



**Eighth Interim Report  
on reported violations of  
international humanitarian  
law and international human  
rights law in Ukraine**

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16 December 2025



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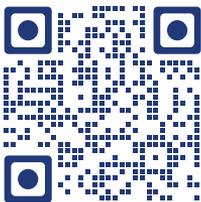
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# Executive Summary

I

1. In line with its monitoring mandate, ODIHR launched the Ukraine Monitoring Initiative (UMI) to monitor and report on the most pressing issues affecting the lives of civilians and prisoners of war (POWs), following the Russian Federation's invasion of Ukraine on 24 February 2022. This is the Eighth Interim Report on reported violations of international humanitarian law (IHL) and international human rights law (IHRL) produced by the UMI, building on the findings and recommendations of the seven previous Interim Reports.
2. The Report includes a short overview of developments in the context of the armed conflict from 1 June to 30 November 2025, while the main body of the report focuses on specific issues reported to ODIHR by 114 survivors and witnesses during three monitoring deployments conducted by ODIHR in Ukraine in the second half of 2025. The report is also informed by the UMI's remote monitoring, using open-source investigation techniques. Additionally, ODIHR received information from non-governmental organizations (NGOs) and made use of information supplied or published by institutions of Ukraine and the Russian Federation, as well as intergovernmental organizations (IGOs), which is referenced throughout the report.
3. ODIHR's monitoring of the conduct of hostilities showed that, from 1 June to 30 November 2025, the Russian Federation armed forces further escalated the use of weapons with wide area effects in urban areas across Ukraine, in blatant disregard of IHL, including the principles of distinction and proportionality. The number of verified civilian casualties in Ukrainian Government-controlled areas of Ukraine increased by 40 per cent compared with the previous six months. ODIHR documented a continued escalation of the use of short-range loitering munitions, including so-called 'First Person View' (FPV) drones, by the Russian armed forces, which remained the leading cause of civilian casualties near the frontline.
4. On a much smaller scale, Ukraine also engaged in shelling and drone strikes on populated areas of Russian-occupied areas of Ukraine as well as the territory of the Russian Federation, resulting in civilian casualties and damage to civilian objects in some cases.
5. The humanitarian situation continued to deteriorate, with damage to energy infrastructure and housing severely impacting the civilian population. Intensified hostilities forced the displacement of large numbers of civilians from frontline areas, while access to these areas for humanitarian actors was further restricted. Security risks increased, while the capacity of local NGOs to respond to calls for assistance decreased. Access to Russian-occupied areas of Ukraine remained significantly restricted for independent international actors, while health risks, due to restricted access to water and water contamination, rose.

6. Witnesses reported to ODIHR instances of attacks by the Russian Federation affecting humanitarian operations, including by short-range drones, the use of which has significantly increased over the course of the armed conflict.
7. ODIHR interviewed a further nine survivors and received testimony from relatives and close contacts of 12 individuals who were, or remain, arbitrarily detained or enforcedly disappeared from Russian-occupied areas of Ukraine. The new evidence gathered by ODIHR confirmed previously documented patterns, including the categories of people targeted, the lack of lawful grounds for detention and the consistent denial of procedural guarantees and contact with the outside world.
8. ODIHR collected additional evidence of the widespread and systematic use of torture by the Russian authorities against detained Ukrainian civilians and POWs. Eleven civilian former detainees and 12 Ukrainian former POWs interviewed by ODIHR during the compilation of this report said that they were subjected to torture or other ill-treatment while in detention at locations in Russian-occupied areas of Ukraine and within the Russian Federation.
9. ODIHR received reports confirming dire detention conditions for civilians, as well as for the internment of Ukrainian POWs. However, testimonies from former Ukrainian POWs indicated that conditions may be improving in some locations.
10. ODIHR also received 11 accounts from former civilian detainees who were released as part of POW exchanges. The number of civilians exchanged alongside POWs increased significantly during the second half of 2025. Information gathered by ODIHR indicates that the detention of Ukrainian civilians in Russian-occupied territories corresponds to the constitutive elements of hostage-taking.
11. ODIHR gathered 21 testimonies on conflict-related sexual violence (CRSV), of which 12 were provided by direct survivors. Almost half of the testimonies ODIHR received regarding POWs also included allegations of CRSV perpetrated against Ukrainian POWs in Russian detention. The types of CRSV perpetrated against Ukrainian civilians and POWs remained similar to the findings of previous ODIHR Interim Reports, and included various instances of rape, group rape and rape of minors.
12. ODIHR collected further information from witnesses regarding attempts by the Russian authorities to alter the status and character of the Russian-occupied territories of Ukraine in violation of IHL, including by making residents' ability to live in the occupied territories dependent on the acquisition of Russian citizenship. Most of the witnesses interviewed by ODIHR left the occupied territories between April and September 2025, providing accounts of their experiences until that time. The imposition of the Russian Federation

curriculum in schools continued. For the first time, ODIHR also received first-hand accounts of military-patriotic education at universities, as well as more detailed accounts about the militarization of children and how students are encouraged to join the Russian armed forces. In addition, ODIHR received more detailed accounts of forced conscription into the Russian armed forces.

13. ODIHR continued to receive accounts, including through 11 witness testimonies, on the use of administrative and judicial measures, including ‘deportation’, to suppress real or perceived dissent by civilians in Russian-occupied territories of Ukraine, confirming the findings outlined in previous Interim Reports.
14. More broadly, ODIHR received accounts, including through 18 witness testimonies, on unfair and unlawful trials of Ukrainian civilians and POWs by the Russian authorities on trumped-up charges including terrorism, murder, espionage, sabotage and extremism. The number of trials was reportedly increasing, with Ukrainian POWs tried en masse. Four witnesses informed ODIHR that the Russian authorities resorted to torture and ill-treatment to coerce confessions and force witnesses to provide (false) testimony.
15. During the second half of 2025, ODIHR received information on reported violations of fair trial rights during the consideration of war crimes charges in Ukraine, including notably, that the Ukrainian authorities reportedly failed to adequately notify the accused about the trial proceedings *in absentia* cases.
16. Witnesses continued to describe to ODIHR efforts by the Russian authorities to compel residents of Russian-occupied territories of Ukraine to ‘cooperate’ in ways that violate IHL, while, at the same time, risking unfair prosecution by the Ukrainian authorities under vague ‘collaboration’ laws.
17. ODIHR collected information, including through witness testimonies, indicating that both parties to the conflict may have recruited and used children in hostilities in contravention of IHL, placing them at risk of harm.
18. ODIHR makes a series of recommendations, calling on both parties to the conflict to address the issues highlighted in this report, as well as to respect and ensure respect for IHL and IHRL. ODIHR also makes recommendations to OSCE participating States to provide redress to survivors of violations, to take steps to ensure accountability and to support and fund humanitarian assistance and the documentation of violations of IHL and IHRL by civil society.

# Introduction

II

19. Nearly four years after the Russian Federation’s invasion of Ukraine, the war continues to be marked by the widespread suffering of the civilian population and serious violations of international humanitarian law (IHL) and international human rights law (IHRL).
20. The OSCE human dimension commitments emphasize the vital importance of participating States adhering to and implementing their binding IHL and IHRL obligations under international treaties,<sup>1</sup> including the Geneva Conventions.<sup>2</sup>
21. In line with its core mandate to assist OSCE participating States in the implementation of human dimension commitments,<sup>3</sup> ODIHR established the Ukraine Monitoring Initiative (UMI) immediately after the 24 February 2022 invasion of Ukraine by the Russian Federation and began monitoring and documenting reported violations in the context of the armed conflict, focusing on the most pressing issues affecting the lives of civilians and prisoners of war (POWs).
22. ODIHR’s analysis of the situation in Ukraine and of alleged IHL and IHRL violations is informed by relevant legal provisions applicable to the armed conflict in Ukraine. The purported ‘annexation’ or integration of territories under occupation by the Russian Federation is illegal under international law, produces no legal effect, and does not alter the status of these territories, which remain Ukrainian territory. More information about the legal framework is available on ODIHR’s website.<sup>4</sup>
23. The methodology employed by the UMI was informed by, and tailored to the circumstances on the ground in Ukraine. ODIHR applies a trauma-informed approach, guided by the ‘do no harm’ principle, informed consent and careful consideration of the risks of re-traumatization. More information about the methodology is available on ODIHR’s website.<sup>5</sup>

1 See [Concluding Document of Budapest](#), (Budapest 1994), CSCE, 6 December 1994, pp. 13, 35.

2 See [Concluding Document of Helsinki](#), (Helsinki 1992), The Fourth Follow-up Meeting, CSCE, 10 July 1992, paras. 47-52; CSCE, [Budapest 1994](#), Chapter IV, Code of conduct on politico-military aspects of security, paras. 29–35.

3 CSCE, [Helsinki 1992](#). See also [Interim Report on reported violations of international humanitarian law and international human rights law in Ukraine](#), (First Interim Report), OSCE/ODIHR, 20 July 2022; [Second Interim Report on reported violations of international humanitarian law and international human rights law in Ukraine](#), (Second Interim Report), OSCE/ODIHR, 14 December 2022; [Third Interim Report on reported violations of international humanitarian law and international human rights law in Ukraine](#), (Third Interim Report), OSCE/ODIHR, 17 July 2023; [Fourth Interim Report on violations of international humanitarian law and international human rights law in Ukraine](#), (Fourth Interim Report), OSCE/ODIHR, 12 December 2023; [Fifth Interim Report on reported violations of international humanitarian law and international human rights law in Ukraine](#), (Fifth Interim Report), OSCE/ODIHR, 22 July 2024; [Sixth Interim Report on reported violations of international humanitarian law and international human rights law in Ukraine](#) (Sixth Interim Report), OSCE/ODIHR, 13 December 2024; [Seventh Interim Report on reported violations of international humanitarian law and international human rights law in Ukraine](#) (Seventh Interim Report), OSCE/ODIHR, 15 July 2025, for additional detail on ODIHR’s mandate.

4 See OSCE/ODIHR, [The legal framework applicable to the armed conflict in Ukraine](#), OSCE/ODIHR, 17 July 2023.

5 See [Ukraine Monitoring Initiative Methodology](#), OSCE/ODIHR, 17 July 2023.

24. This Eighth Interim Report builds upon the findings and recommendations of the seven previous Interim Reports on reported violations of IHL and IHRL in Ukraine published in July 2022 (First Interim Report), December 2022 (Second Interim Report), July 2023 (Third Interim Report), December 2023 (Fourth Interim Report), July 2024 (Fifth Interim Report), December 2024 (Sixth Interim Report) and July 2025 (Seventh Interim Report) respectively.<sup>6</sup> ODIHR's public reporting aims to contribute further to ensuring accountability for violations of IHL and IHRL committed in the context of the armed conflict in Ukraine.
25. The report begins with an overview of conflict-related issues and key developments that occurred in the context of the armed conflict in Ukraine between 1 June 2025 and 30 November 2025. It then turns to specific issues raised during in-person interviews with survivors and witnesses conducted by ODIHR in the second half of 2025, giving prominence to their voices.<sup>7</sup> ODIHR conducted three monitoring deployments to Ukraine during this period. During these visits, ODIHR carried out a total of 106 interviews with 114 witnesses, including survivors of, or witnesses to alleged violations of IHL and IHRL (54 women and 60 men).<sup>8</sup> ODIHR interviewees came from various regions of Ukraine, including Cherkasy, Donetsk, Kharkiv, Kherson, Khmelnytskyi, Kyiv, Luhansk, Mykolaiv, Sumy, Ternopil, Zaporizhzhia, and the Autonomous Republic of Crimea and the City of Sevastopol (Crimea).
26. ODIHR wishes to express its deepest gratitude to all witnesses and survivors who shared their testimony. Additionally, ODIHR received information from non-governmental organizations (NGOs) and made use of information supplied or published by institutions of Ukraine and the Russian Federation, as well as intergovernmental organizations (IGOs), which is referenced throughout the report.

6 OSCE/ODIHR, [First Interim Report](#); [Second Interim Report](#); [Third Interim Report](#); [Fourth Interim Report](#); [Fifth Interim Report](#); [Sixth Interim Report](#); [Seventh Interim Report](#).

7 In this respect, certain information included in Chapter IV may relate to events that occurred before 1 June 2025.

8 As of 30 November 2025, the UMI has carried out 27 missions in and outside Ukraine, during which it has conducted 682 interviews with a total of 720 survivors of, or witnesses to, alleged violations of IHL and IHRL (368 women and 352 men).



# Overview of the situation between 1 June and 30 November 2025

III

## A. CONTINUED VIOLATIONS OF IHL DURING THE CONDUCT OF HOSTILITIES

27. ODIHR has continued to monitor reported violations of IHL committed during the conduct of hostilities in both Ukrainian Government-controlled and Russian-occupied areas of Ukraine, as well as within the Russian Federation. The reporting period saw a further escalation in the Russian armed forces' use of weapons with wide area effects in urban areas across Ukraine, severely impacting residential buildings, medical facilities and educational institutions, as well as critical energy infrastructure. The intensification of fighting, following attempts by Russian forces to gain further territory, together with the recurrent use of short-range combat drones, had a serious impact on the civilian population in frontline areas, forcing many to flee and exacerbating the humanitarian crisis.<sup>9</sup> In the Russian Federation, the Ukrainian armed forces increased attacks on energy facilities, including oil refineries, resulting in fuel shortages across the country.
28. According to data provided by the UN OHCHR, between 1 June and 30 November 2025, the number of verified civilian casualties (killed and injured) in Ukrainian Government-controlled areas of Ukraine increased by 40 per cent compared with the previous six months.<sup>10</sup> When compared with the same period in 2024, casualties were 22 per cent higher. In Russian-occupied areas of Ukraine, verified civilian casualties decreased by nearly 34 per cent compared with the period from December 2024 to May 2025, and by almost 65 per cent when compared with June to November 2024.<sup>11</sup>
29. ODIHR's monitoring activities, including open-source investigative techniques used to verify digital evidence,<sup>12</sup> indicate that the Russian armed forces continued to use explosive weapons with wide area effects<sup>13</sup> routinely in attacks on densely populated areas of Ukraine, including locations far from the

9 For more details, see [Section III.b The humanitarian situation](#).

10 See UN OHCHR Protection of Civilians Updates: [June 2024](#), 8 July 2024, p. 2; [July 2024](#), 9 August 2024, p. 2; [August 2024](#), 6 September 2024, p. 2; [September 2024](#), 11 October 2024, p. 2; [October 2024](#), 15 November 2024, p. 2; [November 2024](#), 10 December 2024, p. 2; [December 2024](#), 9 January 2025, p. 2; [January 2025](#), 11 February 2025, p. 2; [February 2025](#), 11 March 2025, p. 2; [March 2025](#), 9 April 2025, p. 2; [April 2025](#), 8 May 2025, p. 2; [May 2025](#), 12 June 2025, p. 2; [June 2025](#), 10 July 2025, p. 2; [July 2025](#), 13 August 2025, p. 2; [August 2025](#), 10 September, p. 2; [September 2025](#), 10 October 2025, p. 2; [October 2025](#), 12 November 2025, p. 2; [November 2025](#), 12 December 2025, p. 2.

11 *Ibid.* OHCHR notes that the actual number might be higher as some reports are still pending confirmation.

12 As ODIHR is not positioned to conduct detailed assessments of violations of IHL norms in relation to individual attacks, its findings are based on patterns observed during its monitoring activities. These allow it to make provisional conclusions on the degree of compliance with certain IHL norms by the parties to the conflict. For more information, see OSCE/ODIHR, [Ukraine Monitoring Initiative Methodology](#).

13 These are weapons designed for the open battlefield and, given their inherent inaccuracy, their use in densely populated areas is very likely to cause indiscriminate and disproportionate harm to civilians and civilian infrastructure.

frontline.<sup>14</sup> As noted in ODIHR’s Seventh Interim Report, starting from March 2025, the Russian armed forces intensified long-range missile and loitering munitions strikes on large urban centres, resulting in a sharp rise in civilian casualties across the country.<sup>15</sup> This trend persisted into the second half of 2025,<sup>16</sup> with long-range strikes accounting for the majority of civilian deaths and injuries in June — a month that saw the highest number of verified civilian casualties in three years of armed conflict.<sup>17</sup> Moreover, Russian forces often used tactics involving the deployment of large numbers of drones and missiles at populated areas in successive salvos,<sup>18</sup> aimed at saturating Ukraine’s air defence, and ultimately leading to greater damage.<sup>19</sup> The frequent use of aerial bombs, combined with artillery shelling and multiple launch rocket system (MLRS) strikes following the Russian forces’ advances along the front line, have further contributed to the increase in civilian casualties.<sup>20</sup> Many of these attacks raise potential concerns regarding compliance with the principle of proportionality and the prohibition of indiscriminate attacks under IHL.<sup>21</sup>

30. For instance, on the night of 17 June, the Russian Federation launched a large-scale combined attack using 32 missiles and 440 loitering munitions<sup>22</sup> against several Ukrainian cities.<sup>23</sup> The main target was the capital, Kyiv, which was targeted by 14 missiles and 175 drones, with strikes reported in at least 30 locations across several districts.<sup>24</sup> In the Solomianskyi district of the city, one

14 For instance, on 21 August, 26 civilians were injured in a missile strike on a civilian enterprise in Mukacheve (Zakarpattia region), marking the first attack on Ukraine’s westernmost region resulting in civilian casualties since 24 February 2022. See Myroslav Biletskyi, Telegram [post](#), 22 August 2025, in Ukrainian.

15 See OSCE/ODIHR, [Seventh Interim Report](#), para. 23.

16 The reporting period was marked by recurrent strikes on major Ukrainian cities, including Dnipro, Kharkiv, Kyiv and Zaporizhzhia, which often resulted in numerous civilian casualties in a single incident. For instance, ODIHR recorded at least 16 large-scale attacks with missiles and/or loitering munitions targeting the Ukrainian capital which led to civilian casualties. These include the 31 July attack, as a result of which 31 civilians (including five children) were killed, and 171 others (including 17 children) were injured when one of the residential buildings was hit by a missile. According to the UN OHCHR, this attack became the largest in terms of verified civilian casualties in the city since 2022, see UN OHCHR Protection of Civilians Update: [July 2025](#), 13 August 2025, p. 2.

