

EXECUTIVE SUMMARY

The present written submission to the Committee Against Torture is for the purposes of the examination of the combined 5th and 6th periodic reports (CAT/C/GRC/5-6) of Greece on its implementation of the Convention Against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment (Convention Against Torture). TRIAL is focusing on the topic of universal jurisdiction with a view to the effective prosecution of the crime of torture, considered as one of the necessary measures to properly implement the Convention Against Torture, ratified by Greece on 6 Oct 1988.

A detailed review of Greek criminal legislation leads TRIAL to highlight that the legal framework of the State, despite containing a separate criminal offence of torture in its Criminal Code, and despite providing for universal jurisdiction over suspected perpetrators of torture, does not contain a definition of torture which is compatible with the Convention Against Torture.

TRIAL

TRIAL (Swiss Association against Impunity) is an association under Swiss law founded in 2002. It is apolitical and non-confessional. One of its principal goal is the fight against impunity of the perpetrators, accomplices and instigators of genocide, war crimes, crimes against humanity and acts of torture.

In this sense, TRIAL:

- ▶ fights against the impunity of the perpetrators and instigators of the most serious international crimes and their accomplices
- ▶ defends the interests of the victims before Swiss tribunals, international human rights organisms and the International Criminal Court
- ▶ raises awareness among the authorities and the general public regarding the necessity of an efficient national and international justice system for the prosecution of international crimes.

In particular, TRIAL litigates cases before international human rights bodies (UN Treaty bodies and regional courts) and files criminal complaints on behalf of victims before national courts on the basis of universal jurisdiction.

The organisation enjoys consultative status with the UN Economic and Social Council (ECOSOC).

More information can be found on www.trial-ch.org

DEVELOPMENTS

TRIAL appreciates the opportunity to bring to the attention of the Committee Against Torture information regarding the implementation of the Convention Against Torture in Greece.

The following sections address the international legal status of universal jurisdiction and the principle of *aut dedere aut judicare*, and current Greek legislation establishing jurisdiction of Greek courts for the crime of torture.

Universal jurisdiction

Universal jurisdiction is the capacity or competence of a state to exercise jurisdiction where none of the traditional bases of jurisdiction exist (i.e. territorial, nationality, passive personality, or protective jurisdiction). It is a form of jurisdiction which does not require any particular nexus between the perpetrator and the forum, allowing for all States to prosecute perpetrators of international crimes, thereby combating impunity by ensuring there is no safe haven for the perpetrators of international crimes.

The importance of universal jurisdiction is highlighted by the fact that it is States that have the primary responsibility to prosecute suspected international criminals¹.

Whilst the status of universal jurisdiction in international law is not definitively established, there are a growing number of States which have provided for universal jurisdiction in their national legislation². The International Criminal Tribunal for the former Yugoslavia, the judicial body at the forefront of modern international criminal law, was less circumspect, stating that “universal jurisdiction (is) nowadays acknowledged in the case of international crimes.”³ In the case of *Furundžija*, the Tribunal noted, specifically in relation to torture, that:

¹ Indeed, the ad hoc international criminal tribunals (the International Criminal Tribunal for the former Yugoslavia and the International Criminal Tribunal for Rwanda) have concurrent primary jurisdiction in relation to States, whereas the International Criminal Court only has complementary jurisdiction which may only be exercised when States are not competent or not willing to exercise their jurisdiction. It is the States that retain, in most cases, the primary jurisdiction to investigate and prosecute international crimes.

² Such as, most notoriously, Belgium, as well as Australia, Austria, Canada, Denmark, Finland, France, Germany, Netherlands, Norway, Senegal, Spain, the United Kingdom and the United States of America, see <http://www.amnesty.org/en/international-justice/issues/universal-jurisdiction>, accessed 25 August 2011.

³ International Criminal Tribunal for the former Yugoslavia, Appeals Chamber, Decision of 2 October 1995 on the defence motion for interlocutory appeal on jurisdiction in the case of *Prosecutor v. Tadić* (no. IT-94-1), para 62.

