



EUROPEAN CONVENTION
ON HUMAN RIGHTS
CONVENTION EUROPÉENNE
DES DROITS DE L'HOMME
1950 - 2025 **75**



CDDH(2025)R103
Strasbourg, 18 December 2025

STEERING COMMITTEE FOR HUMAN RIGHTS (CDDH)

MEETING REPORT

103rd meeting

Strasbourg, 24 – 27 November 2025

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- Addendum 3:** CDDH Manual on Human Rights and Artificial Intelligence

Information on the meeting

The Steering Committee for Human Rights (CDDH) held its 103rd meeting in Strasbourg, from 24 to 27 November 2025, with Krista OINONEN (Finland), in the Chair.

The agenda of the meeting appears in appendix.

Items for decision by the Committee of Ministers

The CDDH adopted the following texts and decided to transmit them to the Committee of Ministers for information:

- CDDH Study on the need for and feasibility of (an) additional non-binding instrument(s) to complement the 2011 Committee of Ministers' Guidelines on eradicating impunity for serious human rights violations;
- CDDH Manual on Human Rights and Artificial Intelligence.

The CDDH adopted the following text and decided to transmit it to the Committee of Ministers for its consideration:

- CDDH Comments on PACE Recommendation [2300 \(2025\)](#) – Artificial intelligence and migration.

Items for information of the Committee of Ministers

- The CDDH elected Tonje MEINICH (Norway) as its Chairperson and Nicola WENZEL (Germany) as its Vice-Chairperson, re-elected two Bureau members (Tim KOLK (Estonia) and Elias KASTANAS (Greece)) and elected two Bureau members (Babette KOOPMAN (Netherlands) and Pawel WIERDAK (Poland)).
- The CDDH established a new Drafting Group to prepare a Report on the use of new technologies by the European Court of Human Rights and a Report on new tendencies in litigation before the European Court of Human Rights (CDDH-TE); designated the following 10 member States to have the expenses of their experts' participation in the CDDH-TE reimbursed by the Council of Europe: Austria, Belgium, France, Lithuania, Republic of Moldova, Netherlands, Norway, Slovak Republic, Spain and United Kingdom; and elected Milène BLANCHARD (France) as CDDH-TE Chairperson.
- The CDDH established a new Drafting Group to prepare a Study on the protection of the right to vote and to stand for election under the European Convention on Human Rights, taking into account the work of the European Commission for Democracy through Law (Venice Commission) (CDDH-VOTE); designated the following 10 member States to have the expenses of their experts' participation in the CDDH-VOTE reimbursed by the Council of Europe: Austria, Bosnia and Herzegovina, Czechia, Finland, France, Greece, Latvia, North Macedonia, Romania and Spain; and elected Krista OINONEN (Finland) as CDDH-VOTE Chairperson.

As regards the system of the European Convention on Human Rights (ECHR), the CDDH:

- took note of the decisions taken by the Ministers Deputies concerning the CDDH Reports on the first effects of Protocols nos. 15 and 16 to the European Convention on Human Rights;
- received information from the representative of the European Union (EU) and exchanged views on developments concerning the accession of the EU to the Convention; welcomed the recent submission by the European Commission of a request to the Court of Justice of the European Union for an opinion on the compatibility of the revised draft accession agreement with the EU treaties.

As regards the other items on its agenda, the CDDH notably:

- held a workshop on "Ombudsperson Institutions and National Human Rights Institutions: Implementation of Committee of Ministers Recommendations and other international standards";
- exchanged views on its future preparation of a report on examination of implementation of Committee of Ministers Recommendations CM/Rec(2019)6 and CM/Rec(2021)1, with a view to examination and possible adoption of this report at its next plenary meeting;
- exchanged views with Mathieu MORI, Secretary General of the Congress of local and regional authorities;
- exchanged views with Professor Andreas KULICK, Chair of Public International Law and Public Law, University of Mainz and Professor Andras SAJO, Central European University, on issues relating to corporate influence on international human rights;
- exchanged views with Gianluca ESPOSITO, Director General of Human Rights and Rule of Law, including on preparations for the informal conference of Ministers of Justice to be held on 10 December 2025;
- exchanged views on the results of the 5th meeting of the Drafting Group on the eradication of impunity for serious human rights violations (CDDH-ELI); recalled that this Group's terms of reference included possible future follow-up work, subject to further decisions of the Committee of Ministers;
- exchanged views on the results of the 5th meeting of the Drafting Group on human rights and artificial intelligence (CDDH-IA) and decided that with the adoption of the resulting CDDH Handbook, the CDDH-IA had fulfilled its terms of reference;
- exchanged views on the results of the 3rd meeting of the Drafting Group on the safe third country concept (CDDH-PTS) and on preparations for its 4th meeting (17 – 19 March 2026);

- exchanged views on the results of the 1st meeting of the Drafting Committee on Human Rights and Drug Policies (DH-PDA) and on preparations for its 2nd meeting (17–18 December 2025);
- exchanged views on the results of the 10th meeting of the Access Info Group (AIG) of the Convention on access to official documents (CETS 205, Tromsø Convention), including the Workshop organised jointly by the AIG and the T-PD committee of Convention 108 on data protection, and on the 5th meeting of the Consultation of the Parties to the Tromsø Convention;
- agreed to a proposal for a thematic debate on the right of access to official documents, to be held at its next plenary meeting;
- exchanged views on its future activities, notably those resulting from the revisions to its terms of reference for 2026 – 2027, including as regards follow-up work to the CDDH Report on implementation of Recommendation CM/Rec(2021)2;
- adopted an annual evaluation of its activities;
- examined a draft document containing criteria to be applied by its subordinate bodies in relation to public consultations on draft texts under preparation; decided to return to this topic at a future meeting;
- took note of the information provided by its thematic rapporteurs and its representatives to other committees;
- took note of the state of signatures and ratifications of the Council of Europe treaties for which it is responsible, and of recent developments concerning derogations and reservations to the ECHR;
- took note of recent publications of the work of the CDDH, including one in Polish, and encouraged its members to inform the Secretariat of the publication in national official languages of texts resulting from the work of the CDDH;
- adopted a revised calendar of meetings during the first semester of 2026 and took note of a provisional calendar of meetings during the second semester of 2026.

Resource implications

The CDDH noted that all of the above activities were conducted within the foreseen budgetary envelopes and that the CDDH-ELI and CDDH-IA had completed their deliverables within the expected deadlines.

Evaluation of completed activities

The CDDH undertook its annual evaluation of its activities, as required under its terms of reference for 2024 – 2027.

MEETING REPORT

1. The Steering Committee for Human Rights (CDDH) held its 103rd meeting in Strasbourg, from 24 to 27 November 2025, with Krista OINONEN (Finland) in the Chair (see list of participants in [Appendix II](#)).

ITEM 1: OPENING OF THE MEETING, ADOPTION OF THE AGENDA AND ORDER OF BUSINESS

2. The CDDH adopted its agenda as it appears in [Appendix I](#) and agreed to the order of business proposed in the draft annotated agenda (CDDH(2025)OJ02 Annot.).

3. The CDDH exchanged views with Gianluca ESPOSITO, Director General for Human Rights and Rule of Law. Director General Esposito informed the CDDH of the preparations for an informal ministerial conference to take place in Strasbourg on 10 December 2025. The purpose of this conference would be to bring within the Council of Europe institutional framework the discussions on the relationship between the European Convention on Human Rights (the Convention) and migration-related issues that had been developing since a group of nine member States had issued an open letter in May 2025, and to initiate a process based on the four-point plan that the Secretary General had presented to the Ministers' Deputies in Malta in October 2025. It was envisaged that following the conference, the CDDH would be asked to contribute to the preparation of a political declaration, to be adopted at the Ministerial Session in Chisinau in May 2026. In response to questions, Director General Esposito noted that the only outcome of the December conference would be a set of conclusions, of which a draft was close to agreement. There would certainly be converging views, including within the CDDH, on the elements of a future draft declaration, but the hope was that these would not be insurmountable if the text was based on facts and a clear understanding of the Court's caselaw. Director General Esposito also informed the CDDH of other significant activities under his responsibility, including the HUDERIA methodology developed by the Committee on Artificial Intelligence and its connection to CDDH work on a Handbook on human rights and artificial intelligence, and the recent BRAVE forum launching a process of engagement with businesses in relation to their human rights responsibilities.

ITEM 2: RECOMMENDATIONS OF THE PARLIAMENTARY ASSEMBLY AND OF THE CONGRESS OF LOCAL AND REGIONAL AUTHORITIES

4. The CDDH examined draft comments on Recommendation [2300 \(2025\)](#) of the Parliamentary Assembly – Artificial intelligence and migration. The CDDH adopted the comments, as they appear in [Addendum 1](#) and decided to transmit them to the Committee of Ministers.

ITEM 3: WORK ON THE SYSTEM OF THE EUROPEAN CONVENTION ON HUMAN RIGHTS

5. Ambassador HEJBERG PETERSEN (Denmark) informed the CDDH about Denmark's activities further to the open letter initiated by the Prime Ministers of Denmark and Italy in May 2025. These activities were based on core principles: support for the Council of Europe and for the Convention as a cornerstone of the European legal order; support for the independence, integrity, and caselaw of the Court; recognition of how Denmark had benefitted from the Convention system and the work of European institutions; and paramount respect for international law and order. Certain States had various concerns about issues concerning

human rights and migration, reflected in intense domestic political debate. Denmark supported the Secretary General's approach to continue work within Council of Europe structures towards a political declaration in May 2026 and looked forward to working with the CDDH on the way ahead.

6. In response, delegations reaffirmed their commitment to the Convention system and to the independence and authority of the Court. They shared the welcome given to the Secretary General's initiatives, including for a possible future role for the CDDH, and underlined the need for any process to be transparent and inclusive, within Council of Europe structures.

3.1 Committee of experts on the system of the European Convention on Human Rights (DH-SYSC)

7. The Secretariat provided information on the decisions taken by the Ministers Deputies concerning the Reports on the first effects of Protocols Nos. 15 and 16 to the Convention adopted by the CDDH at its 102nd meeting.

3.1.1 The use of new technologies by the European Court of Human Rights / new tendencies in litigation before the European Court of Human Rights

8. The CDDH adopted terms of reference for its Drafting Group to prepare reports on the use of new technologies by the European Court of Human Rights and on new tendencies in litigation before the European Court of Human Rights (CDDH-TE) (respectively deliverables 14 and 15 of the CDDH terms of reference for 2024 – 2027, as revised by the Committee of Ministers in November 2025; deadline for both deliverables: 31 December 2027). The CDDH designated the following 10 member States to have the expenses of their experts' participation in the CDDH-TE reimbursed by the Council of Europe: Austria, Belgium, France, Lithuania, Republic of Moldova, Netherlands, Norway, Slovak Republic, Spain and United Kingdom. It elected Milène BLANCHARD (France) as CDDH-TE Chairperson.

3.2 CDDH ad hoc negotiation Group on the EU accession to the ECHR ("46+1" Group)

9. The CDDH received information from Felix RONKES AGERBEEK, representing the European Union (EU), on the recent submission by the European Commission of a request to the Court of Justice of the EU for an opinion on the compatibility of the revised draft agreement on the accession of the EU to the Convention with the EU treaties. Mr Ronkes Agerbeek noted that experience suggested that the proceedings would take around 18 months and confirmed that the European Commission would now focus its attention on developing the internal rules needed for the EU to participate in the Convention mechanisms.

ITEM 4: ERADICATION OF IMPUNITY FOR SERIOUS HUMAN RIGHTS VIOLATIONS

10. The Chairperson of the Drafting Group on the eradication of impunity for serious human rights violations (CDDH-ELI), Hans-Jörg BEHRENS (Germany), informed the CDDH of the results of the Group's work, notably the completion of a draft study on the need for and feasibility of (an) additional non-binding instrument(s) to complement the 2011 Committee of Ministers Guidelines on eradicating impunity for serious human rights violations.

11. The Chairperson recalled that the CDDH-ELI had held a total of five meetings and presented the five clusters examined by the Group, namely: issues related to the scope of the Guidelines and definition (cluster 1); issues related to cooperation (cluster 2); issues related to criminal law (cluster 3); issues related to the rights of victims (cluster 4); and other issues (cluster 5). He presented the main findings under each cluster, as well as the draft conclusions and

recommendations contained in the draft study, and thanked the members of the Group for their constructive engagement and active participation.

12. The CDDH examined the draft study on the need for and feasibility of (an) additional non-binding instrument(s) to complement the 2011 Committee of Ministers Guidelines on eradicating impunity for serious human rights violations, section-by-section, and the draft conclusions and recommendations, paragraph-by-paragraph, taking into account amendment proposals and comments submitted in writing in advance of the meeting, as well as those made orally during the meeting. The representative of the Republic of Türkiye stated that her government did not agree with the conclusions and recommendations.

