

1. **The Regional Center for Human Rights (RCHR)** is a Ukrainian NGO founded in 2013 in Sevastopol. Since 2014, it has documented international law violations by the Russian Federation in occupied Crimea, expanding its work after the full-scale invasion in 2022. Current priorities of RCHR in the context of armed conflict include, among others, countering (1) grave violations against children, (2) the destruction and appropriation of the cultural heritage of Ukraine, and (3) forcible change in the demographic composition of the population in the occupied territories of Ukraine.
2. RCHR lawyers represent victims of human rights violations before the ECtHR, UN treaty bodies (HRC, CERD), and mechanisms such as the WGEID. The HRC's Views in *Bratsylo and Others v. the Russian Federation*, with RCHR's legal participation, marked the first case addressing human rights and IHL violations in occupied Crimea. The team has also submitted multiple reports to the HRMMU, the CRC, the UN Special Rapporteur on extrajudicial executions, the UN Special Rapporteur on the right to education and the ICC. One such submission, on the transfer of Ukrainian children to Russian families, contributed to the ICC's arrest warrants for Russian officials. RCHR's analytical work has been referenced in UN reports and the ECtHR judgment in *Ukraine v. Russia (re Crimea)*.
3. RCHR's partners – **the Voices of Children Charitable Foundation and the Ukrainian Child Rights Network (UCRN)**, co-authors of this submission, possess substantial experience in the return and psychosocial reintegration of children who were deported, forcibly transferred, and/or held in territories under the effective control of the Russian Federation.
4. A coalition of organisations intends to present its views on the Russian Federation's compliance with the ICESCR, focusing on its seventh periodic report, the state's replies, and related issues in the context of the armed aggression against Ukraine, for consideration during the 78th Session of the Committee in Geneva.

#### **I. Forcible displacement and transfer of Ukrainian children to Russian families (Articles 2(2), 4, 5(1) and 10(1) of the Covenant)**

5. In its Replies to the list of issues concerning its seventh periodic report, the RF states that it 'evacuated' Ukrainian children from the zone of the so-called "special military operation," including those accompanied by parents or other legal guardians, from national residential institutions for orphans and children without parental care, as well as – as indicated in para. 120 – unaccompanied children in need of family reunification.
6. According to official Ukrainian data, since the beginning of the full-scale invasion, Russia has forcibly displaced at least 19,546 children<sup>1</sup>, including 4,390 orphans and children deprived of parental care<sup>2</sup>. Ukrainian children were deported to 57 regions of the RF<sup>3</sup>, particularly the Omsk region and Sakhalin, where the climatic conditions differ significantly from those of their permanent place of

---

<sup>1</sup> Children of War Platform. URL: <https://childrenofwar.gov.ua/en/>

<sup>2</sup> 'Not even hiding its crimes'. Publication. TSN. 2023. URL: [https://tsn.ua/ato/navit-ne-prihovuye-svoyi-zlochyni-vereschuk-ozvuchila-skilli-ditey-sirit-rosiya-vikrala-z-ukrayini-229522\\_3.html](https://tsn.ua/ato/navit-ne-prihovuye-svoyi-zlochyni-vereschuk-ozvuchila-skilli-ditey-sirit-rosiya-vikrala-z-ukrayini-229522_3.html); see also Annex 1 that has been sent to the Committee separately

<sup>3</sup> Transcript of the 523rd Meeting of the Federation Council of the Russian Federation. 28 September 2022. <https://docs.google.com/document/d/1YzILsandGTZVKvkh15-xUPt0IqtJMwf6hoa4dljPGKM/edit?usp=sharing>

residence<sup>4</sup>. Between 2014 and 2022, approximately one thousand Ukrainian children<sup>5</sup> might be abducted by Russians from the occupied Crimean Peninsula<sup>6</sup>.

7. On 30 May 2022, Ukrainian children were forcibly recognised as citizens of the RF and started receiving Russian documents following a simplified procedure<sup>7</sup>. Imposing Russian citizenship is an instrument of forcible transfer to Russian families and Russification. Since October 2022 and up to this day, senior Russian officials claim that only 380 Ukrainian children have been placed under the care of Russian citizens since the full-scale invasion<sup>8</sup>. However, this information is not accurate. For example, in 2024-2025, the RCHR has documented 3 cases involving the transfer of 5 Ukrainian children from occupied Donetsk and Luhansk regions into Russian families. All of the children are boys between the ages of 5<sup>9</sup> and 10. Two of them were placed with families of Russian military personnel<sup>10</sup>. They are currently residing in the Moscow, Novosibirsk, and Pskov regions. Although the number of such cases reported in Russian media remains relatively low, this process – like the deportation itself – is ongoing.
8. In its Replies, Russia states that since 2022 and up to 25 October 2024, the Commissioner for Human Rights has received around 60 applications for the reunification of minors with relatives or legal representatives, and for assistance in travel to their places of residence. However, on 20 June 2024, Maria Lvova-Belova reported the “reunification of 70 children with 52 families in Ukraine”<sup>11</sup>. In addition to the discrepancy in the reported number of children, Russia is also manipulating the narrative of facilitating their return. Firstly, it has not established a registry of ‘evacuated’ children, nor has it provided such information to Ukraine or the ICRC. Secondly, there is no effective mechanism in Russia with a mandate to search for the parents or legal representatives of these children. Thirdly, Russia’s actions — including the imposition of its citizenship and the forcible placement of children with Russian families — point to a clear lack of intent to ensure their return. Finally, according to Russian officials, logistics, transportation, and other return-related costs are being handled not by Russia, but Qatar<sup>12</sup>. An analysis of the examples in Annex 1 to the third issue of the Bulletin on Maria Lvova-Belova’s activities<sup>13</sup> reveals that Russian authorities deliberately misrepresent the circumstances of children’s return and conceal the obstacles faced by Ukrainian parents and legal representatives<sup>14</sup>.
9. As it was recognised by the ECtHR, an administrative practice of the transfer to Russia and, in many cases, the adoption there of Ukrainian children was committed on a discriminatory basis on the

---

<sup>4</sup> Where and why is Russia abducting Ukrainian children? Publication. Spravdi. 2022. URL:

<https://spravdi.gov.ua/dopomoga-vykradenym-svrotam-vak-rosiya-vsnyovlyuye-ditej-z-ukrayiny/>

<sup>5</sup> According to information provided by the Ministry of Social Policy of Ukraine at the beginning of the temporary occupation of the Crimean Peninsula in 2014, there were 4,323 Ukrainian orphans and children without parental care.

<sup>6</sup> Report on the impact of aggression on the human rights situation in Ukraine: 24 February 2022–23 February 2023. OSCE. URL: <https://www.osce.org/files/f/documents/7/7/542751.pdf?fbclid=IwAR0RxUefyN2PKd7uVBgZnbwWZBLldtZfoZRPgVeBeNkiUI7bH5qayYDt8> (see p.16)

<sup>7</sup> President of the Russian Federation. (2022, May 30). Decree No. 304 on the simplified procedure for acquiring Russian citizenship for residents of occupied regions of Ukraine. URL: <http://www.kremlin.ru/acts/news/68606>

<sup>8</sup> Commissioner for Children’s Rights under the President of the Russian Federation. (2023). Report on the activities of the Commissioner for Children’s Rights for 2022. URL: <https://deti.gov.ru/Devatelnost/documents/258>

<sup>9</sup> Telegram / Children’s Ombudsman of the ‘LNR.’ (2024). Post #1914. URL: [https://t.me/detskiy\\_ombudsmen\\_inr/1914](https://t.me/detskiy_ombudsmen_inr/1914)

<sup>10</sup> Komsomolskaya Pravda – Pskov. (2024, May 31). Children from Donbas find families in Pskov Oblast. URL: [Archived version] <https://web.archive.org/web/20250531121048/https://www.pskov.kp.ru/daily/27558/4882497/>

<sup>11</sup> Help Spina Bifida. (n.d.). A Siberian woman adopted a 10-year-old disabled boy from an orphanage in Donbass. URL: <https://helpspina bifida.ru/ya-ne-smogla-zabyt-foto-stepy-hudenkogo-v-odezhde-ne-po-razmeru-sibiryachka-usynovila-10-letnego-malchika-invalida-iz-detdoma-na-donbasse/>