17 UN OHCHR Protection of Civilians Update: [June 2025](#), 10 July 2025, p. 1.

18 For instance, during the month of October, the Russian armed forces launched approximately 5,300 long-range loitering munitions, as well as 222 cruise and ballistic missiles at Ukraine. During the same period in 2024, roughly 1,900 long-range drones and 75 missiles were deployed, see [Russia’s Intense Air Campaign in October](#), Center for Strategic and International Studies, 14 November 2025. See also [Russian drone, missile attacks on Ukraine set new record in September](#), *ABC News*, 1 October 2025.

19 [The New Salvo War](#), Center for Strategic and International Studies, 31 July 2025; [Russia’s Massed Strikes: The Strategy of Coercion by Salvo](#), Center for Strategic and International Studies, 9 September 2025.

20 For instance, on 28 July, 16 civilians were killed and 43 were injured (all prisoners) when several aerial bombs struck Bilenkivska penal colony in Zaporizhzhia region. See Ministry of Justice of Ukraine, Telegram [post](#), 30 July 2025, in Ukrainian. On 9 September, 25 civilians were killed and 48 were injured when an aerial glide bomb struck next to a mobile post office distributing pensions in the village of Yarova (Donetsk region). See Vadym Filashkin, Telegram [post](#), 10 September 2025, in Ukrainian. On 24 October, two civilians were killed and at least 24 were injured, including three children, in a MLRS strike on a residential area of the city of Kherson. See Kherson Regional Police, Telegram [post](#), 24 October 2025, in Ukrainian.

21 ICRC Customary IHL (CIHL) Rules 1, 7, 11, 12 and 14; AP I, arts. 51(4) and 51(5)(b).

22 Air Force of the Ukrainian Armed Forces, Telegram [post](#), 17 June 2025, in Ukrainian.

23 The cities of Chernihiv and Odesa, as well as several settlements in Kyiv region came under attack.

24 See Tymur Tkachenko, Telegram [post](#), 17 June 2025, in Ukrainian; Volodymyr Zelenskyy, Telegram [post](#), 17 June 2025, in Ukrainian.

missile hit a nine-storey apartment building, destroying an entire section. In the Darnytskyi district, a loitering munition struck a high-rise residential building, damaging several floors. As a result of the attack, 27 civilians were killed and 132 were injured in Kyiv alone.<sup>25</sup> ODIHR spoke to two survivors of the attack on a residential building on Vaclav Havel Boulevard (Solomianskyi district) and reviewed original videos and photographs of the aftermath provided by one of them.<sup>26</sup> Both witnesses told ODIHR that they did not see any military activity prior to, or at the time of the attack.<sup>27</sup> Although the Ministry of Defence of the Russian Federation claimed the attack targeted military objectives,<sup>28</sup> the extensive harm caused to civilians by explosive weapons with wide area effects in a densely populated area, the timing of the attack (at night, when civilians were asleep at home) and the apparent lack of warnings, indicate, at a minimum, a failure to comply with the IHL principles of proportionality and precautions, which may amount to a war crime.<sup>29</sup>

31. On the night of 7 June, the Russian armed forces conducted a massive aerial attack on Kharkiv, using four aerial bombs, one missile and over 50 loitering munitions.<sup>30</sup> In the Kyivskyi district of the city, a civilian commercial building was destroyed after being hit by multiple munitions, while, in Osnovianskyi district, a nine-storey residential building was struck by drones.<sup>31</sup> According to the Ukrainian authorities, eight civilians were killed and 25 were injured as a result of the strike, including two children, one rescue worker and two police officers.<sup>32</sup> ODIHR spoke to an employee who survived the attack, as well as the owner of the company in Kyivskyi district.<sup>33</sup> The owner explained that, although his business is located within the premises of a large state-owned

25 UN OHCHR Protection of Civilians Update: [June 2025](#), 10 July 2025, p. 2.

26 ODIHR Witness Interviews UKR.WS.610; UKR.WS.613.

27 ODIHR Witness Interviews UKR.WS.610, para. 23; UKR.WS.613, para. 14.

28 The Russian Ministry of Defence claimed that the Russian forces carried out a group strike “on objects of the military-industrial complex of Ukraine in Kyiv and Zaporizhzhia regions”. See Russian Ministry of Defence, [Telegram post](#), 17 July 2025, in Russian. Separately, some Ukrainian and Russian sources online said that the main target was Kyiv International Airport Zhuliany, with Russian sources alleging destruction of a ‘Patriot’ air defence missile system at Zhuliany and an industrial zone with warehouses at the “Vizar” Zhuliany Machine-Building Plant. ODIHR could not independently verify these claims.

29 CIHL Rules 14, 15, 20; AP I, arts. 51(4)-(5), 57(2), 85(3)(b) and (5); ICC Statute, art. 8(2)(b)(iv). Furthermore, if there were no military objectives present in the close vicinity of the building, the attack may also violate the IHL principle of distinction, which requires parties to direct operations only against military objectives and prohibits attacks on civilians and civilian objects. See AP I, arts. 48, 51(2), 52(1)-(2).

30 Kharkiv Regional Police, [Telegram post](#), 7 June 2025, in Ukrainian. According to the mayor of the city, this attack was the most powerful since the beginning of the Russian Federation’s invasion of Ukraine in February 2022. See Ihor Terekhov, [Telegram post](#), 7 June 2025, in Ukrainian.

31 Oleh Syniehubov, [Telegram post](#), 7 June 2025, in Ukrainian; State Emergency Service of Ukraine, [Telegram post](#), 9 June 2025, in Ukrainian. See also ODIHR Witness Interviews UKR.WS.614, paras. 5, 15; UKR.WS.615, para. 8.

32 Kharkiv Regional Prosecutor’s Office, [Telegram post](#), 7 June 2025, in Ukrainian; Ihor Klymenko, [Telegram post](#), 7 June 2025, in Ukrainian; Kharkiv Regional Prosecutor’s Office, [Telegram post](#), 12 June 2025, in Ukrainian.

33 ODIHR Witness Interviews UKR.WS.614; UKR.WS.615.

industrial plant that manufactures electronic components,<sup>34</sup> his factory produces industrial packaging used for transporting and storing bulk cargo.<sup>35</sup> At the time of the attack, 25 employees were working the night shift in the factory,<sup>36</sup> six of whom were killed (three men and three women).<sup>37</sup> After the initial strikes, the plant was again targeted by drones, including after the arrival of rescue workers.<sup>38</sup> The witness, who suffered multiple injuries, some of them long lasting, as well as psychological trauma after spending four hours trapped beneath the rubble, told ODIHR: “[...] *I am going back to that place in my mind all the time. I am so sorry for the dead. They did nothing. I try to keep myself in hand, but sometimes somebody asks me a normal question, and I start to cry. I am thinking that we might leave, as there is no future here for us [...]*.”<sup>39</sup> Based on the available information, the attack likely violated the IHL principles of proportionality and precautions. The presence of a potential dual-use or military object near a civilian company does not alter its civilian character. Even if attacking parts of the industrial plant could have offered a military advantage to the Russian Federation, the harm inflicted on civilians appears disproportionate to any such benefit.<sup>40</sup> Furthermore, the reported subsequent loitering munition strikes injuring rescuers indicate a possible deliberate attack on protected persons, which may amount to a war crime.<sup>41</sup>

32. From June to November, ODIHR documented a further escalation in the use of short-range loitering munitions,<sup>42</sup> including so-called FPV drones,<sup>43</sup> by the Russian Federation armed forces, which continued to be a leading cause of civilian casualties near the frontline.<sup>44</sup> July 2025, in particular, saw the highest number of civilian casualties resulting from the use of this weapon since the start of the Russian Federation’s invasion of Ukraine in February 2022.<sup>45</sup> The attacks targeted civilians and civilian vehicles, and damaged civilian

34 The Russian Ministry of Defence stated on 7 June that the Russian armed forces attacked “Ukrainian military-industrial complex facilities, strike drone assembly workshops, maintenance and repair centres for weapons and military equipment, as well as Ukrainian Armed Forces ammunition depots.” See Russian Ministry of Defence, Telegram [post](#), 7 June 2025, in Russian.

35 ODIHR Witness Interview UKR.WS.614, paras. 5-8. The witness also clarified that Russian forces had previously struck the industrial plant several times, but not his enterprise.

36 ODIHR Witness Interview UKR.WS.614, para. 11.

37 ODIHR Witness Interviews UKR.WS.614, para. 13; UKR.WS.615, para. 13.

38 ODIHR Witness Interview UKR.WS.615, paras. 8, 15.

39 ODIHR Witness Interview UKR.WS.615, paras. 6-8, 11-12, 20-21, 24.

40 CIHL Rules 14, 15, 20; AP I, arts. 51(4)-(5), 57(2), 85(3)(b) and (5); ICC Statute, art. 8(2)(b)(iv).

41 ICC Statute, arts. 8(2)(b)(ix) and (e)(iv). See also CIHL Rules 25, 28-30; GC IV, art. 18.

42 See also OSCE/ODIHR, [Seventh Interim Report](#), para. 27.

43 ‘First Person View’ (FPV) weapons are equipped with cameras that provide operators on the ground a direct, real-time view of the areas they fly over and their potential targets. This feature allows operators to assess with greater certainty whether a potential target is a military objective, or a civilian person or object.

44 UN OHCHR, Protection of Civilians Update: [September 2025](#), 10 October 2025, p. 1.

45 [Along Ukraine’s Frontline, the Most Vulnerable Bear the Brunt of Intensifying Attacks](#), UN OHCHR, 18 August 2025.

objects, including vital infrastructure.<sup>46</sup> ODIHR interviewed nine witnesses who reported that FPV drones were used to deliberately strike humanitarian workers distributing aid and evacuating civilians from dangerous areas.<sup>47</sup> Considering the greater visibility provided by such weapons, which should enhance protection for civilians, their reported deployment against civilians and civilian objects violates the fundamental IHL principles of distinction and precaution. Deliberate attacks of this nature may constitute a war crime.<sup>48</sup>

33. During the reporting period, the Russian Federation armed forces repeatedly struck functioning medical facilities and educational institutions in violation of their protected status under IHL.<sup>49</sup> For instance, on 29 July, a missile strike damaged a hospital in Kamianske (Dnipropetrovsk region), killing at least two patients (including a pregnant woman) and injuring 22 (including medical staff).<sup>50</sup> On the morning of 29 October, nine civilians, including four children and three medical workers, were injured during an attack on a children's hospital in Kherson.<sup>51</sup> IHL stipulates that medical facilities and their personnel enjoy special protection and must never be targeted.<sup>52</sup> On 23 June, two ballistic missiles struck a functioning school in Bilhorod-Dnistrovskiyi (Odesa region), killing three and injuring 12 educational workers, as well as wounding two children.<sup>53</sup> ODIHR interviewed one of the survivors of the attack, who provided original videos and photographs of the aftermath of the strike, which reveal extensive damage to the building. Educational institutions are entitled to enhanced protection if they are not being used for military purposes;<sup>54</sup> parties

46 For example, on 27 July, three civilians were killed and 20 more were injured in an attack on a passenger bus near Ivolzhanske village (Sumy region). See Sumy Regional Prosecutor's Office, Telegram [post](#), 27 July 2025, in Ukrainian. On 9 August, two civilians were killed and 16 were injured in an attack on a bus near the village of Inzhenerne (Kherson region). See Kherson Regional Police, Telegram [post](#), 9 August 2025, in Ukrainian. See also ODIHR Witness Interview UKR.WS.676, paras. 6-9; [Killzone: How Russian Drones Are Devastating the River Dnipro's Right Bank](#), Truth Hounds, 17 November 2025.

47 ODIHR Witness Interviews UKR.WS.586, paras. 44-45, 98-99; UKR.WS.592, paras. 19, 21-22; UKR.WS.603, paras. 8, 32; UKR.WS.616, para. 16; UKR.WS.624, para. 14; UKR.WS.625, paras. 9, 11; UKR.WS.651, paras. 26-27; UKR.WS.658, paras. 37-44, 54; UKR.WS.681, paras. 96, 100-103. For more details, see [Section IV.a. Attacks on humanitarian operations](#).

48 In October 2025, the Independent International Commission of Inquiry on Ukraine concluded that the use of short-range drones by Russian armed forces against civilian targets in localities on the right bank of the Dnipro River "amount to the crimes against humanity of murder and of forcible transfer of population". See Report of the Independent International Commission of Inquiry on Ukraine, IICI, [A/80/497](#), 21 October 2025, p. 2. See also ICC Statute, art. 8(2)(b)(iii).

49 According to the Ukrainian authorities, between 1 June and 25 November 2025, 622 medical facilities and 586 educational institutions were damaged or destroyed as a result of Russian Federation attacks. Information provided to ODIHR by the Permanent Mission of Ukraine to the International Organizations in Vienna.

50 Dnipropetrovsk Regional Military Administration, Telegram [post](#), 29 July 2025, in Ukrainian; Telegram [post](#), 29 July 2025, in Ukrainian; Andrii Bilousov, Telegram [post](#), 29 July 2025, in Ukrainian.

51 Kherson Regional Police, Telegram [post](#), 29 October 2025, in Ukrainian.

52 CIHL Rules 25, 28, 29; GC IV, arts. 18, 20-22; AP I, arts. 12, 15.

53 Oleh Kiper, Telegram [post](#), 23 June 2025, in Ukrainian; State Emergency Service of Ukraine, Telegram [post](#), 23 June 2025, in Ukrainian; Odesa Regional Prosecutor's Office, Telegram [post](#), 23 June 2025, in Ukrainian. See also ODIHR Witness Interview UKR.WS.671, paras. 9, 23-17, 29-30, 32. The attack took place the day after a graduation ceremony, when the children were already on holiday; otherwise, the number of casualties could have been significantly higher.

54 Based on information available to ODIHR, the school does not appear to have been used for military purposes.

to the conflict are obliged to take special measures to avoid their destruction or damage.<sup>55</sup>

34. During the second half of 2025, Russian armed forces continued conducting localized attacks on energy facilities,<sup>56</sup> with the number of such attacks increasing in September.<sup>57</sup> From October onwards, they also resumed large-scale nationwide strikes, carried out with greater intensity than at any previous stage of the armed conflict. Eight major attacks took place in less than two months,<sup>58</sup> each involving hundreds of missiles and long-range loitering munitions. During these attacks, weapons or their fragments also struck residential buildings and other civilian infrastructure, causing civilian deaths and injuries.<sup>59</sup> For instance, following a large-scale, overnight attack on 19 November,<sup>60</sup> 33 civilians were killed (including six children) and 94 injured (including 18 children) when two, nine-storey, residential buildings in the western city of Ternopil were hit by missiles and drones.<sup>61</sup> The latest campaign of attacks<sup>62</sup> further strained Ukraine's energy infrastructure. In addition to requiring the introduction of daily rolling blackouts across most regions of the country, the attacks also triggered prolonged emergency power outages, leaving large numbers of civilians without access to electricity, water and heating<sup>63</sup> in cold weather.<sup>64</sup> Some of the attacks on energy facilities<sup>65</sup> also posed

55 Hague Regulations (1907), art. 27; CIHL Rule 38.

56 See also OSCE/ODIHR, [Seventh Interim Report](#), para. 28.

57 The UN OHCHR recorded 13 such attacks in June, at least nine in August and 31 in September. See UN OHCHR Protection of Civilians Updates: [June 2025](#), 10 July 2025, p. 1; [August 2025](#), 10 September, p. 1; [September 2025](#), 10 October 2025, p. 1.

58 The attacks occurred on 10, 22, 30 October and 8, 14, 19, 25, 29 November 2025, respectively.

59 For instance, on 25 November, seven civilians were killed and 20 were injured (including a child) after multi-story residential buildings were hit in Kyiv. See Vitalii Klychko, [Telegram post](#), 25 November 2025, in Ukrainian.

60 According to the Ukrainian authorities, energy facilities were targeted in Chernihiv, Cherkasy, Dnipropetrovsk, Donetsk, Ivano-Frankivsk, Lviv and Kharkiv regions. In addition to the scheduled blackouts imposed in all areas of the country, emergency power cuts were temporarily implemented in several regions of Ukraine. See Ministry of Energy of Ukraine, [Telegram post](#), 19 November 2025, in Ukrainian.

61 State Emergency Service of Ukraine, [Telegram post](#), 22 November 2025, in Ukrainian.

62 According to the Ukrainian government, between 1 June and 25 November 2025, the Russian Federation armed forces carried out 543 strikes on electricity facilities in Ukraine. See Information provided to ODIHR by the Permanent Mission of Ukraine to the International Organizations in Vienna.

63 See, for instance, [Ukraine facing widespread power cuts after generating capacity reduced to 'zero' by Russian attacks](#), *The Guardian*, 9 November 2025; [Russia's attacks have ramped up – Ukraine is fighting to hold on through another winter](#), *BBC News*, 13 November 2025; [Ukraine's most perilous winter so far](#), *Politico*, 13 November 2025; [Blackouts May Last All Winter as Ukraine's Power Generation Losses Overtake 30% Decline in Consumption](#), *Kyiv Post*, 18 November 2025.

64 The deliberate destruction of Ukraine's energy infrastructure, which is essential for the survival of the civilian population, is in violation of IHL, including the obligation to take precautions to minimize damage to civilian objects when striking potential military targets. See CIHL Rule 54; API, arts. 54(2), 57(2)(a)(ii).

