

**Mandates of the Special Rapporteur on the promotion of truth, justice, reparation and guarantees of non-recurrence; the Special Rapporteur on the promotion and protection of human rights in the context of climate change; the Special Rapporteur in the field of cultural rights; the Special Rapporteur on the human right to a clean, healthy and sustainable environment and the Special Rapporteur on the implications for human rights of the environmentally sound management and disposal of hazardous substances and wastes**

Ref.: AL USA 35/2025  
(Please use this reference in your reply)

10 October 2025

Excellency,

We have the honour to address you in our capacities as Special Rapporteur on the promotion of truth, justice, reparation and guarantees of non-recurrence; Special Rapporteur on the promotion and protection of human rights in the context of climate change; Special Rapporteur in the field of cultural rights; Special Rapporteur on the human right to a clean, healthy and sustainable environment and Special Rapporteur on the implications for human rights of the environmentally sound management and disposal of hazardous substances and wastes, pursuant to Human Rights Council resolutions 54/8, 57/31, 55/5, 55/2 and 54/10.

In this connection, we would like to bring to the attention of your Excellency's Government information we have received concerning **the ongoing harm and human rights violations experienced by the people of the Marshall Islands, as a result of the United States of America's former nuclear testing programme.**

According to the information received:

*Background*

Between 1946 and 1958, the United States used the Marshall Islands as a nuclear weapons test site.

The first two tests (Operation Crossroads) were conducted in 1946, prior to designation as Trust Territory. Later, the Marshall Islands was under a United Nations trusteeship pursuant to Security Council resolution 21 (1947), with the United States designated as the Administering Authority. As the Marshall Islands fell within the Trust Territory of the Pacific Islands (also referred to as referenced as a "strategic trust territory"), which the Security Council had designated as a 'strategic area', the United States had permission to militarize the territory.

The United States conducted 67 known detonations of nuclear weapons throughout the territory of the Marshall Islands, mostly in Bikini Atoll and Enewetak Atoll. Those tests had a total yield equivalent to 108,490,500 tonnes of dynamite.

On 1 March 1954, the Castle Bravo test was conducted on Bikini Atoll. This was the most powerful known nuclear detonation by the United States, with a blast 1,000 times the explosive power of the bombing of Hiroshima. The detonation

created a fallout cloud that spread more than 300 miles from the blast site, covering neighbouring Rongelap Atoll and Utrök Atoll. Many other atolls were also impacted, including at least Ailuk, Likiep, Mejit and other midrange atolls. Given the number and the power of tests made, it is very likely that the geographic area impacted is much broader.

The people of the Marshall Islands made repeated requests for the United States to cease the nuclear testing. They filed two petitions with the United Nations Trusteeship Council, in 1954 and 1956, highlighting their concerns regarding the danger posed by the testing and the removal of Marshallese people from their lands, and requesting no further testing of lethal weapons in the area. These requests were denied, and the testing continued until 1958.

### *Impact on Human Rights*

The United States' nuclear testing program had immediate and continuing impacts on the human rights of the people of the Marshall Islands. In particular, the testing affected and continues to affect their rights to health and housing, their cultural rights, and their right to a clean, healthy and sustainable environment, which includes the right to live, work, study and play in a non-toxic environment.

As has been documented by numerous human rights bodies and mechanisms,<sup>1</sup> radiation from the nuclear testing resulted in fatalities and has been linked to both acute and long-term transgenerational health complications, including: radiation poisoning; increases in cancers and thyroid diseases; growth retardation in children; high rates of still births, miscarriages, congenital birth defects; and other reproductive problems. The Marshallese people also experienced psychological trauma as a result of the testing and its impact on them, as well as ongoing anxiety and fear due to the uncertainty and lack of information regarding their potential radiation exposure. The nuclear fallout contaminated local food supplies, causing illnesses and ultimately the stigmatization of these foods. The consumption of processed products over local produce has been associated with other non-communicable diseases, such as diabetes, hypertension and obesity. There may be further unknown negative health impacts as a result of the testing programme.

