on 23 July 2025. As reported above, the AfCHPR has received a request for advisory opinion on the climate crisis on 2 May 2025. Unlike the unanimous ITLOS bench, the judges of the Inter-American Court were sharply divided on several key issues, including the recognition of Nature and its components as subjects of rights, the characterisation of certain prohibitions on anthropogenic conduct as jus cogens, access to justice, and obligations towards especially vulnerable groups.

In Advisory Opinion OC-32/25, the Inter-American Court unanimously affirms that, according to the best available science, the current situation **constitutes a climate emergency** which “can only be adequately addressed through urgent and effective actions for mitigation, adaptation and progress towards sustainable development, articulated with a human rights perspective.”

In this context, States, under the American Convention on Human Rights, are required to refrain from actions that obstruct, delay, or reverse measures necessary to protect human rights. They are **prohibited from adopting retrogressive climate policies**, in line with the principles of progressivity and non-regression, which require the preservation and advancement of human rights.

States must adopt “**reinforced due diligence**” to counter the human causes of climate change and to protect people under their jurisdiction from climate impacts. They must guarantee equal and non-discriminatory access to rights for those affected by climate change through **reasonable and differentiated measures** and by ensuring access to complete environmental data to enable **informed participation**.

The Court is of the opinion, by four votes in favour and three partially against, that States have specific obligations to protect particularly **vulnerable groups** such as children, indigenous and tribal peoples, Afro-descendants, peasant and fishing communities, and those disproportionately affected by climate disasters. They must also protect individuals who become vulnerable due to changing or contextual circumstances, even if they don't belong to traditionally recognised categories.

States also have a **special duty to protect environmental defenders**, which includes obligations to ensure their safety, investigate and punish attacks or threats against them, and prevent the criminalisation of their environmental advocacy.

The Court is of the opinion that the right to a healthy climate, as an element of the right to a healthy environment, **protects present and future generations of humanity, as well as Nature itself**. Nature and its components are **subjects of rights** (four votes in favour and three against). This approach reflects the modern understanding of the **interdependence between human rights and environmental protection**, particularly

in response to the global environmental crisis. The Court further affirms that the prohibition of **human actions that may irreversibly affect** the balance of the shared ecosystem is a **jus cogens norm** (four votes in favour and three against).

In this context, States have an obligation to reduce greenhouse gas emissions by setting **mitigation targets and human rights-based strategies** and **regulating corporate behaviour** and **assessing the climate impact** of relevant projects and activities. They must immediately **define and regularly update ambitious national climate adaptation goals** and plans. States must also **incorporate regulations into their domestic legal frameworks and cooperate in good faith** to ensure the respect, guarantee, and progressive development of human rights in the context of the climate emergency.

22 May 2025: Hearing in the first case of forced sterilisations in Peru

The case concerns the death of Celia Ramos Durand, a Peruvian woman who died in 1997 after being forcibly sterilised under the “National Reproductive Health and Family Planning Programme” during the administration of President Alberto Fujimori. The case was filed by Celia Ramos Durand’s daughters. It is [estimated](#) that, in Peru between 1996 and 2000, more than 200,000 women were sterilised without giving their consent.



Judges of the Inter-American Court at the hearing held in the capital of Guatemala | Inter-American Court of Human Rights – Creative Commons. In Diana Cariboni, [5 June 2025, Open Democracy](#)

Developments from the Inter-American Commission

[The Inter-American Commission on Human Rights (IACHR) investigates human rights violations and issues merits reports with recommendations. It is composed of seven

independent members who serve in a personal capacity. If violations are found by the Commission and not resolved, it can refer cases to the Inter-American Court of Human Rights (IACtHR). The Court delivers binding judgments on States that have accepted its jurisdiction.]

20 May 2025: Venezuela must restore the unlawfully and arbitrarily revoked passports of opposition activists, rights defenders, and journalists (IACHR)

The IACHR and its Special Rapporteur for Freedom of Expression condemn Venezuela's unlawful and arbitrary revocation of passports from opposition activists, rights defenders, and journalists. They call on the State to promptly restore these documents to allow holders to travel, carry out daily activities, and access international protection. They also urge an end to repression aimed at intimidating civilians and call on the international community to support recognition of expired or revoked Venezuelan documents. See [here](#).

7 May 2025: The IACHR extends precautionary measures for Honduran environmental defenders and their families

The IACHR has extended precautionary measures for 13 individuals facing ongoing threats and violence due to their environmental advocacy in Honduras. These risks had materialised in the murder of Juan López in September 2024. See [here](#).

1 May 2025: Merits report on death of Mexican migrant in U.S. Border Custody

The IACHR published Admissibility and Merits Report No. 60/25 on the death of a Mexican migrant in 2010 after being detained by U.S. border agents. According to the 2016 petition, he was brutally beaten, tasered, and restrained despite being unarmed and injured.

The report acknowledges that the incident occurred in a broader context of discrimination against migrants, particularly those of Latin American origin, marked by the disproportionate use of force by border agents and a lack of accountability. The IACHR also found that US laws governing the use of force lacked the clear parameters and limits necessary to effectively safeguard human rights.