65 For instance, on 1 October, a Russian attack on energy infrastructure in Kyiv region cut the power supply to the defunct Chernobyl Nuclear Power Plant for several hours. See [Russia cut power to defunct Chernobyl nuclear plant, Ukraine says](#), *RFI*, 1 October 2025. Since the end of September, the Russian-occupied Zaporizhzhia Nuclear Power Plant (ZNPP) has been offline after an alleged Russian drone strike cut the sole remaining power line to Ukrainian-controlled territory. See Energotom, [Telegram post](#), 25 September 2025, in Ukrainian.

risks to Ukraine's nuclear safety.<sup>66</sup> Separately, ODIHR recorded a number of attacks on the Ukrainian railway system during the reporting period,<sup>67</sup> exacerbating the risks to the civilian population.<sup>68</sup>

35. Although on a much smaller scale, the Ukrainian armed forces also conducted shelling and loitering munitions strikes on densely populated areas of Russian-occupied territories of Ukraine, resulting in civilian casualties and damage to civilian objects. For instance, according to the Russian authorities, four civilians were killed and eleven others were injured in a combined MLRS and drone strike on the Petrovskiy district of Donetsk (Donetsk region) on 4 July.<sup>69</sup> On 12 October, the Russian authorities reported that six civilians (including one child) were injured in a short-range drone attack on a bus in Horlivka (Donetsk region).<sup>70</sup> They further reported that, during the second half of 2025, Ukrainian forces carried out additional strikes on local energy infrastructure, disrupting electricity and water supplies.<sup>71</sup>
36. Finally, the Ukrainian armed forces continued to carry out shelling and launch loitering munitions strikes on the territory of the Russian Federation.<sup>72</sup>

66 IHL stipulates that “works or installations containing dangerous forces, namely dams, dykes and nuclear electrical generating stations, shall not be [attacked], even where these objects are military objectives, if such attack may cause the release of dangerous forces and consequent severe losses [of life] among the civilian population.” See AP I, art. 56(1). Deliberately targeting a nuclear power facility in the knowledge that such an attack would cause excessive loss of life to civilians or damage to civilian objects constitutes a grave breach and may amount to a war crime. See AP I, art. 85(3)(c); ICC Statute, art. 8(2)(b)(iv).

67 On 18 July, one civilian was killed (a train driver) and two others were injured in a drone strike on railway infrastructure in Verbkiivska and Bohdanivska hromadas (Dnipropetrovsk region). See Dnipropetrovsk Regional Police, Telegram [post](#), 18 July 2025, in Ukrainian; Ukrzaliznytsia, Telegram [post](#), 18 July 2025, in Ukrainian. On 5 August, the railway infrastructure in Lozova (Kharkiv region) was hit with loitering munitions, resulting in the death of one civilian (a mechanic) and injury of another ten (including seven railway employees and three children). See Kharkiv Regional Prosecutor's Office, Telegram [post](#), 5 August 2025, in Ukrainian. On 4 October, one civilian was killed and nine others were injured (including three children) when drones hit a railway station in Shostka (Sumy region). See Sumy Regional Military Administration, Telegram [post](#), 5 October 2025, in Ukrainian.

68 Logistical infrastructure is often used for both civilian and military purposes, making it a ‘dual-use’ object. Where such an object makes an effective contribution to military action and its destruction offers a definite military advantage, it may qualify as a military objective despite its civilian functions. However, any attack must still comply with the IHL principles of distinction, proportionality and precautions. Strikes that resulted in civilian casualties therefore raise serious concerns, especially given the high and foreseeable civilian presence on Ukrainian railways, which are the country's primary mode of transportation and a critical means of evacuation.

69 Denis Pushilin, Telegram [post](#), 4 July 2025, in Russian. ODIHR has not yet been able to independently verify the reported number of casualties.

70 Denis Pushilin, Telegram [post](#), 12 October 2025, in Russian. Information from the UN OHCHR corroborates the reported number of civilian injuries, see UN OHCHR Protection of Civilians Update: [October 2025](#), 12 November 2025, p. 2.

71 For instance, as a result of the shelling of Novotroitske electrical substation on 4 June, 192 settlements and 120,000 residents of the Russian-occupied parts of Kherson region were left without access to electricity and water. See Vladimir Saldo, Telegram [post](#), 5 June 2025, in Russian. On 5 June, several districts of the occupied Zaporizhzhia region were left without electricity and with reduced water pressure. See Yevgeny Balitsky, Telegram [post](#), 5 June 2025, in Russian. On 25 November, more than 68,000 residents in the occupied part of Zaporizhzhia region were left without electricity as a result of strikes on two power supply facilities. See Yevgeny Balitsky, Telegram [post](#), 25 November 2025, in Russian; Yevgeny Balitsky, Telegram [post](#), 25 November, in Russian.

72 See also OSCE/ODIHR, [Fifth Interim Report](#), para. 26; [Sixth Interim Report](#), para. 30; [Seventh Interim Report](#), para. 28.

While many of these attacks appeared to target military objectives, in some cases they also resulted in civilian casualties and damage to civilian objects.<sup>73</sup> During the reporting period, Ukraine also continued to strike Russian energy facilities, particularly oil refineries.<sup>74</sup> Starting from August, the number of such attacks increased significantly, with coordinated long-range loitering munitions strikes often carried out several times a week. This has resulted in a decrease in Russia's oil refining capacity, leading to petrol shortages in the country and reduced fuel exports.<sup>75</sup> In addition, thermal power stations came under repeated attack in November.<sup>76</sup> Some of these attacks resulted in civilian casualties.<sup>77</sup> ODIHR cautions that such attacks carry a risk of violating IHL, as the targeting of objects indispensable to the survival of the civilian population must adhere to the principles of proportionality and precaution.<sup>78</sup>

## B. THE HUMANITARIAN SITUATION

37. The humanitarian situation continued to deteriorate. Notably, the destruction of energy infrastructure and housing had a significant impact on the civilian population as winter approached.<sup>79</sup> The effects were especially severe in

73 For instance, on 15 July, 27 civilians were injured (including four children) in a loitering munitions attack on Voronezh (Voronezh region). See Aleksandr Gusev, Telegram [post](#), 15 July 2025, in Russian. On 15 August, one civilian was killed and another 17 were injured (including a child) in a drone strike on a multi-storey residential building in Kursk (Kursk region). See Investigative Committee of Russia, Telegram [post](#), 15 August 2025, in Russian. ODIHR has not yet been able to verify the reported number of casualties from the Russian Federation in accordance with its [methodology](#).

74 See also OSCE/ODIHR, [Sixth Interim Report](#), para. 30; [Seventh Interim Report](#), para. 28. Although 'dual-use objects', which serve both military and civilian purposes, may be legitimate military targets, any attack on such objects may be rendered unlawful for failure to adhere to the fundamental principle of proportionality, which includes an analysis of possible reverberating effects from the attack. IHL stipulates that "works or installations containing dangerous forces" shall not be attacked, even where such objects are military objectives, if the attacks may cause the release of dangerous forces and severe loss of life among the civilian population. See CIHL Rules 7, 8, 54; AP I, art. 51(5)(b), art. 52(2).

75 As of October, 20 per cent of Russian refinery capacity was reportedly taken out of service, leading to a six per cent decline in total oil processing in Russia. See [Russia using spare oil refining capacity to offset Ukrainian drone damage, sources say](#), *Reuters*, 13 November 2025. See also [Ukraine strikes choke off Russian oil exports and fuel supplies](#), *Aljazeera*, 18 September 2025; [The Slow Death of Russian Oil: Why Ukraine's Campaign Against Moscow's Energy Sector Is Working](#), *Foreign Affairs*, 5 November 2025; [Ukraine's best defence against Putin's energy war is more attacks on Russia's oil refining sector](#), *Chatham House*, 10 November 2025.

76 During the first week of November, Ukraine carried out attacks on energy infrastructure across Russia's 12 regions, including strikes on thermal power plants in the Kursk, Kostroma, and Oryol regions. See [Ukraine war situation update: 1 – 7 November 2025](#), ACLED, 12 November 2025.

77 For example, on 10 August, one civilian was killed and several others were injured when debris from a loitering munition fell in the courtyard of a residential building following an attack on an oil refinery in Saratov (Saratov region). See Roman Busargin, Telegram [post](#), 10 August 2025, in Russian. On 25 November, three civilians were killed and nine were injured in a long-range drone attack on energy infrastructure in Rostov region. See Igor Sliusar, Telegram [post](#), 25 November, in Russian. On the same day, nine civilians were injured following a long-range loitering munitions strike on energy facilities in Krasnodar Krai. See Veniamin Kondratyev, Telegram [post](#), 25 November, in Russian. ODIHR has not yet been able to verify the reported number of casualties from the Russian Federation in accordance with its [methodology](#).

78 AP I, arts. 54(2), 57(2)(a)(ii).

79 For more details, see [Section III.a. Continued violations of IHL during the conduct of hostilities](#). See also UN OHCHR Protection of Civilians Updates: [September 2025](#), 10 October 2025, p. 1; [October 2025](#), 12 November 2025, pp. 1-2.

frontline regions.<sup>80</sup> Ongoing hostilities also continued to prompt displacement,<sup>81</sup> with over 123,000 civilians evacuated from the frontline areas since June 2025, according to the Ukrainian authorities.<sup>82</sup>

38. Where hostilities intensified, elderly people and those with limited mobility were often among the last civilians to leave their homes,<sup>83</sup> resulting in their disproportionate presence in frontline areas.<sup>84</sup> One witness described to ODIHR the rescue of an 84-year-old evacuee from the frontline in Kharkiv region, illustrating the circumstances civilians, many of whom are elderly, may face when evacuated late from high-risk areas: *“Her village was heavily shelled, and her house was destroyed. There was no roof and no doors or windows. She sat in a closet for two days without food, water or electricity. She was rescued by volunteers who were going from house to house shouting if anyone was alive. She was brought to the hub with nothing but her purse and documents. She was trembling with fear.”*<sup>85</sup>
39. Parties to the conflict are obliged to respect and protect the rights of populations under their effective control, including the elderly, people with disabilities and those with serious health conditions.<sup>86</sup> Notwithstanding these obligations, civil society humanitarian personnel and volunteers have continued to play a crucial complementary role by providing assistance to civilians. Local NGOs and volunteers have been actively engaged in providing critical support to affected civilians in Ukrainian Government-controlled areas of Ukraine, particularly in frontline areas, where access for international organizations is often constrained by security concerns.<sup>87</sup> In addition to increased security risks faced by humanitarian personnel,<sup>88</sup> the capacity of local NGOs to provide humanitarian assistance continued to decrease during the reporting period. Five witnesses active in the humanitarian space reported to ODIHR that ongoing mobilization into the Ukrainian armed forces had reduced the number of male colleagues, who were predominantly performing

80 [Ukraine: Humanitarian Situation Snapshot \(August – September 2025\)](#), UN OCHA, 5 November 2025. See also [Winter power outages: The consequences of power outages, and factors contributing to societal resilience](#), REACH Initiative, 6 November 2025, p. 9; [Cold Spot Risk Assessment 2025/2026 – Autumn update](#), REACH Initiative, 7 November 2025, p. 6.

81 [Ukraine: Russian attacks on energy could trigger major ‘crisis within crisis’](#), *UN News*, 31 October 2025.

82 [Погоджено обов’язкову евакуацію дітей разом із батьками або законними представниками з окремих населених пунктів Дніпропетровської та Запорізької областей](#) [Mandatory evacuation of children with their parents or legal representatives from certain settlements in Dnipropetrovsk and Zaporizhzhia regions has been agreed], Ministry for Development of Communities and Territories of Ukraine, 9 November 2025, in Ukrainian.

83 ODIHR Witness Interview UKR.WS.592, para. 15. See also [No Quick End: The impact of the war on civilian protection in Ukraine \(September 2025\)](#), Protection Analysis Update, UNHCR, 3 October 2025, p. 11.

84 [No Quick End: The impact of the war on civilian protection in Ukraine \(September 2025\)](#), Protection Analysis Update, UNHCR, 3 October 2025, p. 9.

85 ODIHR Witness Interview UKR.WS.624, para. 6.

86 CIHL Rule 138; GC IV, art. 27. See also GC IV, art. 17.

87 ODIHR Witness Interview UKR.WS.586, para. 90; [Ukraine: Humanitarian Access Severity Overview \(October 2025\)](#), UN OCHA, 6 November 2025, p. 4.

88 See [Section IV.a. Attacks on humanitarian operations](#).

physically demanding tasks, such as evacuating people with limited mobility or loading and unloading aid supplies.<sup>89</sup>

40. In addition, as hostilities continued to intensify and humanitarian access became increasingly restricted in some frontline locations, civilians were often only able to obtain assistance from or via Ukrainian police or military personnel,<sup>90</sup> and evacuation became the only life-saving option for many. This deterioration was especially evident in the cities of Myrnohrad and Pokrovsk (Donetsk region).<sup>91</sup>
41. In the Russian-occupied territories of Ukraine, access to civilians in need remained significantly restricted for independent international actors, limiting impartial assessment of humanitarian needs and the delivery of life-saving assistance.<sup>92</sup> ODIHR is particularly concerned about the health risks posed by increasingly restricted access to water and water contamination during the reporting period.<sup>93</sup> In Donetsk region in particular, the centralized water supply, partly as a result of the ongoing hostilities that have affected it since 2022, was reported to be insufficient and of poor quality, rendering it unsuitable for cooking or personal hygiene.<sup>94</sup> Under IHL, an occupying power is obliged to ensure that the basic needs of the civilian population under occupation are met.<sup>95</sup> Information gathered by ODIHR indicates that the Russian Federation may have failed to fulfil this obligation, resulting in insufficient access to water for the civilian population.

89 ODIHR Witness Interviews UKR.WS.586, paras. 24, 38; UKR.WS.592, paras. 7, 8, 10, 15, 33; UKR.WS.616, para. 8; UKR.WS.624, para. 11; UKR.WS.625, para. 24.

90 ODIHR Witness Interviews UKR.WS.586, para. 97; UKR.WS.616, para. 8. Military personnel, however, then often turn to volunteers to effectuate evacuations. See, for instance, [Russians are luring volunteers with fake evacuation requests from Donetsk region – humanitarian Mission “Proliska”](#), ZMINA, 11 December 2025. As opposed to humanitarian relief personnel, military personnel engaged in the delivery of humanitarian aid are not afforded the same underlying protected status (as civilians) and, thus, fall outside the scope of ICC Statute, art. Article 8(2)(b)(iii). See also ICRC, Commentary to AP I (1987), art. 71, p. 832.

91 Humanitarian programmes completely stopped by August 2025 in the greater Pokrovsk–Myrnohrad area, see [Ukraine: Humanitarian Access Severity Overview \(October 2025\)](#), UN OCHA, 6 November 2025, p. 4; [1,253 people remain in Pokrovsk, and 1,350 in Myrnohrad](#), Donetsk Regional State Administration, 12 November 2025.

92 See, for instance, [Humanitarian Needs in Occupied Areas: What do we know and what can we do?](#), REACH Initiative, 25 September 2025.

93 [Report on the Human Rights Situation in Ukraine \(1 June–30 November 2025\)](#), UN OHCHR, 9 December 2025, paras. 82–86; ‘Ticking environmental bomb’: Water crisis worsens in Russia-annexed Donbas, *Aljazeera*, 28 October 2025. Information provided to ODIHR by the Permanent Mission of Ukraine to the International Organizations in Vienna.

94 Voenkor Kotenok, Telegram [post](#), 22 July 2025, in Russian; [Засуха в оккупированном Донбассе: что происходит с водой в регионе?](#) [Drought in occupied Donbas: What’s happening to the region’s water supply?], *BBC News*, 26 July 2025, in Russian; [«Воду дают раз в три дня. Это условное время»](#) [“Water is provided once every three days. This is a provisional period”], *Meduza*, 26 September 2025, in Russian. See also [Встреча с главой Донецкой Народной Республики Денисом Пушилиным](#) [Meeting with Head of the Donetsk People’s Republic, Denis Pushilin], Администрация Президента России [Administration of the President of Russia], 4 August 2025, in Russian; [Пушилин назвал стабильно тяжелой ситуацией с водой в ДНР](#) [Pushilin called the water situation in the DPR persistently dire]. TASS, 24 November 2025, in Russian. See also ODIHR Witness Interview UKR.WS.605, para. 64.

95 GC IV, arts. 55, 56; AP I, art. 69.

## C. OTHER SIGNIFICANT DEVELOPMENTS

42. During the second half of 2025, as in previous reporting periods, ODIHR continued monitoring prisoner of war (POW) exchanges between Ukraine and the Russian Federation.<sup>96</sup> Between June and November 2025, five rounds of POW exchange took place alongside nine, parity-based ‘all-for-all’ exchanges following talks in Istanbul or mediated by the United Arab Emirates. These exchanges included both military personnel and civilians.<sup>97</sup> Available reports suggest that an estimated 1,500 POWs and 199 civilian detainees,<sup>98</sup> as well as the remains of around 7,612 fallen soldiers were returned to Ukraine.<sup>99</sup> At least 28 Russian civilians were reported to have returned to the Russian Federation during the same period.<sup>100</sup> Although ODIHR is unable to provide an estimate of the number of Russian POWs returned during the reporting period, it expects the figure to be similar to those received by Ukraine. The remains of at least 143 Russian soldiers were reportedly transferred to the Russian Federation in 2025 so far.<sup>101</sup> As of 1 December 2025, a total of 70 POW exchanges have occurred since the Russian Federation’s invasion in 2022, leading to the repatriation of approximately 5,863 Ukrainian POWs and 403 detained civilians.<sup>102</sup>

96 See OSCE/ODIHR, [Interim Report](#), para. 126; [Second Interim Report](#), para. 163; [Third Interim Report](#), paras. 39-40; [Fourth Interim Report](#), para. 35; [Fifth Interim Report](#), para. 29; [Sixth Interim Report](#), para. 92; [Seventh Interim Report](#), paras. 39-40. See also OSCE Moscow Mechanism, Report on Possible Violations and Abuses of International Humanitarian and Human Rights Law, War Crimes and Crimes Against Humanity, Related to the Treatment of Ukrainian POWs by the Russian Federation (OSCE Moscow Mechanism Report), [ODIHR.GAL/43/25/Corr.1](#), 22 September 2025.