Several Marshallese communities were displaced from their homes to enable the nuclear testing. They endured repeated relocations throughout the testing period,

---

<sup>1</sup> See, eg, Calin Georgescu, *Report of the Special Rapporteur on the implications for human rights of the environmentally sound management and disposal of hazardous substances and wastes*, UN Doc A/HRC/21/48/Add.1 (3 September 2012); Office of the United Nations High Commissioner for Human Rights, *Addressing the challenges and barriers to the full realization and enjoyment of the human rights of the people of the Marshall Islands, stemming from the State's nuclear legacy*, UN Doc A/HRC/57/77 (24 September 2024); Statement by the Special Rapporteur on the implications for human rights of the environmentally sound management and disposal of hazardous substances and wastes, Item 10: Enhanced Interactive Dialogue, 57th regular session of the Human Rights Council (4 October 2024) [https://webtv.un.org/en/asset/k1g/k1gbxeozjg?kalturaStartTime=7231&config\[playback\]={"audioLanguage":"en"}&config\[ui\]={"locale":"en"}](https://webtv.un.org/en/asset/k1g/k1gbxeozjg?kalturaStartTime=7231&config[playback]={); Marcos Orellana, *Report of the Special Rapporteur on the implications for human rights of the environmentally sound management and disposal of hazardous substances and wastes*, UN Doc A/80/174 (16 July 2025).

due to food shortages, malnutrition, and unsafe radiation levels, and were even misled into returning to contaminated sites. The ongoing displacement impacted the Marshallese people's connection to their indigenous way of life, cultural identity, and traditional knowledge, such as being unable to perform their traditional migratory practices to gather food, medicines, and materials. Women lost their role as custodians of the land and suffered humiliation during the relocations, including invasive radiation checks by male American personnel. Several women were stigmatized in this context, impacting their marriage and motherhood prospects. Many Marshallese, particularly those from the Bikini, Rongelap and Enewetak Atolls, remain indefinitely displaced from their ancestral homes, after nearly 80 years.

These nuclear-related harms are further compounded by climate change. Some Marshallese were displaced due to the nuclear testing to islands that are more vulnerable to rising sea levels. The Runit Dome in the Enewetak Atoll, which houses radioactive waste and debris from the nuclear testing programme, poses a risk of leaking radiation into the surrounding waters if rising sea levels push up groundwater. It is reported that most of the radioactive material deposited in Enewetak is in the lagoon neighboring Runit, and not in Runit itself. This could have catastrophic consequences for the people of the Marshall Islands and the broader region.

#### *Remediation and Accountability Efforts*

The governments of both the United States and the Marshall Islands have taken steps to rehabilitate the affected atolls and provide redress to the victims of the nuclear testing programme.

In 1986, the Marshall Islands and the United States entered into the Compact of Free Association, establishing the Marshall Islands as a sovereign State, with the United States retaining responsibility for security and defence, and military operating rights. Under Section 177 of the Compact, the United States accepted responsibility for compensating Marshallese citizens for loss or damage resulting from the nuclear testing.

In 1987, the Marshall Islands established a Nuclear Claims Tribunal, pursuant to the agreement reached under the Compact, and the United States established a \$150 million trust fund – the Nuclear Claims Fund – to provide compensation to claimants. The Nuclear Claims Tribunal has assessed more than \$2.3 billion of claims for personal injuries and damage caused at Bikini, Enewetak, Rongelap and Utrök Atolls. Claims from other atolls were presented, but not assessed by the Tribunal. However, no claimant has yet received full compensation, and the Nuclear Claims Fund is now largely exhausted.

In addition, the United States has provided approximately \$700 million in funding to address the effects of the nuclear testing, providing cleanup, rehabilitation, resettlement and radiation-related healthcare services. The United States has also recently approved grants of \$5 million for a museum and research facility, and \$10 million to improve the accessibility of documents and information about the nuclear testing previously provided to the Marshallese.

The Marshallese people filed multiple legal suits in United States courts claiming, among other things, that the nuclear testing resulted in loss of property. Those actions were dismissed based on a lack of jurisdiction, pursuant to the Section 177 Agreement under the Compact, which the United States considers to constitute a full and final settlement of all claims relating to the nuclear testing program.

In 2000, the Marshall Islands filed a Changed Circumstances Petition to the United States Congress, requesting additional compensation under the Section 177 Agreement in light of newly declassified documents that revealed that the extent of the radioactive fallout had been underestimated. A working group established to evaluate the petition concluded that it did not meet the criteria in the 177 Agreement, and Congress has not yet acted on the petition.