“it would seem that one of the consequences of the *jus cogens* character bestowed by the international community upon the prohibition of torture is that every State is entitled to investigate, prosecute and punish or extradite individuals accused of torture, who are present in a territory under its jurisdiction. Indeed, it would be inconsistent on the one hand to prohibit torture to such an extent as to restrict the normally unfettered treaty making power of sovereign States, and on the other hand bar States from prosecuting and punishing those torturers who have engaged in this odious practice abroad. This legal basis for States’ universal jurisdiction over torture bears out and strengthens the legal foundation for such jurisdiction found by other courts in the inherently universal character of the crime. It has been held that international crimes being universally condemned wherever they occur, every State has the right to prosecute and punish the authors of such crimes. As stated in general terms by the Supreme Court of Israel in *Eichmann*, and echoed by a USA court in *Demjanjuk*, “it is the universal character of the crimes in question (*i.e.* international crimes) which vests in every State the authority to try and punish those who participated in their commission”⁴

Aut dedere, aut judicare: States have an obligation to prosecute or extradite persons suspected of torture

The Convention Against Torture was the first human rights treaty to set out the obligation to establish universal jurisdiction.⁵ Articles 4 to 9 of the Convention set out a matrix of obligations which have the result that States may, and in certain circumstances, must exercise universal jurisdiction.

Article 4 provides that “each State Party shall ensure that all acts of torture are offences under its criminal law”. Article 5(1) provides that “each State Party shall take such measures as may be necessary to establish its jurisdiction over the offences referred to in Article 4” and lists three heads of jurisdiction: territorial, nationality and passive personality. Article 5(2) sets out a further requirement for States to establish jurisdiction “over such offences in cases where the alleged offender is present in any territory under its jurisdiction and it does not extradite him.”

Article 6 requires States “in whose territory a person alleged to have committed any offence referred to in Article 4 is present (to) take him into custody or (to) take other legal measures to ensure his presence”. Article 7 requires States in whose territory a person who is suspected of torture is found, “if it does not extradite him,

⁴ International Criminal Tribunal for the former Yugoslavia, Trial Chamber, *Prosecutor v Furundžija*, Judgment of 10 December 1998 (no. IT-95-17/1-T), para 156.

⁵ Many international treaties dealing with international crimes provide for a form of universal jurisdiction through the principle of *aut dedere aut judicare*, including the Geneva Conventions of 1949, the Hague Convention for the Suppression of Unlawful Seizure of Aircraft of 1970, the Convention on the Prevention and Punishment of Crimes Against Internationally Protected Persons of 1973, the International Convention Against the Taking of Hostages of 1979, the International Convention for the Suppression of Terrorist Bombings 1997, the International Convention on the Suppression of the Financing of Terrorism of 1999, the United Nations Convention against Corruption of 2003, and the International Convention for the Protection of All Persons from Enforced Disappearance of 2006.

(to) submit the case to its competent authorities for the purpose of prosecution”. Article 8 sets out the requirement that “the offences referred to in Article 4 shall be deemed to be included as extraditable offences in any extradition treaty existing between States Parties” and Article 9 provides that “States Parties shall afford one another the greatest measure of assistance in connection with criminal proceedings brought in respect of any of the offences referred to in Article 4, including the supply of all evidence at their disposal necessary for the proceedings.”

In particular, the combination of Articles 5(2) and 7(1) of the Convention requires States parties to either extradite alleged offenders or to both establish and exercise jurisdiction over alleged offenders, by submitting the case to the competent authorities for the purpose of prosecution. These provisions thus enshrine the principle of *aut dedere, aut judicare*.

Universal jurisdiction is a method of establishing jurisdiction over individuals. The principle of *aut dedere, aut judicare* is more specific. It requires States not only to establish jurisdiction over alleged perpetrators of international crimes who are in their territory (which may include universal jurisdiction, if there is no other applicable form of jurisdiction) but also to exercise such jurisdiction, i.e. to bring proceedings against the suspect – or to extradite the suspect.

If the authorities have reasonable grounds to believe that torture has been committed by a person present in their territory, the Convention Against Torture requires them to take the person into custody (or otherwise ensure his presence) and to commence a preliminary inquiry.⁶ Unless another State requests extradition,⁷ the forum State is required to prosecute the alleged offender. The presence of the perpetrator is the only condition to the requirement of a State to bring to justice an alleged torturer.⁸ Thus *aut dedere aut judicare* is an unequal choice – extradition is only an option if a request has been made and the extradition is not contrary to international law.⁹ Otherwise, the State must prosecute.