97 For more details, see [Section IV.e. Exchanges of civilians](#).

98 Volodymyr Zelenskyy, Facebook [post](#), 9 June 2025, in Ukrainian; Coordination Headquarters for the Treatment of Prisoners of War, Facebook [post](#), 9 June 2025, in Ukrainian; Russian Ministry of Defence, Telegram [post](#), 9 June 2025, in Russian; Coordination Headquarters for the Treatment of Prisoners of War, Facebook [post](#), 10 June 2025, in Ukrainian; Russian Ministry of Defence, Telegram [post](#), 10 June 2025, in Russian; Coordination Headquarters for the Treatment of Prisoners of War, Facebook [post](#), 12 June 2025, in Ukrainian; Russian Ministry of Defence, Telegram [post](#), 12 June 2025, in Russian; Volodymyr Zelenskyy, Facebook [post](#), 14 June 2025, in Ukrainian; Coordination Headquarters for the Treatment of Prisoners of War, Facebook [post](#), 14 June 2025, in Ukrainian; Russian Ministry of Defence, Telegram [post](#), 14 June 2025, in Russian; Volodymyr Zelenskyy, Facebook [post](#), 14 August 2025, in Ukrainian; Coordination Headquarters for the Treatment of Prisoners of War, Facebook [post](#), 14 August 2025, in Ukrainian; Russian Ministry of Defence, Telegram [post](#), 14 August 2025, in Russian; Coordination Headquarters for the Treatment of Prisoners of War, Facebook [post](#), 24 August 2025, in Ukrainian; Russian Ministry of Defence, Telegram [post](#), 24 August 2025, in Russian; [Russia and Ukraine stage new prisoner exchange after UAE mediation](#), *Reuters*, 24 August 2025; Coordination Headquarters for the Treatment of Prisoners of War, Facebook [post](#), 2 October 2025, in Ukrainian; Russian Ministry of Defence, Telegram [post](#), 2 October 2025, in Russian; See also [Treatment of civilians deprived of their liberty in the context of the armed attack by the Russian Federation against Ukraine](#), UN OHCHR, 23 September 2025, para. 77.

99 Coordination Headquarters for the Treatment of Prisoners of War, Telegram [post](#), 11 June 2025, in Ukrainian; Telegram [post](#), 13 June 2025, in Ukrainian; Telegram [post](#), 14 June 2025, in Ukrainian; Telegram [post](#), 17 July 2025, in Ukrainian; Telegram [post](#), 19 August 2025, in Ukrainian; Telegram [post](#), 23 October 2025, in Ukrainian; Telegram [post](#), 20 November 2025, in Ukrainian.

100 Russian Ministry of Defence, Telegram [post](#), 24 August 2025, in Russian; [Россия и Украина провели обмен пленными по формуле 185 на 185](#) [Russia and Ukraine held POW exchange according to formula 185 to 185], *TASS*, 2 October 2025, in Russian.

101 МИД: РФ в 2025 году передала Украине свыше 9 тыс. тысяч тел погибших солдат ВСУ [MFA: In 2025, RF handed over to Ukraine over 9,000 bodies of fallen UAF soldiers], *TASS*, 12 November 2025, in Russian.

102 Information provided to ODIHR by the Permanent Mission of Ukraine to the International Organizations to Vienna.

43. During the reporting period, a large number of materials<sup>103</sup> emerged online allegedly depicting the execution of Ukrainian civilians and captured Ukrainian military personnel by Russian armed forces in several locations across Donetsk, Kharkiv and Zaporizhzhia regions.<sup>104</sup> The Ukrainian authorities have opened investigations into each reported incident. ODIHR remains concerned that the release of such materials may indicate an increased frequency of executions of POWs under Russian control. ODIHR also recorded several worrying allegations regarding the purported execution of Russian POWs by members of the Ukrainian armed forces.<sup>105</sup>
44. Two witnesses, who are working on issues related to civilian prisoners returned outside the POW exchange framework, reported that former prisoners released from Russian custody face significant obstacles in returning to Ukraine, including lack of documentation and difficulties in obtaining temporary identity papers to leave the Russian Federation.<sup>106</sup> Some civilians also face an unclear legal status in Ukraine,<sup>107</sup> as they are not recognized as victims of unlawful deportation or forcible transfer and are instead subject to immediate mobilization upon arrival in Ukraine.<sup>108</sup>
45. ODIHR is concerned by reports indicating an increase in the deportation of Ukrainian civilians to Georgia from the Russian Federation and Russian-occupied territories upon their release from detention.<sup>109</sup> This group reportedly included individuals who had completed criminal sentences unrelated to the armed conflict.<sup>110</sup> ODIHR also received accounts indicating that those deported

103 As part of its monitoring activities, ODIHR regularly consults social media channels and platforms affiliated with, or supportive of parties to the conflict. ODIHR has not been able to independently verify or geolocate the videos. Preliminary analysis, however, indicates no observable signs of manipulation and suggests that the footage exhibits all hallmarks of authenticity.

104 Dmytro Lubinets, Telegram [post](#), 1 July 2025, in Ukrainian; [Прив'язали до мотоцикла і волочили дорогою: окупанти, ймовірно, стратили українського полоненого](#) [Tied to a motorcycle and dragged along the road: occupiers likely executed Ukrainian prisoner], *Obozrevatel*, 1 July 2025, in Ukrainian; [Військовий рф розстріляв мирного жителя на Донеччині – прокурори розпочали розслідування чергового воєнного злочину](#) [Russian military shot a civilian in the Donetsk region — prosecutors have launched an investigation into another war crime], Office of the Prosecutor General of Ukraine, 6 August 2025, in Ukrainian; Donetsk Regional Prosecutor's Office, Facebook [post](#), 6 August 2025, in Ukrainian; Denys Khrystov, X [post](#), 19 October 2025, in Ukrainian; Donetsk Regional Prosecutor's Office, Facebook [post](#), 23 October 2025, in Ukrainian; Office of the Prosecutor General of Ukraine, Facebook [post](#), 4 November 2025, in Ukrainian; Donetsk Regional Prosecutor's Office, Telegram [post](#), 22 November 2025, in Ukrainian.

105 [Комбата ВСУ заочно приговорили к 24 годам колонии за расстрел пленных бойцов РФ](#) [Ukrainian Armed Forces commander sentenced in absentia to 24 years of prison for executing Russian prisoners of war], *Russian Gazette*, 11 November 2025, in Russian; ASTRA, Telegram [post](#), 15 November 2025, in Russian; DShRG Rusich, Telegram [post](#), 20 November 2025, in Russian. See also [Report on the human rights situation in Ukraine \(1 June–30 November 2025\)](#), UN OHCHR, 9 December 2025, para. 64.

106 ODIHR Witness Interviews UKR.WS.577, paras. 42-43; UKR.WS.593, paras. 42, 48, 50.

107 ODIHR Witness Interviews UKR.WS.577, paras. 45; UKR.WS.593, para. 125, 132; Information provided to ODIHR by an NGO working on IHRL and IHL issues in Ukraine.

108 ODIHR Witness Interview UKR.WS.577, para.46; Information provided to ODIHR by an NGO working on IHRL and IHL issues in Ukraine.

109 [65 Ukrainian citizens stranded at the Dariali border crossing point returned to their homeland](#), Ministry of Internal Affairs of Georgia, 22 August 2025; [End of ordeal as 65 stranded Ukrainians sent home](#), *Civil Georgia*, 22 August 2025. See also [Section IV.g.i.\(a\). Forced adoption of Russian citizenship](#).

110 Information provided to ODIHR by an NGO working on IHRL and IHL issues in Ukraine.

were held for extended periods under inadequate conditions at the temporary migration center at the Georgian Dariali crossing point.<sup>111</sup>

111 ODIHR Witness Interviews UKR.WS.577, para. 41; UKR.WS.593, para. 50-51.

**Specific issues  
described by  
witnesses and  
survivors**

**IV**

## A. ATTACKS ON HUMANITARIAN OPERATIONS

46. During the second half of 2025, ODIHR continued monitoring instances of attacks affecting humanitarian operations.<sup>112</sup> For instance, on 4 September 2025, the Russian Federation launched an attack on a Danish Refugee Council (DRC) demining team that was working to clear landmines and explosive remnants of war in Chernihiv region, claiming that they were targeting Ukrainian military units.<sup>113</sup> As a result, two humanitarian relief personnel were killed and eight others injured.<sup>114</sup> Intentional attacks directed against those engaged in humanitarian assistance may amount to a war crime.<sup>115</sup>
47. ODIHR interviewed nine humanitarian workers and volunteers who were engaged in the provision and delivery of aid, and/or conducted evacuations from frontline areas.<sup>116</sup> Under IHL, parties are required to respect and protect humanitarian relief personnel.<sup>117</sup> Six interviewees reported that, since February 2022, they had been directly exposed to attacks during humanitarian operations,<sup>118</sup> and seven had knowledge of colleagues who had come under attack while on duty.<sup>119</sup>
48. Five witnesses highlighted the particular risks posed by short-range drone attacks,<sup>120</sup> which have noticeably increased over the course of the armed conflict, creating additional impediments to reaching people in need of life-saving assistance, and forcing humanitarian actors to limit their operations in high-

112 The situation remained particularly concerning in Kherson, with recorded instances of attacks on clearly marked vehicles of the UN and Ukrainian Red Cross. See [In Kherson, a Ukrainian Red Cross vehicle was destroyed in a drone attack](#), Ukrainian Red Cross Society, 6 June 2025; [Ukrainian Red Cross Staff Injured in UAV Attack in Kherson](#), Ukrainian Red Cross Society, 16 September 2025; [UN Convoy came under attack while delivering aid to a front-line community in the Kherson region](#), UN in Ukraine, 14 October 2025. See also OSCE/ODIHR, [Seventh Interim Report](#), paras. 33-36.

113 Russian Ministry of Defence, [Telegram post](#), 4 September 2025, in Russian. The Russian Federation took responsibility for the attack, claiming that they targeted Ukrainian armed forces. Video footage of the incident, published by the Russian Ministry of Defence, shows several white vehicles being struck. No military vehicles, objects or personnel are readily discernible on the video. DRC's statement suggests that the teams on the ground were conducting purely civilian humanitarian activities in order to protect communities and enable safe access to essential infrastructure, farmland and homes. These circumstances indicate that the Russian Federation may have failed to comply with its obligations under IHL to distinguish between civilian and military objects, to take all feasible precautions in attack and to respect and protect humanitarian personnel engaged in exclusively civilian activities.

114 [Ukraine: Danish Refugee Council \(DRC\) statement on the missile strike at a humanitarian demining site in Ukraine](#), DRC, 4 September 2025. See also [Aid workers who devote their lives to helping people in need must be protected](#), UN in Ukraine, 4 September 2025; Dmytro Bryzhynskyi, [Telegram post](#), 4 September 2025, in Ukrainian; Viacheslav Chau, [Telegram post](#), 4 September 2025, in Ukrainian. Such an attack is, in addition, worrisome due to Ukraine being one of the world's most mine-contaminated countries in the world. See OSCE/ODIHR, [Third Interim Report](#), para. 22.

115 ICC Statute, art. 8(2)(b)(iii). See also CIHL Rules 31, 32; GC IV, art. 59; AP I, arts. 70(2)-(4), 71(2).

116 ODIHR Witness Interviews UKR.WS.586; UKR.WS.592; UKR.WS.603; UKR.WS.616; UKR.WS.624; UKR.WS.625; UKR.WS.651; UKR.WS.658; UKR.WS.681.

117 CIHL Rule 31; AP I, art. 71(2).

118 ODIHR Witness Interviews UKR.WS.592, para. 22; UKR.WS.603, para. 8; UKR.WS.625, para. 11; UKR.WS.651, paras. 26-27; UKR.WS.658, paras. 28, 37-40; UKR.WS.681, paras. 11, 22, 58, 74.

119 ODIHR Witness Interviews UKR.WS.586, paras. 44-45, 98-99; UKR.WS.592, para. 19, 21; UKR.WS.603, para. 32; UKR.WS.624, para. 13; UKR.WS.625, paras. 9, 11; UKR.WS.658, para. 54; UKR.WS.681, paras. 109, 112.

120 ODIHR Witness Interviews UKR.WS.592, para. 20; UKR.WS.616, paras. 6-7; UKR.WS.651, para. 15; UKR.WS.658, paras. 26, 29; UKR.WS.681, para. 113.

risk areas.<sup>121</sup> One witness, a volunteer for an international humanitarian NGO, explained how the situation had worsened: *“It is very different, not just from 2023 but from 2024, and even from the start of 2025. Before, I could go to Avdiivka or places where the front was 2-3 km away, and I could go there several times. But now it’s not possible. Now, I need more preparation to go even once to a place that is further away from the frontline. It is too dangerous because of the drones.”*<sup>122</sup>

49. Furthermore, five witnesses interviewed by ODIHR shared their belief that the humanitarian nature of their activities did not prevent them from being deliberately targeted by the Russian armed forces.<sup>123</sup> One humanitarian worker for a local organization noted: *“We [humanitarian workers] were targets anyway. It did not matter who we were. They shelled marked humanitarian vehicles, [...] whether we were acting as humanitarians made no difference to them.”*<sup>124</sup>
50. ODIHR is concerned that inadequate adherence to the principle of distinction by parties to the conflict may affect the operational decisions of the local humanitarian actors, who continue to provide assistance in frontline regions despite increased risks. Some local humanitarian workers and volunteers have resorted to using specialized equipment or have adopted approaches believed to mitigate the risk of detection and subsequent targeting by drones.<sup>125</sup> One employee of a local NGO focusing on the evacuation of civilians explained to ODIHR: *“Sometimes we are in camouflage-type clothing, because it is a big problem that wearing ‘very bright clothes’ makes it difficult to hide from the FPV. So, if you have military-type clothing, you are less visible. In this way, we increase our survival chances of being seen by the FPV.”*<sup>126</sup>
51. The risks posed by hostilities should not be so great as to force humanitarian actors to alter their visibility or behaviour in a manner that obscures their protected status. Instead, parties to the conflict must take immediate measures to ensure respect for the principles of distinction and precaution.<sup>127</sup> When there is doubt about the status of a possible target, parties are obliged to exercise a presumption in favour of civilian status.<sup>128</sup>

121 [Ukraine: Humanitarian Access Severity Overview \(October 2025\)](#), UN OCHA, 6 November 2025, p. 4. See also [Section III.a. Continued violations of IHL during the conduct of hostilities](#).

122 ODIHR Witness Interview UKR.WS.651, para. 15.

123 ODIHR Witness Interviews UKR.WS.592, paras. 19, 28; UKR.WS.616, para. 16; UKR.WS.625, para. 10; UKR.WS.681, para. 130; UKR.WS.658, para. 38.

124 ODIHR Witness Interview UKR.WS.681, para. 130.

125 ODIHR Witness Interview UKR.WS.592, paras. 27-29; [Що потрібно гуманітарним працівникам та волонтерам для безпеки](#) [Duty of Care: What Humanitarian Workers and Volunteers Need to Stay Safe], [Інтерфакс-Україна](#) [Interfax-Ukraine], YouTube, 14 November 2025, in Ukrainian. See also [БФ «Схід SOS» отримав 8 детекторів дронів «Дзига» й 2 детектори «TinySA Ultra»](#) [Vostok SOS received 8 Dzyga drone detectors and 2 TinySA Ultra detectors], East SOS, 3 November 2025, in Ukrainian. On attacks of humanitarian vehicles equipped with special devices, see [Гуманітарна місія “Проліска”](#) [Humanitarian mission “Proliska”], Facebook [post](#), 29 October 2025, in Ukrainian; [Christian Wehrschütz escaped drone attack in Ukraine](#), *VOL.AT*, 8 November 2025.

126 ODIHR Witness Interview UKR.WS.592, para. 28.

127 CIHL Rules 1, 7, 15; AP I, arts. 48, 57, 58.

128 AP I, arts. 50(1), 52(3).

## B. ARBITRARY DEPRIVATION OF LIBERTY AND ENFORCED DISAPPEARANCES IN AREAS UNDER THE CONTROL OF THE RUSSIAN AUTHORITIES

52. ODIHR continued to document cases of arbitrary deprivation of liberty, including enforced disappearances, in Russian-occupied territories of Ukraine. ODIHR interviewed nine survivors of arbitrary detention (five men and four women).<sup>129</sup> In addition, ODIHR obtained accounts from relatives and close contacts of twelve individuals who were previously or remain unlawfully deprived of their liberty by the Russian authorities,<sup>130</sup> as well as credible allegations of such violations.<sup>131</sup> While most reported cases occurred between 2022 and 2024, ODIHR documented one incident of unlawful detention in May 2025.
53. New evidence collected by ODIHR confirmed previous findings<sup>132</sup> that the Russian authorities targeted specific groups of civilians for their alleged support for the Ukrainian armed forces,<sup>133</sup> or for former association with, or having relatives in Ukrainian forces.<sup>134</sup> Others were reportedly detained because of their position in the community, refusal to cooperate<sup>135</sup> or their perceived pro-Ukrainian views or opposition to the occupation.<sup>136</sup> For instance, ODIHR was told of a case where a judge from Donetsk region was detained for five months to compel her to continue working in the same position under the occupying authorities.<sup>137</sup> In another case, Russian authorities unlawfully arrested the head of a village administration in Zaporizhzhia region to coerce their cooperation, including by providing information about former participants in Ukraine's 2014 security and military campaign against Russia-supported armed groups in Donetsk and Luhansk.<sup>138</sup>

129 ODIHR Witness Interviews UKR.WS.578; UKR.WS.618; UKR.WS.628; UKR.WS.635; UKR.WS.644; UKR.WS.659; UKR.WS.666; UKR.WS.669; UKR.WS.680. One of the survivors was a minor at the time of his arrest.

130 ODIHR Witness Interviews UKR.WS.590; UKR.WS.597; UKR.WS.620; UKR.WS.626; UKR.WS.627; UKR.WS.633; UKR.WS.643; UKR.WS.646; UKR.WS.654. See also UKR.WS.578, paras. 11, 53; UKR.WS.666, paras. 14, 22-23.