In 2017, the Marshall Islands established a National Nuclear Commission, to improve the coordination of the Government's efforts to address ongoing and unresolved issues arising from the nuclear weapons testing programme. In 2019, the National Nuclear Commission developed a domestic nuclear justice strategy centred on five pillars: compensation; health care; the environment; national capacity; and education and awareness. The Marshall Islands has pledged to pursue transitional justice for the human rights violations and challenges stemming from the nuclear legacy.

We note the efforts the United States has made to take responsibility and address the harm caused by its nuclear testing programme. We understand that it is the United States' position that the Section 177 Agreement constitutes the full and final settlement of all claims between the Marshall Islands and the United States in relation to the nuclear testing programme. However, we would encourage the Government of the United States to increase its efforts to address this legacy and the harm it continues to cause to many victims.

We express our concern regarding the persistent gaps in information and data regarding the full extent of the negative impacts of the nuclear testing on the Marshallese people and their territory. Addressing the current information gaps is essential for enabling the Marshall Islands to respond fully to the ongoing impacts of nuclear testing.

We call upon the United States to declassify relevant records and disclose all relevant information pertaining to the nuclear testing period and its effects on the health and environment of Marshallese people. The release of this information is vital in allowing the Marshallese people to understand and address the problems they face as a result of the nuclear testing, with the support of the international community. The United States should also support the Marshallese in establishing a truth and reconciliation mechanism and commissioning a comprehensive scientific assessment of the region to effectively assess current radiation levels and health risks. The United States and the Marshall Islands can seek collaboration from the international community and non-State actors to support these efforts. We are also available to provide technical assistance where needed.

We emphasize the right to an effective remedy as established in international human rights law, and call on the United States to fulfil this right for the Marshallese. We understand that it is the United States' position that the obligation to protect the rights of the Marshallese people falls to the Marshall Islands, after its independence as a sovereign State. However, the United States has a legal obligation to ensure the right to an effective remedy to those within its territory and under its jurisdiction. Even if this responsibility would not apply to remedies for harms arising after the Marshall Islands became a State, the obligation to provide an effective remedy for harms relating to its relevant actions remains.

The right to an effective remedy requires that individuals have accessible and effective remedies to vindicate their rights, and reparations must be provided to individuals whose rights have been violated. The United States is also obliged under customary international law to provide full reparation for harm it has caused in violation of international law. The funding provided by the United States for compensation claims largely remains inadequate to address the harm caused by the nuclear testing. The United States should duly consider the judgments of the Nuclear Claims Tribunal to that end. The United States should also consider offering a presidential apology to victims, and should provide more comprehensive rehabilitation efforts in order to restore ancestral lands to the Marshallese people.

The United States should continue to support the Marshall Islands in addressing the harms caused by the nuclear testing. While the Marshall Islands has made efforts to support its people, it lacks capacity, in particular in the provision of adequate healthcare to address cancers and other non-communicable diseases experienced by the Marshallese as a result of nuclear radiation.

Lastly, the United States should continue to monitor the environmental impacts of the testing, in particular the risk of the Runit Dome leaking and causing further contamination, and take appropriate actions to ensure it does not lead to further human rights violations.

In connection with the above alleged facts and concerns, please refer to the **Annex on Reference to international human rights law** attached to this letter which cites international human rights instruments and standards relevant to these allegations.

As it is our responsibility, under the mandates provided to us by the Human Rights Council, to seek to clarify all cases brought to our attention, we would be grateful for your observations on the following matters:

1. Please provide any additional details or comments you may have on the above-mentioned concerns, including any key information that you consider is missing from our description of the harm caused and the remediation steps taken.
2. Please provide information on concrete progress made by your Excellency's Government regarding the plan to manage the risk of radioactive debris from the Runit Dome leaking into the surrounding area, including impacts of sea-level rise driven by climate change.

