

A Recent Development in International Law: Judgment by the European Court of Human Rights in *Georgia v Russia*

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Context

On 9 April 2021, Georgia marked thirty years of the restoration of its Democratic Republic, seventy years after it had been annexed by the Soviet Union. While the last three decades have proved remarkable in terms of Georgia's State-building and in the context of its strides towards European and Euro-Atlantic integration, the process has been overshadowed by the aggression and intimidation by its northern neighbour, the Russian Federation. It began from the first day of Georgia's restored independence and can be divided into two major stages: First, from the early 1990s until August 2008, Georgia was subjected to covert pressure and aggression by the Russian Federation, which then mostly utilised aggressive puppet regimes representing criminal and separatist groups in the two Georgian regions of Abkhazia and Tskhinvali region/South Ossetia thus waging a proxy war on Georgia; second, in 2008 as Georgia's institutions became stronger and more resilient to these stealth tactics, Russia rolled out its troops and military hardware across the state border deep into Georgia and launched a full-scale military attack, in gross violation of the fundamental principles of international law and the United Nations Charter.

Although the massive armed hostilities stopped short of Russian troops taking over the whole of Georgia, the Russia–Georgia war in August 2008 left its longstanding undermining imprint on the international security and turned the perspective of peace and stability in the wider region upside-down. Russia's forcible attempt of redrawing the sovereign borders and the illegal occupation of two Georgian regions of Abkhazia and Tskhinvali region/South Ossetia established a dangerous precedent with the consequences that have been expanding on an annual basis. The illegal annexation by Russia of the Ukrainian region of Crimea in 2014 showed that Georgia is not an isolated

case, and that the same scenarios were playing out in Georgia and Ukraine, with Moscow attempting to create a destabilised zone in Europe.¹

Military aggression against Georgia in 2008 was a watershed moment in Russia's foreign policy, when Moscow openly declared its ambitions to retain dominance in the region that is still considered by the Kremlin as its 'privileged sphere of influence.'²

Russia has established its occupation regimes in both Georgian regions, and takes steps towards de-facto annexation of those.³ Throughout the occupied territories, hundreds of thousands of the Georgian population have fallen victim to ethnic cleansing and have become internally displaced persons (IDPs) and refugees in exile, while thousands of ethnic Georgians on the ground continue to be kidnapped, tortured and murdered.⁴ Meanwhile, the occupation forces continue the illegal process of so-called 'borderization' through erecting barbed-wire fences and other artificial barriers along the occupation line that separate families and villages exacerbates the already difficult humanitarian situation on the ground.⁵

Facing this challenge from a major military power, Georgia committed itself to a peaceful resolution of the conflict through political dialogue and the continued involvement of international organisations and other actors, which manifested in the so-called process of the Geneva Discussions.⁶ In parallel, Georgia also chose to utilise all international political and legal instruments and remedies available to protect its sovereign rights as well as the rights and freedoms of the population affected by the ongoing occupation. In particular, before August 2008, the Russia–Georgia conflict-

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- 1 The Ministry of Foreign Affairs of Georgia Quarterly Reports of the Ministry of Foreign Affairs of Georgia on the Human Rights Situation in the Occupied Regions of Georgia <<https://mfa.gov.ge/Occupied-Territories.aspx>> accessed 1 January 2022.
 - 2 'Medvedev on Russia's Interest' *The Economist* <<https://www.economist.com/certain-ideas-of-europe/2008/09/01/medvedev-on-russias-interests>> accessed 1 January 2022.
 - 3 Svante Cornell and David Smith, 'Moscow moves to De Facto Annexation of Georgian Breakaway Regions' <https://www.gfsis.org/media/download/GSAC/Articles/Moscow_Moves_to_De_Facto_Annexation.pdf> accessed 1 January 2022.
 - 4 Council of Europe: Ministers Deputies *The Council of Europe and the Conflict in Georgia* Decisions of the Council of Europe Ministers Deputies (1404th meeting, 12 and 17 May 2021).
 - 5 Ministry of Foreign Affairs of Georgia Quarterly Reports of the Ministry of Foreign Affairs of Georgia on the Human Rights Situation in the Occupied Regions of Georgia <<https://mfa.gov.ge/Occupied-Territories.aspx>> accessed 1 January 2022.
 - 6 The Geneva International Discussions were launched in Geneva, Switzerland, in October 2008, in order to address the consequences of the August 2008 war in Georgia. The decision on the formation of such a format was adopted according to the 12 August 2008 Ceasefire Agreement. From that period onwards, the Geneva discussions are being held four times a year. Co-chaired by the Organization for Security and Co-operation in Europe, the European Union and the United Nations, the Geneva process brings together representatives of Georgia, the Russian Federation, the United States and Georgia's breakaway regions—Abkhazia and South Ossetia <<https://smr.gov.ge/en/page/26/geneva-international-discussions>> accessed 1 January 2022.