131 ODIHR Witness Interviews UKR.WS.578, para. 33; UKR.WS.618, paras. 11, 15; UKR.WS.635, paras. 19, 22; UKR.WS.644, paras. 20, 27; UKR.WS.659, paras. 13-14, 23-24, 34. See also UKR.WS.620, para. 5; UKR.WS.627, para. 14; UKR.WS.633, paras. 25-26.

132 See also OSCE/ODIHR, [Third Interim Report](#), paras. 42-43; [Fourth Interim Report](#), paras. 43-44; [Fifth Interim Report](#), para. 34; [Sixth Interim Report](#), para. 41; [Seventh Interim Report](#), para. 46.

133 ODIHR Witness Interviews UKR.WS.578, paras. 11, 24, 33; UKR.WS.680, paras. 5-6. See also UKR.WS.597, paras. 14-15, 19-21; UKR.WS.620, paras. 12, 15; UKR.WS.643, paras. 6, 12; UKR.WS.646, paras. 13, 19-20, 28-29. Although in some of the reported cases witnesses said that the victims were involved in gathering information or otherwise assisted Ukrainian forces, ODIHR believes that the strict conditions for the internment of civilians provided by IHL and IHRL, which require such a measure to be exceptional and temporary, were not met, rendering such detentions unlawful and arbitrary.

134 ODIHR Witness Interviews UKR.WS.635, paras. 8, 11-12, 14; UKR.WS.644, paras. 4, 11. See also UKR.WS.627, paras. 7-8; UKR.WS.643, paras. 10, 14-15; UKR.WS.654, paras. 5, 7.

135 ODIHR Witness Interviews UKR.WS.618, paras. 12-13; UKR.WS.628, para. 16; UKR.WS.666, paras. 16-17, 22, 24, 33, 38, 49. See also UKR.WS.643, para. 11.

136 ODIHR Witness Interviews UKR.WS.628, paras. 6, 8; UKR.WS.659, paras. 11-13. See also UKR.WS.627, paras. 5, 9; UKR.WS.633, para.9; UKR.WS.646, paras. 11, 13-14, 16. For more details, see [Section IV.g.iii. Suppression of dissent](#).

137 ODIHR Witness Interview UKR.WS.666, paras. 24, 33, 38.

138 Officially designated as the Anti-Terrorist Operation, Ukraine conducted a security and military campaign against Russia-supported armed groups in Donetsk and Luhansk regions in 2014-2018. In 2018-2022, it was formally replaced by the "Joint Forces Operation". See ODIHR Witness Interview UKR.WS.618, paras. 9, 12-13.

54. According to witnesses, the Russian authorities held detainees in both official<sup>139</sup> and improvised facilities.<sup>140</sup> Consistent with previous ODIHR findings,<sup>141</sup> detainees were often forcibly transferred between detention locations in the Russian-occupied areas of Ukraine and/or unlawfully deported to the Russian Federation.<sup>142</sup> Survivors reported that, in all locations, they endured dire detention conditions and were subjected to torture and ill-treatment.<sup>143</sup> The duration of unlawful detention varied, with the longest periods reported as 34 and 38 months.<sup>144</sup>
55. In addition, ODIHR continued to document violations of procedural guarantees for the confinement of civilians.<sup>145</sup> In line with previous findings, six survivors reported that they were never informed of the grounds for their detention and/or formally charged with any offence, preventing them from challenging their detention or having it regularly reviewed.<sup>146</sup> The right to legal representation was also denied.<sup>147</sup> Three survivors reported being forced to sign blank protocols or other documents without the opportunity to read their contents.<sup>148</sup> Moreover, in two of the reported instances, civilian detainees were wrongfully classified as POWs, effectively denying them procedural safeguards under the Fourth Geneva Convention.<sup>149</sup>
56. As previously noted by ODIHR, civilian detainees often had limited or no communication with the outside world.<sup>150</sup> Six documented cases involved the incommunicado detention of civilians for part or all of the period held.<sup>151</sup> Three survivors reported visits by external monitors, while noting that their visits

139 ODIHR Witness Interviews UKR.WS.578, para. 23; UKR.WS.618, para. 11; UKR.WS.635, para. 4; UKR.WS.644, para. 8; UKR.WS.659, paras. 15, 22; UKR.WS.666, paras. 14, 20-21, 23. See also UKR.WS.597, paras. 5, 7; UKR.WS.620, paras. 3, 20; UKR.WS.626, paras. 4, 12-14; UKR.WS.627, paras. 8, 23, 25, 31-32, 36; UKR.WS.633, paras. 21-22; UKR.WS.643, paras. 19, 24; UKR.WS.646, paras. 27, 38; UKR.WS.654, paras. 4, 10.

140 ODIHR Witness Interviews UKR.WS.578, para. 16; UKR.WS.628, paras. 13-14; UKR.WS.635, para. 4; UKR.WS.680, para. 5. See also UKR.WS.627, paras. 8, 11, 13; UKR.WS.643, para. 15.

141 See OSCE/ODIHR, [Fifth Interim Report](#), para. 36; [Seventh Interim Report](#), para. 47.

142 ODIHR Witness Interviews UKR.WS.578, paras. 26, 29; UKR.WS.635, para. 4; UKR.WS.644, para. 8; UKR.WS.666, paras. 19, 25; UKR.WS.669, paras. 7, 9-11. See also UKR.WS.578, para. 21; UKR.WS.597, paras. 5, 7, 15; UKR.WS.620, paras. 3, 20; UKR.WS.626, paras. 4, 12-14; UKR.WS.627, paras. 8, 23, 25, 31-32, 36; UKR.WS.643, paras. 19, 24; UKR.WS.646, paras. 40-41; UKR.WS.654, paras. 4, 10.

143 For more details, see [Section IV.c. Torture and ill-treatment in areas under the control of the Russian authorities](#).

144 ODIHR Witness Interviews UKR.WS.635, para. 4; UKR.WS.644, para. 8.

145 See also OSCE/ODIHR, [Fifth Interim Report](#), para. 40; [Sixth Interim Report](#), para. 45; [Seventh Interim Report](#), para. 48.

146 ODIHR Witness Interviews UKR.WS.578, paras. 44-45; UKR.WS.618, para. 9; UKR.WS.628; UKR.WS.659, para. 43; UKR.WS.669, paras. 39, 43; UKR.WS.680, para. 6. See also UKR.WS.597, para. 26; UKR.WS.646, paras. 22-24.

147 ODIHR Witness Interviews UKR.WS.578, paras. 24, 45; UKR.WS.618, paras. 11-13; UKR.WS.628, paras. 11, 17, 19; UKR.WS.635, paras. 44-45; UKR.WS.659, para. 39; UKR.WS. 669, paras. 35-117; UKR.WS.680, paras. 7, 16. For more details, see [Section IV.h. Trials of Ukrainian civilians and POWs by the Russian authorities](#).

148 ODIHR Witness Interviews UKR.WS.578, para. 40; UKR.WS.644, paras. 10, 12; UKR.WS.659, paras. 40-42.

149 ODIHR Witness Interviews UKR.WS.635, paras. 27, 44-45; UKR.WS.644, paras. 19, 21, 23, 80-81.

150 See also OSCE/ODIHR, [Fourth Interim Report](#), para. 49; [Fifth Interim Report](#), para. 39; [Sixth Interim Report](#), paras. 40, 44; [Seventh Interim Report](#), para. 50.

151 ODIHR Witness Interviews UKR.WS.578, paras. 43, 55; UKR.WS.635, para. 42; UKR.WS.644, paras. 8, 43; UKR.WS.669, para. 112; UKR.WS.680, paras. 7, 12. See also UKR.WS.597, paras. 5, 7, 26; UKR.WS.620, paras. 3-4.

were limited in scope.<sup>152</sup> In addition, family members of detained civilians continued to describe recurrent<sup>153</sup> difficulties in obtaining information about the fate and whereabouts of their relatives.<sup>154</sup> In instances where the detainees' whereabouts became known, relatives reported that communication or visits were often prohibited or severely restricted.<sup>155</sup>

57. Similarly to earlier accounts collected by ODIHR,<sup>156</sup> five survivors interviewed reported release without formal proceedings.<sup>157</sup> Five arbitrarily detained civilians were released as part of POW exchanges.<sup>158</sup>
58. In one case reported to ODIHR,<sup>159</sup> a civilian was arrested in the so-called 'Donetsk People's Republic' in 2017 and held incommunicado in several detention facilities without trial. Following the Russian authorities taking control of the facility in 2022, an investigation was opened into his case. In mid-2024, in violation of IHL,<sup>160</sup> he was tried under the Russian Criminal Code and found guilty of 'terrorism' and 'espionage', but released for time served. However, as he left the courtroom, FSB officers arrested him on spurious administrative charges of 'violating the curfew' and 'disobeying law enforcement, and later deported him, first to a detention centre in Taganrog and then to a penal colony in central Russia. The witness recounted to ODIHR how he was subjected to torture and ill-treatment, never given reasons for his detention, and no administrative proceedings were initiated during this time. In August 2025, he returned to Ukraine as part of an official POW exchange. ODIHR notes that the detention of civilians merely for the purpose of carrying out a prisoner exchange may constitute hostage-taking, which is a war crime.<sup>161</sup>
59. ODIHR received information from relatives on the status of ten civilians who, at the time of the interviews, remained detained or 'disappeared' by the Russian authorities.<sup>162</sup> Many were arbitrarily detained as early as 2022.<sup>163</sup> In

152 ODIHR Witness Interviews UKR.WS.635, para. 58; UKR.WS.644, paras. 44-45, 67; UKR.WS.669, paras. 113-114.

153 See also OSCE/ODIHR, [Fifth Interim Report](#), para. 39; [Sixth Interim Report](#), para. 44; [Seventh Interim Report](#), paras. 53-54.

154 ODIHR Witness Interviews UKR.WS.597, paras. 5, 7, 26; UKR.WS.626, para. 8; UKR.WS.627, paras. 11, 14, 20, 23, 31-32; UKR.WS.633, paras. 15, 19-21, 29; UKR.WS.643, para. 17; UKR.WS.646, paras. 37, 39. See also UKR.WS.578, para. 43.

155 ODIHR Witness Interviews UKR.WS.597, paras. 5, 7; UKR.WS.620, paras. 8-9, 19, 21; UKR.WS.626, paras. 12, 14, 16; UKR.WS.627, paras. 23-24, 31, 33, 36; UKR.WS.633, paras. 19, 22; UKR.WS.643, paras. 25-28; UKR.WS.646, paras. 39-41, 53-55; UKR.WS.654, paras. 9-11. See also UKR.WS.644, paras. 33, 42-43.

156 See OSCE/ODIHR, [Fourth Interim Report](#), para. 54; [Sixth Interim Report](#), para. 46; [Seventh Interim Report](#), para. 51.

157 ODIHR Witness Interviews UKR.WS.578, paras. 17, 47; UKR.WS.618, para. 21; UKR.WS.628, para. 19; UKR.WS.659, paras. 43-44; UKR.WS.680, para. 6. See also UKR.WS.644, para. 29.

158 ODIHR Witness Interviews UKR.WS.635, paras. 60-62; UKR.WS.644, paras. 76-80; UKR.WS.666, paras. 41-42, 48; UKR.WS.669, paras. 118-122. For more details, see [Section IV.e. Exchanges of civilians](#).

159 ODIHR Witness Interview UKR.WS.669.

160 GC IV, art. 64.

161 CIHL Rule 96; GC IV, arts. 34,147; AP I, art. 75(2); ICC Rome Statute, art. 8(2)(a)(viii). For more details, see [Section IV.e. Exchanges of civilians](#).

162 ODIHR Witness Interviews UKR.WS.590; UKR.WS.597; UKR.WS.620; UKR.WS.626; UKR.WS.627; UKR.WS.633; UKR.WS.643; UKR.WS.646; UKR.WS.654; See also UKR.WS.578, para. 53.

163 ODIHR Witness Interviews UKR.WS.620, para. 3; UKR.WS.627, para. 7; UKR.WS.643, para. 16; UKR.WS.654, para.4. See also UKR.WS.578, paras. 4, 11.

six reported cases, victims were charged or convicted of criminal offences on fabricated charges, including ‘terrorism’, ‘espionage’, ‘sabotage’ and ‘treason’, following their, often prolonged, arbitrary detention,<sup>164</sup> attesting to a practice by the Russian authorities.<sup>165</sup> Witnesses also reported that detained civilians were denied fundamental fair trial guarantees in criminal prosecutions.<sup>166</sup>

60. In two instances, witnesses reported how civilians were arrested in Russian-occupied territories of Ukraine on charges related to national security-related incidents.<sup>167</sup> Prosecutions were based on the Russian Criminal Code. Witnesses indicated that criminal cases lacked factual evidence and/or relied on false testimony and confessions extracted under torture.<sup>168</sup> Reportedly, access to independent legal counsel was denied or severely restricted.<sup>169</sup> ODIHR notes that denial of fundamental fair trial guarantees in and of itself renders any detention related to criminal prosecution arbitrary.<sup>170</sup>
61. ODIHR received updated information on two cases documented in the Seventh Interim Report.<sup>171</sup> One victim, abducted in February 2025 in Crimea, remains in custody without charges; a brief telephone call with her daughter in summer 2025 did not clarify the legal basis for detention. Another woman, unlawfully convicted of ‘espionage’ in 2024, after six months incommunicado was deported, in July 2025, to a penal colony in the Russian Federation to serve her sentence after her appeal was rejected two months earlier.
62. The exact number of civilians arbitrarily detained by the Russian Federation in the context of its invasion of Ukraine remains unknown. Since 24 February 2022, Ukrainian law enforcement bodies have been investigating over 6,500 cases of abduction and unlawful deprivation of liberty.<sup>172</sup> Overall, approximately 16,000 civilians are considered missing or illegally detained, with the International Committee of the Red Cross confirming over 870. The

164 ODIHR Witness Interviews UKR.WS.620, para. 10; UKR.WS.627, para. 34; UKR.WS.643, para. 20; UKR.WS.646, para. 45; UKR.WS.654, para. 16. See also UKR.WS.597, paras. 5, 7, 18-21.

165 See also OSCE/ODIHR, [Fifth Interim Report](#), paras. 30, 41; [Sixth Interim Report](#), para. 50; [Seventh Interim Report](#), para. 55.

166 ODIHR Witness Interviews UKR.WS.620, paras. 10-11; UKR.WS.627, paras. 11, 27; UKR.WS.643, paras. 5-6, 29; UKR.WS.654, paras. 11, 19. For more details, see [Section IV.h. Trials of Ukrainian civilians and POWs by the Russian authorities](#).

167 ODIHR Witness Interviews UKR.WS.626, paras. 7-9; UKR.WS.633, paras.11-13. Criminal prosecutions were initiated for charges of ‘terrorism’.

168 ODIHR Witness Interviews UKR.WS.626, paras. 10, 17; UKR.WS.633, paras. 11-16.

169 ODIHR Witness Interviews UKR.WS.626, paras. 11, 15; UKR.WS.633, para. 19.

170 See ICCPR, arts. 9, 14; *General Comment No. 35: Article 9 (Liberty and Security of Person)*, UN HRC, [CCPR/C/GC/35](#), para. 17; *General Comment No. 32: Article 14 (Right to Equality Before Courts and Tribunals and to a Fair Trial)*, UN HRC, [CCPR/C/GC/32](#). See also *Revised Methods of Work of the Working Group on Arbitrary Detention*, WGAD, [A/HRC/36/38](#), para. 8(c); [OSCE Moscow Mechanism Report](#). For more details, see [Section IV.h. Trials of Ukrainian civilians and POWs by the Russian authorities](#).

171 See OSCE/ODIHR, [Seventh Interim Report](#), UKR.WS.575 and UKR.WS.576. Information provided to ODIHR by two NGOs working on issues related to the arbitrary detention of Ukrainian civilians.

172 Separately, more than 1,500 civilians previously detained in Russian-occupied areas or in the Russian Federation have been returned to Ukraine through exchanges and other measures. Police have also registered 2,222 cases of enforced disappearances and 3,008 cases of civilians taken hostage, with 307 individuals believed to remain in detention. See Information provided to ODIHR by the Permanent Mission of Ukraine to the International Organizations in Vienna.

whereabouts of the others remains unknown, although they are believed to be held at locations in Russian-occupied territories of Ukraine and in the Russian Federation.<sup>173</sup> Ukrainian civilians subjected to arbitrary detention should be released immediately and unconditionally.

### C. TORTURE AND ILL-TREATMENT IN AREAS UNDER RUSSIAN CONTROL

63. ODIHR continued to receive further evidence of the widespread and systematic use of torture against civilians in Russian custody.<sup>174</sup> During the second half of 2025, ODIHR interviewed eleven survivors (seven men and four women) of torture and other forms of ill-treatment and punishment<sup>175</sup> and received credible allegations of such violations from relatives of individuals who were or remain detained under Russian authority.<sup>176</sup>
64. The cases newly reported to ODIHR occurred between 2022 and 2025, in both official and makeshift places of detention in Russian-controlled areas of Ukraine, including Donetsk, Kherson and Zaporizhzhia regions, and in Crimea, as well as in the Russian Federation. Survivors identified perpetrators as members of the Russian armed forces,<sup>177</sup> the Federal Security Service (FSB),<sup>178</sup> the National Guard of Russia (*Rosgvardiya*),<sup>179</sup> as well as regular personnel and special purpose units (*Spetsnaz*) of the Federal Penitentiary Service (FSIN).<sup>180</sup>
65. Survivors and witnesses reported that these Russian authorities committed torture and ill-treatment during interrogations and at different stages of detention, including during arrest and transfer.<sup>181</sup> In line with previously documented practices,<sup>182</sup> new accounts indicate that torture was routinely

173 *Ibid.*

174 See also OSCE/ODIHR, [Third Interim Report](#), paras. 55-64; [Fourth Interim Report](#), paras. 56-66; [Fifth Interim Report](#), paras. 42-51; [Sixth Interim Report](#), paras. 52-65; [Seventh Interim Report](#), paras. 57-66.