3. Please provide information regarding the proposed timeline for the release of all information pertaining to the nuclear testing period and its effects on the health and environment of the Marshallese people, including the declassification of official records to the fullest extent possible.
4. Please provide information regarding any United States efforts or plans to commission a comprehensive independent scientific assessment of the current radiation levels and health risks in all Marshall Islands atolls.
5. Please indicate whether the United States will provide adequate support to the Marshall Islands Government to establish a truth and reconciliation mechanism in relation to the nuclear testing programme.
6. Please clarify the United States' policy concerning the reparations programme to the benefit of the Marshallese people, including whether additional funding will be provided to the Nuclear Claims Tribunal, the status of Congress' consideration of the Changed Circumstances Petition, and whether other types of reparation are being contemplated in relation to victims and families, such as a presidential apology.
7. Please provide information regarding the steps your Excellency's Government is taking to complete the full and safe rehabilitation of the Atolls affected by the nuclear testing.
8. Please provide information regarding any further remediation steps you plan to take in the future for the benefit of the people of the Marshall Islands in healing from the nuclear legacy.
9. Please provide information regarding the environmental impact assessments that have been or will be carried out, including the measures to be implemented in relation to restoration, or – where restoration is not possible – the environmental remediation and compensation measures.

This communication and any response received from your Excellency's Government will be made public via the communications reporting [website](#) within 60 days. They will also subsequently be made available in the usual report to be presented to the Human Rights Council.

While awaiting a reply, we urge that all necessary interim measures be taken to halt the alleged violations and prevent their re-occurrence and in the event that the investigations support or suggest the allegations to be correct, to ensure the accountability of any person(s) responsible for the alleged violations.

Please be informed that a letter on the same subject has also been addressed to the Government of the Republic of the Marshall Islands.

Please accept, Excellency, the assurances of our highest consideration.

Bernard Duhaine

Special Rapporteur on the promotion of truth, justice, reparation and guarantees of non-recurrence

Elisa Morgera

Special Rapporteur on the promotion and protection of human rights in the context of climate change

Alexandra Xanthaki

Special Rapporteur in the field of cultural rights

Astrid Puentes Riaño

Special Rapporteur on the human right to a clean, healthy and sustainable environment

Marcos A. Orellana

Special Rapporteur on the implications for human rights of the environmentally sound management and disposal of hazardous substances and wastes

## Annex

### Reference to international human rights law

In connection with above alleged facts and concerns, we refer to your Excellency's Government to its legal obligations under the international treaties it has ratified and to broader international human rights standards.

#### *Right to an Effective Remedy*

The United States ratified the International Covenant on Civil and Political Rights ('ICCPR') on 8 June 1992. While the concerns raised in this communication precede the ratification of the ICCPR by the United States, they set general principles of law, already existent in customary law. For instance, article 2(3) of the ICCPR obliges States parties to ensure that any person whose rights have been violated has access to an effective remedy. As clarified by the Human Rights Committee in its general comment No. 31, such remedies must be accessible and effective, must be adapted to the special vulnerability of certain groups, and must be enforced by competent authorities through judicial, administrative, or other mechanisms (para. 15).

The right to an effective remedy requires States to make reparation to individuals whose rights under the ICCPR have been violated, otherwise the obligation to provide an effective remedy will not have been discharged (para. 16). Reparation may include restitution, compensation, rehabilitation, satisfaction (such as providing full and public disclosure of the truth concerning the violations, public apologies, memorials, and guarantees of non-repetition), and bringing perpetrators to justice.

The United States is also obliged under customary international law to provide full reparation for harm it has caused in violation of international law, as established by the International Court of Justice in the *Chorzów Factory* case.<sup>2</sup>

#### *Cultural rights*

We would like to respectfully refer Your Excellency's Government to article 15, paragraph 1(a), of the International Covenant on Economic, Social and Cultural Rights (ICESCR), which recognizes the right of everyone to take part in cultural life. Under this provision, States Parties undertake to respect and ensure the enjoyment and development of cultural practices, as well as to safeguard the freedom indispensable for creative activity.

The Committee on Economic, Social and Cultural Rights, in its 2009 general comment 21 on the right to take part in cultural life (E/C.12/GC/21) stressed that States must refrain from interfering with the exercise of and the access to cultural practices, goods and services. It further recalled the right of everyone to seek, receive and impart information and ideas of all kinds and forms including art forms; to enjoy the freedom to create, individually, in association with others, or within a community or group, which implies that States parties must abolish censorship of cultural activities in the arts and other forms of expression (§49 c). It also recalled the right of everyone to access to

---

<sup>2</sup> *Factory at Chorzów (Merits) (Germany v Poland)* [1928] PCIJ (ser A) No. 17 (13 September 1928).

their own cultural and linguistic heritage and that of others (E/C.12/GC/21, paragraph 44, 48, 49).

