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AD HOC MULTIDISCIPLINARY GROUP ON THE ENVIRONMENT (GME)

**STATE OF PLAY OF THE EXECUTION OF ECtHR JUDGMENTS RELATED TO THE
ENVIRONMENT**

Document prepared by the Secretariat

State of play of the execution of ECtHR judgments related to the environment

Overview prepared by the Department for the Execution of Judgments of the European Court of Human Rights. It is binding on neither the Committee of Ministers nor the Court.

I. Short summary of the execution process

Member states have undertaken to comply with final judgments of the European Court of Human Rights ('Court') finding violations of the European Convention of Human Rights. The adoption of the necessary execution measures is supervised by the Committee of Ministers ('CM') and cases remain under supervision until the required measures have been taken.

Once judgments and decisions become final, states indicate to the CM the measures planned and/ or taken in an "action plan". Once all the measures have been taken, an "action report" is submitted. During the supervision process, applicants, NGOs and national human rights institutions (NHRIs) can submit communications in writing.

The supervision of the adoption and implementation of action plans follows a twin-track procedure. Most cases follow the standard procedure. An enhanced procedure is used for cases requiring urgent individual measures or revealing important complex or structural problems (in particular pilot-judgments), as well as for inter-state cases.

II. Summary table on main cases pending execution

App. No.	Case title	Definitive judgment	Theme	Supervision procedure	Previous CM-DH examination
34327/06	<i>Genç and Demirgan group of cases v. Türkiye (former Taşkın group)</i>	10/10/2017	access to and efficient functioning of justice and no or delayed enforcement of domestic judicial decisions	Enhanced (Complex problem)	December 2024
54414/13	<i>Cordella and Others v. Italy</i>	24/06/2019	pollution by steelworks and lack of effective remedy to obtain decontamination	Enhanced (Complex problem)	December 2024
35648/10	<i>Locascia and Others v. Italy</i>	19/01/2024	pollution from landfill site	Enhanced (Complex problem)	March 2025
53600/20	<i>Verein Klimaseniorinnen Schweiz and Others v. Switzerland</i>	09/04/2024	positive obligation to implement sufficient measures to combat climate change	Enhanced (Complex problem)	September 2025
51567/14	<i>Cannavacciuolo and Others v. Italy</i>	30/04/2025	systematic illegal dumping of waste on private land in the Campania	Enhanced (Pilot judgment)	/

			region ("Terra dei Fuochi")		
52854/18	<i>L.F. and Others v. Italy</i>	15/09/2025	environmental pollution caused by the continuing operation of a foundry in the Salerno municipality (Campania region)	To be determined	/

III. Developments in main pending cases

A. *Verein Klimaseniorinnen Schweiz and Others v. Switzerland*

The case concerns the failure of the authorities to sufficiently comply with the obligation to adopt, and effectively apply, regulations and measures capable of mitigating the existing and potentially irreversible, future adverse effects of climate change on the right to private and family life and home (violation of Article 8). The case also concerns the lack of access to a court by the applicant association with a complaint concerning the effective implementation of measures capable of mitigating the effects of climate change under existing domestic law in 2016-2020 (violation of Article 6 § 1).

At its last examination of this case in September 2025, the CM:

- strongly welcomed the adoption of a comprehensive legislative and regulatory framework at federal level setting out the goals, targets and timetable for achieving net-zero emissions by 2050, accompanied by relevant measures at cantonal level;
- noted that the authorities, by a method of its choice, has quantified the future greenhouse gas emissions;
- invited the authorities to **consider the opportunity of establishing an independent national body** suited to the national political structure **to monitor its climate policy**, mandated *inter alia* to issue recommendations to the political authorities;
- invited the authorities to ensure that the domestic courts have the necessary means and procedural avenues to provide the **necessary safeguards in climate change litigation**;
- invited the authorities to inform the CM on the **evolution of domestic case-law**, regarding both the standing of associations to bring climate change-related cases and on courts' assessments of the merits of such cases.

Latest communication from the authorities: [DH-DD\(2025\)1047](#);

Latest submissions from the applicant association, NGOs, UN Special Rapporteur on the promotion and protection of human rights in the context of climate change, and NHRI: [DH-DD\(2025\)863](#), [DH-DD\(2025\)848](#), [DH-DD\(2025\)864](#) and [DH-DD\(2025\)911](#).

The CM will next examine this case at one of the DH meetings in 2026. The indicative work programme for 2026 will be considered by the Committee during the December 2025 meeting, after which it will be made public (by 5 December 2025 at the latest).

B. *Locascia and Others v. Italy*

The case concerns the issue of the authorities' failure to take all necessary measures to ensure effective protection of applicants in respect of environmental pollution caused by landfill site ("*Lo Uttaro*") located in the area where they lived (substantive violation of Article 8).

The CM received submissions from the applicants indicating that restrictions on farming and water use due to contamination are still ongoing in the *Lo Uttaro* area, and that the remediation plan has not yet been implemented, nor has any timeline been established in this regard. It also received a submission from civil society stating that groundwater in the affected area remains significantly contaminated due to the leachate within the landfill.