Aut dedere, aut judicare is not a rule of jurisdiction but a principle of law. First, States parties are required to establish jurisdiction over the crime and the suspect, i.e. they must criminalise torture and subsequently ensure the prosecution of any alleged perpetrators of the crime. The purpose is to create jurisdiction without loopholes – using universal jurisdiction in a remedial manner where other approaches or heads of jurisdiction are not available. Second, States parties are required to cooperate in terms of extradition and judicial assistance. Article 8 of the Convention is aimed at removing legal obstacles to extradition from one State party to another, whilst Article 9 provides that all States parties are required to provide judicial assistance to the

⁶ Article 6, Convention Against Torture.

⁷ The States listed in Article 5(1) of the Convention Against Torture, namely the territorial State, national State of the alleged offender or national State of the victim.

⁸ See *Suleymane Guengueng et al v Senegal*, CAT/C/36/D/181/2001, 19 May 2006 (*Habré Case*), paras 9.7-9.9 in which the Committee rejected the argument that an extradition request must be made and rejected by the forum State. See also M. Nowak, E. McArthur, *The United Nations Convention Against Torture: A Commentary*, Oxford University Press, 2008, which notes that the drafting process of Articles 5-9 bears out this interpretation.

⁹ Nowak and McArthur, above n 9.

forum State.

Jurists have argued that the principle of *aut dedere aut judicare* is developing as a rule of customary international law, or indeed, that it has already attained customary status, at least as concerns certain categories of international crimes.¹⁰ Consistent reaffirmation of the principle through its inclusion in treaties is put forward as proof that the principle is a positive norm of general international law and a condition for the effective repression of offences which are universally condemned by the international community.¹¹ The International Law Commission has included the topic “Obligation to extradite or obligation to prosecute” in its current programme of work, including the possibility of elaborating draft articles on the obligation *aut dedere aut judicare*.¹² The Special Rapporteur, Zdzislaw Galicki, whilst noting that the varying positions of States on the question of the customary basis of the obligation to extradite or prosecute, pointed out that “the critical approach of States to the idea of a possible customary basis for the obligation *aut dedere aut judicare* has been to some extent relaxed.”¹³

Certainly the principle of *aut dedere aut judicare* is essential to the effectiveness of the Convention. The Committee has frequently expressed concern regarding the internal laws of States parties which do not confer jurisdiction for acts of torture.¹⁴ See, for example, the Committee’s Concluding Observations on Nepal in 2007, in which the Committee stated that it “regrets the absence of universal jurisdiction in domestic legislation for acts of torture, as well as the fact that certain provisions of the draft Criminal Code are not in line with articles 5 to 9 of the Convention” and recommended that the State “take the necessary measures to ensure that acts of torture are made subject to universal jurisdiction under the draft Criminal Code, in accordance with article 5 of the Convention. The State party should also make every effort to ensure compliance with articles 6 to 9 of the Convention”.¹⁵ The Committee has also expressed concern regarding limitations on universal jurisdiction provisions, such as the French legislative requirement that the suspect be normally resident on France.¹⁶

¹⁰ M. Cherif Bassiouni, E. M. Wise, *Aut Dedere Aut Judicare: The Duty to Extradite or Prosecute in International Law*, Martinus Nijhoff Publishers, 1995; Z. Galicki, “Preliminary report on the obligation to extradite or prosecute, International Law Commission”, 58th Session, 2006, A/CN.4/571, paras 40-42.

¹¹ Above n 6.

¹² Z. Galicki, “Second report on the obligation to extradite or prosecute”, International Law Commission, 59th Session, 2007, A/CN.4/585, para 18.

¹³ Z. Galicki, “Third report on the obligation to extradite or prosecute”, International Law Commission, 60th Session, 2008, A/CN.4/603, para 98.

¹⁴ See, *inter alia*, Concluding Observations of the Committee against Torture: Ukraine, A/57/44, 21 November 2001, para 5(d); Conclusions and Recommendations of the Committee against Torture: Uganda, CAT/C/CR/34/UGA, 21 June 2005, para 5 (c); Conclusions and Recommendations of the Committee against Torture: Democratic Republic of Congo, CAT/C/DRC/CO/1, 1 April 2006, para 5(b); Conclusions and Recommendations of the Committee against Torture: South Africa, CAT/C/ZAF/CO/1, 7 December 2006, para 17; Conclusions and Recommendations of the Committee against Torture: Benin, CAT/C/BEN/CO/2, 19 February 2008, para 15; Concluding Observations of the Committee against Torture: Indonesia, CAT/C/IDN/CO/, 2 July 2008, para 29.