related issues had been addressed predominantly at the United Nations Security Council (UNSC),⁷ the United Nations General Assembly (UNGA),⁸ the Organization for Security and Cooperation in Europe (OSCE), the Council of Europe (CoE), political bodies as well as the European Union and other multilateral fora. After August 2008, Georgia expanded its toolbox of legal defence efforts by resorting to international courts like the International Court of Justice (ICJ), the International Criminal Court (ICC) and the European Court of Human Rights (ECtHR).⁹ Confronting the Russian warfare-oriented mindset with international law and legal processes at the European Court of Human Rights has proved to be one of the most effective forms of these efforts.

On 11 August 2008, Georgia lodged one of such applications at the ECHR in the context of the armed conflict that occurred after the open invasion of Georgian territory by Russian troops, from 7 August 2008. On 12 August 2008 a ceasefire agreement¹⁰ was concluded between the Russian Federation and Georgia, under the auspices of the European Union, specifying that the parties would refrain from the use of force, end hostilities and provide access to humanitarian aid, and that Georgian military forces would withdraw to their usual bases and Russian military forces to the lines prior to the outbreak of hostilities. The Russian Federation has never complied with the above agreement and continues to occupy the two Georgian regions. Moscow transgressed beyond occupation and declared its puppet occupation regimes in both Georgian territories (Abkhazia, Georgia and Tskhinvali Region/South Ossetia) as so called ‘independent republics’ and institutionalised the ethnic cleansing policy against the Georgian population by destroying most of the Georgian villages in Tskhinvali region/South Ossetia.¹¹

ECtHR Judgment on the Case *Georgia v Russia*¹²

On 21 January 2021, the ECtHR delivered a legally-binding judgment in the case concerning the armed conflict between Georgia and the Russian Federation in August

7 The UN Security Council adopted thirty-two resolutions on the situation in Abkhazia, Georgia during 1993–2008 annually (First UNSC Resolution N849 of 9 July 1993 and the last UNSC Resolution 1808 of 15 April 2008). The UNSC Resolutions available at <<https://www.un.org/securitycouncil/content/resolutions-0>> accessed 1 January 2022.

8 Since 2008, the United Nations General Assembly adopted fourteen resolutions titled ‘Status of Internally Displaced Persons and Refugees from Abkhazia, Georgia, and the Tskhinvali region/South Ossetia, Georgia’ <https://research.un.org/en/docs/ga/quick/regular/76> accessed 1 January 2022.

9 <<https://www.icj-cij.org/en/case/140>>; <<https://agenda.ge/en/news/2021/3226>> accessed 1 January 2022.

10 Government of Georgia, *Russian Aggression of Georgia: Six Point Peace Plan* <<https://smr.gov.ge/uploads/prev/9bbbc7.pdf>> accessed 1 January 2022.

11 Ministry of Foreign Affairs of Georgia *Quarterly Reports on the Human Rights Situation in the Occupied Regions of Georgia* <<https://mfa.gov.ge/Occupied-Territories.aspx>> accessed 1 January 2022.

12 *Georgia v Russia (II)* Application No 38263/08 (21 January 2021) <[https://hudoc.echr.coe.int/fre#{%22itemid%22:\[%22001-207757%22\]}](https://hudoc.echr.coe.int/fre#{%22itemid%22:[%22001-207757%22]})> accessed 1 January 2022.

2008 and its consequences.¹³ The judgment confirmed the illegality of the Russian occupation of Georgian territories and the fact of ‘effective control’ exercised by the Russian Federation over Georgia’s territories of Abkhazia and Tskhinvali region/South Ossetia.