At its first examination of this case in March 2025 (jointly with the case of *Di Sarno v. Italy*), the CM:

- highlighted that the execution of this judgment calls for the adoption of all the necessary measures to **ensure that the pollution of the *Lo Uttaro* area no longer jeopardizes human health and the environment**;
- noted with interest, in this connection, the information provided on the plans adopted to **permanently secure two landfill sites** in this area and called on the authorities to ensure their rapid and full implementation and keep the Committee informed of the progress achieved.

Latest communication from the authorities [DH-DD\(2024\)1500](#).

Latest submissions from the applicants and civil society [DH-DD\(2025\)200](#), [DH-DD\(2025\)246](#).

C. *Cordella and Others v. Italy*

This group of cases concerns the national authorities' failure to take the necessary measures to ensure the protection of the applicants, local residents, from the environmental pollution emitted by a large steelwork in Taranto (ILVA), causing a serious risk to health, and the lack of effective remedies enabling them to obtain measures that would secure the depollution of the areas concerned (violation of Articles 8 and 13).

At its last examination in December 2024, the CM

- noted with satisfaction that in September 2023 almost the entirety of the works envisaged by the environmental plan to reduce the plant's emissions output had been carried out and invited the authorities **to complete the remaining works**;
- noted with regret the lack of **the requested comprehensive study to assess** on the issue of the **persistence of serious health problems** in the affected area;
- urged the authorities to carry out, in the context of the ongoing process for the renewal of the authorisations for the operation of the steelworks, an **independent and comprehensive study of the effect of all harmful substances emitted by the steelworks**;
- strongly called on them to guarantee that the continued **functioning of the steelworks will be authorised only when unequivocal scientific evidence** demonstrates its compatibility with the protection of human health and the environment;
- noted with interest the **possibility to initiate civil proceedings** to obtain preventive and remedial orders in protection of the right to health from harmful industrial activities and asked the authorities to provide **additional information** on this issue and

examples of judicial decisions demonstrating the effectiveness of this or any other remedy / to rapidly adopt the necessary measures.

Following the **closure of the Di Sarno case in March 2025** (on ending and preventing environmental pollution and disasters), the issue raised in that case under Article 13 (lack of effective remedies to secure compensation for damage resulting from the improper management of waste) continues to be examined in the *Cordella* case.

Latest communications from the authorities [DH-DD\(2024\)1121](#), [DH-DD\(2024\)1219](#);

Latest submissions from the applicants and civil society [DH-DD\(2024\)473](#), [DH-DD\(2024\)1284](#).

D. Cannavacciuolo and Others v. Italy

This pilot judgment concerns dumping, burying or burning of waste on private land, often carried out by organised criminal groups, in the parts of the Campania region known as the *Terra dei Fuochi*, where some 2.9 million people live. Increased rates of cancer and pollution of groundwater had been recorded in the area. The Court found in particular that the Italian State had failed to deal with such a serious situation with the diligence and expedition required – despite having known about the problem for many years – specifically in assessing the problem, preventing its continuation, and communicating to the affected public (violation of Article 2).

The Court held under Article 46 that Italy had to draw up a comprehensive strategy to address the *Terra dei Fuochi* situation, set up an independent monitoring mechanism, and establish a public information platform. The time-limit for this is two years.

In August 2025, the Italian Government adopted [urgent legislative measures](#) (Law Decree No. 116) to strengthen the combat of serious environmental crimes, restore legality and better protect public health and the environment.

Initial action plan/report is awaited in this case.

E. Genç and Demirgan group of cases v. Türkiye (former Taşkın group)

This group of cases concerns the failure of the national authorities to comply with administrative court decisions delivered in favour of the applicants between 1996 and 2014, annulling various permits required for the operation of a gold mine and a starch factory, and halting the operation of three thermal power plants on grounds of risk to public health and environment (violations of Article 6 § 1 in all cases and also of Article 8 in the case concerning the gold mine).

At its last examination in December 2024, the CM

- invited the authorities to submit further information on specific measures taken or envisaged to **prevent circumventing of judicial decisions on environmental issues** to ensure respect for the rule of law and principle of legal certainty;
- noted that the Environmental Impact Assessment (EIA) process and reports are crucial for ensuring that the operation of industrial activities must be conditional on prior independent assessment confirming their operation with the protection of human health and the environment; invited the authorities to **clarify the conditions under which decisions of “no EIA required” can be adopted** and to provide **information on the existing safeguards** to ensure that such decisions comply with the State’s positive obligation to protect human health and the environment;

- noted with interest the information that filtering mechanisms have been installed in the three thermal power plants concerned by these cases; invited the authorities to provide information on the most recent **official studies on the impact on human health and the environment of the current operation of these power plants and their auxiliary facilities** and on the **ongoing domestic proceedings** as regards the auxiliary facilities;
- reiterated their request for information as regards the **reasons for the operation of the Yatağan power plant** with a temporary operation permit;
- invited the authorities to provide information on the **functioning and latest conclusions of the Monitoring Committee** recently established by the Ministry of Energy and Natural Resources to monitor the compliance of power plants with environmental legislation.

F. L.F. and Others v. Italy

This case concerns the authorities' failure to take adequate protective measures against the effects of the pollution caused by the continuing operation of a foundry near the applicants' homes in the Municipality of Salerno (violation of Article 8).

Initial action plan/report is awaited in this case which will be classified by the CM at its December 2025 DH meeting.