<sup>12</sup> Telegram Channel: Malvova Belova. (n.d.). Post #3494. URL: <https://t.me/malvovabelova/3494>

<sup>13</sup> Telegram Channel: Malvova Belova. (n.d.). Post #5531. URL: <https://t.me/malvovabelova/5531>

<sup>14</sup> Methodological Recommendations on the Organization and Implementation of the Educational Process for Children Temporarily Residing in the Territory of the Russian Federation. URL: <https://deti.gov.ru/uploads/magic/ru-RU/Document-0-307-src-1718871066.5662.pdf>

<sup>14</sup> See also Annex 2 that has been sent to the Committee separately

grounds of national origin<sup>15</sup>. It violates Article 2 (2) of the Covenant. The children's removal from their homes, their separation from their parents and caregivers, their transfer to Russia and the absence of any steps by the Russian authorities to secure their reunification, while active arrangements were being made for their temporary or permanent placement in foster families or adoption, amounted to the violation of Articles 4 and 10 (1) of the Covenant. The treatment of the children concerned attained the threshold of severity required to engage the prohibition of torture and ill-treatment with a long-lasting and traumatising impact on their physical and mental health in violation of Article 12 of the Covenant.

## **II. Lack of access to Ukrainian and Ukrainian-language education (Articles 2(2), 4, and 13 of the Covenant)**

10. The occupation of part of Ukraine's territory is accompanied by the imposition of the RF's federal state educational standard<sup>16</sup>. It provides for the spiritual and moral development and upbringing of students to adopt national values, form their Russian civic identity, instil love for the Motherland [RF], and a sense of involvement in its fate<sup>17</sup>. The de facto transition to Russian educational standards through the distribution of Russian textbooks, the coercive re-education of teachers with instructions on how to justify Russia's war of aggression in Ukraine, and changes in the exterior of schools (the destruction of Ukrainian state symbols, the imposition of Russian ones) took place, where possible, immediately after the establishment of effective control over the territories of Ukraine.
11. Since 2022, the occupation administrations have managed to include 1,300 schools in the newly occupied territories into the Russian educational system<sup>18</sup>. Russia prevents the continuation of online education for children from the occupied territories in Ukrainian schools that were relocated to Ukraine-controlled regions. As of the end of 2024, only 44,000 out of 600,000 schoolchildren were able to continue such education<sup>19</sup>.
12. Unauthorised searches of personal property and housing, removal of Ukrainian textbooks and other data necessary for education, threats to deprive parents of their rights, and removal of the child from the family to prevent the preservation of ties between Ukrainian children and relocated educational institutions have been recorded. In addition to restricting access to Ukrainian-language education, such coercion also leads to a loss of quality in the educational process and educational gaps, even for those children whose families are willing to take risks.
13. As it was recognised by the ECtHR, the evidence shows that official measures to suppress education in the Ukrainian language were implemented by Russian-controlled officials in occupied Crimea, the 'DPR' and the 'LPR' as early as 2014 and in the Ukrainian territories occupied after the invasion of 24 February 2022. The impugned measures replaced all education in the Ukrainian language with education in the Russian language, with the Ukrainian language being taught, at best, only as a foreign or a minority language. After the full-scale invasion began, not a single child in Sevastopol studied the Ukrainian language. The 'leaders' of the occupied Luhansk and Donetsk regions claim that they have achieved the same indicator. Denis Pushilin stated that he 'will not allow the appearance of the Ukrainian language in the region.' In August 2022, the education and science minister of the so-called

---

<sup>15</sup> Ukraine and the Netherlands v. Russia. ECtHR. (8019/16, 43800/14). URL: <https://hudoc.echr.coe.int/eng?i=001-244292>

<sup>16</sup> Federal State Educational Standards of the Russian Federation. URL: <https://fgos.ru/>

<sup>17</sup> Federal State Educational Standards for Primary General Education in Russia. URL: <https://fgos.ru/fgos/fgos-noo/>  
Federal State Educational Standards for Basic General Education in Russia. URL: <https://fgos.ru/fgos/fgos-ooo/>

<sup>18</sup> Telegram Channel: Kherson Regional State Administration. (2025). Post #868. URL: <https://t.me/depobrherson/868>

<sup>19</sup> Life Pravda. What changes to expect for students and teachers following the latest decisions of the Ministry of Education: Interview with the Deputy Minister. URL: <https://life.pravda.com.ua/society/yakih-zmin-chekati-uchnyam-i-vchitelyam-na-tli-ostannih-rishen-mon-interv-yu-iz-zastupnikom-ministra-303962/>

LPR, Ivan Kusov, stated that the Ukrainian language would not be included in the school curriculum<sup>20</sup>. This statement is confirmed by statistics provided by the Ministry of Education of the RF. According to these statistics, 112 schoolchildren (0.17%) studied the Ukrainian language in the LPR in the 2022-23 academic year, and only 94 children (0.14%) in the 2023-24 academic year<sup>21</sup>. Ultimately, in June 2025, the Russian Ministry of Education envisaged to remove the Ukrainian language from the federal general education curriculum<sup>22</sup>. The occupation authorities took an even more radical step by completely cancelling the study of the Ukrainian language in schools in the Kherson and Zaporizhzhia regions starting from September 01, 2023<sup>23</sup>.

14. Policies of suppressing the Ukrainian language in schools and of persecuting Ukrainian-speaking children at school, implemented by the RF in Crimea, were found by the ICJ as a practice of racial discrimination<sup>24</sup>. The ECtHR has concluded that such policies violate the right to education and the prohibition of discrimination across all occupied Ukrainian territories<sup>25</sup>. The lack of access to Ukrainian and Ukrainian-language education in occupied territories violates Articles 2(2) and 13 of the Covenant, in particular, in connection with the freedom of parents to choose schools for their children and to ensure their education in conformity with their own convictions. By imposing its educational standards, in violation of international humanitarian law<sup>26</sup>, the RF also breaches Article 4 of the Covenant concerning unlawful limitations to rights that are incompatible with their nature and purpose.

### **III. Militarisation and indoctrination in education and leisure (Articles 4, 12-13, and 14 of the Covenant)**

15. Russian education, which has been illegally imposed on the occupied territories of Ukraine, is characterised by a high level of militarisation. As of the beginning of 2025, according to the statements by the occupation administrations, 1,200 specialised classes were opened in schools in the occupied territories, including cadet, police, and military-patriotic classes<sup>27</sup>. The purpose of such specialised classes integrated into the general education system is to prepare children for military or civil service (in law enforcement and security agencies) in the RF, in particular, tactical, engineering, fire training, and patriotic education<sup>28</sup>.
16. In its 2023 submission to the UN Committee on the Rights of the Child, Human Rights Watch noted that ‘the Russian curriculum justifies the invasion, falsely portrays Ukraine as a ‘neo-Nazi state,’ and

---

<sup>20</sup> Rossaprimavera.ru. LPR begins implementing a program to update school education. URL: <https://rossaprimavera.ru/news/0d2e9572>

<sup>21</sup> RTVI. Ministry of Education: This school year, Ukrainian language was taught in Bashkortostan and five other Russian regions. URL: <https://rtvi.com/news/minprosveshheniya-v-etom-uchebnom-godu-ukrainskij-yazyk-prepodavalsya-v-bashkortostane-i-eshhe-pyati-regionah-rossii/>

<sup>22</sup> Ministry of Education of the Russian Federation. Draft order ‘On amendments to certain orders of the Ministry of Education of the Russian Federation.’ URL: <https://docs.edu.gov.ru/document/32d2eb4f4e529b320e4b3d1a625d4b8d>

<sup>23</sup> More information is included in the Submission by the RCHR to the Special Rapporteur on the right to education dated on 22 April 2025

<sup>24</sup> ICJ. Application of the International Convention for the Suppression of the Financing of Terrorism and of the International Convention on the Elimination of All Forms of Racial Discrimination (Ukraine v. Russian Federation), Judgment of 31 January 2024. URL: <https://www.icj-cij.org/sites/default/files/case-related/166/166-20240131-jud-01-00-en.pdf>