13. On this basis, the CDDH adopted the study on the need for and feasibility of (an) additional non-binding instrument(s) to complement the 2011 Committee of Ministers Guidelines on eradicating impunity for serious human rights violations with certain amendments, as it appears in [Addendum 2](#), and decided to transmit it to the Committee of Ministers for information and possible further action on the final recommendations.

14. The CDDH recalled that the CDDH-ELI terms of reference foresaw continuation of its work, subject to the Committee of Ministers' decisions on possible further work. On this basis, the CDDH-ELI was maintained in its current composition.

ITEM 5: ARTIFICIAL INTELLIGENCE

15. The Chairperson of the Drafting Group on Human Rights and Artificial Intelligence (CDDH-IA), Alfonso BREZMES (Spain), informed the CDDH of the results of the Group's work, notably the completion of a draft Handbook on Human Rights and Artificial Intelligence.

16. The Chairperson recalled that the CDDH-IA had held a total of five meetings. He presented the draft Handbook, including its sections covering key technical concepts of artificial intelligence, relevant legal instruments and human rights principles, issues relating to human rights and business, and sectorial analyses relating to various areas of public administration. He thanked the members of the Group for their constructive engagement and active participation.

17. The CDDH examined the draft Handbook, paragraph-by-paragraph, taking into account amendment proposals and comments submitted in writing in advance of the meeting, as well as those made orally during the meeting. The representative of Türkiye stated that her government expressed reservations regarding the use of the concept of gender in the text. This reservation has not been included in the text due to the nature of the Handbook.

18. On this basis, the CDDH adopted the Handbook on Human Rights and Artificial Intelligence, as it appears in Addendum 3, and decided to transmit it to the Committee of Ministers for information. It concluded that the CDDH-IA had fulfilled its terms of reference.

19. The Secretariat informed the CDDH of its intention to prepare the Handbook for publication online in an appropriate format that would facilitate cross-referencing between different sections, with a view to enhancing its accessibility and utility.

ITEM 6: SAFE THIRD COUNTRY CONCEPT

20. The Chairperson of the Drafting Group on the safe third country concept (CDDH-PTS), Elīna Luīze VĪTOLA (Latvia), informed the CDDH of the results of its 2nd meeting (23-25 September 2025) and 3rd meetings (19-21 November 2025).

21. During these meetings, the Group held exchanges of views with experts from the European Network of National Human Rights Institutions (ENNHRI), the European Council of Refugees and Exiles (ECRE), and academic experts, in particular Professor Vincent CHETAIL and Professor Dr Daniel THYM. The Group also heard presentations from a representative of the European Commission on recent legislative developments at the European Union (EU) level concerning the safe third country concept.

22. The Chairperson of the CDDH-PTS informed the CDDH that the Group had decided to prepare a draft study on the need for and the feasibility of updating Recommendation No. R(97)22 structured around five thematic blocks. These include developments in the case-law of the European Court of Human Rights and the Committee of Ministers' 2009 Guidelines on Accelerated Asylum Procedures, in line with the mandate of the CDDH-PTS, as well as three additional areas of reflection, namely the current geopolitical contexts and different hybrid situations, ongoing legislative processes at EU level, and an assessment of the clarity and precision of the text of the 1997 Recommendation.

23. During the second and third meetings, the Group held lively and substantive discussions. At its third meeting, the Group also held preliminary exchanges and discussions on possible conclusions regarding the need to update the 1997 Recommendation. The Chairperson informed the CDDH of the three possible outcomes of this work: no update to the 1997 Recommendation or the Explanatory Report, an update of both the Recommendation and its Explanatory Report, or an update of the Explanatory Report of the 1997 Recommendation only. Delegations had been invited to submit additional information within three weeks of the last meeting. The Group will continue its work at its next meeting, during which it will finalise the draft study.

24. The Rapporteur on Gender Equality drew the attention of the CDDH to Committee of Ministers [Recommendation CM/Rec\(2022\)17](#) on protecting the rights of migrant, refugee and asylum-seeking women and girls, adopted in 2022, for consideration in the CDDH-PTS work.

25. The CDDH took note of this information and welcomed the progress being made by the CDDH-PTS.

ITEM 7: HUMAN RIGHTS AND DRUG POLICIES

26. The Chairperson of the Drafting Committee on human rights and drug policies (DH-PDA), Tonje MEINICH (Norway), informed the CDDH of the results of its 1st meeting (1-2 July 2025). She recalled the multidisciplinary composition of the Committee, whose work was based on guidelines that had been prepared by the Pompidou Group. At its next meeting in December, the Group would begin examining draft text for the recommendation. It would also consider two general questions: whether the scope of the recommendation should include only drug use disorder or also other addictions; and whether it should cover criminal offences limited to possession and low-level dealing or also other offences committed in connection with drug possession or use. She indicated that the Committee may seek further guidance from the CDDH at the latter's next meeting.

27. The CDDH took note of this information and welcomed the progress being made by the DH-PDA.

ITEM 8: PROHIBITION OF THE TRADE IN GOODS USED FOR TORTURE AND THE DEATH PENALTY

28. The Secretariat informed the CDDH that the Ministers' Deputies had taken note of the CDDH report on the implementation of Recommendation [CM/Rec\(2021\)2](#) of the Committee of Ministers to member States on measures against the trade in goods used for the death penalty, torture and other cruel, inhuman or degrading treatment or punishment (CDDH(2025)R102 Addendum 4 REV) and had adopted decisions on follow-up to the proposals for further work in this field.

29. The Secretariat informed the CDDH that these decisions had been reflected in the revised CDDH terms of reference for 2024 – 2027: a report on possible amendments of Appendices 1 and 3 to Recommendation CM/Rec(2021)2 and on the possibility of introducing a simplified amendment procedure for Appendix 2 (deliverable no. 19; deadline for completion: 31 December 2026); guidance on best practices for State officials and private actors involved in the organisation of and participation in law enforcement equipment trade fairs (deliverable no. 20; deadline for completion: 31 December 2027); and a report on developments concerning regulation at international level of the trade in goods used for the death penalty, torture, and inhuman or degrading treatment or punishment (deliverable no. 21; deadline for completion: 31 December 2027).

30. The CDDH discussed the working methods for these three new deliverables and agreed that the Secretariat would prepare draft text for deliverables 19 and 20, with the assistance of civil society organisations, and for deliverable 21.

31. The CDDH was also informed that, since its previous plenary meeting, Monaco had joined the Alliance for Torture-Free Trade.

ITEM 9: NATIONAL HUMAN RIGHTS INSTITUTIONS AND OMBUDSPERSON INSTITUTIONS

32. The CDDH held a Workshop on Ombudsman Institutions and National Human Rights Institutions: Implementation of Committee of Ministers Recommendations and Other International Standards. It thanked all of the invited speakers who participated in the Workshop. It took note that the Secretariat would prepare the proceedings of the Workshop, and that these proceedings, along with the results of the questionnaire to member States and the survey conducted of other Council of Europe bodies' co-operation with NHRIs and the European Network of NHRIs, would inform a draft CDDH Report on its examination of the implementation of Committee of Ministers Recommendations CM/Rec(2019)6 and CM/Rec(2021)1, to be presented by the Secretariat at the next plenary meeting.

ITEM 10: ECHR IN UNIVERSITY EDUCATION AND PROFESSIONAL TRAINING

33. The Secretariat presented the document containing lists of possible networks and associations relevant to issues under Recommendation CM/Rec(2019)5. The CDDH exchanged views on the methodological issues raised in this document and on the scope of its future examination of implementation of the recommendation. It concluded that the examination should be limited to universities offering law courses and institutions providing professional training for lawyers, judges, prosecutors, and law enforcement officers. It decided to obtain relevant information by way of a questionnaire to member States, to be prepared by the Bureau.

ITEM 11: HUMAN RIGHTS AND BUSINESS

34. The CDDH exchanged views with Professor Andreas KULICK, Chair of Public International Law and Public Law, Director of the Mainz International Adjudication Center

(MAIAC), Johannes Gutenberg University Mainz, and Professor Andras SAJO, Central European University, member of the Meta Oversight Board and former judge of the European Court of Human Rights. Their presentations appear respectively in [Appendix V](#) and [Appendix VI](#).

ITEM 12: FUTURE ACTIVITIES

35. The CDDH received information from the Secretariat on the revision of its terms of reference for 2024 – 2027 by the Committee of Ministers.

36. The CDDH adopted terms of reference for its Drafting Group to prepare a study on the protection of the right to vote and to stand for election under the European Convention on Human Rights, taking into account the work of the European Commission for Democracy through Law (Venice Commission) (CDDH-VOTE) (deliverable 17 of the CDDH terms of reference for 2024 – 2027: deadline 31 December 2027); designated the following 10 member States to have the expenses of their experts' participation in the CDDH-VOTE reimbursed by the Council of Europe: Austria, Bosnia and Herzegovina, Czechia, Finland, France, Greece, Latvia, North Macedonia, Romania and Spain; and elected Krista OINONEN (Finland) as CDDH-VOTE Chairperson.

37. Concerning new deliverable 18 (to discuss the implications of the conclusions of the advisory opinions of the International Court of Justice and the Inter-American Court of Human Rights relating to climate change), the CDDH decided to invite representatives of the two courts and of the European Court of Human Rights to its discussion, to be held at its next meeting.

ITEM 13: PUBLIC CONSULTATIONS

38. The CDDH examined and made certain amendments to the document prepared by the Secretariat containing draft criteria to be applied by its subordinate bodies in relation to public consultations on texts under preparation. It decided to postpone further examination of the document and to return to the topic at a future meeting.

ITEM 14: EUROPEAN SOCIAL CHARTER

39. The CDDH examined and made an amendment to the document prepared by the Bureau suggesting possible future CDDH activities related to the system of the European Social Charter, which concluded that the initial focus could be on the collective complaints procedure. Members stressed the need to avoid impinging on the role of the Governmental Committee established under the Charter. The representative of the European Social Charter secretariat noted that the role of the Governmental Committee related mainly to the reporting procedure rather than the collective complaints procedure.

40. The CDDH asked the Secretariat to send the amended document (CDDH(2025)20REV) to the Secretariat of the European Social Charter for consultation of the Governmental Committee.

ITEM 15: ANNUAL EVALUATION OF ACTIVITIES

41. The CDDH examined and adopted the evaluation of its activities in 2025, as set out in document CDDH(2025)21_FINAL.

ITEM 16: ACCESS TO OFFICIAL DOCUMENTS

42. The Secretariat updated the CDDH on the recent activities of the Council of Europe Convention on Access to Official Documents (CETS No. 205, Tromsø Convention). The Consultation of the Parties had held its 5th meeting on 1-2 October 2025, during which it had adopted conclusions and recommendations in respect of Albania, Armenia and Slovenia, bringing the number of Parties which have been evaluated during the baseline evaluation round to 14. It had also filled a vacancy in the Access Info Group (AIG), decided to increase the size of the AIG from 10 to 12 members, and elected 12 members to the AIG for a four-year mandate starting on 1 April 2026.

43. At its 10th meeting (3-5 November 2025), the AIG approved a baseline evaluation report in respect of Spain and adopted its opinion on the definition of “official documents” under the Convention; this was its first interpretative opinion on the provisions of the Convention. At this meeting, the AIG also co-organised a workshop with the Committee of the Council of Europe Convention for the protection of individuals with regard to the processing of personal data (Convention 108), in collaboration with the Group of States against Corruption (GRECO). The [workshop](#) explored the relationship between the right of access to official documents and the right to privacy, focusing on two main themes.

44. Further to the decision of the CDDH at its 102nd meeting, the Secretariat presented a proposal for a thematic debate on the right of access to official documents as required under the CDDH’s terms of reference (CDDH(2025)23). The CDDH agreed to hold the thematic debate as proposed at its next meeting.

ITEM 17: INVITED PERSONALITIES

45. The CDDH exchanged views with Mathieu MORI, Secretary General of the Congress of Local and Regional Authorities of the Council of Europe. Mr Mori’s presentation appears in [Appendix IV](#).

ITEM 18: THEMATIC RAPPORTEURS AND REPRESENTATIVES TO OTHER COMMITTEES

46. The CDDH received information from Milène BLANCHARD (France), its representative to the Pompidou Group, on completion of policy guidelines and supporting documents by the latter’s Joint Expert Group on organised crime related to drug trafficking (OC-DT).

47. It also received information from Elias KASTANAS (Greece), its representative to the Steering Committee for human rights in the field of biomedicine and health (CDBIO), on the Workshop entitled “Neurotechnologies and Human Rights Framework: Do We Need New Rights”, which took place on 9 November 2025, and in which he, along with the CDDH Chairperson, had participated. The CDDH took note of the CDBIO’s expectation that the CDDH would also be associated with any further work on this issue.