Also, we wish to refer to the UNESCO Convention for the Safeguarding of the Intangible Cultural Heritage (2003), which recognizes the vital role of communities, particularly indigenous communities, in the production, safeguarding, and transmission of intangible cultural heritage. Article 11, in particular, highlights that “Each State Party shall: (a) take the necessary measures to ensure the safeguarding of the intangible cultural heritage present in its territory; (b) among the safeguarding measures referred to in article 2, paragraph 3, identify and define the various elements of the intangible cultural heritage present in its territory, with the participation of communities, groups and relevant non-governmental organizations.” This provision underscores the importance of inclusive and community-led approaches to preserving cultural practices, expressions, and knowledge systems that are central to the identity and continuity of the Marshallese people.

The mandate holders in the field of cultural rights have further recommended that “States parties obtain the free and informed prior consent when the preservation of the cultural resources of concerned individuals or communities, especially those associated with their way of life and cultural expression, are at risk (E/C.12/GC/21, paragraphs 49(a), 52(f) and 55(e))...Concerned communities and relevant individuals should be consulted and invited to actively participate in the whole process of identification, selection, classification, interpretation, preservation/safeguard, stewardship and development of cultural heritage (A/HRC/17/38, para. 80(c)).” The Special Rapporteurs have also underscored that States should make available effective remedies, including judicial remedies, to concerned individuals and communities who feel that their cultural heritage is either not fully respected and protected, or that their right of access to and enjoyment of cultural heritage is being infringed upon (para. 80(l)). States should also develop cultural heritage mapping processes within their territory and utilize cultural impact assessments in the planning and implementation of development projects, in full cooperation with concerned communities (para. 80(e)).”

### *Indigenous Peoples’ Rights*

Under the United Nations Declaration on the Rights of Indigenous Peoples (‘UNDRIP’), which the United States has endorsed, States have a duty to consult in good faith with Indigenous Peoples through their own representative institutions in order to obtain their free, prior, and informed consent before adopting or implementing legislative or administrative measures that may affect them (article 19). This obligation reflects the central principle that Indigenous Peoples must be active participants in decisions that impact their lives, lands, and resources.

Article 26 of UNDRIP underlines the right of Indigenous Peoples to the lands, territories, and resources that they have traditionally owned, occupied, or otherwise used or acquired. States are obliged to recognize and protect these rights, ensuring that Indigenous Peoples can maintain their cultural, spiritual, and economic relationship with their ancestral territories. Article 28 further affirms the right of Indigenous Peoples to redress, including restitution or, when restitution is not possible, to just, fair, and equitable compensation for lands, territories, and resources that have been confiscated,

taken, occupied, used, or damaged without free, prior, and informed consent. The American Convention on Human Rights similarly protects Indigenous Peoples' rights to their land, in particular through article 21.

The impacts of nuclear weapons activities must be understood in the context of the special relationship Indigenous Peoples have with their ancestral lands, territories, and ways of life. Such activities often cause irreversible harm to sacred sites, ecosystems, and subsistence practices, undermining cultural survival and self-determination. This has been recognized by human rights bodies, including the Human Rights Committee in *Oliveira Pereira et al. v. Paraguay*, which affirmed the fundamental connection between indigenous rights and the protection of traditional lands. In cases where environmental contamination or displacement has occurred, States have a heightened obligation to provide remedies that restore, as far as possible, Indigenous Peoples' ability to live in dignity, security, and harmony with their environment.

### *Displacement*

The Guiding Principles on Internal Displacement identify the rights and guarantees relevant to the protection of persons from forced displacement and their protection and assistance during displacement, well as during return or resettlement and reintegration. In particular, principle 8 declares that displacement should not be carried out in a manner that violates the rights to life, dignity, liberty and security of those affected, and principle 9 provides that States are under a particular obligation to protect against the displacement of Indigenous Peoples and other groups with a special dependency on, and attachment to, their lands.

Principle 18 affirms that internally displaced people have the right to an adequate standard of living, at minimum including access to essential food and potable water, basic shelter and housing, appropriate clothing, and essential medical services and sanitation.