175 ODIHR Witness Interviews UKR.WS.578; UKR.WS.579; UKR.WS.581; UKR.WS.618; UKR.WS.628; UKR.WS.635; UKR.WS.644; UKR.WS.659; UKR.WS.666; UKR.WS.669; UKR.WS.680.

176 ODIHR Witness Interviews UKR.WS.578, paras. 13-14; UKR.WS.604, paras. 24-29, 31-32; UKR.WS.626, para. 9; UKR.WS.627, paras. 9, 11-12, 25, 30; UKR.WS.633, para. 23; UKR.WS.643, paras. 7-8, 15-16, 36; UKR.WS.646, paras. 24-26; UKR.WS.654, para. 11; UKR.WS.674, paras. 7-10, 13-14; UKR.WS.682, paras. 13, 16. This includes individuals who were detained before February 2022 in both the so-called 'Donetsk People's Republic' and in territories controlled by the Ukrainian government, and who remained in custody in facilities that came under Russian control after the Russian Federation's invasion of Ukraine.

177 ODIHR Witness Interviews UKR.WS.578, paras. 11, 15; UKR.WS.618, para. 20; UKR.WS.628, para. 14; UKR.WS.659, paras. 17, 19-20, 29; UKR.WS.680, paras. 5-6, 10, 15. See also UKR.WS.627, paras. 7, 9, 17.

178 ODIHR Witness Interviews UKR.WS.578, para. 24; UKR.WS.659, paras. 15-16, 18; UKR.WS.666, paras. 33, 37.

179 ODIHR Witness Interview UKR.WS.644, paras. 30, 47-48.

180 ODIHR Witness Interviews UKR.WS.579, paras. 6, 9, 15; UKR.WS.581, paras. 10, 13, 15, 28; UKR.WS.635, para. 27; UKR.WS.644, para. 47; UKR.WS.669, paras. 47-48.

181 ODIHR Witness Interviews UKR.WS.578, paras. 12-13, 17; UKR.WS.579, paras. 15-17; UKR.WS.581, para. 12; UKR.WS.628, paras. 10-12; UKR.WS.635, paras. 13, 20-21; UKR.WS.666, para. 25; UKR.WS.669, paras. 35-36, 74-75. See also UKR.WS.627, para. 9; UKR.WS.643, paras. 7-8, 16; UKR.WS.644, para. 75.

182 See also OSCE/ODIHR, [Third Interim Report](#), para. 56; [Fourth Interim Report](#), para. 58; [Fifth Interim Report](#), para. 44; [Sixth Interim Report](#), para. 54; [Seventh Interim Report](#), para. 58.

used to extract information or elicit confessions.<sup>183</sup> Torture was also applied to punish, intimidate or humiliate victims,<sup>184</sup> or to force them to cooperate.<sup>185</sup>

66. Victims were subjected to a wide range of methods of torture or ill-treatment. Recurrent methods used across different detention facilities<sup>186</sup> included severe beatings, often with a variety of instruments,<sup>187</sup> administration of electric shocks,<sup>188</sup> stress positions,<sup>189</sup> hooding<sup>190</sup> and mock executions,<sup>191</sup> as well as threats of death and physical violence, including threats against family members.<sup>192</sup> Eight survivors also reported being subjected to sexual violence, sexualized torture and threats of sexual violence.<sup>193</sup> Other reported methods included strangulation, starvation and burns inflicted with a hot iron.<sup>194</sup> Most survivors reported being subjected to multiple forms of torture or ill-treatment while in detention.
67. Eight survivors reported having suffered various short- and long-term physical injuries and psychological trauma resulting from torture and/or their detention conditions. These included bruises and lacerations, burns, broken teeth and fingers, fractured ribs, chest and kidney pain, and reduced eyesight, as well as sleep disturbances, anxiety and panic attacks.<sup>195</sup>

183 ODIHR Witness Interviews UKR.WS.578, paras. 12, 24; UKR.WS.628, para. 16; UKR.WS.635, paras. 15-17; UKR.WS.659, paras. 17, 19-21, 28, 31; UKR.WS.680, paras. 5, 16. See also UKR.WS.627, para. 11; UKR.WS.643, paras. 7-8, 16; UKR.WS.646, paras. 25-28.

184 ODIHR Witness Interviews UKR.WS.578, paras. 38-39; UKR.WS.579, para. 23; UKR.WS.628, para. 15; UKR.WS.635, paras. 13, 27, 32-33, 40-41, 52, 57; UKR.WS.644, paras. 26, 48; UKR.WS.659, paras. 29-30; UKR.WS.666, para. 25; UKR.WS.669, paras. 48, 50, 53, 104-107. See also UKR.WS.682, para. 13.

185 ODIHR Witness Interviews UKR.WS.618, paras. 12-13; UKR.WS.635, para. 16; UKR.WS.666, paras. 24-25, 33, 38.

186 See also OSCE/ODIHR, [Second Interim Report](#), para. 102; [Third Interim Report](#), para. 57; [Fourth Interim Report](#), para. 60; [Fifth Interim Report](#), para. 46; [Sixth Interim Report](#), para. 55; [Seventh Interim Report](#), para. 59.

187 ODIHR Witness Interviews UKR.WS.578, paras. 13, 17, 24; UKR.WS.579, paras. 6, 9, 18, 23, 29; UKR.WS.581, para. 15; UKR.WS.628, para. 14; UKR.WS.635, paras. 13, 15, 17, 40, 45-46, 48, 50-51, 54; UKR.WS.644, paras. 30, 39, 47, 50, 61, 66; UKR.WS.659, paras. 17, 29-31; UKR.WS.666, para. 25; UKR.WS.669, paras. 48, 75-76, 79, 85-89, 105-106; UKR.WS.680, paras. 5, 18. See also UKR.WS.626, paras. 9, 12; UKR.WS.627, para. 11; UKR.WS.643, paras. 7-8, 16; UKR.WS.646, paras. 24, 26; UKR.WS.654, para. 11; UKR.WS.682, para. 13.

188 ODIHR Witness Interviews UKR.WS.635, paras. 17, 46, 50; UKR.WS.644, paras. 47, 61-62, 66, 75; UKR.WS.659, para. 19; UKR.WS.666, paras. 26, 37; UKR.WS.669, para. 48; UKR.WS.680, paras. 5, 17. See also UKR.WS.627, para. 9; UKR.WS.643, paras. 15, 36; UKR.WS.646, para. 26; UKR.WS.654, para. 11.

189 ODIHR Witness Interviews UKR.WS.578, paras. 17, 38; UKR.WS.579, para. 29; UKR.WS.635, paras. 18, 45, 48-49; UKR.WS.644, paras. 30, 49, 62, 66, 74; UKR.WS.666, para. 27; UKR.WS.669, paras. 80, 109; UKR.WS.680, para. 5. See also UKR.WS.654, para. 11.

190 ODIHR Witness Interviews UKR.WS.635, para. 50; UKR.WS.644, paras. 61-62; UKR.WS.659, para. 19; UKR.WS.669, paras. 74, 81.

191 ODIHR Witness Interviews UKR.WS.578, para. 12; UKR.WS.635, para. 17; UKR.WS.666, paras. 20, 35. See also UKR.WS.646, para. 26.

192 ODIHR Witness Interviews UKR.WS.618, paras. 13, 16; UKR.WS.635, paras. 15-16; UKR.WS.644, para. 14; UKR.WS.659, paras. 19, 36-37; UKR.WS.666, paras. 23-24; UKR.WS.680, para. 16.

193 ODIHR Witness Interviews UKR.WS.579, para. 32; UKR.WS.618, para. 20; UKR.WS.628, paras. 14-15; UKR.WS.635, paras. 48, 50, 52, 54, 61; UKR.WS.644, paras. 61, 74; UKR.WS.666, para. 37; UKR.WS.669, paras. 37, 79, 81; UKR.WS.680, paras. 5-6, 17, 21, 47. For more details, see [Section IV.f. Conflict-related sexual violence in areas under the control of the Russian authorities](#).

194 ODIHR Witness Interviews UKR.WS.579, para. 29; UKR.WS.628, para. 14; UKR.WS.643, para. 15; UKR.WS.669, paras. 94-96.

195 ODIHR Witness Interviews UKR.WS.578, para. 20; UKR.WS.579, para. 29; UKR.WS.628, para. 23; UKR.WS.635, paras. 46, 48, 63-64; UKR.WS.659, paras. 30-31; UKR.WS.666, paras. 25, 35; UKR.WS.669, para. 76, 79, 98, 102-103; UKR.WS.680, para. 22. See also UKR.WS.627, paras. 9, 37; UKR.WS.674, para. 7.

68. Outside interrogations, survivors reported severe beatings upon arrival at detention facilities, known as *‘priyomka’* (intake), as well as acts of torture and ill-treatment during regular routines such as cell inspections, showering and walks.<sup>196</sup> One witness told ODIHR: *“During the checks, we needed to be in the cell. Bent over with our head between the legs of the person standing in front of you. Then, spread out against the wall. We would then either get tasered all over our body, or they would use a wooden hammer on our legs and arms.”*<sup>197</sup> As previously reported by ODIHR,<sup>198</sup> detention authorities subjected victims to different forms of humiliation, including forcing them to memorize and recite the Russian anthem and patriotic songs.<sup>199</sup> Witnesses also stated that perpetrators often used derogatory names and offensive language to address them.<sup>200</sup>
69. Nearly all survivors of torture also witnessed the torture or physical abuse of other civilians and POWs held together with them in the same facilities.<sup>201</sup> Moreover, ODIHR received credible reports of deaths in custody resulting from torture and/or inhuman conditions.<sup>202</sup>
70. Finally, ODIHR continued to receive reports of widespread, dire detention conditions that may amount to cruel, inhuman or degrading treatment or punishment.<sup>203</sup> These included overcrowded cells, lack of proper ventilation and light, unhygienic conditions, inadequate sanitation, no or insufficient water and food, and the inability to walk or exercise,<sup>204</sup> as well as no access to or inadequate levels of medical care.<sup>205</sup> Two survivors reported losing dangerous amounts of weight due to poor nutrition in detention.<sup>206</sup> One of the witnesses, who lost almost half his weight in Russian detention, told ODIHR: *“People were going crazy because of the lack of food. We were constantly hungry.”*

196 ODIHR Witness Interviews UKR.WS.578, paras. 38-39; UKR.WS.579, paras. 9, 18, 29; UKR.WS.581, paras. 13, 28-29; UKR.WS.635, paras. 32-34, 41, 45, 47-57; UKR.WS.644, paras. 26, 30-31, 48-49, 51, 61, 66, 74; UKR.WS.666, paras. 25, 27; UKR.WS.669, paras. 53, 74-76, 79-81, 85-89, 104-107, 109. See also UKR.WS.674, para. 9.

197 ODIHR Witness Interview UKR.WS.644, para.46.

198 See also OSCE/ODIHR, [Third Interim Report](#), para. 48; [Fourth Interim Report](#), para. 51; [Fifth Interim Report](#), para. 45; [Sixth Interim Report](#), para. 58; [Seventh Interim Report](#), para. 62.

199 ODIHR Witness Interviews UKR.WS.578, para. 34; UKR.WS.581, paras. 16, 33; UKR.WS.635, paras. 48, 55; UKR.WS.644, paras. 30, 38, 47; UKR.WS.666, paras. 25, 30, 42; UKR.WS.669, paras. 53, 90. See also UKR.WS.604, para. 97; UKR.WS.674, para. 9; UKR.WS.682, para. 13.

200 ODIHR Witness Interviews UKR.WS.635, paras. 11, 15, 27, 53; UKR.WS.669, paras. 37, 77.

201 ODIHR Witness Interviews UKR.WS.578, paras. 13-14, 37; UKR.WS.579, paras. 9, 18; UKR.WS.581, paras. 32-33; UKR.WS.618, para. 16; UKR.WS.635, paras. 23, 40, 54; UKR.WS.644, paras. 18, 20, 48, 68, 74-75; UKR.WS.659, paras. 29-30, 32-33; UKR.WS.666, paras. 23, 25, 31-32, 48; UKR.WS.669, paras. 57-61. For more details on POWs, see [Section IV.d. The situation of prisoners of war](#).

202 ODIHR Witness Interview UKR.WS.669, paras. 17, 65.

203 See also OSCE/ODIHR, [Fourth Interim Report](#), para. 63; [Fifth Interim Report](#), para. 38; [Sixth Interim Report](#), para. 42; [Seventh Interim Report](#), para. 63.

204 ODIHR Witness Interviews UKR.WS.578, para. 17; UKR.WS.618, para. 17; UKR.WS.635, paras. 18, 24-25, 55, 29-31, 35-38; UKR.WS.644, paras. 9, 17-18, 25, 30, 34, 63-64; UKR.WS.659, paras. 25-26; UKR.WS.666, paras. 23, 28-29, 40; UKR.WS.669, paras. 52, 54, 83, 94-95, 99, 101. See also UKR.WS.620, para. 13; UKR.WS.643, para. 35; UKR.WS.646, para. 27; UKR.WS.654, para. 11; UKR.WS.682, para. 13.

205 ODIHR Witness Interviews UKR.WS.579, para. 28; UKR.WS.581, paras. 6, 15, 19-21, 36; UKR.WS.635, paras. 39-40; UKR.WS.644, para. 25; UKR.WS.659, para. 32; UKR.WS.669, paras. 64, 102, 110; See also UKR.WS.627, para. 25; UKR.WS.674, para. 9. Denial of medical assistance may also amount to a violation of prohibition of torture and other cruel, inhuman or degrading treatment or punishment.

206 ODIHR Witness Interviews UKR.WS.578, para. 20; UKR.WS.669, para. 63. See also UKR.WS.627, para. 37; UKR.WS.654, para. 12; UKR.WS. 682, para. 13.

*We were always thinking about food. We were going crazy because of hunger and lack of food. It was impossible to think about anything else.*<sup>207</sup>

71. Torture and inhuman treatment, including wilfully causing great suffering or serious injury to body and health, are strictly prohibited under IHL and constitute war crimes.<sup>208</sup> Under IHRL, the prohibition of torture and other inhuman and degrading treatment is absolute and permits no derogation, even in times of armed conflict.<sup>209</sup> The widespread and systematic use of torture and degrading and inhuman treatment of detainees under Russian authority may amount to crimes against humanity.<sup>210</sup>

#### D. THE SITUATION OF PRISONERS OF WAR

72. During the second half of 2025, ODIHR continued to receive accounts,<sup>211</sup> including through 22 witness testimonies, concerning violations of IHL and IHRL related to the treatment of Ukrainian POWs. Twelve testimonies were provided by former POWs (all men),<sup>212</sup> six by family members of interned POWs and four by other civilian witnesses.<sup>213</sup> Of these former POWs, seven were released in 2025.<sup>214</sup> At the time of publication, all prisoners whose cases were described by their family members remain in detention in the Russian Federation. The length of internment reflected in the testimonies ranged from 18 to 45 months.
73. ODIHR documented the locations where most of the reported violations were perpetrated. Eight POWs were held in Olenivka (Donetsk region),<sup>215</sup> where they were interned in dire conditions,<sup>216</sup> ill-treated<sup>217</sup> and denied the right to correspondence.<sup>218</sup> Upon capture by the Russian armed forces, four POWs

207 ODIHR Witness Interview UKR.WS.669, para. 95.

208 CIHL Rules 90, 92; GC IV, art. 32; AP I, arts. 75(1)-(2) and 11. See also ICC Statute, art. 8(2)(a)(ii).

209 ICCPR, art. 7; CAT, art. 2.

210 ICC Statute, arts. 7(1)(f) and (k). See OSCE/ODIHR, [Fourth Interim Report](#), para. 56. See also Report of the Independent International Commission of Inquiry on Ukraine, IICI, [A/79/549](#), 25 October 2024, paras. 72-78; [Treatment of civilians deprived of their liberty in the context of the armed attack by the Russian Federation against Ukraine](#), UN OHCHR, 23 September 2025, para. 78.

211 See OSCE/ODIHR, [Third Interim Report](#), para. 28; [Fourth Interim Report](#), para. 33; [Fifth Interim Report](#), para. 52; [Sixth Interim Report](#), para. 66; [Seventh Interim Report](#), para. 67.

212 ODIHR Witness Interviews UKR.WS.582; UKR.WS.584; UKR.WS.587; UKR.WS.589; UKR.WS.594; UKR.WS.599; UKR.WS.600; UKR.WS.607; UKR.WS.622; UKR.WS.623; UKR.WS.656; UKR.WS.661.

213 ODIHR Witness Interviews UKR.WS.606; UKR.WS.617; UKR.WS.633; UKR.WS.640; UKR.WS.649; UKR.WS.668 (family members); UKR.WS.593; UKR.WS.647; UKR.WS.652; UKR.WS.678 (civilians detained alongside POWs or otherwise engaged in POW issues).

214 ODIHR Witness Interviews UKR.WS.582; UKR.WS.587; UKR.WS.589; UKR.WS.594; UKR.WS.600; UKR.WS.607; UKR.WS.622.

215 ODIHR Witness Interviews UKR.WS.587, para. 9; UKR.WS.589, para. 17; UKR.WS.600, para. 5; UKR.WS.607, para. 6; UKR.WS.617, para. 6; UKR.WS.622, para. 4; UKR.WS.633, paras. 6-7; UKR.WS.656, para. 3.

216 ODIHR Witness Interviews UKR.WS.587, para. 18; UKR.WS.600, para. 79; UKR.WS.622, paras. 14-15.

217 ODIHR Witness Interviews UKR.WS.587, para. 15; UKR.WS.589, para. 18; UKR.WS.600, para. 74; UKR.WS.607, paras. 20, 22, 23, 26, 37; UKR.WS.656, paras. 9-10.