While the ECtHR held that the events occurring during the active phase of hostilities (8 to 12 August 2008) had not fallen within the jurisdiction of the Russian Federation for the purposes of Article 1 of the European Convention on Human Rights,¹⁴ the court established its jurisdiction in the case beyond 12 August and until at least 10 October 2008.¹⁵

The ECtHR held that ‘the Russian Federation had exercised “effective control” over South Ossetia, Abkhazia and the “buffer zone” during the period from 12 August to 10 October 2008, the date of the official withdrawal of the Russian troops.’¹⁶

Proceeding from the above finding, there is no other room for interpretation but to conclude that the ECtHR upheld Georgia’s claim that the Tskhinvali region and Abkhazia are integral parts of Georgia’s territory and are occupied illegally by the Russian Federation.

The ECtHR is clear in its ruling that not only was the Russian Federation guilty of isolated or individual violations of human rights and freedoms under the European Convention but it also applied ‘administrative practice’ to such violations:

299. Having regard to all those factors, the Court concludes that there was an administrative practice contrary to Article 2 of Protocol No. 4 as regards the inability of Georgian nationals to return to their respective homes. That situation was still ongoing on 23 May 2018, the date of the hearing on the merits in the present case, when the parties submitted their most recent (oral) observations to the Court.¹⁷

And further

301. The Court therefore considers that there has been a violation of Article 2 of Protocol No. 4 at least until 23 May 2018, and that the Russian Federation is responsible for that violation.¹⁸

13 *ibid.*

14 Judgment by the European Court of Human Rights in *Georgia v Russia* para 144 <https://hudoc.echr.coe.int/fre#_Toc61345575> accessed 1 January 2022.

15 *ibid* para 175.

16 *ibid* para 174.

17 *ibid* para 299.

18 *ibid* para 30.

In its 21 January 2021 Judgment, the ECtHR, ruled that the Russian Federation was in violation of a number of Articles of the European Convention of Human Rights, in particular of the following.

Prohibition of Torture (Article 3 of the Convention):

The ECtHR shared Georgia's position and recognised Russia's responsibility for torture, inhuman and degrading treatment of Georgian prisoners of war and civilians. In particular, the court held that Russia was responsible for the torture of the Georgian prisoners of war as well as the detention of about 160 Georgian civilians and their inhuman and degrading treatment at the Tskhinvali detention centre.¹⁹

The Right to Liberty and Security (Article 5 of the Convention):

The illegal detention of Georgian citizens by Russian forces and the de facto government forces of the Tskhinvali region under their control have also led to violations of the right to liberty and security.²⁰

Freedom of Movement (Article 2 of Protocol No. 4 to the Convention), Right to Respect for Private and Family Life (Article 8 of the Convention) and the Right to Property (Article 1 of Protocol No. 1 to the Convention):

The court found that 'there was an administrative practice contrary to Article 2 of Protocol No. 4 as regards the inability of Georgian nationals to return to their respective homes. That situation was still ongoing on 23 May 2018,'²¹ and 'there has been a violation of Article 2 of Protocol No. 4 at least until 23 May 2018, and that the Russian Federation is responsible for that violation.'²² The European Court shared the arguments of the government of Georgia regarding the ethnic cleansing carried out by Russia and found Russia responsible for the deliberate torching, looting and destruction of the Georgian villages in the Tskhinvali region and its surrounding areas. As a result of such ethnic cleansing and within the context of the ongoing occupation, thousands of Georgians have been forcibly evicted from their homes and that their freedom of movement, property rights and the right to respect for family life are still being violated. Thus the court concluded that 'there has therefore been a violation of Articles 2, 3 and 8 of the Convention and Article 1 of Protocol No. 1, and the Russian Federation is responsible for that violation.'²³

Right to Life (Article 2 of the Convention):

The court found that Russia was responsible for the violation of the procedural part of the right to life, as it did not investigate the killing of Georgian citizens during and after

19 *ibid* para 252.

20 *ibid* para 256.

21 *ibid* para 299.

22 *ibid* para 301.

23 *ibid* para 222.

the war.²⁴ The Committee of Ministers of the CoE will oversee the investigation into these killings.

Russia did not Cooperate with the Court (Violation of Article 38):

The European Court also found a violation of Article 38 of the Convention by the Russian Federation regarding the obligation to cooperate with the court. Unlike Georgia, the Russian Federation did not cooperate with the European Court and did not provide substantial evidence of active hostilities to help establish additional facts about the case. In particular, the court ruled that ‘the respondent Government have fallen short of their obligation to furnish all necessary facilities to the Court in its task of establishing the facts of the case, as required under Article 38 of the Convention.’²⁵

As for the compensation for damages, pursuant to the well-established practice, the issue of just satisfaction and compensation for the violations of the European Convention by Russian Federation will be resolved separately. The parties have one year to submit their observations on this issue.