<sup>25</sup> European Court of Human Rights. (2023). Grand Chamber judgment in the case of Ukraine v. Russia (re Crimea) (Applications nos. 20958/14 and 38334/18). URL: <https://hudoc.echr.coe.int/eng?i=001-235139>,

European Court of Human Rights. (2020). Grand Chamber judgment in the case of Ukraine and the Netherlands v. Russia (Applications nos. 8019/16, 43800/14, 28525/20 and 11055/22). URL: <https://hudoc.echr.coe.int/eng?i=001-244292>

<sup>26</sup> Article 43 of the Hague Regulations to the Hague Convention IV; Articles 50, 64 of the Geneva Convention IV; Article of the Additional Protocol I to the Geneva Conventions

<sup>27</sup> Telegram Channel: Kherson Regional State Administration. (2025). Post #11407. URL: <https://t.me/depobrherson/11407>

<sup>28</sup> Rules of Admission to the State Educational Institution of the LPR “Akademicheskyy Cadet Corps named after M.I. Platov”. URL: <https://alchevsk.su/news/43878>

strictly limits instruction in the Ukrainian language, violating Ukrainian children’s right to an education that develops respect for the child’s ‘own cultural identity, language and values,’ as well as the “national values” of the child’s country and country of origin. Distortions in the Russian curriculum also violate children’s right to education and information, denying them access to unbiased information and materials from a diversity of national and international sources.<sup>29</sup> Similar conclusions were also reached by the authors of ‘A Study of the Content of Russian School Textbooks (2014-2022).’<sup>30</sup>

17. The following subjects were integrated into the school curriculum: ‘Conversations about the Important,’ ‘Lessons of Courage,’ and ‘Lessons of Faith and Victory.’ In such lessons, in addition to justifying and normalising the RF’s aggression against Ukraine, children are taught how to make trench candles, camouflage nets, and tactical bracelets. These items are then given to Russian soldiers at the front<sup>31</sup>. In addition, Russian military personnel, in particular participants of the ‘special military operation (hereinafter referred to as “SMO”),’ are regularly invited to Ukrainian schools, and children are also encouraged to write soldiers letters of support and gratitude. Ukrainian children are involved in such activities without the proper consent of their parents or other legal representatives. They, in general, cannot provide education for their children according to their convictions, and therefore cannot give proper consent, because open resistance to re-education can be perceived as an act of disloyalty to the aggressor state and have negative consequences for the family as a whole (threats of deprivation of parental rights, ‘preventive’ conversations with Russian law enforcement agencies, etc.).
18. The academic disciplines “Military History of the Russian Federation” and “Fundamentals of Security and Defence of the Motherland” (hereinafter referred to as “FSDM”) are integrated into the curriculum and mandatory for all schoolchildren. The tasks of “FSDM” include military training, the formation of values and mastery of knowledge that ensure readiness for military service, the fulfilment of the duty to defend the Motherland [RF] as a factor in building a professional trajectory<sup>32</sup>.
19. Thousands of Ukrainian children from the occupied territories are also militarised in ‘re-education camps’ and military-patriotic movements such as *Young Army, Fighter, Avangard, Griffon, Yevpatoria Troopers, and others*. In 2024, at least 8,380 children were taken to re-education camps, including those with a strong militarisation component (Young Patriot, Moscow region)<sup>33</sup>.
20. UNESCO and the UN Committee on the Rights of the Child have found that the militarisation of education and promotion of military service from childhood by Russia violate international law, including the Geneva Conventions<sup>34</sup> and the Convention on the Rights of the Child<sup>35</sup>. The ECtHR

<sup>29</sup> Human Rights Watch. (2023, December 21). Russia: submission to UN committee on the rights of the child. URL: <https://www.hrw.org/news/2023/12/21/russia-submission-un-committee-rights-child>

<sup>30</sup> Studies of the content of Russian school textbooks (2014-2022). RCHR. Almenda URL: <https://almenda.org/en/doslidzhennya-zmistu-shkilnykh-pidruchnykh-rosiyi/>

<sup>31</sup> Crimea News. (2024, January 12). “Survival bracelets,” camouflage nets, and dugout candles: How schoolchildren of the Dzhankoy district assist soldiers of the special military operation. URL: <https://crimea-news.com/society/2024/01/12/1278394.html>,

STV92. (2024, January 15). Sevastopol schoolchildren delivered over 50 dugout candles to special military operation soldiers. URL: <https://stv92.ru/news/news-7623/>,

BezFormata. (2024, January 20). Students and teachers of the Alyoshkinsky educational district joined the “Parcel to Our Heroes” campaign. URL: <https://herson.bezformata.com/listnews/aleshkinskogo/142892973/>

<sup>32</sup> Federal working program “Basis of security and victory safety” (for 10-11 grades of secondary schools). URL: [https://web.archive.org/web/20250630212115/https://edsoo.ru/wp-content/uploads/2024/03/frp-obzr\\_10-11\\_22032024.pdf](https://web.archive.org/web/20250630212115/https://edsoo.ru/wp-content/uploads/2024/03/frp-obzr_10-11_22032024.pdf)

<sup>33</sup> RCHR. Ukrainian children in re-education camps. Tracker. URL: <https://docs.google.com/document/d/1hdbh3u0dqlpbYceFmEct45PfcvTF4iHKP0OaSWiX9yI/edit?usp=sharing>

<sup>34</sup> Follow-up to decisions and resolutions adopted by the Executive Board and the General Conference at their previous sessions, part I: Programme issues, E. Follow-up of the situation in the Autonomous Republic of Crimea (Ukraine). URL: <https://unesdoc.unesco.org/ark:/48223/pf0000378910>, p. 13

<sup>35</sup> Consideration of reports submitted by States parties under article 8 of the Optional Protocol to the Convention on the Rights of the Child on the involvement of children in armed conflict. CRC/C/OPAC/ISR/CO/1. URL: <https://www2.ohchr.org/english/bodies/crc/docs/crc-c-opac-isr-co-1.pdf> pp. 22-23

recognised that Russian indoctrination in education violated the rights to education and views of parents in occupied territory on the history and status of Ukraine attained the level of cogency, seriousness, cohesion, and importance to be considered ‘convictions’<sup>36</sup>. Given this and the recognised nature of these acts as administrative practice, they constitute a violation of Articles 4, 13, and 14 of the Covenant. Russification and militarised re-education cause long-term negative effects on the physical and mental health of affected children<sup>37</sup>, the unique manifestations of which can collectively be described as the ‘lost connection syndrome.’ This also indicates a violation by the RF of Article 12 of the Covenant.

#### IV. Destruction and exploitation of cultural heritage

21. The large-scale removal and appropriation of Ukrainian cultural heritage by the Russian Federation in the temporarily occupied territories illustrates a deliberate strategy of cultural erasure and material dispossession, executed through state policy and legal manipulation.

##### A. Ongoing unlawful archaeological excavations on the territory of the Crimean Peninsula (Articles 1(1), 5(1), 15(1)(a) and 15(1)(b) of the Covenant)

22. Between 2014 and 2023, the Ministry of Culture of the Russian Federation issued 1,358 permits for archaeological activities on the occupied territory of the Crimean Peninsula<sup>38</sup>. Approximately 60% of these permits were issued for the field excavations: all at sites of Ukrainian origin, including significant antique and medieval sites such as Tauric Chersonesos<sup>39</sup>, Accra<sup>40</sup>, Solkhat (Old Crimea)<sup>41</sup>, and Myrmekion<sup>42</sup>.
23. Following the occupation of Crimea, the Russian Federation launched major infrastructure projects, including the “Tavrida” highway and the Kerch Bridge, under Government Decree No. 79 of 11 August 2014. Both projects were implemented during 2016-2019<sup>43</sup>. In connection with these works,

---

<sup>36</sup>European Court of Human Rights. (2020). Grand Chamber judgment in the case of Ukraine and the Netherlands v. Russia (Applications nos. 8019/16, 43800/14, 28525/20 and 11055/22). URL: <https://hudoc.echr.coe.int/eng/?i=001-244292>

<sup>37</sup> RCHR. UCRN. Voices of Children Charitable Foundation (2024). Report “(Non)return of children: Ukraine in the face of the greatest challenge since the Independence”. RCHR. URL: <https://krymbezpravil.org.ua/en/analytics-en/nonreturn-of-children-ukraine-in-the-face-of-the-greatest-challenge-since-the-independence/>

