

Mandates of the Special Rapporteur on the promotion and protection of human rights and fundamental freedoms while countering terrorism; the Working Group on Arbitrary Detention; the Special Rapporteur on extrajudicial, summary or arbitrary executions; the Special Rapporteur on the promotion and protection of the right to freedom of opinion and expression; the Special Rapporteur on the rights to freedom of peaceful assembly and of association and the Special Rapporteur on the independence of judges and lawyers

Ref.: AL ARM 1/2026

(Please use this reference in your reply)

11 May 2026

Excellency,

We have the honour to address you in our capacities as Special Rapporteur on the promotion and protection of human rights and fundamental freedoms while countering terrorism; Working Group on Arbitrary Detention; Special Rapporteur on extrajudicial, summary or arbitrary executions; Special Rapporteur on the promotion and protection of the right to freedom of opinion and expression; Special Rapporteur on the rights to freedom of peaceful assembly and of association and Special Rapporteur on the independence of judges and lawyers, pursuant to Human Rights Council resolutions 58/14, 60/8, 53/4, 52/9, 59/4 and 53/12.

In this connection, we would like to bring to the attention of your Excellency's Government information we have received concerning the **excessive use of force, the misuse of counter-terrorism and national security charges, and administrative restrictions against members and supporters of the protest movement known as "Holy Struggle" since May 2025**. We are concerned that the measures taken appear not to be consistent with Armenia's international human rights law obligations.

According to the information received:

Border delimitation and demarcation processes between the Governments of Armenia and Azerbaijan in Kirants village, Tavush, in April 2024, led to the transfer of dozens of lands and properties believed by local residents to be part of the territory of Armenia to Azerbaijan. Archbishop Bagrat Galstanyan of the Tavush Diocese organized and led a series of peaceful protests at the border that later became known as "Holy (Sacred) Struggle" and expanded to include a march to Yerevan. A rally in Yerevan on 9 May 2024 was attended by about 40,000 people. The peaceful protests, that took place from April to June 2024, were allegedly met with arbitrary detentions and police violence, including the use of "flashbangs" that injured at least 83 protesters and 8 journalists on 12 June 2024. The protesters unsuccessfully called for the resignation of the Prime Minister through a parliamentary vote of no-confidence. While the peaceful protests diminished over time, Holy Struggle remained politically active.

In June 2025, 18 supporters of the movement were arrested and charged with offences of preparing acts of terrorism and attempting to seize state power, and restrictive administrative measures were also imposed on them. The individuals and measures are as follows:

1. Archbishop Bagrat (Vazgen) Galstanyan: detention from 25 June 2025 to the present.
2. Igor Sargsyan: house arrest, travel ban, and bail of 2 million AMD, from 25 June to 13 November 2025.
3. Karo Okumushyan: house arrest, travel ban, and bail of 1.5 million AMD, from 25 June to 20 November 2025.
4. Artur Sargsyan (Member of Parliament): house arrest, travel ban, and bail of 20 million AMD, from 9 July to 4 December 2025.
5. Vahagn Chakhalyan: house arrest from 5 July 2025 to 5 March 2026.
6. Aghvan Arshakyan: administrative supervision and travel ban, from 25 June to 30 October 2025.
7. Ara Rostomyan: administrative supervision and travel ban, from 25 June to 20 November 2025.
8. Arsen Ghazaryan: administrative supervision and travel ban, from 25 June to 20 November 2025.
9. Davit Galstyan: administrative supervision, bail of 5 million AMD, and travel ban, from 25 June to 20 November 2025.
10. Lidya Mantashyan: administrative supervision, bail of 2.5 million AMD, and travel ban, from 25 June to 27 November 2025.
11. Mihran Makhsudyan: administrative supervision, bail of 5 million AMD, and travel ban, from 25 June to 20 November 2025.
12. Tigran Galstyan: administrative supervision and travel ban, 25 June to 13 November 2025.
13. Tigran Topalyan: administrative supervision, travel ban, and bail of 2 million AMD, from 25 June to 13 November 2025.
14. Hayk Shahnazaryan: administrative supervision, travel ban, and bail of 10 million AMD, from 25 June to 13 November 2025.
15. Arman Israelyan: administrative supervision (since 22 January 2026), travel ban, and bail of 2 million AMD, from 25 June to 20 November 2025.
16. Armen Aleksanyan: administrative supervision (since 23 February 2026) and travel ban from 25 June to 20 November 2025.
17. Movses Sharbatyan: administrative supervision (since 23 February 2026) and other restrictions from 25 June 2025 to 23 February 2026.