Legal and Political Implications of the ECtHR 21 January 2021 Judgment

The judgment of the ECtHR is an important and adequate international legal assessment of Russia’s 2008 military aggression against Georgia. The above-described findings of the ECtHR judgment have only one interpretation—the Russian Federation was responsible for the abuses committed during the August 2008 and during the period of the occupation. The ECtHR also confirmed the fact that the August 2008 war was waged between two states—the Russian Federation and Georgia; and that Russia invaded the territory of Georgia in breach of international law.

The ECtHR judgment in *Georgia v Russia* has already been reflected in a number of multilateral political statements and declarations, some of the examples are as follows:

- On 23 January 2021 the EU made the statement on the above ‘landmark judgment’ (as it is referred to) and stated the following: ‘The ruling clearly concludes that after 12 August 2008 the Russian Federation, exercising effective control over South Ossetia and Abkhazia, violated several provisions of the European Convention of Human Rights.’²⁶

24 *ibid* para 315.

25 *ibid* para 346.

26 EU External Action Service *Statement by the European Union Spokesperson of the EU External Action Service* (23 January 2021) <https://eeas.europa.eu/delegations/council-europe/91942/georgiarussia-statement-spokesperson-judgement-european-court-human-rights_en> accessed 1 January 2022.

- On 16 March 2021, the EU issued a Joint Press Release following the 6th Association Council Meeting between the European Union and Georgia and it contains the following wording on the issue:

The Association council took note of the judgment of 21 January 2021 of the European Court of Human Rights Grand Chamber in the inter-State case concerning the armed conflict between Georgia and the Russian Federation in August 2008 and its consequences which concluded that after the 12 August 2008 the Russian Federation, exercising effective control over Abkhazia and South Ossetia, violated several provisions of the European Convention of Human Rights.²⁷

- On 14 April 2021, the European Union (EU) made statement on the Secretary General's 23rd Consolidated Report on the Conflict in Georgia and stated the following:

3. The EU reiterates its grave concern about the continuing Russian illegal military presence in the Georgian regions of Abkhazia and South Ossetia. We highlight the landmark judgement by the Grand Chamber of the European Court of Human Rights delivered on 21 January in the inter-State case *Georgia v Russian Federation*. The ruling clearly concludes that after 12 August 2008 the Russian Federation, exercising effective control over South Ossetia and Abkhazia, violated several provisions of the European Convention on Human Rights. 4. The EU reiterates its call upon the Russian Federation to ensure proper follow-up of the ruling, including, as foreseen in the ruling itself, through an adequate and effective investigation not only into the events which had occurred after the cessation of hostilities (following the ceasefire agreement of 12 August 2008) but also into the events which had occurred during the active phase of hostilities (8 to 12 August 2008), and to hold all those responsible for human rights violations accountable.²⁸

- Decisions of the Committee of Ministers' Deputies of the CoE of 12 May 2021 include chapter '2.1 The Council of Europe and the conflict in Georgia',²⁹ whereby several points reflected in the context of ECtHR decision merits special attention, in particular:

In paragraph 3, the Committee of Ministers' Deputies of the Council of Europe (CoE) '... welcomed the judgment of the European Court of Human Rights in the

27 Joint Press Release Following the 6th Association Council meeting between the European Union and Georgia (16 March 2021) <<https://www.consilium.europa.eu/en/press/press-releases/2021/03/16/joint-press-release-following-the-6th-association-council-meeting-between-the-european-union-and-georgia/>> accessed 1 January 2022.

28 EU Statement on the Secretary General's 23rd Consolidated Report on the Conflict in Georgia, Brussels (14 April 2021) <https://eeas.europa.eu/delegations/council-europe/96597/eu-statement-secretary-generals-23rd-consolidated-report-conflict-georgia_en?fbclid=IwAR22sXcNT1STTlj7HNf5IX0-yx59vGedoKY06HWSIKGFKm40MTvZ866FEI> accessed 1 January 2022.