After receiving no response from the United States to its Merits Report in December 2024 or its Final Report in March 2025, the IACHR reiterated its recommendations, which included providing full reparations, reopening the criminal investigation to ensure accountability, and adopting systemic reforms to prevent future violations (such as restricting taser use and training law enforcement in human rights). See [here](#).

16 May 2025: The IACHR presents case on extrajudicial executions in Brazil to the IACtHR

The case involves the extrajudicial killings of three people, injuries to two others, and a lack of proper investigation and accountability. In Report No. 101/23, the Inter-American Commission on Human Rights (IACHR) found signs of Military Police involvement, unjustified use of lethal force, and broader patterns of abuse. It also highlighted serious investigative failures and resulting impunity.

The Commission found Brazil responsible for the violation of the rights to life, personal integrity, judicial guarantees and judicial protection. It requests the Inter-American Court to determine the following measures: full material and immaterial reparations, healthcare for families, thorough investigations and justice in accordance with inter-American standards, as well as the adoption of non-repetition guarantees in São Paulo (reforming police protocols, establishing accountability mechanisms and strengthening investigative capacity on the lethal use of force). See [here](#).

July 2025: Public hearing – climate emergency, waste pickers and methane emissions

In the context of the IACHR's 193rd Ordinary Period of Sessions, public hearings will be held online from July 21 to 25, including a regional thematic hearing convened *ex officio* by the Commission. It will address the situation of waste pickers and efforts to reduce methane emissions in Latin America and the Caribbean, within the broader context of the global climate emergency. The aim is to help develop inter-American standards and inform inclusive public policies. Interested participants must register online to join the hearing. See [here](#).

Survey on user accessibility to IACHR mechanisms

The IACHR is conducting a survey to gather feedback from individuals who used its mechanisms in 2024. The anonymous 10-minute survey aims to improve accessibility and effectiveness of tools such as the petition/precautionary measures system, the platform for monitoring compliance with IACHR recommendations, public hearings, and its website. Results will help evaluate progress on the 2023–2027 Strategic Plan and will be included in future annual reports. See [here](#).

The IACHR calls for participation in identifying cases that may contribute to the development of inter-American human rights jurisprudence

The IACHR has launched a new call for States and civil society to help identify cases that can advance inter-American human rights jurisprudence, as part of implementing its Prioritization Policy under Resolution 4/23. Until 30 June 2025, the IACHR accepts

submissions through an online system in the organisation's four official languages (Spanish, English, Portuguese, and French). The initiative aims to improve access to timely justice and support legal and institutional reforms across the Americas. See [here](#).

IACHR's calls to States

On 26 June 2025, the IACHR called on States to [eradicate violence](#) against women and girls with sensory disabilities. The IACHR has found that violence against women and girls with disabilities can not only cause further disabilities but also worsen pre-existing disabilities and structural exclusion patterns.

The IACHR also called on States to [uphold LGBTI rights](#) and avoid regressive measures. Despite significant progress, 3,000 LGBTI persons have been murdered since 2014 in the Americas and the Caribbean, according to a civil society observatory.

On 27 June 2025, Peru was [urged to refrain](#) from passing laws granting amnesties for serious human rights violations. A Bill, approved in a first vote in Peru, proposes granting amnesty to members of the Armed Forces, police, and Self-Defense Committees who have been reported, investigated, or prosecuted for actions committed during counterterrorism operations between 1980 and 2000.

The IACHR also [urged States](#) to promote the establishment of national torture registers to better understand the scope of the problem in a given location, identify patterns, high-risk areas and potential perpetrators in order to officially investigate, and eradicate such practices.

IV. OTHER INSTITUTIONS

1. International Organization for Mediation

On 30 May 2025, the [Convention on the Establishment of the International Organization for Mediation](#) (IOMed) was signed in Hong Kong by 33 founding member States, with representatives from 85 countries and nearly 20 international organizations in attendance. Based in Hong Kong, IOMed will be the first intergovernmental body dedicated to the peaceful settlement of international disputes through mediation. The Governing Council of the Organization, consisting of representatives of all contracting parties, is the highest decision-making body and will formulate rules, procedures, and regulations in order to operationalise the Organization. The Secretariat, headed by a Secretary General, will manage the day-to-day operation. The Organization will also maintain several panels of mediators nominated by contracting parties.

2. Special Tribunal for the Crime of Aggression against Ukraine

On 25 June 2025, Ukraine’s President Volodymyr Zelenskyy and the Secretary General of the Council of Europe, Alain Berset, have signed an [agreement](#) on the establishment of a [Special Tribunal for the Crime of Aggression against Ukraine](#), including the [Statute](#) of the Special Tribunal. The Special Tribunal is mandated to “to investigate, prosecute and try persons who bear the greatest responsibility for the crime of aggression against Ukraine”, based on the “territorial jurisdiction of Ukraine”. According to the Statute, “the official position of any accused person at the time of the alleged commission of a crime, whether as head of State or government, a member of a government or parliament, an elected representative or a government official, shall not relieve such person of criminal responsibility nor mitigate punishment”. The Agreement will enter into force following Ukraine’s completion of its internal legal procedures and the establishment of an Enlarged Partial Agreement which will set out funding and management details.

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