48. The CDDH also received information from Nicola WENZEL (Germany), its thematic rapporteur on human rights and the environment, concerning the work of the Multidisciplinary Group on the Environment (GME) and the Committee of Ministers’ decision to create a new Steering Committee on the Environment (CDENV) as of 1 January 2026; and from Tim KOLK (Estonia), its thematic rapporteur on human rights and artificial intelligence, concerning the work of the Committee on Artificial Intelligence (CAI), notably in relation to the HUDERIA methodology, and the Committee of Ministers’ decision to create a new Steering Committee for

New and Emerging Digital Technologies (CDNET) as of 1 January 2026. Mr Kolk asked whether the position of thematic rapporteur on human rights and artificial intelligence would still be needed now that the CDDH had completed its own deliverable on this issue (see item 5 above).

ITEM 19: GENDER EQUALITY

49. The CDDH received information from Philippe WERY (Belgium), its gender equality rapporteur, on the integration of the gender equality dimension into the work of its subordinate bodies and on recent work of the Gender Equality Committee.

ITEM 20: ELECTIONS

50. The CDDH elected Tonje MEINICH (Norway) as its Chairperson and Nicola WENZEL (Germany) as its Vice-Chairperson, re-elected two Bureau member (Elias KASTANAS (Greece) and Tim KOLK (Estonia)) and elected two new Bureau members (Babette KOOPMAN (Netherlands), and Pawel WIERDAK (Poland)). The full composition of the CDDH Bureau and the presidencies of its subordinate bodies appear at [Appendix VIII](#).

ITEM 21: CONVENTIONS

51. The CDDH took note of information provided by the Secretariat on recent signatures and ratifications of Council of Europe conventions under the responsibility of the CDDH, as well as of recent developments concerning derogations and reservations to the European Convention on Human Rights.

52. The Secretariat recalled that the CDDH terms of reference called on it to “carry out, at regular intervals, within the limits of the available resources and bearing in mind its priorities, an examination of some or all of the conventions for which it has been given responsibility, in co-operation, where appropriate, with the relevant convention based bodies, and report back to the Committee of Ministers”. The CDDH noted that this might form the basis for possible future activities to support the functioning of certain conventions.

ITEM 22: PUBLICATIONS

53. The CDDH noted the publication of the Proceedings of the Workshop on facilitating the implementation of the Committee of Ministers’ Recommendation CM/Rec(2012)2 on measures against the trade in goods used for the death penalty, torture and other cruel, inhuman or degrading treatment or punishment (Strasbourg, 27 November 2024) as well as the translation in Polish of the Toolkit on Human Rights impact assessment of the measures taken by the States in situations of crisis. It encouraged its members to inform the Secretariat of publication in languages other than English or French of texts that had been prepared by the CDDH, notably non-binding instruments of the Committee of Ministers that called for translation into national official languages.

ITEM 23: CALENDAR

54. The CDDH adopted its calendar of meetings for the premier semester of 2026 and took note of a proposed calendar of meetings for the second semester of 2026, as they appear in [Appendix IX](#).

ITEM 24: OTHER BUSINESS

55. None.

ITEM 25: ADOPTION OF THE ABRIDGED REPORT

56. The CDDH adopted the abridged report of the present meeting.

* * *

Appendix I

Agenda

1: OPENING OF THE MEETING, ADOPTION OF THE AGENDA AND ORDER OF BUSINESS	1 : OUVERTURE DE LA RÉUNION, ADOPTION DE L'ORDRE DU JOUR ET DE L'ORDRE DES TRAVAUX
CDDH(2025)R102 – Report of the 102nd meeting CDDH-BU(2025)R114 – Report of the 114th meeting of the Bureau	CDDH(2025)R102 – Rapport de la 102 ^e réunion CDDH-BU(2025)R114 – Rapport de la 114 ^e réunion du Bureau
2: RECOMMENDATIONS OF THE PARLIAMENTARY ASSEMBLY & THE CONGRESS	2 : RECOMMANDATIONS DE L'ASSEMBLÉE PARLEMENTAIRE & DU CONGRÈS
CDDH(2025)12 – Draft CDDH comments on PACE Recommendation 2300 (2025) – Artificial intelligence and migration	CDDH(2025)12 – Projet de commentaires du CDDH sur la Recommandation 2300 (2025) de l'Assemblée parlementaire – L'intelligence artificielle et la migration
3: SYSTEM OF THE EUROPEAN CONVENTION ON HUMAN RIGHTS	3 : SYSTÈME DE LA CONVENTION EUROPÉENNE DES DROITS DE L'HOMME
3.1. Committee of Experts on the system of the European Convention on Human Rights (DH-SYSC)	3.1 Comité d'experts sur le système de la Convention européenne des droits de l'homme (DH-SYSC)
CDDH(2025)R102 Addendum 2 – CDDH Report on the first effects of Protocol No. 15 to the European Convention on Human Rights CDDH(2025)R102 Addendum 3 – CDDH Report on the first effects of Protocol No. 16 to the European Convention on Human Rights CDDH(2025)15 – Decisions of the Ministers' Deputies further to the 102nd CDDH meeting	CDDH(2025)R102 Addendum 2 – Rapport du CDDH évaluant les premiers effets du Protocole 15 à la Convention européenne des droits de l'homme CDDH(2025)R102 Addendum 3 – Rapport du CDDH évaluant les premiers effets du Protocole 16 à la Convention européenne des droits de l'homme CDDH(2025)15 – Décisions des Délégués des Ministres suite à la 102 ^e réunion du CDDH
3.1.1. The use of new technologies by the European Court of Human Rights/ new tendencies in litigation before the European Court of Human Rights	3.1.1. L'utilisation de nouvelles technologies par la Cour européenne des droits de l'homme / nouvelles tendances en matière de litiges devant la Cour européenne des droits de l'homme
CDDH terms of reference 2024 – 2027 CDDH(2025)16 – Draft terms of reference of the Drafting Group on the use of new technologies by the European Court of Human Rights and new tendencies in litigation before the European Court of Human Rights (CDDH-TE)	Mandat du CDDH pour 2024 – 2027 CDDH(2025)16 – Projet de mandat pour le Groupe de rédaction sur l'utilisation de nouvelles technologies par la Cour européenne des droits de l'homme et nouvelles tendances en matière de litiges devant la Cour européenne des droits de l'homme (CDDH-TE)
3.2 CDDH ad hoc negotiation group (“46+1”) on EU accession to the ECHR	3.2 Groupe de négociation ad hoc du CDDH (« 46+1 ») sur l'adhésion de l'UE à la CEDH
CDDH(2023)R EXTRA ADDENDUM	CDDH(2023)R EXTRA ADDENDUM
4: ERADICATION OF IMPUNITY FOR SERIOUS HUMAN RIGHTS VIOLATIONS	4 : ÉLIMINATION DE L'IMPUNITÉ POUR LES VIOLATIONS GRAVES DES DROITS HUMAINS
CDDH-ELI(2025)R5 Rev. – Report of the 5th meeting CDDH-ELI(2025)R5 Addendum – [DRAFT] Study on the need for and feasibility of (an) additional non-binding instrument(s) to complement the 2011 Committee of Ministers' Guidelines on eradicating impunity for serious human rights violations	CDDH-ELI(2025)R5 Rev. – Rapport de la 5 ^e réunion CDDH-ELI(2025)R5 Addendum – [PROJET d'] Étude sur la nécessité et la faisabilité d'un instrument(s) additionnel(s) non contraignant(s) pour compléter les Lignes directrices du Comité des Ministres de 2011 sur l'élimination de l'impunité pour les violations graves des droits de l'homme
5: ARTIFICIAL INTELLIGENCE	5: INTELLIGENCE ARTIFICIELLE
CDDH-IA(2025)R5 Rev. – Report of the 5th meeting	CDDH-IA(2025)R5 Rev. – Rapport de la 5 ^e réunion

CDDH-IA(2025)R5 Addendum – [DRAFT] Manual on Human Rights and Artificial Intelligence CDDH-IA(2025)18 – Compilation of comments received on CDDH-IA(2025)R5 Addendum	CDDH-IA(2025)R5 Addendum – [PROJET de] Manuel sur les droits humains et l'intelligence artificielle CDDH-IA(2025)18 – Compilation de commentaires reçus sur CDDH-IA(2025)R5 Addendum
6. SAFE THIRD COUNTRY CONCEPT	6. NOTION DE PAYS TIERS SÛR
CDDH-PTS(2025)R2 – Report of the 2nd meeting CDDH-PTS(2025)R3 – Report of the 3rd meeting	CDDH-PTS(2025)R2 – Rapport de la 2 ^e réunion CDDH-PTS(2025)R3 – Rapport de la 3 ^e réunion
7: HUMAN RIGHTS AND DRUG POLICIES	7 : DROITS HUMAINS DANS LES POLITIQUES EN MATIÈRE DE DROGUES
DH-PDA(2025)R1 – Report of the 1 st meeting	DH-PDA(2025)R1 – Rapport de la 1 ^e réunion
8. PROHIBITION OF THE TRADE IN GOODS USED FOR TORTURE AND THE DEATH PENALTY	8. INTERDICTION DU COMMERCE DE BIENS UTILISÉS POUR LA TORTURE ET LA PEINE DE MORT
CDDH(2025)R102 Addendum 4 REV – CDDH Report on the implementation of Recommendation CM/Rec(2021)2 on measures against the trade in goods used for the death penalty, torture and other cruel, inhuman or degrading treatment or punishment CDDH(2025)15 – Decisions of the Ministers' Deputies further to the 102nd CDDH meeting CDDH(2025)25 – Revised terms of reference for the CDDH for 2026-2027	CDDH(2025)R102 Addendum 4 REV – Rapport du CDDH sur la mise en œuvre de la Recommandation CM/Rec(2021)2 sur des mesures contre le commerce de biens utilisés pour la peine de mort, la torture et autres peines ou traitements cruels, inhumains ou dégradants CDDH(2025)15 – Décisions des Délégués des Ministres suite à la 102 ^e réunion du CDDH CDDH(2025)25 – Mandat révisé du CDDH pour 2026-2027
9: NATIONAL HUMAN RIGHTS INSTITUTIONS & OMBUDSPERSON INSTITUTIONS	9: INSTITUTIONS NATIONALES DES DROITS HUMAINS & INSTITUTIONS DE L'OMBUDSMAN
CDDH(2025)22 – Draft programme of the Workshop CDDH(2025)10 – Questionnaire on implementation of CM recommendations CDDH(2025)11 – Compilation of the replies to the questionnaire CDDH(2025)24 – Compilation of replies to the internal survey	CDDH(2025)22 – Projet de programme de l'Atelier CDDH(2025)10 – Questionnaire sur la mise en œuvre des recommandations CDDH(2025)11 – Compilation des réponses au questionnaire CDDH(2025)24 – Compilation des réponses au questionnaire interne (<i>disponible en anglais uniquement</i>)
10: ECHR IN UNIVERSITY EDUCATION & PROFESSIONAL TRAINING	10: LA CEDH DANS L'ENSEIGNEMENT UNIVERSITAIRE ET LA FORMATION PROFESSIONNELLE
Recommendation CM/Rec(2019)5 of the Committee of Ministers to member States on the system of the European Convention on Human Rights in university education and professional training CDDH(2025)18 – List of possible networks and associations relevant to issues under Recommendation CM/Rec(2019)5	Recommandation CM/Rec(2019)5 du Comité des Ministres aux États membres sur le système de la Convention européenne des droits de l'homme dans l'enseignement universitaire et la formation professionnelle CDDH(2025)18 – Liste d'éventuels réseaux et associations à établir conformément à la Recommandation CM/Rec(2019)5
11: HUMAN RIGHTS AND BUSINESS	11 : DROITS HUMAINS ET ENTREPRISES
12: FUTURE ACTIVITIES	12 : ACTIVITÉS FUTURES
Revised terms of reference for the CDDH for 2026 – 2027 Recommendation CM/Rec(2014)2 on the promotion of human rights of older persons	Mandat révisé du CDDH pour 2026 – 2027 Recommandation CM/Rec(2014)2 du Comité des Ministres sur la promotion des droits de l'homme des personnes âgées