<sup>38</sup> Culture of occupation: how Russia is rewriting Crimea. LB.ua. 2025. URL: [https://lb.ua/blog/rchr/685774\\_kultura\\_okupatsii\\_yak\\_rosiya.html](https://lb.ua/blog/rchr/685774_kultura_okupatsii_yak_rosiya.html)

<sup>39</sup> The Chersonesos Taurica, a UNESCO World Heritage Site, Has Been Looted, Altered, and Rebranded by Russia in Occupied Crimea. ICOM UK. 2024. URL: <https://uk.icom.museum/the-chersonesos-taurica-a-unesco-world-heritage-site-has-been-looted-altered-and-rebranded-by-russia-in-occupied-crimea/>

Russians destroyed Tauric Chersonesos, a UNESCO World Heritage Site. RCHR. URL: <https://rchr.org.ua/en/publications/russians-destroyed-tauric-chersonesos-a-unesco-world-heritage-site/>

<sup>40</sup> Report: “Illegal archaeological excavations on the territory of the archaeological site ‘Ancient City of Acra’”. RCHR. 2024. URL: <https://krymbezpravil.org.ua/materialy/nezakonni-arkheolohichni-rozkopky-na-terytorii-ob-iektu-arkheolohii-antychne-misto-akra/>

<sup>41</sup> Report “Illegal archaeological excavations on the territory of the archaeological site ‘medieval town of Solkhat (Old Crimea)’”. RCHR. 2024. URL: <https://krymbezpravil.org.ua/materialy/nezakonni-arkheolohichni-rozkopky-ob-iektu-arkheolohii-serednovichne-misto-solkhat-staryv-krym/>

<sup>42</sup> Report “Illegal archaeological excavations on the territory of the archaeological site ‘Medieval town of Myrmekion’”. RCHR. 2024. URL: <https://krymbezpravil.org.ua/materialy/nezakonni-arkheolohichni-rozkopky-arkheolohichnoho-kompleksu-starodavnie-misto-mirmekiy/>

<sup>43</sup> Report “Illegal archaeological excavations in the construction zone of the highway to the Kerch Strait crossing. RCHR. 2024. URL: <https://krymbezpravil.org.ua/materialy/nezakonni-arkheolohichni-rozkopky-u-zoni-budivnytstva-avtomobilnoi-dorohy-do-transportnoho-perekhodu-cherez-kerchensku-protoku/>

unauthorised excavations on over 90 hectares led to the destruction of more than 90 archaeological sites<sup>44</sup>. These actions reflect both material exploitation and the ideological reshaping of the region's cultural landscape.

24. Estimated millions archaeological artefacts have been excavated from the archaeological heritage sites of the occupied Crimea, including, according to Russian scientific sources,<sup>45</sup> approximately 6.5 million objects discovered during the excavations of Tauric Chersonesos<sup>46</sup>. Information about the whereabouts of most of them is not available and is not provided by the Russian side, which raises serious concerns about their illegal traffic, trade, or undocumented distribution. This exclusion stands in direct contradiction to the idea, which affirms that cultural heritage must be preserved and transmitted in ways that ensure accessibility, participation, and transparency<sup>47</sup>.
25. In total, as of November 2024, the Tauric Chersonese reserve-museum reported that 26,382 items from the excavations of the Southern Suburb were accepted into the museum collections, and about 55,500 more items are in the queue for acceptance<sup>48</sup>. In addition, a significant part of the objects found in the Southern Suburb requires restoration. About 20,000 of them were restored before they were handed over to the museum (earlier, the State Hermitage Museum staff was involved in the process). Separately, it was emphasised that all employees of the 'restoration department' passed the state certification of the Ministry of Culture of the Russian Federation<sup>49</sup>.

### **B. Appropriation of cultural property in the occupied regions of Ukraine after 2022 (Articles 1(1), 5(1), 15(1)(a) and 15(2) of the Covenant)**

26. Following the occupation of parts of eastern and southern Ukraine, the Russian Federation adopted a unified legislative approach to reclassify and assert control over cultural heritage located in the newly occupied territories. In October 2022, federal constitutional laws concerning the so-called 'Luhansk People's Republic',<sup>50</sup> 'Donetsk People's Republic'<sup>51</sup>, Zaporizhzhia<sup>52</sup>, and Kherson<sup>53</sup> regions introduced nearly identical provisions (Art. 30 in each case), establishing that all cultural property in the respective territories shall be subject to the legislation of the Russian Federation from the date of their purported 'accession'.

---

<sup>44</sup> Rolled under the asphalt: cultural and historical heritage as a victim of the occupiers in Crimea. 24 Channel. 2021. URL: [https://24tv.ua/yak-kulturna-spadshhina-stala-zhertvoyu-okupantiv-novini-krimu\\_n1652518](https://24tv.ua/yak-kulturna-spadshhina-stala-zhertvoyu-okupantiv-novini-krimu_n1652518)

<sup>45</sup> Bulletin of the Institute of Material Culture History of the Russian Academy of Sciences No. 15, p. 9. URL: <https://www.old.archeo.ru/izdaniya-1/seriinye-izdaniya/byulleten-instituta-istorii-materialnoi-kultury-ran.-ohrannaya-arheologiya/2024Bul15.pdf/view>

<sup>46</sup> Statement of Aksenov on the number of excavated artifacts in Chersonesos. 2024. URL: <https://archive.ph/KmwU9>

<sup>47</sup> General Comment No. 21. CESCR. URL: <https://www.refworld.org/legal/general/cescr/2009/en/83710> (paras. 15, 49)

<sup>48</sup> Statement on the number of excavated and appropriated artifacts. Tass media. 2024. URL: <https://archive.ph/zkYJ1>

<sup>49</sup> Statement of Tauric Chersonesos museum on the number of appropriated artifacts. 2023. URL: <https://archive.ph/4EChK>

<sup>50</sup> Federal Constitutional Law "On the Admission of the Lugansk People's Republic to the Russian Federation and the Establishment of a New Entity within the Russian Federation – the Lugansk People's Republic" of 04.10.2022 N 6-FKZ Art 30. URL: <https://web.archive.org/web/20250503123416/https://fzrf.su/zakon/2022-10-04-n-6-fkz/st-30.php>

<sup>51</sup> Federal Constitutional Law "On the Admission of the Donetsk People's Republic to the Russian Federation and the Establishment of a New Entity within the Russian Federation – the Donetsk People's Republic" of 04.10.2022 N 6-FKZ Art 30. URL:

[https://web.archive.org/web/20230924131145/https://www.consultant.ru/document/cons\\_doc\\_LAW\\_428188/c49e430d256c07089e35afac973ae936bd2fba71/](https://web.archive.org/web/20230924131145/https://www.consultant.ru/document/cons_doc_LAW_428188/c49e430d256c07089e35afac973ae936bd2fba71/)

<sup>52</sup> Federal Constitutional Law "On the Admission of the Zaporizhzhia oblast' to the Russian Federation and the Establishment of a New Entity within the Russian Federation – the Zaporizhzhia oblast'" of 04.10.2022 N 6-FKZ Art 30. URL:

[https://web.archive.org/web/20250421171654/https://www.consultant.ru/document/cons\\_doc\\_LAW\\_428185/1899b8353a828ded39f0c9b70115bb03e63a6a0b/](https://web.archive.org/web/20250421171654/https://www.consultant.ru/document/cons_doc_LAW_428185/1899b8353a828ded39f0c9b70115bb03e63a6a0b/)

<sup>53</sup> Federal Constitutional Law "On the Admission of the Kherson oblast' to the Russian Federation and the Establishment of a New Entity within the Russian Federation – the Kherson oblast'" of 04.10.2022 N 6-FKZ Art 30. URL:

[https://web.archive.org/web/20250624173434/https://www.consultant.ru/document/cons\\_doc\\_LAW\\_428186/541db39f67f618a3acf28d6d8734ae30bb903559/](https://web.archive.org/web/20250624173434/https://www.consultant.ru/document/cons_doc_LAW_428186/541db39f67f618a3acf28d6d8734ae30bb903559/)

27. Under these laws, all cultural property in occupied territories was placed under Russian jurisdiction, irrespective of its prior legal status under Ukrainian law, and managed by federal or occupation-aligned bodies, enabling their unilateral reclassification, reinterpretation, and use in alignment with Russian state narratives. Such measures constitute not a protective measure but a coordinated policy of cultural appropriation, suppress Ukrainian identity, facilitate historical revisionism, and contradicts the obligations of the Russian Federation under Article 15(1)(a) and Article 15(2) of the Covenant, as well as it also constitutes a breach of Article 1(1) of the Covenant, which affirms the right of all peoples to freely pursue their cultural development.
28. Moreover, the process runs counter to the principles set out in the UNESCO Declaration concerning the Intentional Destruction of Cultural Heritage (2003), particularly Article 5, which prohibits state action that intentionally destroys or alters cultural heritage for political or ideological ends. The substitution of Ukrainian law with Russian law in the field of heritage protection cannot be justified under international humanitarian law and exceeds the limits of administrative functions permissible to an Occupying Power under the 1954 Hague Convention and its First Protocol, as well as customary IHL<sup>54</sup>.