18. Hrayr Hakobyan: travel ban from 25 June to 29 July 2025.

In June 2025, the Armenian Prime Minister and the Investigative Committee of Armenia (which investigates criminal cases) alleged that it had evidence of a “coup plan” by Holy Struggle and the Archbishop to unconstitutionally seize power through terrorism. However, the evidence in question reportedly concerns political opposition, protest actions, and civil disobedience, as well as the possession of ordinary household, festive or construction objects, without any reference to or indications of violence or threats of violence, intent to use weapons, or genuine terrorism. The Prime Minister reportedly condemned the plan as destabilizing Armenia. The Investigative Committee reportedly leaked wiretaps of private conversations by the Archbishop and presented them spliced, selectively, and out of context as evidence of terrorism, absent indicia of violence. Wiretap evidence of Holy Struggle expressly rejecting violence were not published, and defence lawyers were denied permission to release them.

The measures against Holy Struggle are reportedly part of a broader campaign of repression and silencing of dissent by the authorities since May 2025 against opposition groups, public figures, political parties, and the Armenian Apostolic Church. The campaign includes the misuse of law enforcement authority, politically motivated prosecutions, and counter-terrorism laws, as well as concerted propaganda to stigmatize critics. The authorities have also criticised the Church for engaging in politics.

Without prejudging the accuracy of these allegations, we are concerned that should the above allegations prove to be true, they may violate Armenia’s international human rights obligations.

We are concerned that allegations of excessive use of force by police during protests, including “less lethal” weapons such as flashbangs, may violate the duty to respect the right to life under article 6 of the ICCPR and other international standards on the use of force by law enforcement; the right to security of person under article 9 of the ICCPR; and freedoms of peaceful assembly, association and expression and the right to take part in public life under articles 21, 22, 19 and 25 respectively of the ICCPR. The use of force must not be used to disperse peaceful and legitimate protests. We refer your Excellency’s Government to the Annex to this letter for the applicable legal standards.

The apparent abuse of counter-terrorism offences, including related to bail restrictions (such as house arrest, administrative supervision, travel bans and sureties) against members of Holy Struggle for the legitimate exercise of freedoms of peaceful assembly, association and expression and the right to take part in public life could also violate international law. House arrest engages the right to liberty under article 9 of the ICCPR, while administrative supervision and travel bans engage the right to freedom of movement under article 12 of the ICCPR and the right to privacy under article 17 of the ICCPR.

Pejorative statements by public officials about the guilt of criminal suspects before a final determination of guilt following a fair trial by a competent, independent

and impartial court may further infringe on the presumption of innocence under article 14 of the ICCPR. This is especially the case when defence lawyers are denied the ability to release potentially exculpatory evidence. The imposition of criminal bail restrictions must also satisfy international standards regarding the definition of terrorism and legality, due process and judicial safeguards, and the necessity and proportionality of each restriction.

According to best practice international standards, terrorist offences must be limited to acts that intentionally kill or seriously injure persons in pursuit of a terrorist purpose (see Annex). Overbroad definitions of terrorism that capture the legitimate exercise of human rights are not consistent with international law, including the requirement of legality under article 15 of the ICCPR (see Annex). This principle prevents ill-defined and/or overly broad laws which are open to arbitrary application and abuse, including to target civil society on political or other unjustified grounds and suppress fundamental rights and freedoms.

Finally, in addition to the obligation to uphold the right of freedom of expression generally, States also have a responsibility to ensure the safety of journalists, including their ability to work in a safe manner in the context of demonstrations, and not to be subject to any kind of reprisals for their work. Appropriate training for State security forces must be provided to respect and protect journalists who are performing their functions, including during protests.

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 information and/or comment(s) you may have on the above-mentioned allegations.
2. Please explain whether the alleged excessive use of force by police at the peaceful protests against participants and journalists, described in this letter, has been investigated in line with international standards and indicate the outcomes of those investigations. Please also explain which measures have been taken to prevent their re-occurrence, including appropriate training for security forces.
3. Please provide information about the factual and legal bases for the arrests, detention and charging of the above-mentioned individuals and explain how these actions comply with Armenia's obligations under international human rights law.
4. Please indicate how the terrorist offences alleged against members of Holy Struggle satisfy the definition of terrorism as properly defined according to international standards, including the requirement of legality.