218 ODIHR Witness Interviews UKR.WS.587, para. 25; UKR.WS.607, paras. 32-33; UKR.WS.656, para. 37.

were temporarily held in a facility/facilities in Sartana (Donetsk region)<sup>219</sup> where they received little food, no water<sup>220</sup> and had no beds or bedding.<sup>221</sup> Three POWs were held in each of the following locations within the Russian Federation: Pakino (Vladimir region),<sup>222</sup> Rostov-on-Don (Rostov region)<sup>223</sup> and Kamyshin (Volgograd region).<sup>224</sup> Another three were held in Sukhodilsk (Luhansk region).<sup>225</sup> In Pakino, detainees reported being made to perform exhausting physical exercises<sup>226</sup> and being harassed and insulted by guards.<sup>227</sup> In Kamyshin, POWs reported being systematically tortured,<sup>228</sup> including during interrogations;<sup>229</sup> as well as several instances of sexual violence.<sup>230</sup> In Sukhodilsk, POWs were routinely subjected to beatings<sup>231</sup> and electric shocks.<sup>232</sup>

74. Consistent with previous reports,<sup>233</sup> witnesses described how, especially upon capture, POWs were interned in improvised facilities such as a mine shaft,<sup>234</sup> hangars,<sup>235</sup> private houses,<sup>236</sup> a shed<sup>237</sup> and a children's camp.<sup>238</sup> Following transfer, most of their internment was spent in penal colonies,<sup>239</sup> pre-trial detention centres,<sup>240</sup> military bases<sup>241</sup> and police stations.<sup>242</sup> Every POW reported being held in multiple detention sites during their internment. At some locations, such as Sartana, Olenivka and Pakino, POWs were reportedly held alongside civilian detainees,<sup>243</sup> while others held only POWs.<sup>244</sup> Usually,

219 ODIHR Witness Interviews UKR.WS.587, para. 13; UKR.WS.589, para. 11; UKR.WS.607, para. 8; UKR.WS.622, para. 9.

220 ODIHR Witness Interviews UKR.WS.589, para. 13; UKR.WS.607, para. 14; UKR.WS.622, para. 12.

221 ODIHR Witness Interviews UKR.WS.607, para. 14; UKR.WS.622, para. 9.

222 ODIHR Witness Interviews UKR.WS.589, para. 51; UKR.WS.600, para. 5; UKR.WS.607, para. 6.

223 ODIHR Witness Interviews UKR.WS.617, para. 6; UKR.WS.633, paras. 6-7, UKR.WS.640, paras. 5-6.

224 ODIHR Witness Interviews UKR.WS.556, para. 3; UKR.WS.589, para. 26; UKR.WS.607, para. 41.

225 ODIHR Witness Interviews UKR.WS.582, para. 62; UKR.WS.587, para. 9; UKR.WS.599, para. 6.

226 ODIHR Witness Interviews UKR.WS.589, para. 91; UKR.WS.607, paras. 92-93.

227 ODIHR Witness Interviews UKR.WS.589, para. 68; UKR.WS.600, para. 151; UKR.WS.607, para. 76.

228 ODIHR Witness Interviews UKR.WS.589, paras. 28-29, 47, 48; UKR.WS.607, paras. 41, 44, 64, 72; UKR.WS.656, paras. 12, 18.

229 ODIHR Witness Interviews UKR.WS.589, paras. 33-34; UKR.WS.607, paras. 65-66; UKR.WS.656, para. 14.

230 ODIHR Witness Interviews UKR.WS.589, para. 48; UKR.WS.607, para. 72.

231 ODIHR Witness Interviews UKR.WS.582, para. 69; UKR.WS.599, para. 52.

232 ODIHR Witness Interviews UKR.WS.582, para. 93; UKR.WS.587, paras. 37, 71; UKR.WS.599, para. 67.

233 See OSCE/ODIHR, [Fifth Interim Report](#), para. 54; [Sixth Interim Report](#), para. 67; [Seventh Interim Report](#), para. 68.

234 ODIHR Witness Interview UKR.WS.582, para. 27.

235 ODIHR Witness Interviews UKR.WS.587, para. 13; UKR.WS.589, para. 11; UKR.WS.622, para. 4.

236 ODIHR Witness Interviews UKR.WS.594, para. 37; UKR.WS.623, para. 11.

237 ODIHR Witness Interview UKR.WS.607, para. 14.

238 ODIHR Witness Interview UKR.WS.623, para. 20.

239 ODIHR Witness Interviews UKR.WS.582, para. 30; UKR.WS.584, para. 89; UKR.WS.587, para. 9; UKR.WS.599, para. 6; UKR.WS.600, para. 5; UKR.WS.617, para. 6; UKR.WS.622, para. 4; UKR.WS.623, para. 28; UKR.WS.633, para. 6; UKR.WS.649, para. 3; UKR.WS.656, para. 3; UKR.WS.661, paras. 6, 31.

240 ODIHR Witness Interviews UKR.WS.582, paras. 29, 31; UKR.WS.584, para. 89; UKR.WS.587, para. 9; UKR.WS.594, para. 79; UKR.WS.599, para. 6; UKR.WS.600, para. 5; UKR.WS.617, para. 6; UKR.WS.633, para. 6; UKR.WS.649, para. 3; UKR.WS.656, para. 3.

241 ODIHR Witness Interview UKR.WS.582, para. 27.

242 ODIHR Witness Interviews UKR.WS.589, para. 9; UKR.WS.600, para. 5; UKR.WS.623, para. 26.

243 ODIHR Witness Interviews UKR.WS.589, para. 24; UKR.WS.600, para. 81; UKR.WS.607, para. 108.

244 ODIHR Witness Interviews UKR.WS.594, para. 58; UKR.WS.607, para. 73; UKR.WS.622, para. 21; UKR.WS.661, para. 7.

male and female POWs were held separately,<sup>245</sup> including in Olenivka, where a separate building for women was reported.<sup>246</sup> In three cases, however, men and women were held together.<sup>247</sup>

75. All POWs interviewed by ODIHR reported being subjected to torture, indicating its widespread and systematic use by the Russian authorities.<sup>248</sup> Physical violence in the form of beatings by detention facility guards was frequently described,<sup>249</sup> occurring on a regular basis, such as “*five times per week*”,<sup>250</sup> or “*every time [POWs] left the cell*”.<sup>251</sup> Other reported methods included electric shocks (lasting up to eight hours),<sup>252</sup> stress positions,<sup>253</sup> setting dogs on detainees<sup>254</sup> and acts of sexual violence,<sup>255</sup> such as applying electric shocks to genitals.<sup>256</sup> Ill-treatment occurred during the so-called ‘*priyomka*’,<sup>257</sup> interrogations,<sup>258</sup> showers<sup>259</sup> and walks.<sup>260</sup>
76. Witnesses also described other types of ill-treatment, including threats.<sup>261</sup> POWs were threatened with sexual violence,<sup>262</sup> death,<sup>263</sup> execution,<sup>264</sup> excessive physical exercise (e.g. thousands of squats)<sup>265</sup> and solitary confinement.<sup>266</sup> As previously reported by ODIHR,<sup>267</sup> POWs were forced to burn or scratch

245 ODIHR Witness Interviews UKR.WS.594, paras. 58, 133; UKR.WS.599, para. 84; UKR.WS.600, para. 38; UKR.WS.607, para. 73; UKR.WS.622, para. 21; UKR.WS.656, para. 40; UKR.WS.661, para. 7.

246 ODIHR Witness Interviews UKR.WS.587, para. 21; UKR.WS.600, para. 80.

247 ODIHR Witness Interviews UKR.WS.594, para. 67; UKR.WS.600, para. 64; UKR.WS.623, para. 17.

248 See also OSCE/ODIHR, [Fourth Interim Report](#), para. 33; [Fifth Interim Report](#), para. 6; [Sixth Interim Report](#), para. 8; [Seventh Interim Report](#), para. 70.

249 ODIHR Witness Interviews UKR.WS.582, paras. 44, 69, 102-103; UKR.WS.584, para. 13, 17, 54, 169; UKR.WS.587, paras. 15, 67; UKR.WS.589, paras. 18, 28, 29; UKR.WS.594, paras. 41, 46, 49, 57, 103-104, 119; UKR.WS.599, paras. 19, 52, 71; UKR.WS.600, paras. 74, 98; UKR.WS.607, paras. 22-23, 26, 43-44, 55, 64, 93, 101; UKR.WS.617, para. 27; UKR.WS.623, para. 32; UKR.WS.633, paras. 10, 13; UKR.WS.649, para. 8; UKR.WS.656, paras. 9-10, 12, 30; UKR.WS.661, paras. 10, 16, 41.

250 ODIHR Witness Interview UKR.WS.582, para. 69.

251 ODIHR Witness Interview UKR.WS.589, para. 29.

252 ODIHR Witness Interview UKR.WS.587, para. 71. See also UKR.WS.582, paras. 57, 93; UKR.WS.584, paras. 17-18, 30, 91; UKR.WS.589, para. 47; UKR.WS.594, paras. 57, 117, 119; UKR.WS.599, paras. 65, 67; UKR.WS.600, paras. 100, 107; UKR.WS.607, paras. 43-44; UKR.WS.622, paras. 13, 23; UKR.WS.523, para. 10; UKR.WS.633, para. 10; UKR.WS.656, para. 12.

253 ODIHR Witness Interviews UKR.WS.582, para. 45; UKR.WS.587, para. 67; UKR.WS.589, para. 29; UKR.WS.594, paras. 95, 120; UKR.WS.622, para. 13; UKR.WS.661, para. 41.

254 ODIHR Witness Interviews UKR.WS.584, para. 78; UKR.WS.594, para. 197; UKR.WS.600, para. 146.

255 ODIHR Witness Interviews UKR.WS.584, paras. 30, 91; UKR.WS.589, paras. 48, 92; UKR.WS.594, para. 101; UKR.WS.600, para. 101; UKR.WS.607, para. 72; UKR.WS.656, para. 23.

256 ODIHR Witness Interview UKR.WS.584, paras. 30, 91. For more details, see [Section IV.f. Conflict-related sexual violence in areas under the control of the Russian authorities](#).

257 ODIHR Witness Interviews UKR.WS.582, paras. 102-103; UKR.WS.584, paras. 17, 169; UKR.WS.587, paras. 15, 67; UKR.WS.589, para. 18; UKR.WS.594, para. 46; UKR.WS.599, para. 19; UKR.WS.600, para. 74; UKR.WS.607, paras. 20, 43; UKR.WS.622, para. 13; UKR.WS.623, para. 32; UKR.WS.656, para. 9.

258 ODIHR Witness Interviews UKR.WS.587, para. 71; UKR.WS.607, para. 101.

259 ODIHR Witness Interview UKR.WS.594, paras. 104, 117.

260 ODIHR Witness Interviews UKR.WS.584, para. 54; UKR.WS.600, para. 146.

261 ODIHR Witness Interviews UKR.WS.584, para. 13; UKR.WS.594, para. 182; UKR.WS.599, para. 63; UKR.WS.661, para. 33.

262 ODIHR Witness Interviews UKR.WS.594, para. 182; UKR.WS.607, para. 72.

263 ODIHR Witness Interviews UKR.WS.584, para. 13; UKR.WS.633, para. 10.

264 ODIHR Witness Interview UKR.WS.584, para. 19.

265 ODIHR Witness Interviews UKR.WS.582, para. 72; UKR.WS.584, para. 130; UKR.WS.589, para. 52; UKR.WS.594, para. 152; UKR.WS.607, para. 93.

266 ODIHR Witness Interview UKR.WS.599, para. 64.

267 See OSCE/ODIHR, [Seventh Interim Report](#), para. 72.

off their tattoos with sharp objects<sup>268</sup> and reported having their teeth filed or extracted.<sup>269</sup> Ill-treatment was often used to extract confessions or as punishment. For instance, after POWs complained about the detention conditions, they were given food which had been pepper-sprayed, causing vomiting.<sup>270</sup>

77. All 12 former POWs also reported being subjected to degrading and humiliating treatment. They were made to learn the anthems of Russia and the so-called ‘Luhansk People’s Republic’,<sup>271</sup> sing or listen to Russian or Soviet patriotic songs,<sup>272</sup> memorize poems<sup>273</sup> and learn the history of Russia.<sup>274</sup> Failure to comply resulted in punishment.<sup>275</sup> One witness recalled: “*When we returned to the cell, we had to keep our backs to the door and bend over and shout, ‘Glory to the heroes of Russia!’*.”<sup>276</sup> Guards also verbally insulted POWs, using slurs and calling them ‘murderers’ and ‘fascists’.<sup>277</sup> POWs also reported being made to perform impractical or demeaning tasks, such as polishing a cup with a toothbrush,<sup>278</sup> ‘duck-walking’ for several hours,<sup>279</sup> cleaning up messes intentionally created by guards<sup>280</sup> and stomping on a Ukrainian flag.<sup>281</sup> One former POW said that after each beating, they were forced to say “*Thank you, chief [spasibo, grazhdanin nachalnik]*”.<sup>282</sup>
78. ODIHR received reports confirming poor internment conditions for Ukrainian POWs, as in earlier findings.<sup>283</sup> Witnesses described limited and poor-quality food,<sup>284</sup> very short eating periods<sup>285</sup> and insufficient water, particularly upon

268 ODIHR Witness Interviews UKR.WS.600, para. 58; UKR.WS.607, para. 37.

269 ODIHR Witness Interviews UKR.WS.617, para. 27; UKR.WS.649, para. 8.

270 ODIHR Witness Interview UKR.WS.584, para. 106.

271 ODIHR Witness Interviews UKR.WS.582, paras. 46, 129; UKR.WS.584, para. 94; UKR.WS.587, para. 31; UKR.WS.589, para. 54; UKR.WS.594, paras. 49, 128; UKR.WS.599, para. 72; UKR.WS.600, paras. 50, 101; UKR.WS.607, para. 53; UKR.WS.622, para. 23; UKR.WS.623, para. 18; UKR.WS.633, para. 11; UKR.WS.656, para. 17.

272 ODIHR Witness Interviews UKR.WS.582, paras. 46, 129; UKR.WS.584, para. 94; UKR.WS.587, para. 31; UKR.WS.594, paras. 128, 173; UKR.WS.599, para. 72; UKR.WS.600, paras. 50, 101, 192; UKR.WS.607, paras. 53, 91; UKR.WS.622, para. 23; UKR.WS.623, para. 40; UKR.WS.647, para. 48; UKR.WS.656, para. 17.

273 ODIHR Witness Interviews UKR.WS.600, paras. 50, 101; UKR.WS.656, para. 26.

274 ODIHR Witness Interviews UKR.WS.584, para. 94; UKR.WS.587, paras. 31, 34; UKR.WS.656, para. 17.

275 ODIHR Witness Interviews UKR.WS.594, para. 61; UKR.WS.600, para. 102; UKR.WS.656, para. 26.

276 ODIHR Witness Interview UKR.WS.661, para. 39.

277 ODIHR Witness Interviews UKR.WS.582, para. 68; UKR.WS.589, paras. 37, 68; UKR.WS.599, para. 62; UKR.WS.600, para. 151; UKR.WS.607, para. 78.

278 ODIHR Witness Interview UKR.WS.594, para. 149.

279 ODIHR Witness Interview UKR.WS.599, para. 50.

280 ODIHR Witness Interview UKR.WS.600, para. 160.

281 ODIHR Witness Interview UKR.WS.622, para. 16.

282 ODIHR Witness Interview UKR.WS.587, para. 67.

283 See OSCE/ODIHR, [Fourth Interim Report](#), para. 69; [Fifth Interim Report](#), paras. 63-67; [Sixth Interim Report](#), paras. 77-80; [Seventh Interim Report](#), paras. 73-75. See also [OSCE Moscow Mechanism Report](#), pp. 26, 28, 29.

284 ODIHR Witness Interviews UKR.WS.582, paras. 49, 109; UKR.WS.584, para. 79; UKR.WS.587, paras. 18, 30; UKR.WS.594, paras. 53, 109, 110; UKR.WS.599, para. 75; UKR.WS.607, para. 87; UKR.WS.617, para. 27; UKR.WS.622, paras. 12, 15, 27; UKR.WS.656, para. 12.

285 ODIHR Witness Interviews UKR.WS.582, paras. 118-119; UKR.WS.594, paras. 53, 62; UKR.WS.599, paras. 47, 76; UKR.WS.607, para. 33.

apprehension.<sup>286</sup> Detention cells were described as cold or poorly ventilated,<sup>287</sup> infested with bed bugs and rats,<sup>288</sup> and lacking proper bedding<sup>289</sup> (or in some cases, even beds).<sup>290</sup> Hygiene was difficult to maintain, due to limited access to showers, water<sup>291</sup> and hygiene items such as toilet paper, toothbrushes, toothpaste, soap and razors.<sup>292</sup> In some facilities, access to toilets was restricted or impeded.<sup>293</sup> For instance, a POW reported waiting seven hours every day before being taken to a toilet by the guards.<sup>294</sup> POWs had no change of clothing, often lacked winter clothing<sup>295</sup> and could only wash clothes by hand.<sup>296</sup> Cell conditions were made worse by practices such as the use of bright lights<sup>297</sup> and loud music<sup>298</sup> or requirements that detainees stand or walk around the cell for long periods.<sup>299</sup>

79. Witnesses reported little to no access to medical care.<sup>300</sup> The poor conditions of internment and ongoing ill-treatment led to serious health issues,<sup>301</sup> including disability.<sup>302</sup> One witness recounted a doctor asking guards: “*Why did you bring him here? Why not just shoot him somewhere?*”<sup>303</sup> Several POWs also described outbreaks of contagious diseases, such as scabies, in internment facilities.<sup>304</sup> Four witnesses reported deaths in detention due to a lack of medical care,<sup>305</sup> and five provided information about cases of suicide.<sup>306</sup>

286 ODIHR Witness Interviews UKR.WS.584, para. 12; UKR.WS.589, para. 13; UKR.WS.607, para. 14; UKR.WS.622, para. 12.

287 ODIHR Witness Interviews UKR.WS.594, paras. 53, 172; UKR.WS.599, para. 24; UKR.WS.607, para. 61.

288 ODIHR Witness Interviews UKR.WS.582, para. 65; UKR.WS.594, para. 151.

289 ODIHR Witness Interviews UKR.WS.587, para. 63; UKR.WS.589, para. 58; UKR.WS.599, para. 21; UKR.WS.607, para. 14; UKR.WS.622, para. 14.