¹⁵ Conclusions and Recommendations of the Committee against Torture, Nepal, CAT/C/NPL/CO/2, 13 April 2007, para 18.

¹⁶ Conclusions and Recommendations of the Committee against Torture: France, CAT/C/FRA/CO/4-6, 20 May 2010, para 19.

In the case of *Suleymane Guengueng et al v Senegal*,¹⁷ the Committee found Senegal to be in violation of Articles 5(2) and 7 of the Convention, in relation to the failure of the Senegalese courts to prosecute or extradite Hissène Habré, the former President of Chad, accused of acts of torture in Chad. Both the Court of Cassation of Senegal and the Dakar Court of Appeal found that they lacked jurisdiction to try Mr Habré, despite his presence on within their territory, in contravention of the obligation under Article 5(2). Further, in the absence of a request for extradition being made at the time when the complainants submitted their complaint in January 2000, Senegal did not prosecute Mr Habré, in contravention of the obligation under Article 7. The Committee found a separate contravention of Article 7 from the time that Belgium issued its extradition request, on 19 September 2005, for the refusal of Senegal to comply with the extradition request. The Committee also noted as a positive development the UK House of Lords judgment of 24 March 1999 in the case of *R v Bartle and the Commissioner of Police for the Metropolis, ex parte Pinochet*, in particular the findings that UK Courts have jurisdiction over acts of torture committed abroad, and that a Head of State does not have immunity for torture.¹⁸

The Special Rapporteur on torture and other cruel, inhuman or degrading treatment or punishment also recently expressed concern regarding the prevalence of impunity as one the root causes of the widespread practice of torture, and disappointment with respect to the low number of prosecutions for torture. He highlighted the challenge of effective application of the international legal framework, noting that “torture occurs because national legal frameworks are deficient... Torture persists because national criminal systems lack the essential procedural safeguards to prevent its occurrence, to effectively investigate allegations and to bring perpetrators to justice.”¹⁹

Criminalisation of torture in Greek Law

Torture is prohibited under Article 7 of the Greek Constitution:

“Torture, any bodily maltreatment, impairment of health or the use of psychological violence, as well as any other offence against human dignity are prohibited and punished as provided by law.”

The offence of torture is provided by Article 137A of the Greek Criminal Code:

“(1) Any public servant or military officer whose duties include the prosecution or interrogation or examination of criminal or disciplinary offences or the execution of penalties or the guarding or the custody of detainees, shall be punishable by imprisonment if he or she subjects to torture, in the course of the performance of his or her duties, any person under his or her authority, with a view:

(a) To extorting from him or her or a third person a confession, deposition, piece of information or statement, especially that of repudiation or acceptance of a political or other ideology;

¹⁷ CAT/C/36/D/181/2001, 19 May 2006.

¹⁸ Conclusions and Recommendations of the Committee against Torture: United Kingdom of Great Britain and Northern Ireland, Crown Dependencies, and Overseas Territories, CAT/C/CR/33/3, 10 December 2004, para 3(d).

¹⁹ Final report of Manfred Nowak: “Interim report of the Special Rapporteur on torture and other cruel, inhuman or degrading treatment or punishment”, A/65/273, 10 August 2010.

- (b) To punishing him or her;
- (c) To intimidating him or her or a third person.

(2) The term torture refers to:

- (a) Any systematic infliction of acute physical pain;
- (b) Any systematic infliction of physical exhaustion endangering the health of a person;
- (c) Any systematic infliction of mental suffering, which could lead to severe psychological damage;
- (d) Any illegal use of chemicals, drugs or other natural or artificial means aiming at bending the victim's will.

(3) The cases involving physical injury, injury to the health, the use of illegal physical or psychological force and any other serious offence against human dignity, which is committed by persons under the conditions and for the purposes defined, are punishable by three to five years' imprisonment. Offences against human dignity include in particular:

- (a) The use of a lie detector;
- (b) Prolonged isolation;
- (c) Serious attack on sexual dignity of the person.”