### **C. Illicit traffic of cultural property (Articles 1(1), 5(1), 15(1)(a) and 15(1)(b) of the Covenant)**

29. The Russian Federation is actively involved in the illegal trafficking and transfer of Ukrainian cultural property, stolen from the museums of Ukraine. This includes artefacts stolen from museums taken from the occupied territories of Donetsk, Luhansk, Kherson, and Zaporizhzhia regions, as well as goods illegally excavated and removed from the Crimean Peninsula.
30. As for one case, the Kherson Museum of Local Lore, which had over 193,000 exhibits, 23,000 of which were stolen by the Russian Federation. Among them was one of the best archaeological collections in Ukraine, featuring artefacts dating back over 7,000 years. This included a collection of ancient coins from the Northern Black Sea region states, treasures from Scythian burial mounds, and a collection of antique weapons<sup>55</sup>. Another case – the Oleksiy Shovkunenko Kherson Art Museum, which was looted between October 31 and November 3, 2022. The museum's collection includes more than 10,000 pieces of art – 90% of them stolen<sup>56</sup>.
31. Later, on April 01, 2023, the so-called 'Ministry of Culture of the Kherson region' signed an agreement with the director of the Tavrida Central Museum in Simferopol, Andriy Malgin, to assume 'custody' of paintings looted from the Kherson Regional Museum of Local Lore during Russia's retreat from the city<sup>57</sup>. According to Russian media, these stolen artworks are now stored in Crimea 'under supervision,' while additional looted collections remain in occupied Henichesk, with the most valuable items 'temporarily' transferred to Crimean museums<sup>58</sup>.

<sup>54</sup> IHL Database. Customary IHL. Rule 40. URL: <https://ihl-databases.icrc.org/en/customary-ihl/v1/rule40>

IHL Database. Customary IHL. Rule 41. URL: <https://ihl-databases.icrc.org/en/customary-ihl/v1/rule41>

<sup>55</sup> Statement of the Kherson museums on looted cultural goods. 2022. URL:

<https://www.radiosvoboda.org/a/novyny-pryazovya-muzevi-khersona-pohrabuvannya-okupantamy/32182204.html>

<https://www.ukrinform.ua/rubric-culture/3994388-rosiani-vikrali-23-tisaci-artefaktiv-z-hersonskogo-kraeznavcogo-muzeu.html>

<sup>56</sup> Russian occupying forces loot Kherson art museum. Kyiv Independent. 2022. URL:

<https://kyivindependent.com/russian-occupying-forces-loot-kherson-art-museum/>

Statement of the Kherson museums on looted cultural goods. NV.ua. 2022. URL:

<https://nv.ua/ukr/ukraine/events/okupanti-vivezli-furami-ta-avtobusami-ekspozitsiyu-hersonskogo-hudozhnogo-muzeyu-50281814.html>

<sup>57</sup> Statement of the representative of occupation authorities on looting of cultural goods. 2023. URL:

<https://nv.ua/ukr/ukraine/events/rosiyskiy-okupant-samostijno-zadokumentuvav-kradizhki-kartin-z-hersonu-50315003.html>

<sup>58</sup> Statement of the occupation authorities on looting of cultural goods. 2022. URL: <https://archive.ph/j77zT>



32. On April 26, 2025, 117 cultural goods from the Tauric Chersonesos reserve were illegally transferred to Yekaterinburg (RF), outside the occupied territory and beyond any transparent provenance chain<sup>59</sup>.
33. The large-scale excavations, removal, and unaccounted dispersal of Ukrainian cultural property by the Russian Federation in the temporarily occupied territories constitute a violation of Article 15(1)(a) and (b) of the Covenant. These actions deny individuals and communities their right to participate in cultural life and to access the benefits of scientific progress by obstructing access to heritage, excluding Ukrainian institutions from research and conservation, and dismantling the cultural continuity of the occupied population. The opacity of these processes, combined with the physical transfer of cultural goods outside the occupied territory, renders participation non-transparent, discriminatory, and politically subordinated.
34. These practices violate the right of individuals and communities to access and benefit from their cultural heritage, as protected under Article 15(1)(a) of the Covenant, and breach the obligation to conserve and make cultural heritage accessible without discrimination. Read in conjunction with Article 5(1), which prohibits the use of the Covenant to justify the damaging or undue limitation of its rights, the Russian Federation's conduct amounts to a misuse of legal authority to suppress cultural identity and erase historical continuity. These actions also contravene Article 4 of the 1954 Hague Convention, which prohibit the destruction, appropriation, and unlawful export of cultural property by an Occupying Power. They constitute a war crime under Article 8(2)(b)(xiii) of the Rome Statute. The resulting exclusion of the Ukrainian people from their material heritage undermines the universality and integrity of cultural rights and the foundational principles of the Covenant itself.

## V. Reprogramming of museums and cultural institutions (Articles 5(1), 15(1)(a) and 15(1)(b) of the Covenant)

35. In the temporarily occupied territories of Ukraine, museums and cultural institutions have been transformed from spaces of preservation and education into platforms of ideological production. Once oriented toward public engagement with historical knowledge, these institutions now operate as organs of state propaganda, promoting militarised, exclusionary, and historically revisionist narratives.
36. The Russian Federation systematically misuses cultural institutions, utilizing them to disseminate these three main ideological narratives, rather than fulfilling their intended cultural purpose:
  - a. The portrayal of occupied territories as an 'historical and spiritual part of Russia' (e.g., lectures on Crimea as 'the cradle of Russian Orthodoxy and statehood'<sup>60</sup>, project "Donbass-Russia. Common History" in 'DPR'<sup>61</sup>, or an open day dedicated to the Day of Russia in 'LPR'<sup>62</sup>);
  - b. the exclusive claim of Russia as 'the heir of the victory in World War II,' and so 'the right to fight entirely against nazi,' used to justify current aggression against Ukraine using the infrastructure of institutions designed to preserve cultural heritage (e.g., the exhibition "Revived Heroes" in Tauric Chersonesos<sup>63</sup>);

<sup>59</sup> Information of illicit traffic of cultural property from the occupied territories to the RF. 2025. URL: <https://www.facebook.com/RCHR.Crimea/posts/pfbid0XSXYu5dZptbeRYXD32RNG4uArnKE4TJ3wY9KmeqtKTimWnLfoXGfCht5Uy8SEC11>

<sup>60</sup> Telegram Channel: tauric\_chersonesos (2025). Post # 7821. URL: [https://web.archive.org/web/20250730102154/https://t.me/tauric\\_chersonesos/7821](https://web.archive.org/web/20250730102154/https://t.me/tauric_chersonesos/7821)

<sup>61</sup> Telegram Channel: mincult\_dnr (2023). Post # 9299. URL: [https://web.archive.org/web/20230326033553/https://t.me/mincult\\_dnr/9299](https://web.archive.org/web/20230326033553/https://t.me/mincult_dnr/9299)

<sup>62</sup> Telegram Channel: MK\_LNR (2025). Post # 23622. URL: [https://web.archive.org/web/20250730102504/https://t.me/MK\\_LNR/23622?single](https://web.archive.org/web/20250730102504/https://t.me/MK_LNR/23622?single)