CDDH(2025)19 – Draft terms of reference of the Drafting Group on the right to vote and to stand for election under the European Convention on Human Rights (CDDH-VOTE)	CDDH(2025)19 – Mandat du Groupe de rédaction sur le droit de vote et de se porter candidat aux élections par la Convention européenne des droits de l'homme (CDDH-VOTE)
13: PUBLIC CONSULTATIONS	13 : CONSULTATIONS PUBLIQUES
CDDH(2025)17 – [Draft] criteria to be applied by CDDH subordinate bodies in relation to public consultations on texts under preparation	CDDH(2025)17 – [Projet de] critères à appliquer par les instances subordonnées au CDDH concernant les consultations publiques sur des textes en cours de préparation
14: EUROPEAN SOCIAL CHARTER	14 : CHARTE SOCIALE EUROPÉENNE
CDDH(2025)20 – Possible future CDDH activities related to the system of the European Social Charter	CDDH(2025)20 – Éventuelles activités futures du CDDH liées au système de la Charte sociale européenne
15: ANNUAL EVALUATION OF ACTIVITIES	15 : ÉVALUATION ANNUELLE DES ACTIVITÉS
CDDH(2025)21 – Draft evaluation of CDDH activities in 2025	CDDH(2025)21 – Projet d'évaluation des activités du CDDH en 2025
16: ACCESS TO OFFICIAL DOCUMENTS	16 : ACCÈS AUX DOCUMENTS PUBLICS
COP(2025)R5 – Report of the 5th meeting AIG(2025)R10 – Report of the 10th meeting of the Access Info Group AIG(2025)LD10 – Decisions adopted at the 10th meeting of the Access Info Group CDDH(2025)23 – Thematic debate on the right of access to official documents – Draft proposal	COP(2025)R5 – Rapport de la 5 ^e réunion AIG(2025)R10 – Rapport de la 10^e réunion du Groupe AIG AIG(2025)LD10 – Décisions adoptées lors de la 10 ^e réunion CDDH(2025)23 – Débat thématique sur le droit d'accès aux documents publics – Projet de proposition
17: INVITED PERSONALITIES	17 : PERSONNALITÉS INVITÉES
18: THEMATIC RAPPORTEURS & REPRESENTATIVES TO OTHER COMMITTEES	18 : RAPPORTEURS THÉMATIQUES ET REPRÉSENTANTS DANS D'AUTRES COMITÉS
19: GENDER EQUALITY	19: ÉGALITÉ DE GENRE
CDDH(2025)13 – The gender equality dimension in the work of the CDDH and its subordinate bodies CDDH(2020)13 – Thematic Form on Gender Equality	CDDH(2025)13 – La dimension d'égalité de genre dans les travaux du CDDH et de ses instances subordonnées CDDH(2020)13 – Fiche thématique sur l'égalité de genre
20: ELECTIONS	20 : ÉLECTIONS
21: CONVENTIONS	21 : CONVENTIONS
CDDH(2025)14 – State of signatures and ratifications of certain treaties under the responsibility of the CDDH	CDDH(2025)14 – État des signatures et ratifications de certains traités sous la responsabilité du CDDH
22: PUBLICATIONS	22 : PUBLICATIONS
CDDH Report on the implementation of Committee of Ministers Recommendation CM/Rec(2021)2 on measures against the trade in goods used for the death penalty, torture and other cruel, inhuman or degrading treatment or punishment Proceedings of the Conference of the System of the European Convention on Human Rights: Responding to new trends and challenges	Rapport du CDDH sur la mise en œuvre de la Recommandation du Comité des Ministres CM/Rec(2021)2 sur des mesures contre le commerce de biens utilisés pour la peine de mort, la torture et autres peines ou traitements cruels, inhumains ou dégradants. Actes de la Conférence sur le Système de la Convention européenne des droits de l'homme : répondre aux nouvelles tendances et aux nouveaux défis

<p>Polish version of the Toolkit for human rights impact assessment of the measures taken by the State in situation of crisis CDDH Publications' website</p>	<p>Version polonaise de Boîte à outils pour l'évaluation de l'impact sur les droits humains des mesures prises par l'État en situations de crise Site internet des publications du CDDH</p>
23: CALENDAR	23 : CALENDRIER
24: OTHER BUSINESS	24 : QUESTIONS DIVERSES
25: ADOPTION OF THE ABRIDGED REPORT	25 : ADOPTION DU RAPPORT ABRÉGÉ

Appendix II**List of participants****MEMBERS / MEMBRES**

ALBANIA / ALBANIE	Brunilda KOÇO Deputy Permanent Representative of Albania to the Council of Europe
ANDORRA / ANDORRE	Carlos PUENTE GALINDO Third Secretary, Department of International Legal Affairs and Human Resources, Ministry of Foreign Affairs
ARMENIA / ARMÉNIE	Roza ARAKELYAN Legal Adviser of the Department of International Treaties and Law of the Ministry of Foreign Affairs Nelly SAROYAN Head of Department International Treaties and Law, Ministry of Foreign Affairs
AUSTRIA / AUTRICHE	Brigitte OHMS Deputy Government Agent, Division for European and International Law, Human Rights Protection (dpt. V 7), Federal Chancellery
AZERBAIJAN / AZERBAIDJAN	Ziya FATALIYEV Deputy Permanent Representative, Permanent Representation to the Council of Europe
BELGIUM / BELGIQUE	Philippe WERY Chef du Service des droits de l'homme, SPF Justice, Service des Droits de l'Homme
BOSNIA AND HERZEGOVINA / BOSNIE-HERZEGOVINE	Monika MIJIC Acting Agent of the Council of Ministers, of Bosnia and Herzegovina before European Court of Human Rights
BULGARIA / BULGARIE	APOLOGISED
CROATIA / CROATIE	Fran Krsto OČIĆ Senior Adviser to the Representative, Office of the Representative of the Republic of Croatia before the European Court of Human Rights
CYPRUS / CHYPRE	John HUNTER Deputy Permanent Representative, Permanent Representation of Cyprus to the Council of Europe Eleni JOSEPHIDES Deputy to the Permanent Representative, Permanent Representation of Cyprus to the Council of Europe
CZECHIA / TCHÉQUIE	Petr KONŮPKA Deputy Agent of the Government for the representation before the European Court of Human Rights, Ministry of Justice

DENMARK / DANEMARK	<p>Clara KRUSE SCHLEEF Ministry of Justice</p> <p>Nicolaj A. HEJBERG PETERSEN Ambassador for Conventions</p> <p>Thomas V. LYTKEN LARSEN Head of Secretariat</p>
ESTONIA / ESTONIE	<p>Tim KOLK Agent du gouvernement estonien auprès de la Cour européenne des droits de l'homme, ministère des Affaires étrangères</p>
FINLAND / FINLANDE	<p>Krista OINONEN Government Agent before the ECtHR, Director, Unit for Human Rights Courts and Conventions, Ministry for Foreign Affairs</p>
FRANCE	<p>Milène BLANCHARD Sous-directrice des droits de l'Homme, Direction des affaires juridiques, ministère de l'Europe et des affaires étrangères</p>
GEORGIA / GÉORGIE	APOLOGISED
GERMANY / ALLEMAGNE	<p>Nicola WENZEL LL.M., Head of Unit IV C 1 (Human Rights), Government Agent before the European Court of Human Rights, Federal Ministry of Justice</p> <p>Hans-Jörg BEHRENS LL.M., Head of Unit IV C 1 (Human Rights), Government Agent before the European Court of Human Rights, Federal Ministry of Justice</p>
GREECE / GRÈCE	<p>Elias KASTANAS Senior Legal Counselor, Legal Department, Public International Law Section, Hellenic Ministry of Foreign Affairs</p> <p>Spyridon Heracles AKTYPIS, PhD Deputy to the Permanent Representative Permanent Representation of Greece</p>
HUNGARY / HONGRIE	<p>Zoltan TALLODI Government Agent before the ECtHR, Ministry of Justice, Department of International Criminal Law and Office of the Agent before ECHR</p>
ICELAND / ISLANDE	<p>Ingunn MARKÚSDÓTTIR Lawyer, Ministry of Justice</p>
IRELAND / IRLANDE	<p>Darina FLYNN Assistant Legal Adviser, Legal Division, Department of Foreign Affairs and Trade</p>
ITALY / ITALIE	<p>Benedetto GIUNTINI Chef du Bureau politique relatif au Conseil de l'Europe du ministère des Affaires Etrangères et de la Coopération Internationale</p>

LATVIA / LETTONIE	Elīna Luīze VĪTOLA Government Agent of Latvia before International Human Rights Institutions, Ministry of Foreign Affairs
LIECHTENSTEIN	APOLOGISED
LITHUANIA / LITUANIE	Ričard DZIKOVIČ Government agent before ECtHR, Head of Legal Representation, Ministry of Justice
LUXEMBOURG	Anne GOSSET Responsable du service droits humains – Ministère de la Justice
MALTA / MALTE	APOLOGISED
REPUBLIC OF MOLDOVA / RÉPUBLIQUE DE MOLDOVA	Andrei BRICEAC Government Agent, Ministry of Justice
MONACO	Raphaël SIMIAN Adjoint au Directeur des Affaires juridiques, Agent du Gouvernement auprès de la CEDH
MONTENEGRO / MONTÉNÉGRO	APOLOGISED
NETHERLANDS / PAYS-BAS	Babette KOOPMAN Government Agent before the European Court of Human Rights, Ministry of Foreign Affairs
NORTH MACEDONIA / MACÉDOINE DU NORD	Elena BODEVA Head of Unit - Directorate for Multilateral Relations, Ministry of Foreign Affairs
NORWAY / NORVÈGE	Tonje MEINICH Deputy Director General, Legislation Department, Ministry of Justice and Public Security
POLAND / POLOGNE	Paweł WIERDAK Agent of the Government of Poland before the ECtHR, Deputy Director, Legal and Treaty Department, Ministry of Foreign Affairs
PORTUGAL	Helena LEITÃO Procureure générale adjointe, Agente du Gouvernement du Portugal auprès de la Cour
ROMANIA / ROUMANIE	Adriana-Mihaela BĂRBIERU Co-agent before the European Court of Human Rights, Deputy to the Permanent Representative
SAN MARINO / SAINT MARIN	Ilaria SALICIONI Ministre Plénipotentiaire, Département du ministère des Affaires Etrangères
SERBIA / SERBIE	Zorana JADRIJEVIĆ MLADAR State Attorney Deputy Government Agent of the Republic of Serbia before the ECHR, The State Attorney's Office, The Agency Department before the European Court of Human Rights

<p>SLOVAK REPUBLIC / RÉPUBLIQUE SLOVAQUE</p>	<p>Miroslava BÁLINTOVÁ Government Agent before the ECHR, Ministry of Justice</p>
<p>SLOVENIA / SLOVÉNIE</p>	<p>Matija VIDMAR Adjoint à la Représentante Permanente, Représentation permanente de la Slovénie auprès du Conseil de l'Europe</p>
<p>SPAIN / ESPAGNE</p>	<p>Francisco SANZ Agent du Gouvernement auprès de la CEDH, Service juridique des Droits de l'Homme, ministère de la Présidence, Justice et relations avec le Parlement</p> <p>Alfonso BREZMES Agent before the ECtHR, Head of the Human Rights Area of the Constitutional Law & Human Rights Department, Ministry of Justice</p>
<p>SWEDEN / SUÈDE</p>	<p>Fredrik BERGIUS Deputy Director, Department for International Law, Human Rights and Treaty Law, Ministry of Foreign Affairs</p> <p>Ivar MELLGREN Desk Officer, Department for International Law and Human Rights, Ministry for Foreign Affairs</p>
<p>SWITZERLAND / SUISSE</p>	<p>Xavier-Baptiste RUEDIN Agent du Gouvernement auprès de la CEDH, Département fédéral de justice et police DFJP, Office fédéral de la justice OFJ Représentation de la Suisse devant la Cour européenne des droits de l'homme</p>
<p>TÜRKIYE</p>	<p>Yasin BULUT Deputy Head of Department of Human Rights, Ministry of Justice</p> <p>Vedia SİRMEN Adjoint au Représentant Permanent, Représentation Permanente de Türkiye auprès du Conseil de l'Europe</p> <p>Ayşen EMÜLER Experte Juridique, ministère des Affaires Etrangères, Représentation Permanente de Türkiye auprès du Conseil de l'Europe</p>
<p>UKRAINE</p>	<p>Oleksii YAKUBENKO Head of the Unit of the Department for Representation of the Government in Inter-State Cases of the Office of the Agent of Ukraine before the European Court of Human Rights, Ministry of Justice</p>
<p>UNITED KINGDOM / ROYAUME-UNI</p>	<p>Ahila SORNARAJAH Legal Counsellor, Foreign, Commonwealth and Development Office</p> <p>Vyaj LOVEJOY Lawyer, agent</p> <p>Jonny MANNING ECHR and COE support officer</p>

INVITEES**Matthieu MORI**

Secretary General of the Congress of local and regional authorities / *Secrétaire général du Congrès des pouvoirs locaux et régionaux*

Professor Andreas KULICK

Chair of Public International Law and Public Law, Director of the Mainz International Adjudication Center (MAIAC), Johannes Gutenberg University Mainz