This definition of torture is based on the definition in Article 1 of the Convention Against Torture, however, there are a number of lacunas in the Greek definition, as follows:

- the reference to “any public servant or military officer” in subsection (1) does not include people “acting in an official capacity”;
- the definition does not include acts of torture carried out with the consent or acquiescence of a public official;²⁰
- the inclusion of the word “systematic” in the definition of torture in subsections (2)(a), (b) and (c);
- the absence of the word “suffering” from the subsection (2)(a); and
- the requirement that mental suffering “could lead to severe psychological damage” in subsection (2) (c).

The Committee Against Torture has recently made a number of recommendations that States Parties ensure that the definition of torture incorporates all elements contained in Article 1 of the Convention.²¹ In its General Comment No. 2, the Committee also pointed out that “serious discrepancies between the Convention's definition and that incorporated into domestic law create actual or potential loopholes for impunity. In some

²⁰ Please note that the definition cited in the Combined 5th and 6th periodic reports to the Committee Against Torture: Greece, CAT/C/GRC/5-6, 10 March 2011, at para 58, includes after subsection (1) the phrase “the same penalty is imposed to a servant or soldier who's ordered by his superiors or voluntarily appropriates such duties and runs the operations of the preceding paragraph.” Whilst this covers acts of torture carried out with the consent of a public official, it does not include torture committed with the acquiescence of a public official.

²¹ Concluding Observations of the Committee Against Torture: Switzerland, CAT/C/CHE/CO/06, 25 May 2010, para 5; Concluding Observations of the Committee Against Torture: Ghana, CAT/C/GHA/CO/1, 15 June 2011, para 9; Concluding Observations of the Committee Against Torture: Monaco, CAT/C/MCO/CO/4-5 17 June 2011, para 7; Concluding Observations of the Committee Against Torture: Kuwait, CAT/C/KWT/CO/2, 28 June 2011, para 7.

cases, although similar language may be used, its meaning may be qualified by domestic law or by judicial interpretation and thus the Committee calls upon each State party to ensure that all parts of its government adhere to the definition set forth in the Convention for the purpose of defining the obligations of the State.”²²

The Committee has not specifically commented on the discrepancies between the Greek definition of torture and the Convention definition, although it has queried “whether legislation prohibiting torture and cruel, inhuman and degrading treatment contains specific provisions regarding gender-based breaches of the Convention, including sexual violence”,²³ to which Greece responded in its report that these offences are already included in the existing provisions.²⁴

Whilst the Greek definition of torture is a relatively broad and detailed one, the discrepancies between the criminal Code definition and the Convention definition have the result that Greek legislation is not in conformity with Article 1 of the Convention Against Torture, and that not all acts of torture are criminalised in Greece.

Jurisdiction of Greek Courts to prosecute acts of torture

Article 8(k) of the Greek Criminal Code provides for the application of Greek criminal law to nationals and non nationals for acts committed abroad, irrespective of the laws of the place of their commission, for crimes “which specific provisions or international conventions signed and ratified by the Greek state provide for the application of Greek criminal legislation.”

The provisions in Article 5 to 7 of the Convention Against Torture provide that State parties must take such measures as may be necessary to establish their jurisdiction over torture when the alleged offender is in their territory and they do not extradite him or her. If the alleged offender is not extradited, the States parties must submit the case to the authorities for the purpose of prosecution. The Convention Against Torture is thus a convention which requires Greece to apply its criminal legislation for the purposes of establishing and exercising jurisdiction over perpetrators of torture found on Greek territory.

Article 28(1) of the Greek Constitution provides that:

“The generally recognised rules of international law, as well as international conventions as of the time they are sanctioned by statute and become operative according to their respective conditions, shall be an integral part of domestic Greek law and shall prevail over any contrary provision of the law. The rules of international law and of international conventions shall be applicable to aliens only under the condition of reciprocity.”

²² Committee Against Torture, General Comment No 2: Implementation of Article 2 by States parties, CAT/C/GC/2, 24 January 2008, para 9.

²³ Committee Against Torture, List of issues prior to the submission of the combined fifth and sixth periodic reports of Greece, CAT/C/GRC/Q/5, 23 February 2008.

²⁴ Combined 5th and 6th periodic reports to the Committee Against Torture: Greece, CAT/C/GRC/5-6, 10 March 2011, para 58.