### *A Clean, Healthy and Sustainable Environment and Access to Information*

The Human Rights Council, in resolution 48/13, and the General Assembly, in resolution 76/300, have recognized the right to a clean, healthy and sustainable environment. The United States voted in favour of the General Assembly resolution. This right includes clean air and water, adequate and nutritious food, healthy biodiversity and ecosystems, a safe and stable climate, non-toxic environments, and participation, access to information, and access to justice in environmental matters.

The 2025 Advisory Opinion by the International Court of Justice (ICJ) on the legal obligations of States in relation to climate change concluded that States are obliged under international law to prevent harm to the climate system by protecting human rights, including the rights to life, health, adequate standard of living, protection from arbitrary displacement, private life, and the human right to a clean, healthy and sustainable environment. The Advisory Opinion also concludes that a violation of this stringent obligation entails State responsibility and the provision of reparations for harm.

We would also like to draw the attention of Your Excellency's Government to the Convention on the Rights of the Child and general comment No. 26 on Children's Rights and the Environment, with a special focus on climate change, which clarifies that children have the right to a clean, healthy and sustainable environment, including include clean air, a safe and stable climate, healthy ecosystems and biodiversity, safe and sufficient water, healthy and sustainable food and non-toxic environments. Relevant obligations include to: ensure access to safe and sufficient water; ensure a fair and just transition of energy sources; conserve, protect and restore biodiversity; prevent marine pollution; and closely regulate and eliminate the use and release of toxic substances that have disproportionate adverse health effects on children.

In particular, according to general comment No. 26, States have an obligation to effectively prevent, protect against and provide remedies for both direct and indirect environmental discrimination, considering the discriminatory effect of environmental harm on Indigenous children, particularly if they are living with disabilities and/or in disaster-prone or climate-vulnerable environments. States should collect disaggregated data to identify the differential effects of environment-related harm on children and to better understand intersectionalities, paying special attention to groups of children who are most at risk, and to implement special measures and policies, as required. States must ensure that all legislation, policies and programmes that deal with environmental issues are not intentionally or unintentionally discriminatory towards children in their content or implementation.

We draw the attention of Your Excellency's Government to the Framework Principles on Human Rights and the Environment set out in the 2018 report of the Special Rapporteur on Human Rights and the Environment (A/HRC/37/59), which affirm the special connection between Indigenous Peoples and their traditional lands, territories and resources (principle 15) and the need to provide access to effective remedies for violations of human rights relating to the environment (principle 10).

Pursuant to article 19(2) of the ICCPR, principle 7 of the Framework Principles on Human Rights and the Environment, and principle 10 of the Rio Declaration on Environment and Development, States should provide affordable, effective and timely access to environmental information held by public authorities, particularly in relation to information on hazardous materials and activities in people's communities.

In addition, the Special Rapporteur on the promotion and protection of human rights in the context of climate change highlighted in A/79/176 that "(t)imely access to high-quality, trustworthy, evidence-based and accessible information on climate change and human rights is essential to ensure that public authorities understand the foreseeability and preventability of negative human rights impacts of climate change and response measures and make holistic, effective and inclusive decisions to mitigate and adapt to climate change. The public must be informed about the magnitude of actual and potential negative human rights risks and impacts of climate change and response measures, and about the adequacy of States' and businesses' responses to effectively protect and respect human rights in the context of climate change. This is necessary to support the resilience and adaptive capacities of people in vulnerable situations to respond to the adverse impacts of climate change".

In this connection, we would like also to highlight OHCHR report A/HRC/57/77 on Addressing the challenges and barriers to the full realization and enjoyment of the human rights of the people of the Marshall Islands, stemming from the State's nuclear legacy stressing that "(i)nadequate information hampers the efforts of the Marshall Islands to efficiently, effectively and fully address its nuclear legacy. It does not have "the human resources, nor technical capacity to monitor radiation in the environment or the effects on human health". Of the limited information the Marshallese have access to, most is sourced from the Government of the United States the actions of which, "shrouded in secrecy", have "contributed to a climate of distrust". According to the National Nuclear Commission, such practices "are not limited to the past, nor only to U.S. Government researchers". The Commission has thus developed a protocol and guidelines to curb the practice of "outsiders ... us[ing] the Marshall Islands to advance their own interests". The lack of a coordinated effort has also resulted in overlapping initiatives, contributing to sentiments of survey fatigue."

### *Health and Housing*

Finally, we wish to recall that the Universal Declaration of Human Rights guarantees the rights to health and housing (article 25).