Professor Andras SAJO (online)

Central European University

WORKSHOP ON OMBUDSPERSON INSTITUTIONS AND NATIONAL HUMAN RIGHTS INSTITUTIONS: IMPLEMENTATION OF COMMITTEE OF MINISTERS RECOMMENDATIONS AND OTHER INTERNATIONAL STANDARDS

Clare OVEY

Director of Human Rights / *Directrice des droits humains, Council of Europe / Conseil de l'Europe*

Michael O'FLAHERTY

Council of Europe Commissioner for Human Rights / *Commissaire aux droits de l'homme du Conseil de l'Europe*

Marta HIRSH-ZIEMBINSKA

Office of the European Ombudsman / *Bureau de l'Ombudsman européen*
Strasbourg

Delphine FREYMANN

Deputy Secretary, European Commission for Democracy through Law (Venice Commission) / *Secrétaire adjointe, Commission européenne pour la démocratie par le droit (Commission de Venise)*

Beate RUDOLF

German Institute for Human Rights, Member of the Board of the European Network of National Human Rights Institutions (ENNHRI) / *Institut allemand des droits humains, Membre du Bureau du Réseau européen des Institutions nationales des droits de l'Homme (ENNHRI)*

Tamar GVARAMADZE

First Deputy Public Defender of Georgia, Global Alliance of National Human Rights Institutions (GANHRI) / *Première Adjointe au Défenseur public de Géorgie, Alliance mondiale des Institutions nationales des droits de l'Homme (GANHRI)*

Vladlen STEFANOV

Chief, National Institutions and Regional Mechanisms Section, Global Operations Division, Office of the United Nations High Commissioner for Human Rights (OHCHR) / *Chef de la Section des institutions nationales et des mécanismes régionaux, Division des opérations mondiales, Haut-Commissariat des Nations unies aux droits de l'homme (OHCHR)*

PARTICIPANTS

HOLY SEE / SAINT-SIÈGE	Christine JEANGÉY Officiel, Chargée des Droits de l'Homme et du Droit Humanitaire, Dicastère pour le service du développement humain intégral
EUROPEAN UNION / UNION EUROPÉENNE	Felix RONKES AGERBEEK (online) Member of the Legal Service, European Commission
CONFERENCE OF INGOs OF THE COUNCIL OF EUROPE / CONFÉRENCE DES OING DU CONSEIL DE L'EUROPE	Simon MATTHIJSEN Standing Committee conference of INGOs at the Council of Europe, Secretary, Treasurer of Right to Die Europe (RTDE), a coalition of national NGOs advocating a right to self-determination in end-of-life choices based on good information & caring support
STEERING COMMITTEE ON ANTI-DISCRIMINATION, DIVERSITY AND INCLUSION / COMITÉ DIRECTEUR SUR L'ANTI-DISCRIMINATION, LA DIVERSITÉ ET L'INCLUSION (CDADI)	Wolfram BECHTE Secretary of CDADI / <i>Secrétaire du CDADI</i>
SOCIAL RIGHTS - COLLECTIVE COMPLAINTS / DROITS SOCIAUX - RÉCLAMATION COLLECTIVES	Gioia SCAPPUCCI Head of Division / <i>Cheffe de Division</i>
DIGITAL DEVELOPMENT / DÉVELOPPEMENT NUMÉRIQUE	Ana TOKHADZE

OBSERVERS / OBSERVATEURS

EUROPEAN NETWORK OF NATIONAL HUMAN RIGHTS INSTITUTIONS / LE RÉSEAU EUROPÉEN DES INSTITUTIONS NATIONALES DES DROITS DE L'HOMME (ENNHRI)	Debbie KOHNER Secretary General Sophie HALE Human Rights Officer
AMNESTY INTERNATIONAL	Rita PATRICIO Senior Executive Officer for the Council of Europe, Amnesty International

SECRETARIAT / SECRÉTARIAT

Directorate General Human Rights and Rule of Law / Direction générale Droits humains et État de droit (DG I)	
	Gianluca ESPOSITO Director General / Directeur général
	Daniele CANGEMI Head of the Human Rights, Justice and Legal Co-operation Standard-settings activities Department / <i>Chef du Service des activités normatives en matière de droits humains, justice et coopération juridique</i>
Human Rights Intergovernmental Cooperation Division / Division de la coopération intergouvernementale en matière de droits humains	
	David MILNER Head of Division, Secretary of the CDDH / <i>Chef de Division, Secrétaire du CDDH</i>
	Elvana THACI Head of the Tromsø Convention Unit, Secretary of the Committee of experts on the System of the European Convention on Human Rights / <i>Chef de l'Unité Convention de Tromsø, Secrétaire du Comité d'experts sur le système de la Convention européenne des droits de l'homme (DH-SYSC)</i>
	Vera MANUELLO Administrator / Administratrice, Secretary of the Drafting Group on the eradication of impunity for serious human rights violations / <i>Secrétaire du Groupe de rédaction sur l'élimination de l'impunité pour les violations graves des droits humains (CDDH-ELI)</i>
	Eilish BRENNAN Assistant Lawyer / <i>Juriste assistante</i>
	Corinne GAVRILOVIC Administrative assistant / <i>Assistante administrative</i>
	Céline DEWAELE Assistant / <i>Assistante</i>

INTERPRETERS / INTERPRÈTES

CHENETIER Chloe
DEBURLET-SUTER Lucie
DEVICTOR Gregoire

Appendix III**Programme of the Workshop****“Ombudsperson Institutions and National Human Rights Institutions: Implementation of Committee of Ministers Recommendations and Other International Standards****09:30 – 09:45 Opening of the workshop / Ouverture de l’atelier**

- **Krista OINONEN**
Chairperson of the Steering Committee for Human Rights (CDDH) / *Présidente du Comité directeur pour les droits humains (CDDH)*
- **Clare OVEY**
Director of Human Rights, Council of Europe / *Directrice des droits humains, Conseil de l’Europe*

09:45 – 10:05 Keynote speech / Discours liminaire

- **Michael O’FLAHERTY**
Council of Europe Commissioner for Human Rights / *Commissaire aux droits de l’homme du Conseil de l’Europe*

10:05 – 11:00 Session I – Ombudsperson institutions / Les institutions de l’Ombudsman

- **Marta HIRSCH-ZIEMBINSKA**
Office of the European Ombudsman / *Bureau du Médiateur européen*
- **Delphine FREYMANN**, Deputy Secretary, European Commission for Democracy through Law (Venice Commission) / *Secrétaire adjointe, Commission européenne pour la démocratie par le droit (Commission de Venise)*

Discussion

**** 11:00 – 11:15 | Coffee break / Pause-café ****

11:15 – 12:20 Session II – National Human Rights Institutions / Institutions nationales des droits humains

- **Beate RUDOLF**
German Institute for Human Rights, Member of the Board of the European Network of National Human Rights Institutions (ENNHRI) / *Institut allemand des droits humains, Membre du Bureau du Réseau européen des Institutions nationales des droits de l’Homme (ENNHRI)*
- **Tamar GVARAMADZE**
First Deputy Public Defender of Georgia, Global Alliance of National Human Rights Institutions (GANHRI) / *Première Adjointe au Défenseur public de Géorgie, Alliance mondiale des Institutions nationales des droits de l’Homme (GANHRI)*

- **Vladlen STEFANOV**

Chief, National Institutions and Regional Mechanisms Section, Global Operations Division, Office of the United Nations High Commissioner for Human Rights (OHCHR) / *Chef de la Section des institutions nationales et des mécanismes régionaux, Division des opérations mondiales, Haut-Commissariat des Nations unies aux droits de l'homme (OHCHR)*

Discussion

12:20 – 12:30 Conclusions

- **Krista OINONEN**

Chairperson of the Steering Committee for Human Rights (CDDH) / *Présidente du Comité directeur pour les droits humains (CDDH)*

Appendix IV**Presentation by Mathieu MORI**

Secretary General of the Congress of local and regional authorities

Madam President,

Dear Participants,

A few words about the Congress:

- one of the 2 political assemblies of the CoE
- representing Local and Regional Authorities
- producing recommendations to the Member States
- monitoring local democracy with the European Charter of Local Self-Government
- Observing local and regional elections
- Disseminating the standards of the CoE at local level

Maybe historically more seen as being active on the CoE pillar on democracy / rule of law (especially on the issue of corruption)

Lately we have been keen to develop our work on human rights.

Why?

First because, like national government, regional and local governments are duty-bearers, they are responsible for implementing the human and fundamental rights obligations of states. These obligations bind all forms of local governments in urban or rural areas, irrespective of their size.

Secondly because of their responsibilities:

1. They deliver essential public services

Local authorities manage housing, water, sanitation, education support services, local health programs, and public safety. These services directly relate to human rights such as:

- the right to housing
- the right to water and sanitation
- the right to education
- the right to health

If local governments fail to provide or manage these services equitably, rights are undermined.

2. They enforce local regulations that affect rights

Local authorities set policies on:

- zoning
- policing at the community level
- land use
- business regulation
- access to public spaces

These decisions can either protect or restrict rights (e.g., freedom of assembly, non-discrimination, environmental rights).

3. They provide accessible accountability mechanisms

Because they are close to citizens, local authorities:

- are easier for people to contact
- can respond more quickly to local complaints
- allow for more direct participation in decision-making (e.g., town meetings, community councils)

This proximity strengthens democratic participation and transparency.

4. They serve marginalized groups directly

Local governments often know the needs of vulnerable groups better than national governments and can tailor solutions—such as inclusive urban planning, local anti-discrimination programs, or targeted social assistance.

CEB and homelessness

5. They play a preventive role

Through effective services, inclusive policies, and community engagement, local authorities can prevent human rights violations caused by poverty, discrimination, unsafe communities, or lack of access to basic needs.

GRETA on human trafficking / GREVIO on violence against women

To conclude: No international or national human rights strategy can succeed without local cooperation.

With this in mind, we have set up a human rights unit within the Congress and we recently adopted a human rights strategy with three objectives:

Objective 1: Integrating and mainstreaming human rights in all Congress work –

Objective 2: Promoting a culture of human rights at the local and regional levels –

Objective 3: And facilitating greater cooperation and political dialogue between local, regional, national and international authorities.

On the first objective of mainstreaming human rights in all Congress work, we have appointed standing rapporteurs on human rights in each of our committees to make sure that every aspect of the work of the committees has a HR dimension.

For example: our monitoring committee has produced a report on foreign interference and its impact on election processes and freedom of expression.

And is now working on a report on the right to free elections at local and regional levels.

Why this work? Because we receive a growing number of complaint letters of citizens / human rights organizations / politicians themselves who believe that the citizens have been deprived of their rights to free and fair elections.

They point out that they cannot bring complaints before the European Court of Human Rights for violations of the right to free elections, since Article 3 of Protocol No. 1 applies only to parliamentary elections.

However, the right to free elections should apply to all levels—presidential, parliamentary, regional and local. At present, the Convention limits this protection to a single level of

governance (parliamentary, and possibly presidential where the president has legislative powers).

Our report will therefore recommend that the Committee of Ministers invites your Committee to explore how to extend the Convention protection of the right to free elections to all levels of governance, in order to better safeguard our democracies.

One of our other committees, the governance committee approved this year a strategic approach to supporting the recovery and reconstruction of Ukraine at the local and regional levels, with full respect for human rights standards and this Committee is also due to examine reports on contested memories and coastal erosion –Both of which have clear human rights considerations that will be addressed.

The Social Inclusion committee adopted reports on combatting human trafficking for the purposes of labour exploitation and on social housing innovation—And next month the committee will consider reports on strengthening the capacities of local and regional authorities in the use of artificial intelligence and a comparative study of local and regional social rights.

This is intended as a contribution to the high-level conference on the European Social Charter in the Republic of Moldova next March – Where the Congress will organise a side-event in cooperation with the Parliamentary Assembly –

And which might be a steppingstone to a future report on the state of social rights at the local and regional level, which we have already discussed with the Department of Social Rights.

Resolutions attached to these reports guide local and regional authorities of course – and this contributes to our second objective, promoting a culture of human rights at local level.

To do that we also publish regularly Human Rights handbooks the latest one published being on the role of local authorities to ensure freedom of expression and freedom of peaceful assembly and association.

Given the public we have, very busy politicians or civil servants who are not experts on human rights we are now also working with a company at developing “Serious games” which are interactive digital applications designed specifically for high level – little time profiles on the duties of LRA when it comes to human rights and the provisions of the European convention of human rights.

And we hope to roll it out next year, so that elected officials can gain an easier, but deeper understanding of what they can do to ensure that the services they provide uphold people’s essential rights.

Lastly, our third objective – dialogue between authorities at all levels.