5. Please indicate how the criminal proceedings, including bail restrictions, satisfy the requirements of due process and fair trial and the presumption of innocence.
6. Please explain how the administrative restrictions imposed on members of Holy Struggle are consistent with international law, including the rights to liberty, freedom of movement, privacy, and freedoms of association, peaceful assembly and expression.
7. Please outline the measures that will be taken to prevent the repression and criminalization of the legitimate exercise of the rights to freedom of peaceful assembly, association, and expression, and the right to take part in public affairs.
8. Please indicate what administrative, legislative and judicial measures have been, or will be, taken to investigate the above allegations of violations and ensure that victims receive effective remedies and reparation, and that any perpetrators are held accountable, in accordance with international law.

This communication, and any response received from your Excellency's Government, will be made public via the communications reporting [website](#) at the 60 days mark. Should your Excellency's Government respond within 60 days, both the communication and the response, may be published before the 60 days mark. The communications and responses will also be made available in the subsequent periodic report to be presented to the Human Rights Council.

Further, we would like to inform your Excellency's Government that after having transmitted the information contained in the present communication to the Government, the Working Group on Arbitrary Detention may also transmit the case through its regular procedure in order to render an opinion on whether the deprivation of liberty was arbitrary or not. The present communication in no way prejudices any opinion the Working Group may render. The Government is required to respond separately to this communication and the regular procedure.

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 accept, Excellency, the assurances of our highest consideration.

Ben Saul

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Ganna Yudkivska

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Annex

Reference to international human rights law

In connection with the above alleged facts and concerns, we refer your Excellency's Government to the following provisions of international human rights law.

Right to life

Article 6 of the ICCPR guarantees the right to life and provides that “every human being has the inherent right to life [which] shall be protected by law. No one shall be arbitrarily deprived of his [or her] life.” In its general comment No. 36, the Human Rights Committee noted that States must take all necessary measures to prevent arbitrary deprivation of life by their law enforcement officials. This includes procedures to ensure that law enforcement actions are properly planned, consistent with the need to minimize the risk they pose to human life, mandatory reporting review and investigation of lethal and other life-threatening incidents (para. 13). The State also has a responsibility to take “all appropriate measures to deter, prevent and punish the perpetrators as well as to address any attitudes or conditions within society which encourage or facilitate such crimes violence or killings committed by non-State actors” (E/CN.4/2005/7, para. 71).

Right to liberty

Article 9 of the ICCPR guarantees the right to liberty and security of person and provides that “no one shall be deprived of his [or her] liberty except on such grounds and in accordance with such procedure as are established by law.” As interpreted by the Human Rights Committee in general comment No. 35, the notion of “arbitrariness” is not to be equated with “against the law” but must be interpreted more broadly to include elements of inappropriateness, injustice, lack of predictability and due process of law, as well as elements of reasonableness, necessity, and proportionality (para. 12).

Any detention due to the peaceful exercise of rights, including the rights to freedom of expression, freedom of assembly and freedom of association, is arbitrary (para 17).

Freedom of peaceful assembly and association

Article 21 of the ICCPR states that “[t]he right of peaceful assembly shall be recognized. No restrictions may be placed on the exercise of this right other than those imposed in conformity with the law and which are necessary in a democratic society in the interests of national security or public safety, public order (ordre public), the protection of public health or morals or the protection of the rights and freedoms of others”. Peaceful assemblies are protected under this provision wherever they take place: outdoors, indoors and online; in public and private spaces; or a combination thereof. Such assemblies may take many forms, including demonstrations, protests, meetings, processions, rallies, sit-ins, candlelit vigils and flash mobs. They are protected under article 21 whether they are stationary, such as pickets, or mobile, such as processions or marches (general comment No. 37, para. 6).