<sup>63</sup> the exhibition "Revived Heroes, Master Classes, and Exhibitions: How Museum Night Was Held in Chersonesos Taurica". URL: <https://stv92.ru/news/news-10010/> (<http://archive.today/2025.08.05-091344/https://stv92.ru/news/news-10010>)

- c. the self-representation of the Russian Federation as “the defender of traditional values” (e.g., religious and military-patriotic activities<sup>64</sup> involving the Russian Orthodox Church, cultural events and dialogues in ‘DPR’<sup>65</sup>, ‘LPR’<sup>66</sup>, ‘Zaporizhzhia oblast’<sup>67</sup>, and ‘Kherson oblast’<sup>68</sup>)
37. These narratives, advanced through exhibitions, lectures, school visits, and commemorative events, do not permit pluralistic or critical engagement with history. Instead, they impose a singular ideological framework that normalises occupation and conflict while systematically excluding Ukrainian perspectives. The absence of transparent records for such programs, many of which occur off-schedule and with no public accountability, further underscores their propagandistic nature.
38. These practices violate Article 15(1)(a) of the Covenant, which guarantees the right of everyone to take part in cultural life, including access to one’s own cultural identity and history, as well as the prohibition of the exclusion of minority or dissenting cultural expressions<sup>69</sup>. Viewed in conjunction with Article 5(1), which forbids any interpretation of the Covenant permitting the destruction or undue limitation of rights, the Russian Federation’s use of cultural institutions for ideological reprogramming constitutes a coercive restriction on cultural participation and a direct violation of the Covenant.
39. Furthermore, the Russian Federation’s extension of its internal legal regime to the occupied Ukrainian territories constitutes a violation of Article 15(b) of the Covenant, as it deprives Ukrainian scholars of real practical opportunities to access cultural property, archaeological data, and scientific records. This practice undermines the credibility of all scientific publications and conclusions derived from such materials, as it contravenes the fundamental principles of objectivity. Data obtained through unlawful means and shielded from independent verification loses its scientific integrity and cultural value, diminishing its relevance to the shared heritage of humanity.

## **VI. Transfer of the Russian civilian population into the occupied territories of Ukraine via special state programs (Articles 5, 13, 14 and 15 of the Covenant)**

40. In 2020, the government of the RF launched the Zemsky [Rural] Teacher federal programme, which aimed to attract teachers to rural and remote areas of Russia by providing them with one-time payments amounting to RUB 1 million (since 2025 – RUB 2 million) and other benefits for working in these regions. Since then, at least 158 teachers from Krasnodar and Altai Krai, Tomsk, Novosibirsk, Saratov, Tyumen, Ivanovo regions, and Udmurtia have relocated to the occupied Autonomous Republic of Crimea, Sevastopol, and the Donetsk, Luhansk, Kherson, and Zaporizhzhia regions<sup>70</sup>. A number of them are the wives of Russian military personnel, participants in the ‘SMO’. Moreover, a significant proportion of the colonising teachers are representatives of ethnic, linguistic, and religious groups other than Ukrainian children, such as 37 teachers from Dagestan working in the Zaporizhzhia region<sup>71</sup>.

<sup>64</sup> Telegram Channel: livadia\_palace (2023). Post # 632. URL: [https://web.archive.org/web/20230630185750/https://t.me/livadia\\_palace/632?single](https://web.archive.org/web/20230630185750/https://t.me/livadia_palace/632?single)

<sup>65</sup> Telegram Channel: mincult\_dnr. (2025). Post # 13819 URL: [https://web.archive.org/web/20250730103902/https://t.me/mincult\\_dnr/18317](https://web.archive.org/web/20250730103902/https://t.me/mincult_dnr/18317)

<sup>66</sup> Telegram Channel: MK\_LNR (2025). Post # 23859. URL: [https://web.archive.org/web/20250730105027/https://t.me/MK\\_LNR/23859](https://web.archive.org/web/20250730105027/https://t.me/MK_LNR/23859)

<sup>67</sup> Telegram Channel: mincultZO. (n.d.). Post # 15852. URL: <https://web.archive.org/web/20250730104649/https://t.me/mincultZO/15852>

<sup>68</sup> Telegram Channel: kultkherson (2023). Post # 1216. URL: <https://web.archive.org/web/20230621154600/https://t.me/kultkherson/1216>

<sup>69</sup> General Comment No. 21. CESCR. URL: <https://www.refworld.org/legal/general/cescr/2009/en/83710> (para. 49)

<sup>70</sup> Results of the implementation of the ‘Zemsky [Rural] Teacher’ in Crimea. URL: <https://archive.ph/CnlyM>, the city of Sevastopol. URL: <https://archive.ph/dKy9a>, Donetsk. URL: <https://archive.ph/m8wfp>, Lugansk. URL: <https://archive.ph/gSybf>, and Zaporizhzhia region. URL: <https://archive.ph/sPiS>

<sup>71</sup> Women teachers from Dagestan work in the Zaporizhzhia region. URL: <https://archive.ph/OMfqO>

41. Colonisers take part in the Russification and indoctrination of Ukrainian children. For example, Russian citizen Liudmila Leus moved from the settlement of Rtishchevsky in the Saratov region of the RF to the settlement of Starobeshevo in the occupied Donetsk region in 2024 to teach history at a local school. In the context of her educational and ‘historical mission’, Liudmila Leus notes: ‘Teachers and I have become fighters, a special front, we are fighting for other children, for their education, knowledge, for them to grow up to be real citizens of Russia, our great beloved country’<sup>72</sup>.
42. Following the example of other “Zemsky” federal programs the Russian government launched another called “Zemsky [Rural] Cultural Worker”. The programme is planned to be launched in 2025<sup>73</sup> with the aim of encouraging cultural professionals to relocate to the temporarily occupied territories of Ukraine for 5 year period to staff libraries, museums, and other cultural institutions. All those to be relocated are supported by state with lump-sum payment of one or two million rubles (approximately 25,000-26,000 USD), and housing to live in the region to which these professionals are relocated<sup>74</sup>. These deployments go beyond technical assistance. The relocated staff are mandated to promote Russian national narratives and suppress Ukrainian cultural expression, effectively displacing local professionals and excluding the occupied population from meaningful participation in their own cultural life.
43. The UN Security Council recognised colonisation as one of the main obstacles to the restoration of peace<sup>75</sup>. In the context of Russian teachers and cultural workers colonising the occupied territories of Ukraine with the aim of militarizing and Russifying Ukrainian children, subordinating cultural institutions to the strategic goals of the Occupying Power, this constitutes not only a violation of IHL<sup>76</sup> and a war crime<sup>77</sup>, but also a breach of Article 5 of the Covenant, as this group is engaged in activities aimed at destroying the rights guaranteed by Articles 13, 14 and 15 of the Covenant. It also obstructs access to cultural life, dismantles existing cultural continuity, and imposes an external identity framework. Such violations create systemic barriers to participation for local communities in cultural life as well as to implementation of the right to education, in direct breach of the principles of availability, accessibility, acceptability, and adaptability<sup>78</sup>.