29 Council of Europe n 4.

case *Georgia v Russia* (II) that established the responsibility of the Russian Federation for grave human rights violations during the period of occupation of the Georgian regions of Abkhazia and Tskhinvali region/South Ossetia following the August 2008 war, as the State exercising effective control over those regions, including the killing, torture, ill-treatment and arbitrary detention of Georgian civilians and military personnel; the looting and burning of Georgian homes; the inhuman treatment of Georgians targeted as an ethnic group; and deprivation of the right of IDPs and refugees to return to their homes’;

In paragraph 19, the Committee of Ministers’ Deputies of the Council of Europe (CoE) ‘... bearing in mind that human rights and fundamental freedoms shall be protected by all relevant States Parties to the European Convention on Human Rights in the Georgian regions of Abkhazia and Tskhinvali region/South Ossetia, reiterated their call to the Russian Federation as the State exercising effective control: to create conditions for the voluntary, safe and dignified return of all IDPs and refugees; to cease any form of ethnic discrimination towards the residents of the Georgian regions, first and foremost, the ethnic discriminatory measures against the Georgian population of the Gali and Akhalkgori districts, including demands to register as foreign residents or to change their surnames in order to be granted access to full civil rights; to remove any obstacles to ending impunity in cases concerning the murder of ethnic Georgians in the Georgian regions of Abkhazia and Tskhinvali region/South Ossetia and to bringing the perpetrators to justice; to immediately cease policies leading to human rights violations in both regions of Georgia; to remove any impediment, restriction or limitation to the right to freedom of movement across the administrative boundary lines (ABLs), including for medical and educational purposes; to cease the denial and/or delay of medical evacuations, especially amid the Covid-19 pandemic; to cease arbitrary detentions of persons, including in the context of so-called “illegal border crossing” and to re-open “crossing points”; to immediately release Zaza Gakheladze and all other illegal detainees; to cease violations of the right to education in schools and preschools, including education in the native Georgian language in both Georgian regions; to prevent further deterioration of monuments belonging to the cultural heritage throughout Georgia’s regions’; In paragraph 20, the Committee of Ministers’ Deputies of the Council of Europe (CoE) ‘... called on the Russian Federation to execute the judgment of the European Court of Human Rights in the case *Georgia v. Russia* (II).’

The ECtHR judgment of 21 January 2021 in the case *Georgia v Russia* is an important breakthrough in terms of strengthening the legal standing of Georgia in the face of continued Russian aggression. This judgment adds up to the ECtHR 2014 ruling³⁰ that the arrest, detention, and collective expulsion of Georgians from Russia in 2006 violated the Convention and the ECtHR 2019 ruling that found Russia was responsible for

30 *Georgia v Russia* (I) (Application 13255/07) Judgment (Merits) Strasbourg (3 July 2014).

paying ten million Euro in compensation for damages inflicted during the mass deportation of Georgians.³¹ It is also important to note that one more interstate application *Georgia v Russia* is currently pending and concerns continued human rights violations throughout Georgian territories occupied by Russia. The ECtHR judgment of 21 January 2021 should definitely facilitate the outcome of this fresh case in favour of Georgia as the key fact like ‘effective control’ of Georgian territories by the Russian Federation as well as ‘administrative practice’ of human rights violations by Russia have already been established by the ECtHR in its 21 January 2021 judgment.

‘This judgment may also have a positive impact on the International Criminal Court’s (ICC) ongoing investigation into possible war crimes and crimes against humanity committed during 2008 war. The ECHR has already unanimously proved that acts of torture against Georgian prisoners of war and the murder of Georgian civilians occurred. The ICC must now identify those responsible for executing these war crimes.’³²

The 21 January 2021 judgment of the ECtHR, by the very nature of its finding, is also significant in its affirmation of a strong stance of international law and international community in support of Georgia’s sovereignty and territorial integrity within its internationally recognised borders.

The judgment of the ECtHR provides a crucial international legal basis for success of further efforts by Georgia and the international community aimed at protecting the rights of the peoples affected by Russia’s continued occupation of Georgian territories Abkhazia and Tskhinvali Region/South Ossetia.

All the findings and the spirit of the 21 January 2021 ECtHR in *Georgia v Russia* judgment underscores further the importance of the just and peaceful struggle of Georgia for protecting its sovereignty and territorial integrity. The judgment also has a broader significance: it boosts the hopes and strengthens the positions of all those nations who are or may become targets of foreign military aggression, and who rely predominantly on international law and international legal mechanisms in the process of defending their sovereignty, territorial integrity and other legitimate national interests.

31 <<https://agenda.ge/en/news/2019/306>> accessed 1 January 2022.