Here, our cooperation programmes are important.

Within the Congress we have the Centre of Expertise for Multilevel governance which helps local communities in our member states to ensure good democratic governance, grounded in respect for human rights. The centre implements approximately 20 projects in 15 CoE MS.

A case in point is Ukraine.

The Congress has made in 2025 an assessment of human rights delivery in Ukraine which made clear that LRA are at the frontline of protecting people most affected by war : IDPs, veterans, refugees... There is a need for a human rights-based approach, involving every level of government, and reflecting the realities of war.

The assessment flagged both the capacity and the resource gaps at local level when it comes to mapping and addressing the human rights vulnerabilities of various groups in Ukraine.

And we are working hand in hand with the Ukrainian authorities to address these issues.

Another example of good example of multilevel dialogue is the work we do on the execution of judgments.

A number of condemnations by the ECHR are down to the actions of local authorities. We are working hand in hand with the department for the execution of judgments at identifying cases where having a political dialogue at local level could be helpful in implementing judgments (cf DG1 Thematic Factsheet of the department for the execution of judgments on LRA).

Dear colleagues,

These points are far from exhaustive, but I hope that they have given you an indication of how far we have come, and our ambitions to go further still.

In doing so, we will look to work with you and with all relevant parts of this house, as well as external actors.

I believe that there is much more that we can achieve together.

I would welcome any questions.

Appendix V

Presentation by Professor Andreas KULICK

Chair of Public International Law and Public Law
University of Mainz

I. Introduction

Corporations are everywhere. What is a truism in our daily lives – from social media to car-manufacturing, to any sort of financial product – is no less true for international law. For a standard account of international law this statement seems misplaced. The law of sources places law-making capacity on the international realm firmly into the hands of states and, to a lesser degree, international organizations. Private actors are supposed to play no role here.

Yet, examples of corporations shaping international law are myriad: Companies like Blue Origin and SpaceX pushing for an interpretation of Article II Outer Space Treaty (OST)¹ that permits space mining by private actors;² the Business Engagement Program under the Convention on Biodiversity (CBD) permitting the private sector to participate in soft law-making;³ or corporate representatives forming part of the Tripartite Structure of the International Labour Organization (ILO), leading to the adoption of more than 200 international conventions.⁴

What is more, this is not a recent phenomenon. Hugo Grotius' *mare liberum*, which became the most influential scholarly work on the law of the sea – establishing the principle of the freedom of the high seas – was a legal opinion written on behalf of the Dutch East India Company, one of the world's first corporate behemoths.⁵ In short, corporate influence is pervasive, prominent and deeply entrenched in international law. This is particularly pertinent in the case of international human rights law.

With respect to international law in general and human rights in particular, such corporate influence raises questions of legitimacy and doctrine: Why should private entities with no direct accountability to a *polis* have a say in how international human rights norms or even entire human rights regimes are to be shaped? Furthermore, does international legal doctrine need to adapt to the reality of corporate influence – like it or not – and if so, how?

¹ Treaty on Principles Governing the Activities of States in the Exploration and Use of Outer Space, Including the Moon and Other Celestial Bodies, 27 January 1967, 610 U.N.T.S. 205.

² See, in further detail, Melissa J. Durkee, 'Interpretive Entrepreneurs' (2021) 107 *Virginia Law Review* 431, 466-470. On the current discussion in the literature on the 'national appropriation clause' in Art. II OST see, e.g., Leslie I. Tennen, 'Enterprise Rights and the Legal Regime for Exploitation of Outer Space Resources' (2016) 47 *University of the Pacific L. Rev.* 281, 288; Abigail D. Pershing, 'Interpreting the Outer Space Treaty's Non-Appropriation Principle: Customary International Law from 1967 to Today' (2019) 44 *Yale J. Int'l L.* 149, 154-157.

³ See Kenneth Ian MacDonald, 'The Devil is in the (Bio)diversity: Private Sector "Engagement" and the Restructuring of Biodiversity Conservation' (2010) 42 *Antipode* 513; also Mark van Oorschot, Marcel Kok and Rob van Tulder, 'Business for Biodiversity – Mobilising Business Towards Net Positive Impact', PBL Policy Brief (2020), available at https://www.pbl.nl/sites/default/files/downloads/pbl-2020-business-for-biodiversity-4143_0.pdf (23 November 2025).

⁴ See e.g. Laurence R. Helfer, 'Understanding Change in International Organizations: Globalization and Innovation in the ILO' (2006) 59 *Vanderbilt L.R.* 649, 651; Guiseppe Casale, *The Fundamentals of International Labour Law* (G. Chapichelli Editore 2020) 32; William R. Simpson, 'The ILO and Tripartism: Some Reflections' (1994) 117 *Monthly Labour Review*, Issue 9, 40 et seq.

⁵ See Hugo Grotius, *Mare Liberum* (first published in 1609; OUP 1916, Ralph van Deman Magoffin trans., James Scott Brown ed.), in particular Ch. I and VIII. See also Peter Borschberg, 'Grotius and the East Indies' in Randall Lesaffer and Janne E. Nijman (eds), *The Cambridge Companion to Hugo Grotius* (CUP 2021) 65, 66-69 and William E. Butler, 'Freedom of the High Seas' in *ibid.* 477, 480-483.

In this presentation, I would like to set out a typology of corporate influence on international law (Part II) to get a firmer grasp of the phenomenon we are dealing with. Part III will exemplify this typology in the field of international human rights with respect to the Meta Oversight Board.

Then, as agreed between us, I hand over to Professor Sajo, who will give more detailed insights into the workings and case law of the Board, before I will eventually provide a few musings on what I think might need to change (Part IV). Part V concludes.

II. A Typology of Corporate Influence

To better capture and understand the phenomenon of corporate influence on international regulation, I submit the following analytical toolbox: We need to distinguish the *objects* of influence, the *forms* of influence and, on a meta-level, the *patterns of regulation* in shaping international law.

1. Objects of Influence

First, it is important to differentiate *what* it is that corporations are exerting influence over: norms, concepts or entire regimes. Influence on an individual legal *norm* pertains, e.g., to space corporations lobbying governments to interpret the term ‘national appropriation’ in Article II OST to permit appropriation of minerals found in space by private actors.⁶ Influence on a legal *concept* means corporations shaping central ‘building blocks of legal doctrine’⁷ such as ‘ius cogens’ or ‘responsibility’. An example of companies shaping a legal *regime* constitutes the establishment, operation and reform of investor-state dispute settlement (ISDS). Sometimes, these three categories may also fall in one or overlap.

2. Forms of Influence

Having identified *what* corporations may influence, it is equally important *how* they do so. I shall distinguish creation, modification and neutralization. First, creation. As said, the established doctrine formally excludes private actors from international law-making.

However, although Article 38(1) of the ICJ Statute petrifies a certain view on sources doctrine, in reality, the picture is more complex. As mentioned, international legal regimes may involve corporate actors formally in the making of hard law (ILO) or soft law (CBD). In addition, indirect impact on international law creation through lobbying is a common feature of international relations, e.g. in international IP law.⁸

Second, interpretation may *de facto* modify the content of international legal norms, by means of Articles 31-33 of the Vienna Convention on the Law of Treaties (VCLT). I already mentioned the interpretation, advanced by SpaceX et al., of Article II OST, by now being endorsed by many countries, including the U.S. (even before Trump II). In an instant, we will focus on the Meta Oversight Board’s practice of interpreting and applying, inter alia, Article 19 of the ICCPR.

Third, corporations may contribute to neutralizing, i.e. destroying, inhibiting or sidelining, international legal norms, concepts or even entire regimes. Examples range from corporate efforts – successful thus far – to prevent the adoption of a Legally Binding Instrument on

⁶ See *supra* note 2.

⁷ Tom Ginsburg and Nicholas Stephanopoulos, ‘The Concepts of Law’ (2017) 84 *U. Chicago L.R.* 147, see also at 150 (‘mental architecture’).

⁸ See Duncan Matthews, *Globalizing Intellectual Property Rights – The TRIPs Agreement* (Routledge 2002) 29 et seq.

Business and Human Rights (LBI)⁹ to late 19th and early 20th century chartered companies enabling colonialism in Africa by sidelining *inter-national* law altogether.¹⁰

3. Patterns of Regulation

Finally, we stay with the *how* of corporate influence but look at it from a meta level. Can we identify regulatory patterns that companies, seeking to shape international law, display? Three of those patterns are particularly instructive for our purposes, which I call *arbitrage*, *mare liberum* and *activism*. They do not necessarily exclude one another but may coincide.

Arbitrage, first, denotes a pattern by which corporations seek to shape international regulation so that it creates competition between different jurisdictions and permits corporate choices. International investment law or international tax law are prime examples. The first allows for so-called forum and treaty shopping for the most preferential investment agreement.¹¹ With respect to the second, the possibility to choose where to place the company headquarters enables tax havens and a race to the bottom.¹²

I call the second regulatory pattern *mare liberum*. Like *arbitrage*, this is an avoidance strategy. But it differs from the former. Here, corporations do not seek to play different regulatory orders against each other, but rather create a realm beyond the regulatory influence of states altogether – or at least something akin to it. Grotius asserted that the high seas constitute a space beyond the sovereignty of individual states, in which free agents can roam and navigate undeterred by sovereign regulation. This is the embodiment of this pattern, whereby corporations carve out regulatory spaces so as to be able to operate beyond state control. In an instant, we will see how Meta's Human Rights Policy can be viewed as an example of this pattern.

The third regulatory strategy is not about avoidance but about engagement. In cases of what I term *activism*, corporations do not try to escape regulation, rather they intend to actively shape it in their image and interest. An example is the aforementioned CBD Business Engagement Program.

Again, we shall recognize this pattern in how Meta dealt with concerns over human rights protections on its platforms, to which I now turn.

III. Example: The Meta Oversight Board

A few days after Hamas attacked Israel on 7 October 2023, a video was posted on Facebook. It showed two persons, a man and a woman, recognizable as hostages as well as their Hamas kidnappers. All their faces were visible and not obscured. The text accompanying the video stated 'Israel is under attack' and '#Free Israel'. Meta, Facebook's parent company, deleted the post for violating its 'Dangerous Organizations and Individuals Policy'.¹³

This case exemplifies some of the most prominent challenges of corporate influence on international human rights in the digital sphere. Meta, in its 'Human Rights Policy', pledged to observe international human rights, enshrined in numerous treaties, including the ICCPR and

⁹ On the process since 2014 see Office of the High Commissioner on Business and Human Rights ('OCHR'), BHR Treaty Process, <https://www.ohchr.org/en/business-and-human-rights/bhr-treaty-process> (25 March 2025). See also Surya Deva, 'Treaty Tantrums: Past, Present and Future of a Business and Human Rights Treaty' (2022) 40 *Netherlands Quarterly of Human Rights* 211, 216 et seq.

¹⁰ See Doreen Lustig, *Veiled Power: International Law and the Private Corporation: 1886-1981* (OUP 2020) 17- 26.

¹¹ See e.g. Jorun Baumgartner, *Treaty Shopping in International Investment Law* (OUP 2016).

¹² See e.g. Shazad Abbas and Alexander Klemm, (2013) 20 'A Partial Race to the Bottom: Corporate Tax Developments in Emerging and Developing Economies', *International Tax and Public Finance* 596 et seq.

¹³ Meta Oversight Board, 'Hostages Kidnapped from Israel', 19 December 2023, 2023-050-FB-UA, available at <https://www.oversightboard.com/decision/fb-m8d2sogs/> (23 November 2025).

its guarantee of freedom of expression in Article 19, as well as the UN Guiding Principles on Business and Human Rights (UNGPs).¹⁴ In 2020, it set up the Oversight Board, a quasi-judicial organ, organized as a separate legal entity.¹⁵ It operates as final instance to assess Meta's content moderation decisions' conformity with international human rights law.

Applying the analytical matrix from before, given the Board's status as a separate legal entity, are we actually dealing with a case of corporate influence? Yet, to my mind, despite the Board impressively asserting a degree of independence early on,¹⁶ Meta's influence on international human rights remains considerable: The Oversight Board's initial members were selected by Meta¹⁷, even though Board Members choose subsequent members themselves.¹⁸ Meta wrote the Board's Charter and Bylaws,¹⁹ the Members serve three-year terms, open for re-election,²⁰ and Meta retains ultimate financial control, holding the decision over the Board's continued existence.²¹

The *object* of influence are primarily norms of international human rights law, with the *form* of influence mainly focused on their modification through interpretation. Such interpretive modification can be considerable, especially if the Board's becomes the primary practice by which online public discourse is scrutinized according to international human rights law and if such interpretation does not follow established methodology. Thus, it may reach beyond individual human rights norms and may, if continually deviating from such methodology, affect the international human rights regime altogether. Also, as the Board applies human rights norms created for the state-individual relationship *vis-à-vis* private actors, this affects the concept of human rights. In addition, the effect of the Oversight Board's 'jurisprudence' may reach beyond human rights law, e.g. the law of armed conflict in the case mentioned, and may affect other areas of international law.