## VII. Seizure and destruction of private property in occupied Crimea (Articles 2(2), 4, 5(1) and 11(1) of the Covenant)

The Russian Federation has been carrying out large-scale arbitrary seizure and destruction of private property in occupied Crimea, under its effective control, including during the period under the Committee’s consideration. This discriminatory practice interferes with an adequate standard of living and results in the forced eviction of owners from their homes and land, including agricultural land. The policy aims to encourage the forced transfer of Ukrainian populations from Crimea. This is contrary to Articles 2(2), 4, 5(1) and 11(1) of the Covenant<sup>79</sup>, Articles 23(g), 43, and 46 of the Regulations of the Hague Convention IV, Articles 47, 56 and 147 of the Geneva Convention IV and

<sup>72</sup> Instagram account: insta\_hbk. Reel video ‘Teachers from various regions of Russia came to the Donetsk People’s Republic under the ‘Zemsky Teacher’ program to develop local education.’ URL: [https://www.instagram.com/insta\\_hbk/reel/DFHfXZMqs9Y/](https://www.instagram.com/insta_hbk/reel/DFHfXZMqs9Y/)

<sup>73</sup> Government Decree No. 1885 of 25 December 2024. URL:

<https://web.archive.org/web/20250502125941/http://government.ru/docs/all/157295/>

<sup>74</sup> Statement of the President of the RF on providing the housing to the program participants. URL:

<https://web.archive.org/web/20250724100416/http://kremlin.ru/events/president/news/77514>

<sup>75</sup> UN Security Council Resolution 1397 (2002). URL:

<https://www.un.org/unispal/wp-content/uploads/2016/04/SRES1397.pdf>

<sup>76</sup> <https://ihl-databases.icrc.org/en/ihl-treaties/gciv-1949> (Articles 49, 50)

<sup>77</sup> <https://www.ice-cpi.int/sites/default/files/2024-05/Rome-Statute-eng.pdf> (Article 8(2)(b)(viii))

<sup>78</sup> General Comment No. 21. CESCR. URL: <https://www.refworld.org/legal/general/cescr/2009/en/83710> (para. 16)

<sup>79</sup> Comment № 7. CESCR. URL: <https://digitallibrary.un.org/record/240198?ln=en&v=pdf> (see paras. 3, 6, 10, 12); General Comment № 26. CESCR. (see para. 7, 22, 27, 49). URL: <https://docs.un.org/en/E/C.12/GC/26>

Article 85(4)(a) of the Additional Protocol I to the Geneva Conventions.

#### **A. Seizure and destruction of private property between 2014 and 2019**

44. Based on decisions of the occupation Russian courts, Russian authorities have seized<sup>80</sup> land plots, including agricultural lands<sup>81</sup>, of 3,728 victims (from 2014 to 2019) and demolished<sup>82</sup> real estate objects of 256 victims (from 2014 to 2019) in occupied Crimea<sup>83</sup>. These properties were acquired by individuals (mainly) and legal entities under decisions of Ukrainian authorities following Ukrainian legislation before the occupation of the peninsula in February 2014. Additionally, by July 2019, 344 houses of Crimean Tatars were demolished in Simferopol. The UN Secretary-General claimed that it may amount to forced eviction<sup>84</sup>.
45. From 2017 to 2019, the occupation Russian courts in Crimea reconsidered the legality of property acquisitions or construction permit issuances under Ukrainian legislation in 3,238 cases<sup>85</sup>. Any alleged violations were grounds for appropriation or destruction without compensation. The lack of title documents in the archives under Russian control in Crimea was an additional ground for taking the property, while the documents provided by the owners were dismissed<sup>86</sup>. The fact that the statute of limitations for appealing the ownership had expired in 65%<sup>87</sup> of cases was disregarded, as were the rights of *bona fide* acquirers<sup>88</sup>.
46. The process was accelerated through cooperation between the occupation authorities and a private entity. According to one of the contracts, the entity was required to submit 2,500 claims on behalf of the authorities in 2017 to reclaim property in occupied Crimea<sup>89</sup>.
47. However, IHL does not authorise the Russian authorities to reconsider the legality of Ukrainian authorities' decisions, as this would violate the *par in parem non habet imperium* principle.<sup>90</sup> Ultimately, instead of returning the property title to its original Ukrainian authorities' owners after the reconsideration, it was granted to the Russian authorities.

#### **B. Land expropriation under the Presidential Decree № 201 between 2020 and 2025**

48. The Presidential Decree № 201, as of 20 March 2020, classified most of the territory of occupied Crimea as “border territories of the Russian Federation”, where it is prohibited for foreigners to own land plots. Otherwise, a compulsory sale at a public auction or transfer of title to the Russian Federation is to be initiated<sup>91</sup>. Since the Russian Federation annexed the peninsula in violation of international law, non-Russian owners are no longer entitled to any land plots.
49. As of April 2020, 13,859 plots of land were owned by non-Russian citizens, 11,622 (84%) of whom were Ukrainian citizens<sup>92</sup>. Thus, the policy primarily targets Ukrainians.
50. To accelerate the implementation of the Decree, the occupation Russian authorities published lists of 2,498 land plots to be alienated by owners or appropriated instead<sup>93</sup>. Additionally, between January

<sup>80</sup> Andriyevskiy against Russia (53891/16) and 229 others. URL: <https://hudoc.echr.coe.int/eng?i=001-215445>

<sup>81</sup> Case № 2-51/2019. URL: <https://archive.fo/Jl2o3>; Case № 2-3039/2016. URL: <https://archive.fo/EVQGg>

<sup>82</sup> Galperina against Russia (10665/18) and 12 others. URL: <https://hudoc.echr.coe.int/eng?i=001-221297>

<sup>83</sup> The monitoring report “Crimea beyond rules. Occupied property”. RCHR and UHHRU. 2021. URL: <https://krymbezpravil.org.ua/en/thematic-reviews/v-pusk-6-okkupyrovannaia-sobstvennost/> (see pages 49-55)

<sup>84</sup> Report of the UN Secretary-General. 2020. A/75/334. URL: <https://docs.un.org/en/A/75/334> (see para. 37)

<sup>85</sup> See footnote 83, page 51

<sup>86</sup> Case № 2-964/2017. URL: <https://archive.fo/34PU5>; Case № 2-1116/2017. URL: <https://archive.fo/G2qRW>

<sup>87</sup> See footnote 83, page 55

<sup>88</sup> Case № 2-1377/2017. URL: <https://archive.fo/et16M>; Case № 2-2550/2017. URL: <https://archive.fo/suHEq>

<sup>89</sup> See footnote 83, pages 110-116

<sup>90</sup> Article 43 of the Regulations to the Hague Convention IV and Article 54 of the Geneva Convention IV

<sup>91</sup> Article 15(3) of the Land Code and Article 238 of the Civil Code of the Russian Federation

<sup>92</sup> Statistical data of the occupation authorities. URL: <https://archive.ph/KCKPm>; <https://archive.ph/QawGs>

<sup>93</sup> See for instance: Armyansk City. URL: <https://archive.ph/cwDTd>; Leninskyi District of Sevastopol City. URL: <https://archive.ph/JHYjm>; Hvardiis'ke village in Simferopol district. URL: <https://archive.ph/NRPtE>

2022 and May 2023, the occupation Russian courts ruled in 138 cases that particular non-Russian citizens had a final six months to alienate their land plots. At least 1,650,000 m<sup>2</sup> of land intended for agricultural use<sup>94</sup> were affected by decisions<sup>95</sup>.

51. Due to pressure, owners were forced to sell their properties below real market value<sup>96</sup>, gift them<sup>97</sup>, or obtain Russian passports<sup>98</sup> before compulsory sales began. Furthermore, they were forced to alienate not only land, but also the real estate properties on it<sup>99</sup>. Consequently, the number of non-Russian citizen owners decreased from 13,859 to 5,505 by January 2024<sup>100</sup>.
52. Since February 2023, the occupation Russian courts have begun to authorise the occupation authorities to initiate public auctions of non-Russian citizens' land plots. The RCHR documented 204 such decisions regarding 180 owners between February 2023 and December 2023. 85% of all owners (153) under decisions are Ukrainian citizens<sup>101</sup>. Most owners do not participate in the proceedings because they are not informed about them. Attempts to appeal were ineffective<sup>102</sup>. Although the occupation Russian courts deny international humanitarian law (IHL) applicability in Crimea, the ECtHR has held that property appropriation under Russian laws (including Decree No. 201) in Crimea without military necessity is arbitrary<sup>103</sup>. The Russian Federation refuses to comply with the Judgement of the ECtHR<sup>104</sup>.
53. As a result of these decisions, land plots have been put up for public auction since September 2024. They can be purchased by individuals holding Russian passports at a 15% discount, or the property title is transferred to the Russian authorities at a 25% discount<sup>105</sup>.
54. The discounted price of land must be reimbursed to owners<sup>106</sup>. However, since March 2022, most non-Russian owners have been classified as “unfriendly citizens”. Consequently, reimbursements are credited to a bank account ‘C’, from which funds are used to pay Russian taxes or fines<sup>107</sup>. This effectively amounts to confiscation<sup>108</sup>, as owners cannot access the funds.
55. The appropriation policy primarily discriminates against Ukrainian citizens (not less than 85% of all owners) in occupied Crimea (Ukraine), revealing signs of direct discrimination based on national and ethnic origin. In any case, Russian authorities treat Ukrainian citizens who own land plots in the border territory of the Russian Federation and Ukrainian citizens who own land plots in occupied Crimea (Ukraine) equally, despite their situations being very different. The latter are protected persons under IHL and their property cannot be seized in occupied Crimea. No such restrictions apply to the