The Human Rights Committee has indicated that “restrictions on peaceful assemblies must not be used, explicitly or implicitly, to stifle expression of political opposition to a government (CCPR/C/MDG/CO/4, para. 51), challenges to authority, including calls for democratic changes of government, the constitution or the political system, or the pursuit of self-determination. They should not be used to prohibit insults to the honour and reputation of officials or State organs” (general comment No. 37, para. 49). Furthermore, authorities must be able to show that any restrictions meet the requirement of legality, and are also both necessary for and proportionate to at least one of the permissible grounds for restrictions enumerated in article 21 (para. 36).

In addition, we refer to a report of the Special Rapporteur on the rights to freedom of peaceful assembly and of association which indicated that “States should facilitate and protect peaceful assemblies, including through negotiation and mediation. Wherever possible, law enforcement authorities should not resort to force during peaceful assemblies and ensure that, ‘where force is absolutely necessary, no one is subject to excessive or indiscriminate use of force’ (A/HRC/RES/19/35, para. 6)” (A/HRC/20/27, para. 89). In a joint report, the former Special Rapporteur on the rights to freedom of peaceful assembly and of association and the Special Rapporteur on extrajudicial, summary or arbitrary executions stated that the use of force by law enforcement officials should be exceptional, and assemblies should ordinarily be managed with no resort to force. Any use of force must comply with the principles of necessity and proportionality. The necessity requirement restricts the kind and degree of force used to the minimum necessary in the circumstances (the least harmful means available), which is a factual cause and effect assessment. Any force used should be targeted at individuals using violence or to avert an imminent threat (A/HRC/31/66, para. 57).

Article 22 of the ICCPR protects the right to freedom of association with others. States not only have a negative obligation to abstain from unduly interfering with the rights of peaceful assembly and of association but also have a positive obligation to facilitate and protect these rights in accordance with international human rights standards (A/HRC/17/27, para. 66 and A/HRC/29/25/Add.1). This means ensuring that the rights to freedom of peaceful assembly and of association are enjoyed by everyone, without discrimination on the basis of race, colour, sex, language, religion, political or other opinion, national or social origin, property, birth or other status (A/HRC/41/41, para. 13). Freedom of association is closely linked to the rights to freedom of expression and to peaceful assembly and is of fundamental importance to the functioning of democratic societies. These rights can only be restricted in very specific circumstances, where the restrictions serve a legitimate public purpose as recognized by international standards and are necessary and proportionate for achieving that purpose. In this sense, we wish to highlight that the Special former Rapporteur on the rights to freedom of peaceful assembly and of association indicated that “[t]he suspension and the involuntarily dissolution of an association are the severest types of restrictions on freedom of association. As a result, it should only be possible when there is a clear and imminent danger resulting in a flagrant violation of national law, in compliance with international human rights law. It should be strictly proportional to the legitimate aim pursued and used only when softer measures would be insufficient” (A/HRC/20/27, para. 75).

The Human Rights Committee has also stated that “the imposition of any restrictions should be guided by the objective of facilitating the right, rather than seeking unnecessary and disproportionate limitations on it. Restrictions must not be discriminatory, impair the essence of the right, or be aimed at discouraging participation in assemblies or causing a chilling effect” (general comment No. 37, para. 36).

In addition, the Special Rapporteur on the rights to freedom of peaceful assembly and of association highlighted that “negative and hostile narratives increasingly used to vilify and criminalize civil society and activists deepen the stigmatization of those exercising their rights to peaceful assembly and association. Stigmatization, whether intentional or not, especially when propagated by authorities, effectively denies these fundamental rights. It misrepresents legitimate exercises of freedom as illegal and those involved as criminals or threats to national security, public order or morals. This fuels harmful stereotypes, fosters hostility, justifies punitive measures and triggers undue restrictions on these rights” (A/79/263, para. 11). The Special Rapporteur emphasized the weaponization of unjustified accusations of terrorism, facilitated by broad anti-terrorism laws, to stifle civic activism and civil society critical of government policies (paras. 32-35).

Freedom of expression and opinion

Article 19 of the ICCPR guarantees the right to freedom of opinion and the right to freedom of expression, which includes the right “to seek, receive and impart information and ideas of all kinds, either orally, in writing or in print, in the form of art, or through any other media”. This right applies online as well as offline, and includes not only the exchange of information that is favourable, but also that which may criticize, shock, or offend.