Maybe most interesting, however, is looking at the Oversight Board through the meta level lens (no pun intended) of patterns of regulation. I submit that Meta's 'Human Rights Policy', including establishing the Oversight Board, displays features of both what I have called *mare liberum* and *activism* strategies. *Activism* because Meta pro-actively declared itself bound by international human rights and set up the Oversight Board. As regards *mare liberum*, the Board applies international human rights law, insisting that it does not deal with domestic constitutional law but rather only scrutinizes the matters before it from an international perspective.²² Therefore, this quasi-adjudicatory system operates beyond the realm of domestic sovereign jurisdictions. Conveniently, there is also no international body competent to review the Oversight Board's decisions. The Human Rights Committee deals much less frequently with Article 19 cases *vis-à-vis* online public discourse – and in any case could only address states' human rights obligations. Hence a system, established by a corporation, creating an international realm beyond individual state control: *mare liberum*.

¹⁴ See <https://about.fb.com/wp-content/uploads/2021/03/Facebooks-Corporate-Human-Rights-Policy.pdf> (23 November 2025).

¹⁵ See <https://www.oversightboard.com/> (23 November 2025). See also Andreas Kulick, 'Meta's Oversight Board and Beyond – Corporations as Interpreters and Adjudicators of International Human Rights' (2023) 22 *The Law and Practice of International Courts and Tribunals* 161, 173 et seq.

¹⁶ See Meta Oversight Board, 'Breast Cancer Symptoms and Nudity', 28 January 2021, 2020-004-IG-UA, available at <https://www.oversightboard.com/decision/ig-7thr3si1/> (23 November 2025).

¹⁷ See also the concerns raised by Kate Klonick, 'The OB: Creating an Independent Institution to Adjudicate Online Free Expression' (2020) 129 *Yale Law Journal* 2418 at 2465.

¹⁸ See Art. 1, 1.2.2. of the OB Bylaws, available at <https://www.oversightboard.com/wpcontent/uploads/2025/07/Oversight-Board-Bylaws-June-2025.pdf> (23 November 2025).

¹⁹ See Kate Klonick, 'The OB: Creating an Independent Institution to Adjudicate Online Free Expression' (2020) 129 *Yale Law Journal* 2418 at 2465 et seq.

²⁰ See Art. 1, 1.4.2. of the OB Bylaws.

²¹ See Art. 2, 1.3.1. of the OB Bylaws.

²² See Meta Oversight Board, 'Former President Trump's Suspension', 5 May 2021, 2021-001-FB-FBR, available at <https://www.oversightboard.com/decision/fb-691qamhj/> (23 November 2025).

IV. What Needs to Change

Having taken stock, what issues are in most dire need of addressing? I limit myself to three.

1. Taking International Law Seriously

First, the Oversight Board's 'case law' no doubt represents the most sophisticated attempt at implementing human rights standards in global platform governance to date. Nonetheless, it does not appear to follow the established methodology of treaty interpretation enshrined in Articles 31-33 VCLT.²³ Yet, international law does not only consist of primary rules. In fact, the primary rules of international human rights law are inseparable from the secondary rules of treaty interpretation, in particular.²⁴ Not observing the latter means not observing human rights.

Taking as example the 'Hostages Kidnapped from Israel' case, Article 31(3)(c) VCLT sets the standards for drawing on other rules of international law when interpreting a treaty provision.²⁵ The Board, when interpreting Article 19(3) ICCPR, referred to Article 27 of the Fourth Geneva Convention, relying on its prohibition of subjecting hostages to 'public curiosity'.²⁶ However, Article 31(3)(c) VCLT requires, among others, that the other 'relevant' rules of international law to draw on must be 'applicable between the parties'. In the case of an inter-state rule such as Article 27 GC IV, it is far from trivial whether this rule of interpretation applies to the relationship between Meta, its users and affected non-state third parties. Even if one regarded the Board as endorsing the view that Article 27 GC IV, in the case at hand, was *lex specialis vis-à-vis* international human rights law,²⁷ a similar question remains. The Board fails to discuss any of this in its written decision.²⁸

Rather, in its 'case law' overall, it mostly contents itself with frequently citing General Comment No. 34 of the Human Rights Committee – a digest of the Committee's jurisprudence on Article 19 ICCPR up until 2010 – and reports of the UN Special Rapporteur on Freedom of Expression from before 2020.²⁹ Instead, it is pivotal that the Oversight Board either meticulously observes the methodology of Articles 31-33 VCLT – or at least provides convincing argumentation for why it does not. Otherwise, it cannot claim to adhere to international human rights law.

2. Taking Corporations Seriously

Second, the Oversight Board appears in need of a horizontal effect doctrine. Meta's 'Human Rights Policy' assumes that human rights apply horizontally, i.e. between non-state actors. This pertains to the relationship between the individuals posting content and those affected by such

²³ See Andreas Kulick, 'Meta's Oversight Board and Beyond – Corporations as Interpreters and Adjudicators of International Human Rights' (2023) 22 *The Law and Practice of International Courts and Tribunals* 161, 177-180, 182-184.

²⁴ See, e.g., from the practice of the Human Rights Committee, *Roger Judge v. Canada*, Communication No. 829/1998, Views adopted on 5 August 2002, Doc. CCPR/C/78/D/829/1998, para. 10.4.

²⁵ See, e.g., for detailed monographic treatment, Campbell McLachlan, *The Principle of Systemic Integration in International Law* (OUP 2024); Panos Merkouris, *Article 31(3)(c) VCLT and the Principle of Systemic Integration – Normative Shadows in Plato's Cave* (Brill 2015).

²⁶ Convention (IV) relative to the Protection of Civilian Persons in Time of War. Geneva, 12 August 1949, UNTS Series Vol. 75, p. 287, Art. 27(1): 'Protected persons are entitled, in all circumstances, to respect for their persons, their honour, their family rights, their religious convictions and practices, and their manners and customs. They shall at all times be humanely treated, and shall be protected especially against all acts of violence or threats thereof and against insults and *public curiosity*.' (emphasis added).

²⁷ See, seminally, *Legal Consequences of a Construction of a Wall in Occupied Palestinian Territory*, ICJ Reports 2004, 136, para. 105 et seq.

²⁸ As it recently did again in a similar case pertaining to videos of detainees in the non-international armed conflict in Sudan with respect to common Article 3 to the Geneva Conventions, see Meta Oversight Board, 'Sudan Rapid Support Forces Video Captive', 11 April 2024, 2023-039-FB-UA.

²⁹ See Andreas Kulick, 'Meta's Oversight Board and Beyond – Corporations as Interpreters and Adjudicators of International Human Rights' (2023) 22 *The Law and Practice of International Courts and Tribunals* 161, 177-180 for analysis of the Oversight Board's case law.

content. However, it should not be overlooked that also those taking the content moderation decisions are not states, but private actors themselves.

The business and human rights literature often submits that large global corporations wield powers and resources similar to those of states and should thus be treated just like them.³⁰ This is what the Oversight Board's decisions indicate, applying the 'three-part test' of Article 19 ICCPR to Meta as if it was a state.³¹ However, such state analogy is too simplistic.

Corporations are bearers of human rights too, at least to some extent and at least under some human rights regimes, most notably the ECHR.³² Hence, the Board needs to deal with the reflective tripartite relationship of those posting content, those affected by the post and the content moderating platform corporation – and the fact that all three of them hold human rights interests. This, of course, is not to say that the exercise to balance these interests should not take into account the specific power relations at hand or the fact that corporations effectively act as *iudex in sua causa*.³³ These may provide arguments for why, in the proportionality balancing and in light of the specific circumstances of each case, corporations' own human rights interests take second tier after individuals' rights.³⁴

3. Taking Those Affected Seriously

Finally, Meta should undertake more serious efforts to involve those affected by content moderation. This goes beyond platform users, as posts may relate to non-users. For this purpose, one may find inspiration in recent developments in participation in bodies of international organizations. There, those affected themselves, organized in affected persons organizations (APOs), assert their interests.³⁵

Similarly, one may consider electing representatives of, say, an APO for Meta's platforms Facebook and Instagram, who participate in relevant steps of platform regulation, particularly: in amending the Community Guidelines as well as the procedural rules governing the Oversight Board; in selecting its members; and in monitoring the implementation of the Board's decisions and recommendations as well as Meta's overall content moderation policies.³⁶

³⁰ See e.g. Menno T. Kamminga and Saman Zia-Zarifi, 'Liability of multinational corporations under international law: an introduction' in Menno T. Kamminga and Saman Zia-Zarifi (eds), *Liability of multinational corporations under international law* (Kluwer 2000) 1 at 5 et seq.; David Bilchitz, 'The Ruggie Framework: an adequate rubric for corporate human rights obligations?' (2010) 7 *Sur - International Journal of Human Rights* 198, 208 et seq. For an overview of the literature to this effect see Fleur Johns, 'Theorizing the Corporation in International Law' in Anne Orford, Florian Hoffmann and Martin Clark (eds), *The Oxford Handbook of the Theory of International Law* (OUP 2016) 635 at 641 et seq.

³¹ See Evelyn Douek, 'The Meta Oversight Board and the Empty Promise of Legitimacy' (2024) 37 *Harvard Journal of Law & Technology* 373, 416.

³² See e.g. Andreas Kulick, 'Corporate Human Rights?' (2021) 32 *European Journal of International Law* 537, 545 et seq.; Marius Emberland, *The Human Rights of Companies – Exploring the Structure of the ECHR* (OUP 2006) 65 et seq.

³³ For further detailed exploration of this argument see Andreas Kulick, 'Meta's Oversight Board and Beyond – Corporations as Interpreters and Adjudicators of International Human Rights' (2023) 22 *The Law and Practice of International Courts and Tribunals* 161, 185 et seq.

³⁴ *Ibid.*

³⁵ See e.g. Jochen von Bernstorff, 'New Responses to the Legitimacy Crisis of International Institutions: The Role of 'Civil Society' and the Rise of the Principle of the 'Most Affected' in International Institutional Law' (2021)

³⁶ For further elaboration see Andreas Kulick, 'Meta's Oversight Board and Beyond – Corporations as Interpreters and Adjudicators of International Human Rights' (2023) 22 *The Law and Practice of International Courts and Tribunals* 161, 191 et seq.

V. Conclusion

Corporate influence on international law is a fact. In certain areas, it is even inevitable. Platform regulation is arguably one of the most pertinent examples: A digital space for online public discourse created and curated by private corporations. It is next to impossible for them not to be involved in regulatory decision-making here, affecting far-reaching human rights interests. If they interpret and apply human rights, they necessarily contribute to shaping them.

Hence, the central question rather is how and to what extent. Corporate influence on international law, including human rights, is not bad by definition. But it evokes questions of legitimacy and doctrine that need addressing because there is no doubt that it is here to stay.

Appendix VI**Presentation by Professor Andras SAJO**

Central European University

I've been asked to speak about Meta Oversight Board today, and how it works as a model of industry self-regulation.

When the Oversight Board was first conceived around 2017, it was born out of a brewing crisis. Facebook, like other social platforms that served hundreds of millions of users, had become an arbiter of speech. Facebook was accused of dictating what people in every region of the world could talk about, how much they could offend one another, whether they could mislead or lie, or advocate violence or political overthrow.

The platform was accused of channeling disinformation in favor of Brexit and against American presidential candidates allegedly shaping the fate of nations and democracy itself.

What emerged from this moment was an experiment in the governance of digital speech called the Oversight Board. Meta, in consultation with experts, human rights activists and other stakeholders selected with the help of head hunters 20 experts to review high-profile and sensitive content moderation decisions. This Board would decide what content should stay and go on the platform, and ground those decisions in international human rights law.

When Meta wanted to get itself out of the hot seat of having to make all these sensitive decisions, it wanted a body that would be perceived as independent. Each of the Board members brings stature from their outside reputation, be it as an activist, expert or scholar. We all care about our personal credibility and have lines we will not cross, as documented in the minority opinions. When we adjudicate cases we are independent. Meta cannot fire us because we say that a post should be taken down. They fund the board, though those resources are put into trust every few years. But there is no guarantee that the funding will be at the same level or provided for ever. Moreover, while this is not a matter of independence, there is always structural dependence. We cannot do our work unless they provide us with information and answer our questions. While we cooperate well much of the time, there are tensions and frustrations we have to work through. On the other hand, there are legitimate proprietary interests which may justify information withholding.