<sup>94</sup> Case № 2-178/2023. URL: <https://archive.ph/9aK0t>; Case № 2-231/2023. URL: <https://archive.ph/J0oKc>;

<sup>95</sup> Report “Standing against discrimination: Human Rights Abuses in Crimea”. RCHR. 2023. URL: <https://rchr.org.ua/en/analytics/standing-against-discrimination-human-rights-abuses-in-crimea-2/> (pages 50-59) Report of the Secretary-General. 2024. A/HRC/56/69. URL: <https://www.ohchr.org/sites/default/files/2025-01/A-HRC-56-69-AdvanceUneditedVersion.pdf> (see para. 59)

<sup>96</sup> Case № 2-3606/2023. URL: <https://archive.ph/vlDn7>; Tymoshenko v. Russia (42935/21). URL: <https://hudoc.echr.coe.int/eng?i=001-228109>

<sup>97</sup> Case № 2-2468/2022. URL: <https://archive.ph/7caRr>; Domanchuk v. Russia (6825/22). URL: <https://hudoc.echr.coe.int/eng?i=001-228109>

<sup>98</sup> Statement of the occupation Russian authorities. URL: <https://archive.fo/zcXqW>

<sup>99</sup> Article 35 of the Land Code of the Russian Federation. Case № 33-7079/2023. URL: <https://archive.fo/F4ben>

<sup>100</sup> Statistical data of the occupation authorities. URL: <https://archive.ph/Sg711>; <https://archive.ph/DGnmG>

<sup>101</sup> Annex 3 containing all the documented cases has been sent to the Committee separately. See also footnote № 95.

<sup>102</sup> Kulikov v. Russia (39098/21). URL: <https://hudoc.echr.coe.int/eng?i=001-242889>; Cases №№ 33-4470/2023, 2-3912/2022, 33-6928/2023. URL: <https://archive.ph/vnm7o>, <https://archive.ph/Tizz2>, <https://archive.ph/tCIiW>

<sup>103</sup> Ukraine v. Russia (re Crimea) (20958/14). URL: <https://hudoc.echr.coe.int/eng?i=001-235139> (see paras. 158-159, 1139, 1145, 1150-1151); Decision of the Committee of Ministers of the CoE. CM/Del/Dec(2025)1521/H46-29. URL: <https://search.coe.int/cm/eng?i=0900001680b476d6> (see paras. 6-7)

<sup>104</sup> List of issues in relation to the 7 periodic report of the Russian Federation. CESCR. URL: <https://digitallibrary.un.org/record/4027197?v=pdf&ln=fr> (see para. 2)

<sup>105</sup> Articles 87, 92 of the Federal Law No. 229-FZ as of 2 October 2007

<sup>106</sup> Article 238 of the Civil Code of the Russian Federation

<sup>107</sup> Russian regulations on a bank account ‘C’. URL: <https://archive.ph/MXHO1>, <https://archive.ph/TTd9p>

Clarification from the occupation authorities. URL: <https://archive.ph/r1OI8>, <https://archive.ph/f8IV9>

<sup>108</sup> Violation of Article 46 of the Hague Regulations to the Hague Convention IV

former in the Russian Federation's border territory. Therefore, the Russian authorities do not respect the protected status of Ukrainian citizens under IHL in occupied Crimea revealing indirect discrimination<sup>109</sup>. Ultimately, the policy aims to alter the Peninsula's demographic composition by displacing Ukrainians while encouraging the resettlement of the Russians to Crimea<sup>110</sup>. It is contrary to Articles 4 and 5(1) of the Covenant.

56. The Russian Federation has not complied with the Committee's previous recommendations regarding non-discrimination of Ukrainian citizens in Crimea<sup>111</sup> and has failed to provide the information in this context for the Committee's request<sup>112</sup>.

## VIII. Recommendations

**The Regional Center for Human Rights, the Voices of Children Charitable Foundation and the Ukrainian Child Rights Network kindly ask the Committee to incorporate the following recommendations into its concluding observations for the Russian Federation:**

- Cooperate without delay in the establishment of an international and independent mechanism to secure, as soon as possible and with due consideration of the children's best interests, the identification of all children transferred from Ukraine to Russia and Russian-controlled territory, the restoration of contact between these children and their surviving family members or legal guardians and the children's safe reunification with their families or legal guardians;
- Comply with the Concluding Observations of the UN Committee on the Rights of the Child to end the politicisation and militarisation of schools and to prevent any attempts to rewrite school curricula and textbooks to reflect the government's political and military agenda;
- Stop the application of the Russian educational standards, as well as the use of Russian teaching and methodological materials in the occupied Crimean peninsula;
- Ensure the availability of education in the Ukrainian language, and enable all Ukrainians to maintain and develop their culture, traditions, and identity;
- Establish proper conditions for learning the Ukrainian language in educational institutions, as well as ensure access to language courses, relevant educational programs, and Ukrainian studies.
- Cease the implementation of programs and policies, such as "Zemsky [Rural] Cultural Worker", that instrumentalise cultural institutions to impose state ideology, and ensure cultural life remains pluralistic, locally grounded, and non-discriminatory;
- Repeal regional laws and federal constitutional provisions that unilaterally reclassify cultural heritage in occupied territories of Ukraine as Russian state property, and restore Ukrainian access to and control over these assets;
- Immediately halt ideological programming targeting the population in occupied territories, including the militarisation of museum spaces and educational activities;
- Ensure transparent access to scientific data, including archaeological findings in the occupied territories of Ukraine;
- Stop the transfer and exhibition of looted cultural property from occupied regions of Ukraine and ensure the return of unlawfully displaced items to Ukrainian institutions;

---

<sup>109</sup> Bratsylo and Others v. Russia, 3022/2017, HRC. URL: <https://digitallibrary.un.org/record/4049157?ln=en&v=pdf> (§8.18)

<sup>110</sup> Report on change of demographic composition of occupied Crimea. RCHR. 2021. URL: <https://krymbezpravil.org.ua/en/thematic-reviews/report-on-the-results-of-the-study-of-the-policy-of-the-russian-federation-on-n-forcible-change-of-demographic-composition-of-the-occupied-crimean-peninsula/>

<sup>111</sup> Concluding observations on the 6 periodic report of the Russian Federation. CESCR. URL: <https://digitallibrary.un.org/record/1318564?ln=en&v=pdf> (see para. 10)

<sup>112</sup> List of issues in relation to the 7 periodic report of the Russian Federation. CESCR. URL: <https://digitallibrary.un.org/record/4027197?v=pdf&ln=fr> (see paras. 8-9)

- Repeal Russian legislation permitting the review of the legality of decisions by Ukrainian authorities concerning the property of protected persons under IHL in Crimea;
- Remove the territory of Crimea from the “border areas of the Russian Federation” list;
- Eliminate the consequences of the seizure and destruction of property, in particular by returning property in kind and providing compensation for damage caused to the owners;
- Comply with the Judgements of ECtHR in the cases of Ukraine v. Russia (re Crimea) and Ukraine and the Netherlands v. Russia, decision of the Committee of Ministers of the CoE on execution of Judgement of ECtHR in the case of Ukraine v. Russia (re Crimea) and the Views of HRC in the case of Bratsylo and Others v. the Russian Federation.

**Additionally, the Regional Center for Human Rights, the Voices of Children Charitable Foundation and the Ukrainian Child Rights Network kindly asks the Committee:**

- Call on the UN General Assembly to strongly condemn the indoctrination and militarisation of children by adopting a thematic resolution on the issue. The politicisation and militarisation of schools by an opposing State should be considered as a form of attack on schools, i.e., a grave violation against children in armed conflict, and the monitoring and evaluation mechanism of the Office of the Special Representative of the Secretary-General for Children and Armed Conflict should be extended to it.