As noted by the Human Rights Committee, States parties to the ICCPR are required to guarantee the right to freedom of expression, including “political discourse, commentary on one’s own and on public affairs, canvassing, discussion of human rights, journalism, cultural and artistic expression, teaching, and religious discourse” (general comment No. 34, para. 11).

The Committee further noted that States parties to the ICCPR “shall put in place effective measures to protect against attacks aimed at silencing those who exercise their right to freedom of expression” (para. 23). Recognizing how journalists and persons who engage in the gathering and analysis of information on the human rights situation and who publish human rights-related reports, including judges and lawyers, are frequently subjected to threats, intimidation and attacks because of their activities, the Committee stressed that “all such attacks should be vigorously investigated in a timely fashion, and the perpetrators prosecuted, and the victims, or, in the case of killings, their representatives, be in receipt of appropriate forms of redress” (para. 23).

Any restriction on the right to freedom of expression must be compatible with the requirements set out in article 19(3) of the ICCPR. Restrictions must (i) be provided by law; (ii) pursue one of the legitimate aims for restriction, which are the respect of the rights or reputations of others and the protection of national security or of public order (*ordre public*), or of public health or morals; and (iii) be necessary and proportionate for those objectives. To be provided by law, a restriction must be formulated with

sufficient precision to enable individuals to regulate their conduct accordingly, must not confer unfettered discretion, and must provide sufficient guidance to those charged with their execution to enable them to ascertain what sorts of expression are properly restricted and what sorts are not (para. 25).

The State has the burden of proof to demonstrate that any such restrictions are compatible with the Covenant, proving “in specific and individualized fashion the precise nature of the threat, and the necessity and proportionality of the specific action taken, in particular by establishing a direct and immediate connection between the expression and the threat” (para. 35). The relation between right and restriction and between norm and exception must not be reversed. A restriction must be “the least intrusive instrument among those which might achieve their protective function” (para. 34). Any restriction on expression or information that a government seeks to justify on grounds of national security and counter-terrorism must have the genuine purpose and demonstrable effect of protecting a legitimate national security interest (general comment No. 34).

Right to take part in the conduct of public affairs

Article 25(a) of the ICCPR provides that: “Every citizen shall have the right and the opportunity, without any of the distinctions mentioned in article 2 and without unreasonable restrictions... [t]o take part in the conduct of public affairs”. The Human Rights Committee noted that “[c]itizens also take part in the conduct of public affairs by exerting influence through public debate and dialogue with their representatives or through their capacity to organize themselves. This participation is supported by ensuring freedom of expression, assembly and association” (general comment No. 25, para. 8).

Right to freedom of movement

Any restriction to the right to liberty of movement and the freedom to leave any country, including his or her own must be compatible with paragraph 3 of article 12 of the ICCPR, which establishes that restrictions are only acceptable if they are provided by law, are necessary to protect national security, public order (ordre public), public health or morals or the rights and freedoms of others, and are consistent with the other rights recognized in the ICCPR.

Right to privacy

Article 17(1) of the ICCPR prohibits arbitrary or unlawful interferences with a person’s privacy, family, home or correspondence, and unlawful attacks on a person’s honour and reputation. Article 17(2) provides that “[e]veryone has the right to the protection of the law against such interference or attacks.” Any interference with the right protected under article 17 must be strictly necessary and proportionate in pursuit of a legitimate aim.

The Human Rights Committee has emphasized the duty of States “not to engage in interferences inconsistent with article 17 of the Covenant and to provide the legislative framework prohibiting such acts by natural or legal persons” (general comment No. 16, para. 9).

Respect for international law while countering terrorism

Many resolutions of the United Nations General Assembly, Security Council and Human Rights Council reaffirm that any measures taken to combat terrorism and violent extremism must comply with the obligations of States under international law, in particular international human rights law, refugee law and international humanitarian law.¹ Counter-terrorism measures must conform to fundamental requirements of legality, legitimate aim, necessity, proportionality, and non-discrimination. Disregard for these principles can have exceptionally harmful effects on the protection of fundamental rights, particularly for minorities, historically marginalized communities, and civil society. States must ensure that measures to combat terrorism do not hinder the work and safety of individuals, groups and organs of society engaged in promoting and defending human rights (A/HRC/RES/22/6, para. 10(a)).