Today we're 21 board members, six from the US. The rest from across the globe. Our board members come from different disciplines, cultures, ideologies, and religions. We are all committed to free expression, but we each define it somewhat differently depending on our background, professional discipline and personal beliefs.

We are a purposefully deliberative body. We debate. We disagree. We write opinions—sometimes with dissents. We debate substantively and take the same side more often than you might think on questions of free speech. In our polarized world, the Board offers a rare chance to engage deeply across differences.

The board works in three principal ways: We decide cases involving individual pieces of content, issue recommendations for policy changes based on those decisions, and take on policy advisory opinions and white papers looking at broader questions of online governance like the use of AI or how Meta treats certain risks. .

Cases come to us through user appeals or referrals from Meta itself. Someone gets frustrated by seeing their content disappear, or by having to look at a post that they find objectionable, and believe violates Meta's community standards against disinformation, abuse, incitement or

some other category of prohibited content. We get thousands of appeals each week so have to prioritize the cases we think will have most impact, setting annual priority areas. The way cases are handled reminds me of the ECHR. The staff prepares the applications for screening. There are inadmissibility grounds, like late submission and Meta has the right to revoke the case where it is under some specific legal obligation, e. .g a similar case is pending in court. We take only those cases which have specific relevance for the social media space, i.e. about 40 major cases per year and a few dozens of repetitive cases handled to some extent like the commissions of the Strasbourg system. Contrary to the ECHR we chose the relevant cases (in a panel of five) like the US Supreme court or as President Wildhaber suggested regarding the ECHR as the constitutional court of Europe.

Once a case is admitted we then research and deliberate the cases via zoom, typically in panels of five, and issue a reasoned decision, applying Meta's own policies and international human rights law to assess whether the content should stay or go. In so doing, we ask Meta questions, often bringing to light aspects of the company's handling of content that would otherwise be out of view. After the panel prepares the draft it goes for comments to the full board. Once the remarks are incorporated or rejected decisions are taken by majority. The decisions we draft are published and public, forming a growing body of unique jurisprudence in the realm of online content.

About 70% of the time we overturn Meta's decisions, finding that the company has either infringed with free speech rights or failed to adhere to its own stated policies and standards. While our case decisions are technically binding, this is unfortunately not as important as it sounds. Because we look only at individual cases, and we take months to work through appeals to the Board, the disposition of individual posts, photos and videos is rarely consequential. If those posts have gone viral, that has already happened. If political speech was suppressed in the run up to an election, we cannot undo that after the votes have been cast. While we work to ensure that our decisions are applied by Meta in future to similar content, that doesn't always happen and it is hard to measure how consistently it happens.

The decisions contain policy recommendations or, equally importantly endorse or refuse policies (for example slur lists, a matter that remains contested within our Board – what Meta needs to do more and less of, whether they are properly enforcing their own rules, and whether those rules live up to human rights standards, in particular freedom of expression. While Meta does not have to implement our recommendations, they are obligated to respond to them. We then track the implementation of our recommendations, 60% of which have been accepted over time and some of which have brought about sweeping change.

In terms of substantive law, being a global entity we rely on the UN Guiding Principles on Business and Human Rights (UNGPs) (endorsed in 2011) are a global framework for respecting human rights in the context of business activities, built on three pillars: the state's duty to protect, the corporate responsibility to respect, and the need for effective access to remedy. This framework clarifies how governments should protect against human rights abuses by businesses and how businesses should avoid infringing on human rights through due diligence and remediation. It also emphasizes the importance of providing effective remedies to those harmed by business activities,

Meta has undertaken that it will abide by the Guiding Principles which means that it accepts, among others two Covenants, and Article 19 in particular. In the application of the Covenants we follow the General Comments and the practice of the HR Committee as well as the interpretations of the Special Rapporteur. It follows that we apply a proportionality analysis that is somewhat stricter than that of the Strasbourg as there is a strong emphasis on the least restrictive means. We try to convince Meta that wherever this is strictly necessary to protect other rights demotion, superscripts and other means will be more human rights conform than outright take down censorship.

When it comes to free speech and content regulation, there are real questions about whether you'd want all the powerful platforms to operate according to the same standards of what content comes up and what comes down. LinkedIn and Youtube have different considerations and dilemmas than Meta does. But that also makes some of the efficiency and legitimacy of self-regulation mechanisms elusive.

Being able to rely on international human rights law offers us a way to reconcile what would otherwise be conflicting standards in every jurisdiction.

The global nature of social media poses special problems, including the difficulty of understanding the context, and we learned that context is crucial but this is perhaps the most difficult thing for the algorithm. Given the speed with which posts can ricochet around the world, our thoughtful, deliberative approach can feel like a mismatch for the medium we see to oversee. At the same time, contemplating sensitive questions of free expression, the limits of satire, the bounds of incitement or how freely information should flow during wartime is not a simple matter of thumbs up or thumbs down.

A few examples of the impact we've had:

Thanks to the Board, now when a user has content taken down, they are notified about which Community Standard their content violated. Rather than be left in the dark about what they have supposedly done wrong, users are told how they broke the rules, allowing them to redo their post or to appeal if they think the judgment was a mistake. In other words, free speech is understood procedurally, within the rule of law, and we insist on justification. The DSA followed our approach, though the result is not obvious.

Also as a result of the board's work when users draft a post that uses a slur or another word or phrase that is not permitted – say praise for a dangerous organization – they receive a pop up note telling them that because of that specific word or phrase their post will not be allowed on the platform. They get a chance to edit the post and get rid of the trigger word, getting the rest of their message across.

Third, at the Board's recommendation AI-generated or modified content is now labeled so that users have a better sense of what they are seeing. There is much more – getting Meta's user rules translated into multiple languages so that hundreds of millions of users can understand them or getting the company to acknowledge and address the problem of veiled threats. There are countless ways in which the board has contributed to a more fair, transparent online ecosystem across Meta's platforms.

Those changes affect billions of posts each year putting more power in the hands of users.

As a board member, it would be unfair to advocate for this business generated model of externalized self-regulation but I hope that the Board is a genuine attempt to make freedom of expression a matter of global concern.

CDDH rapporteurs and representatives

- Rapporteur on gender equality: Philippe WERY (Belgium)
- Thematic rapporteur on human rights and artificial intelligence: Tim KOLK (Estonia)
- Thematic rapporteur on human rights and the environment: Nicola WENZEL (Germany)
- Thematic rapporteur on impunity for serious violations of human rights: Hans-Jörg BEHRENS (Germany)
- Thematic rapporteur on human rights and business: Nicola WENZEL (Germany)
- Representative to the Steering Committee for Human Rights in the fields of Biomedicine and Health (CDBIO): Elias KASTANAS (Greece)
- Representative to the International Cooperation Group on Drugs and Addictions (Pompidou Group): Milène BLANCHARD (France)
- Representative to the Steering Committee on Democracy (CDDEM): Krista OINONEN (Finland)

Appendix VIII**Composition of the Bureau of the CDDH and Chairpersons of subordinate bodies**

BUREAU	END OF THE MANDATE	REFERENCES
Tonje MEINICH (Norway) Chairperson	31 December 2026 (elected for 1 year, renewable)	103rd CDDH meeting (November 2025)
Nicola WENZEL (Germany) Vice-chairperson	31 December 2026 (elected for 1 year, renewable)	103rd CDDH meeting (November 2025)
Tim KOLK (Estonia) Member	31 December 2027 (elected for 2 years, renewable once)	103rd CDDH meeting (November 2025)
Elias KASTANAS (Greece) Member	31 December 2027 (elected for 2 years, renewable once)	103rd CDDH meeting (November 2025)
Milène BLANCHARD (France) Member	31 December 2026 (elected for 2 years, renewable once)	101st CDDH meeting (November 2024)
Elīna Luīze VĪTOLA (Latvia) Member	31 December 2026 (elected for 2 years, renewable once)	101st CDDH meeting (November 2024)
Babette KOOPMAN (Netherlands) Member	31 December 2027 (elected for 2 years, renewable once)	103rd CDDH meeting (November 2025)
Paweł WIERDAK (Poland) Member	31 December 2027 (elected for 2 years, renewable once)	103rd CDDH meeting (November 2025)
CHAIRPERSONS		
"46 + 1" Tonje MEINICH (Norway)		92nd CDDH meeting (November 2019)
CDDH-ELI Hans-Jörg BEHRENS (Germany)		99th CDDH meeting (November 2023)
CDDH-PTS Elīna Luīze VĪTOLA (Latvia)		1st CDDH-PTS meeting (March 2025)
CDDH-VOTE Krista OINONEN (Finland)		103rd CDDH meeting (November 2025)
CDDH-TE Milène BLANCHARD (France)		103rd CDDH meeting (November 2025)
DH-PDA Tonje MEINICH (Norway)		102nd CDDH meeting (June 2025)

Appendix IX

Calendar

*As adopted (for the first semester 2026) and approved (for the second semester 2026)
by the CDDH at its 103rd meeting (24 – 27 November 2025)*

17 – 19/03/2026	<u>4th meeting of the Drafting Group on the safe third country concept / 4^e réunion du Groupe de rédaction sur la notion de pays tiers sûr</u> (CDDH-PTS)
31/03 – 02/04/2026	1st meeting of the Drafting Group on the protection of the right of vote / 1 ^e <i>réunion du Groupe de rédaction sur la protection du droit de vote</i> (CDDH-VOTE) ³⁷
11 – 13/05/2026	1st meeting of the Drafting Group on the use of new technologies by the Court and new tendencies in litigation before the Court / 1 ^e <i>réunion du Groupe de rédaction sur le système de la Convention européenne des droits de l'homme</i> (CDDH-TE) ³⁸
19 – 20/05/2026	<u>3rd meeting of the Drafting Committee on Human Rights and Drug Policies / 3e réunion du Comité de rédaction sur les droits humains et les politiques en matière des drogues</u> (DH-PDA)
27 – 29/05/2026	<u>6th meeting of the Drafting Group on the eradication of impunity for serious human rights violations (follow-up) / 6^e réunion du Groupe de rédaction sur l'élimination de l'impunité pour les violences graves des droits humains (suites)</u> (CDDH-ELI) ³⁹
11 – 12/06/2026	<u>115th meeting of the Bureau of the Steering Committee for Human Rights / 115^e réunion du Bureau du Comité directeur pour les droits humains</u> (CDDH-BU)
30/06 – 03/07/2026	<u>104th meeting of the Steering Committee for Human Rights / 104^e réunion du Comité directeur pour les droits humains</u> (CDDH)
16 – 18/09/2026	2nd meeting of the Drafting Group on the use of new technologies by the Court and new tendencies in litigation before the Court / 2 ^e <i>réunion du Groupe de rédaction sur le système de la Convention européenne des droits de l'homme</i> (CDDH-TE)
23 – 25/09/2026	<u>7th meeting of the Drafting Group on the eradication of impunity for serious human rights violations (follow-up) / 7^e réunion du Groupe de rédaction sur l'élimination de l'impunité pour les violences graves des droits humains (suites)</u> (CDDH-ELI)

³⁷ Proposed new drafting group, subject to Committee of Ministers decisions on the revised CDDH terms of reference for 2026 – 2027 / *Proposition d'un nouveau groupe de rédaction, sous réserve des décisions du Comité des Ministres sur la révision du mandat du CDDH pour 2026 – 2027.*

³⁸ Proposed new drafting group mandated to prepare deliverables 14 & 15 under the CDDH terms of reference for 2024 – 2027 / *Proposition d'un nouveau groupe de rédaction chargé de préparer les livrables 14 et 15 dans le cadre du mandat du CDDH pour 2024 - 2027.*

³⁹ Proposed new drafting group mandated to prepare deliverable 11 under the CDDH terms of reference for 2024 – 2027, subject to the results of deliverable 8 / *Proposition d'un nouveau groupe de rédaction chargé de préparer le livrable 11 dans le cadre du mandat du CDDH pour 2024 – 2027, sous réserve des résultats du livrable 8.*

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- 14 – 16/10/2026 2nd meeting of the Drafting Group on the protection of the right of vote / *2^e réunion du Groupe de rédaction sur la protection du droit de vote* (CDDH-VOTE)
- 04 – 06/11/2026 [8th meeting of the Drafting Group on the eradication of impunity for serious human rights violations \(follow-up\) / 8^e réunion du Groupe de rédaction sur l'élimination de l'impunité pour les violences graves des droits humains \(suites\)](#) (CDDH-ELI)
- 12 – 13/11/2026 [116th meeting of the Bureau of the Steering Committee for Human Rights / 116^e réunion du Bureau du Comité directeur pour les droits humains \(CDDH-BU\)](#)
- 01 – 04/12/2026 [105th meeting of the Steering Committee for Human Rights / 105^e réunion du Comité directeur pour les droits humains \(CDDH\)](#)