These provisions together allow Greece to exercise universal jurisdiction over suspected perpetrators of torture found in Greek territory. Therefore, Greek law is coherent with the requirements to establish and exercise universal jurisdiction under the Convention Against Torture. However, the Committee has noted with concern the lack of implementation of the Convention in Greece, in particular “the absence of data with respect to the practical application of the numerous new legislative acts and the seemingly insufficient steps undertaken to reduce the gap between legislation and practice”²⁵, as well as the “alleged reluctance of prosecutors to institute criminal proceedings under article 137A of the Criminal Code”²⁶ and “the lack of an effective independent system to investigate complaints and reports that allegations of torture and ill-treatment are not investigated promptly and impartially”²⁷

The Committee recommended that Greece “take all necessary steps to ensure effective implementation in practice of adopted legislation”²⁸ and “take necessary measures to establish an effective, reliable and independent complaints system to undertake prompt and impartial investigations.”²⁹ However, when it requested data with respect to persons tried and convicted for torture and whether Greece has ever prosecuted a suspected perpetrator of torture in cases where it had rejected a request for extradition,³⁰ the response from Greece was simply to state that there was no available data regarding torture prosecutions, and that there had been no instances of prosecution in cases of the rejection of an extradition request between 2004 and 2007.³¹ However, the statistics provided by Greece with respect to complaints against police officers of torture and ill-treatment between 2005 and 2009, indicate that out of 281 investigations, criminal proceedings were initiated in only 42 cases, and only 6 have had first instance sentencing judgments, all of which are under appeal³², which effectively confirms the Committee’s concerns with respect to the effectiveness of the complaints mechanism and the implementation of the legislation on torture. Certainly, there is no indication that torture has ever been prosecuted in Greece on the basis of universal jurisdiction provisions, which calls into question the measures taken by Greece to ensure that all suspected perpetrators of torture are prosecuted or extradited.

CONCLUSIONS

Despite the fact that torture is separately defined and criminalised in the Greek Criminal Code, there are a number of discrepancies with the Article 1 definition provided in the Convention. This means that not all acts of torture are criminalised in Greece, in contravention of Article 4 of the Convention. Torture can be prosecuted in Greece on the basis of universal jurisdiction under Article 8(k) of the Criminal Code, which requires Greece to apply the Convention Against Torture requirement of *aut dedere aut judicare* in Greek law, however, universal

²⁵ Conclusions and recommendations of the Committee Against Torture: Greece, CAT/C/CR/33/2, 10 December 2004, para 5 (a).

²⁶ Above n 25, para 5(f).

²⁷ Above n 25, para 5(e).

²⁸ Above n 25, para 6(b).

²⁹ Above n 25, para 6(f).

³⁰ Above n 23, paras 9 and 10.

³¹ Above n 24, paras 90 and 91.

³² Above n 24, paras 179-183.

jurisdiction over torture does not appear to have ever been exercised by Greek courts.

TRIAL therefore respectfully submits to the Committee Against Torture that Greek legislation does not fully implement the Convention Against Torture, due to the absence of a definition corresponding to the Article 1 definition of torture in the Convention, and the result that not all acts of torture are criminal offences in Greece.

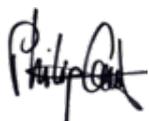
RECOMMENDATIONS

TRIAL respectfully suggests that the Committee Against Torture take the following action:

1. During the dialogue with Greece:
 - a. request the State Party to explain the continued lack of a precise definition of torture;
 - b. ask for clarification regarding the existence of jurisdiction over the crime of torture as defined by the Convention when the suspect is present in Bulgaria; and
 - c. ask for clarification regarding the actual exercise of jurisdiction over suspected perpetrators of torture in cases where extradition is not requested or is refused.

2. After the dialogue with Greece:
 - a. recommend that the State Party ensure that the crime of torture is separately defined and criminalised in Bulgarian law;
 - b. recommend that the State Party ensure that all acts of torture, and not only those constituting war crimes, are capable of being prosecuted under universal jurisdiction provisions; and
 - c. recommend that the State Party ensure that all suspected perpetrators of acts of torture who are found on Bulgarian territory, are either extradited, or prosecuted, if necessary under the universal jurisdiction provisions of Article 6 of the Penal Code.

TRIAL remains at the full disposal of the Committee Against Torture should it require additional information and takes the opportunity of the present communication to renew to the Committee the assurance of its highest consideration.



Philip Grant
TRIAL Director