32 Natia Seskuria, ‘Georgia’s Historic Victory: Implications of the ECHR Ruling’ (11 February 2021) <https://www.mei.edu/publications/georgias-historic-victory-implications-echr-ruling?fbclid=IwAR39IEWcae55Kf81UPmO0xxsmpPf6Yt5UH_nVDYOahf6qNhTlhMTQIjl_uU> accessed 1 January 2022.

References

- Council of Europe, ‘The Council of Europe and the Conflict in Georgia’ Decisions of the Council of Europe Ministers Deputies (1404th meeting, 12 and 17 May 2021).
- Council of Europe, ‘The Decisions of the Ministers’ Deputies of the Council of Europe of 12 May 2021 ‘2.1 The Council of Europe and the Conflict in Georgia’ (12 May 2021) <https://search.coe.int/cm/Pages/result_details.aspx?ObjectID=0900001680a27248> accessed 1 January 2022.
- EU, ‘Statement by the European Union Spokesperson of the EU External Action Service (23 January 2021) <https://eeas.europa.eu/delegations/council-europe/91942/georgiarussia-statement-spokesperson-judgement-european-court-human-rights_en> accessed 1 January 2022.
- EU, *Statement on the Secretary General’s 23rd Consolidated Report on the Conflict in Georgia* (Brussels 14 April 2021) https://eeas.europa.eu/delegations/council-europe/96597/eu-statement-secretary-generals-23rd-consolidated-report-conflict-georgia_en?fbclid=IwAR22sXcNT1STTIj7HNf5IX0-yx59vGedoKY06HWMSIKGFKm40MTvZ866FEI%3E accessed 1 January 2022.
- EU and Georgia, Joint Press Release Following the 6th Association Council meeting between the European Union and Georgia (16 March 2021) <<https://www.consilium.europa.eu/en/press/press-releases/2021/03/16/joint-press-release-following-the-6th-association-council-meeting-between-the-european-union-and-georgia/>> accessed 1 January 2022.
- Government of Georgia, ‘Russian Aggression of Georgia: Six Point Peace Plan’ <<https://smr.gov.ge/uploads/prev/9bbbc7.pdf>> accessed 1 January 2022.
- ‘Medvedev on Russia’s Interest’ *The Economist* (1 September 2008) <<https://www.economist.com/certain-ideas-of-europe/2008/09/01/medvedev-on-russias-interests>> accessed 1 January 2022.
- Ministry of Foreign Affairs of Georgia, *Quarterly Reports of the Ministry of Foreign Affairs of Georgia on the Human Rights Situation in the Occupied Regions of Georgia* <<https://mfa.gov.ge/Occupied-Territories.aspx>> accessed 1 January 2022.
- Office of the State Minister for Reconciliation and Civic Equality of Georgia, ‘Geneva International Discussions’ <<https://smr.gov.ge/en/page/26/geneva-international-discussions>> accessed 1 January 2022.
- Seskuria N, ‘Georgia’s Historic Victory: Implications of the ECHR Ruling’ *Mei@75* (11 February 2021) <https://www.mei.edu/publications/georgias-historic-victory-implications-echr-ruling?fbclid=IwAR39IEWcae55Kf81UPmO0xxsmpPf6Yt5UH_nVDYOahf6qNhTlhMTQIjl_uU> accessed 1 January 2022.

Svante C and Smith D, 'Moscow Moves to De Facto Annexation of Georgian Breakaway Regions'
https://www.gfsis.org/media/download/GSAC/Articles/Moscow_Moves_to_De_Facto_Annexation.pdf accessed 1 January 2022.

UN General Assembly, 'Status of Internally Displaced Persons and Refugees from Abkhazia, Georgia, and the Tskhinvali region/South Ossetia, Georgia' (17 May 2018) A/RES/72/280
<<https://research.un.org/en/docs/ga/quick/regular/76>> accessed 1 January 2022.

UNSC Res N849 (9 July 1993).

UNSC Res 1808 (15 April 2008).

Cases

Georgia v Russia (I) (Application no. 13255/07) Judgment (Merits) Strasbourg (3 July 2014).

Georgia v Russia (II) Application No 38263/08 (21 January 2021)

<[https://hudoc.echr.coe.int/fre#{%22itemid%22:\[%22001-207757%22\]}](https://hudoc.echr.coe.int/fre#{%22itemid%22:[%22001-207757%22]})>