Legality and the definition of terrorism

The principle of legality under article 15(1) of the ICCPR requires that criminal laws are sufficiently precise so that it is clear what types of behaviour constitute a criminal offence and what would be the legal consequences. This principle seeks to prevent ill-defined and/or overly broad laws which are open to arbitrary application and abuse, including targeting civil society on political or other unjustified grounds (A/70/371, para. 46(b)) and suppress the exercise of fundamental rights and freedoms (A/HRC/40/52).

Although no universal treaty generally defines “terrorism”, States should ensure that counter-terrorism legislation is limited to criminalizing conduct which is properly and precisely defined on the basis of the international counter-terrorism instruments,² the General Assembly’s Declaration on Measures to Eliminate International Terrorism (1994), and Security Council resolution 1566 (2004). Based on these authoritative sources, the 2026 revised model definition of terrorism advanced by the Special Rapporteur on the promotion and protection of human rights and fundamental freedoms while countering terrorism provides clear, “best practice” guidance, by identifying conduct that is genuinely terrorist in nature and precisely defining the elements (A/HRC/61/52 and A/HRC/16/51, para. 28). The model definition is as follows:

1. Any person commits a terrorist offence if that person, by any serious criminal act, intentionally causes death, serious bodily injury, or hostage-taking, where:
 - (a) The purpose of the conduct, by its nature or context, is:
 - (i) To provoke a state of terror in the public or a group of persons; or

¹ Security Council resolutions 1373 (2001), 1456 (2003), 1566 (2004), 1624 (2005), 2178 (2014), 2242 (2015), 2341 (2017), 2354 (2017), 2368 (2017), 2370 (2017), 2395 (2017) and 2396 (2017); Human Rights Council resolution 35/34; and General Assembly resolutions 49/60, 51/210, 72/123 and 72/180, among others

² See https://treaties.un.org/Pages/DB.aspx?path=DB/studies/page2_en.xml.

- (ii) To unduly compel a Government or an international organization to do or to abstain from doing any act;
 - (b) The conduct is intended to advance a political or ideological purpose, which must be a substantial purpose; and
 - (c) The conduct, given its nature or context, intentionally causes serious damage to a country or an international organization.
2. A terrorist offence does not include:
- (a) An act of advocacy, protest, dissent or industrial action that does not intentionally cause death or serious bodily injury;
 - (b) Conduct committed in armed conflict that does not violate international humanitarian law;
 - (c) The provision of humanitarian activities by impartial humanitarian organizations in accordance with international humanitarian law;
 - (d) The activities of State military forces in the exercise of their official duties, inasmuch as they are accordance with international law; and
 - (e) An act intended to establish or re-establish democracy, constitutional Government or the rule of law, or to exercise or safeguard human rights.

Excessive use of force

International principles and norms govern the use of force by law enforcement authorities. The Code of Conduct for Law Enforcement Officials, General Assembly resolution 34/169 of 17 December 1979 and the Basic Principles on the Use of Force and Firearms by Law Enforcement Officials (adopted by the Eighth United Nations Congress on the Prevention of Crime and the Treatment of Offenders, Havana, 27 August to 7 September 1990), provide an authoritative interpretation of the limits on the conduct of law enforcement forces. Principle 9 of the Basic Principles provides that intentional lethal use of firearms may only be made when strictly unavoidable in order to protect life. Principles 12, 13 and 14 restrict the use of firearms to situations of violent assemblies and provide that force and firearms may only be used as a last resort when unavoidable and require exercising the utmost restraint. Should lethal force be used, restraint must be exercised at all times and damage and/or injury mitigated, including giving a clear warning of the intent to use force and to provide sufficient time to heed that warning, and providing medical assistance as soon as possible when necessary.

The compilation of practical recommendations for the proper management of assemblies (A/HRC/31/66) recalls that the use of force by law enforcement officials should be exceptional, and assemblies should ordinarily be managed with no resort to force. Any use of force must comply with the principles of necessity and proportionality (para. 57). These principles apply to the use of all force, including potentially lethal

force. Firearms may be used only against an imminent threat either to protect life or to prevent life-threatening injuries (making the use of force proportionate). In addition, there must be no other feasible option, such as capture or the use of non-lethal force to address the threat to life (making the force necessary) (para. 59). Furthermore, firearms should never be used simply to disperse an assembly; indiscriminate firing into a crowd is always unlawful (para. 60).