290 ODIHR Witness Interviews UKR.WS.584, para. 20; UKR.WS.589, para. 30; UKR.WS.600, para. 79; UKR.WS.607, para. 14; UKR.WS.622, para. 14.

291 ODIHR Witness Interviews UKR.WS.582, para. 107; UKR.WS.587, para. 28; UKR.WS.594, para. 53; UKR.WS.599, para. 24.

292 ODIHR Witness Interviews UKR.WS.582, para. 127; UKR.WS.587, para. 63; UKR.WS.599, para. 80; UKR.WS.600, para. 173; UKR.WS.649, para. 22; UKR.WS.656, para. 25; UKR.WS.661, para. 38.

293 ODIHR Witness Interviews UKR.WS.584, paras. 20, 149-150; UKR.WS.594, para. 68; UKR.WS.599, paras. 15, 42.

294 ODIHR Witness Interview UKR.WS.584, para. 150.

295 ODIHR Witness Interviews UKR.WS.594, para. 172; UKR.WS.599, para. 81; UKR.WS.600, para. 131.

296 ODIHR Witness Interview UKR.WS.656, para. 25.

297 ODIHR Witness Interviews UKR.WS.587, para. 70; UKR.WS.594, paras. 53, 127.

298 ODIHR Witness Interviews UKR.WS.587, para. 70; UKR.WS.589, para. 53; UKR.WS.594, para. 181.

299 ODIHR Witness Interviews UKR.WS.587, para. 70; UKR.WS.649, para. 22; UKR.WS.656, para. 21.

300 ODIHR Witness Interviews UKR.WS.582, para. 51; UKR.WS.584, para. 81; UKR.WS.587, para. 29; UKR.WS.589, para. 25, 44; UKR.WS.594, paras. 59, 124; UKR.WS.599, paras. 43-44; UKR.WS.600, para. 112; UKR.WS.607, para. 53; UKR.WS.617, para. 27; UKR.WS.622, para. 17; UKR.WS.656, para. 22.

301 ODIHR Witness Interviews UKR.WS.582, para. 50; UKR.WS.584, paras. 56, 91; UKR.WS.589, paras. 83, 85; UKR.WS.594, paras. 121, 153, 160; UKR.WS.623, para. 45; UKR.WS.656, paras. 12, 21; UKR.WS.661, para. 56.

302 ODIHR Witness Interview UKR.WS.599, para. 101.

303 ODIHR Witness Interview UKR.WS.594, para. 160.

304 ODIHR Witness Interviews UKR.WS.589, para. 86; UKR.WS.594, paras. 187-188; UKR.WS.600, para. 171; UKR.WS.656, para. 31.

305 ODIHR Witness Interviews UKR.WS.582, para. 84; UKR.WS.584, paras. 17, 55; UKR.WS.587, para. 30; UKR.WS.600, para. 183. See also [OSCE Moscow Mechanism Report](#), p. 21.

306 ODIHR Witness Interviews UKR.WS.582, para. 84; UKR.WS.594, para. 194; UKR.WS.599, para. 95; UKR.WS.600, paras. 181-182; UKR.WS.607, para. 118.

80. POWs were often not informed about their status or the rights afforded to them under IHL.<sup>307</sup> One witness stated that a POW was beaten on the head with a copy of the Geneva Conventions.<sup>308</sup> In many cases, detainees were denied the right to correspondence,<sup>309</sup> and were effectively held incommunicado.<sup>310</sup> Relatives often learned of their apprehension or location only from the interviews POWs were compelled to give, exposing them to public curiosity in contravention of IHL.<sup>311</sup> Fourteen witnesses reported that the Russian authorities attempted to recruit Ukrainian POWs, as well as regular prisoners, into the Russian armed forces in exchange for financial benefits or amnesty.<sup>312</sup>
81. Some evidence indicates that detention conditions for Ukrainian POWs may be improving. POWs captured in 2022 told ODIHR that initial detention conditions were the most severe,<sup>313</sup> and that conditions gradually improved over time.<sup>314</sup> According to one witness, this was due to pressure on detention facility administrations after reports of malnutrition of POWs.<sup>315</sup> This improvement may be linked to the allocation of funding after detention facilities were incorporated into the Russian federal penitentiary system.<sup>316</sup> In addition, seven POWs reported being visited by journalists and representatives of an ombudsperson or an international organization while in detention.<sup>317</sup> Witnesses noted that while such visits did appear to have some positive effects, these were generally short-lived.<sup>318</sup>

307 ODIHR Witness Interviews UKR.WS.582, paras. 48, 76; UKR.WS.584, para. 28; UKR.WS.587, para. 53; UKR.WS.589, para. 37; UKR.WS.594, paras. 71, 203; UKR.WS.599, para. 92; UKR.WS.600, paras. 194-195; UKR.WS.607, para. 126; UKR.WS.622, para. 32. See also [OSCE Moscow Mechanism Report](#), pp. 14-18.

308 ODIHR Witness Interview UKR.WS.584, para. 29.

309 See also [OSCE Moscow Mechanism Report](#), pp. 34, 35.

310 ODIHR Witness Interviews UKR.WS.582, para. 48; UKR.WS.587, para. 25; UKR.WS.589, para. 74; UKR.WS.617, para. 17; UKR.WS.622, para. 32; UKR.WS.623, para. 59; UKR.WS.656, para. 37.

311 GC III, art. 13(2). See ODIHR Witness Interviews UKR.WS.582, para. 34; UKR.WS.584, para. 22; UKR.WS.587, para. 13; UKR.WS.589, paras. 42, 46; UKR.WS.594, paras. 55, 76; UKR.WS.599, paras. 14, 29; UKR.WS.600, para. 37; UKR.WS.607, para. 69; UKR.WS.622, para. 29; UKR.WS.623, paras. 15, 43. See also [OSCE/ODIHR, Fourth Interim Report](#), para. 33; [Fifth Interim Report](#), para. 60; [Sixth Interim Report](#), para. 87; [Seventh Interim Report](#), para. 76.

312 ODIHR Witness Interviews UKR.WS.577, paras. 39, 40; UKR.WS.581, para. 25; UKR.WS.584, para. 119; UKR.WS.587, para. 58; UKR.WS.620, para. 9; UKR.WS.622, para. 30; UKR.WS.647, para. 48; UKR.WS.650, para. 53; UKR.WS.660, para. 70; UKR.WS.661, para. 8; UKR.WS.662, paras. 30-31; UKR.WS.664, para. 65; UKR.WS.665, paras. 88, 92, 94; UKR.WS.672, para. 19.

313 ODIHR Witness Interviews UKR.WS.584, para. 12; UKR.WS.587, para. 13; UKR.WS.589, para. 13; UKR.WS.599, para. 15; UKR.WS.607, para. 14; UKR.WS.622, paras. 9, 12.

314 ODIHR Witness Interviews UKR.WS.599, para. 80; UKR.WS.607, para. 115; UKR.WS.622, para. 27.

315 ODIHR Witness Interview UKR.WS.607, para. 115.

316 Information provided to ODIHR by a human rights defender working on issues of Ukrainian civilian detainees and POWs.

317 ODIHR Witness Interviews UKR.WS.584, paras. 74, 135, 138; UKR.WS.587, para. 47, 70, 84, 189; UKR.WS.589, para. 72; UKR.WS.600, paras. 66, 164; UKR.WS.607, paras. 112-113; UKR.WS.656, paras. 28, 36; UKR.WS.661, para. 46. To the contrary, two witnesses mentioned not being visited by such representatives. See ODIHR Witness Interviews UKR.WS.599, paras. 38, 90; UKR.WS.622, para. 28.

318 ODIHR Witness Interviews UKR.WS.584, para. 136; UKR.WS.589, para. 72; UKR.WS.599, para. 91; UKR.WS.600, paras. 66, 176.

## E. EXCHANGES OF CIVILIANS

82. During the second half of 2025, ODIHR interviewed 11 civilians released as part of POW exchanges<sup>319</sup> and received additional accounts from two witnesses<sup>320</sup> regarding the profiles of civilians included in official POW exchanges between the Russian Federation and Ukraine. While civilians have previously been exchanged alongside POWs, the number of civilians exchanged increased significantly during this period. The POW exchanges of May, August and October 2025 alone led to the return of 199 civilians to Ukraine.<sup>321</sup> At least 28 Russian civilians were reportedly included in the POW exchanges of August and October 2025.<sup>322</sup> While the exchange of civilian internees is not prohibited under IHL, such exchanges presuppose that the civilians concerned were lawfully detained.<sup>323</sup> The detention of civilians merely for the purpose of carrying out a future exchange may amount to hostage-taking, which constitutes a war crime.<sup>324</sup>
83. Two witnesses told ODIHR that the Russian Federation exchanged Ukrainian civilians who had been detained *after* February 2022 for refusing to cooperate with the occupation authorities or due to alleged prior association with the Ukrainian armed forces.<sup>325</sup> Moreover, according to nine witnesses, some civilians exchanged in recent POW swaps had been detained *before* February 2022 by local ‘authorities’ in the so-called ‘Luhansk People’s Republic’ and ‘Donetsk People’s Republic’ on fabricated charges, including alleged collaboration with the Ukrainian Security Service (SBU) or armed forces, or support for terrorism.<sup>326</sup> Despite not meeting the legal criteria for inclusion in POW exchanges, the Russian Federation apparently included them.<sup>327</sup> The Russian Federation designates Ukrainian civilian detainees as “*persons detained for countering the special military operation,*” thereby blurring the

319 ODIHR Witness Interviews UKR.WS.635, paras. 10-11; UKR.WS.647, paras. 6-9; UKR.WS.650, paras. 4,6; UKR.WS.652, paras. 5-8; UKR.WS.660, paras. 6-9; UKR.WS.664, paras. 6-9; UKR.WS.665, paras. 6-7, 17-24; UKR.WS.666, paras. 14-19; UKR.WS.667, paras. 17-22; UKR.WS.669, para. 13; UKR.WS.670, paras. 4-8.

320 ODIHR Witness Interviews UKR.WS.577, paras. 28, 29, 39, 40; UKR.WS.593, paras. 58, 60-61, 105.

321 See [Treatment of civilians deprived of their liberty in the context of the armed attack by the Russian Federation against Ukraine](#), UN OHCHR, 23 September 2025, para. 77. Volodymyr Zelenskyy, Telegram post, 2 October 2025, in Ukrainian.

322 Russian Ministry of Defence, Telegram post, 24 August 2025, in Russian; Telegram post, 2 October 2025, in Russian.

323 GC IV, arts. 42, 78. The detention of civilians who do not pose an imperative security threat would be tantamount to hostage-taking, which is prohibited under IHL.

324 CIHL Rule 96; GC IV, arts. 34, 147; AP I, art. 75(2); ICC Rome Statute, art. 8(2)(a)(viii). For more details, see [Section IV.b. Arbitrary deprivation of liberty and enforced disappearances in areas under the control of the Russian authorities](#).

325 ODIHR Witness Interviews UKR.WS.635, paras. 10-11; UKR.WS.666, paras. 14-19. See also OSCE/ODIHR, [Seventh Interim Report](#), para. 40.

326 ODIHR Witness Interviews UKR.WS.647, paras. 6-9; UKR.WS.650, paras. 4,6; UKR.WS.652, paras. 5-8; UKR.WS.660, paras. 6-9; UKR.WS.664, paras. 6-9; UKR.WS.665, paras. 6-7, 17-24; UKR.WS.667, paras. 17-22; UKR.WS.669, para. 13; UKR.WS.670, paras. 4-8.

327 See also [Section IV.b. Arbitrary deprivation of liberty and enforced disappearances in areas under the control of the Russian authorities](#).

distinction between POWs and civilian detainees, who are subject to different legal regimes under IHL.<sup>328</sup>

84. Information provided by two witnesses further indicates that the Russian Federation has included former Ukrainian inmates who had already completed their sentences in recent POW exchanges.<sup>329</sup> This involved individuals previously held in Ukrainian detention facilities in territories later occupied by the Russian Federation, as well as Ukrainian nationals who served sentences in the Russian Federation. These civilians did not hold Russian citizenship and, upon completion of their sentences, were transferred to and kept in migration detention centres.<sup>330</sup> According to one witness working on issues related to Ukrainian prisoners in the Russian Federation and the Russian-occupied territories of Ukraine: “*In the [POW] exchange between Ukraine and Russia in May 2025, the Russians brought [...] Ukrainian ex-inmates, who had served their sentences. They should just have been freed, but the Russians used them for the exchange, although they should not be part of these exchanges, as they are free people*”.<sup>331</sup>
85. Information gathered by ODIHR indicates that the detention of Ukrainian civilians in the Russian-occupied territories of Ukraine, as well as the practice of placing former Ukrainian prisoners in migration detention centres upon completion of their sentences and subsequently including them in POW exchanges, corresponds to the constitutive elements of hostage-taking as defined under IHL.<sup>332</sup>
86. In the framework of official POW exchanges, Ukraine, for its part, transferred Russian civilians reportedly detained by the Ukrainian armed forces in the Kursk region of the Russian Federation,<sup>333</sup> as well as Ukrainian citizens convicted of collaboration with the Russian authorities.<sup>334</sup>
87. The lack of a clear distinction between POWs and detained civilians is a matter of concern, as the two categories are governed by different legal regimes. Blurring the lines between them risks undermining the specific safeguards guaranteed under both IHL and IHRL.<sup>335</sup> The accounts received suggest that

328 See [OSCE Moscow Mechanism Report](#), p. 1.

329 ODIHR Witness Interviews UKR.WS.577, paras. 28, 29, 40; UKR.WS.593, paras. 58, 60-61, 105.

330 For more details, see [Section IV.g.i.\(a\). Forced adoption of Russian citizenship](#).

331 ODIHR Witness Interview UKR.WS.577, para. 14.

332 CIHL Rule 96; GC IV, arts. 34, 147; AP I, art. 75(2). See also ICC Statute, art. 8(2)(a)(viii).

333 Russian Ministry of Defence, [Telegram post](#), 24 August 2025, in Russian. Several civilians, who the Ukrainian armed forces had transferred from an area of active hostilities in Kursk region, remain displaced in Sumy region in a manner described by the Russian authorities as “effectively as hostages”. Information provided to ODIHR by the High Commissioner for Human Rights in the Russian Federation. See also OSCE/ODIHR, [Seventh Interim Report](#), para. 42. ODIHR is currently unable to independently verify the status of these individuals, the circumstances surrounding their displacement, nor the obstacles to their return to the Russian Federation.

334 ODIHR Witness Interview UKR.WS.577, para. 14. See also OSCE/ODIHR, [Seventh Interim Report](#), para. 132.

335 [OSCE Moscow Mechanism Report](#), pp. 13-14, 40, 51.

these individuals were effectively used as ‘bargaining chips’ in the exchange process, despite not meeting the legal criteria for POW status.

## **F. CONFLICT-RELATED SEXUAL VIOLENCE IN AREAS UNDER THE CONTROL OF THE RUSSIAN AUTHORITIES**

88. During the second half of 2025, ODIHR received 21 testimonies on conflict-related sexual violence (CRSV) perpetrated by members of the Russian armed forces or Russian authorities,<sup>336</sup> including 12 provided by direct survivors. Survivors were aged between 14 and 52 years old.<sup>337</sup> Ten testimonies described acts of CRSV against men, eight against women, and three involved both male and female victims. All but two of the reported cases took place in custodial settings. Almost half of the testimonies regarding POWs included allegations of CRSV against Ukrainian POWs in Russian detention.<sup>338</sup> Detention facilities cited by survivors and witnesses were located in Russian-occupied territories of Ukraine, including Donetsk, Luhansk, Kharkiv, Kherson and Zaporizhzhia regions,<sup>339</sup> as well as Kamyshin, Stary Oskol and Biysk within the Russian Federation.<sup>340</sup> As of 1 December 2025, the Prosecutor General’s Office of Ukraine had initiated 385 criminal investigations into allegations of CRSV involving 142 male and 243 female survivors (including 22 underage girls and one underage boy). Alleged acts included rape, mutilation or violence to genitals, forced nudity, threats and attempts of rape, and being forced to witness the sexual abuse of relatives.<sup>341</sup>
89. Testimonies received during the reporting period both confirmed and complemented previous findings<sup>342</sup> — indicating the continued widespread occurrence of CRSV perpetrated by the Russian authorities<sup>343</sup> — and informed ODIHR about new violations. Such acts constitute serious violations of IHL and IHRL and may amount to war crimes or crimes against humanity.<sup>344</sup>

336 ODIHR Witness Interviews UKR.WS.577; UKR.WS.579; UKR.WS.584; UKR.WS.587; UKR.WS.589; UKR.WS.593; UKR.WS.594; UKR.WS.600; UKR.WS.604; UKR.WS.607; UKR.WS.609; UKR.WS.618; UKR.WS.622; UKR.WS.628; UKR.WS.633; UKR.WS.640; UKR.WS.656; UKR.WS.661; UKR.WS.666; UKR.WS.669; UKR.WS.680.

337 ODIHR Witness Interviews UKR.WS.609, para. 36; UKR.WS.628, paras. 14, 15.

338 ODIHR Witness Interviews UKR.WS.584; UKR.WS.587; UKR.WS.589; UKR.WS.594; UKR.WS.600; UKR.WS.607; UKR.WS.622; UKR.WS.656; UKR.WS.661.

339 ODIHR Witness Interviews UKR.WS.577; UKR.WS.579; UKR.WS.584; UKR.WS.587; UKR.WS.618; UKR.WS.622; UKR.WS.628; UKR.WS.660; UKR.WS.661; UKR.WS.666; UKR.WS.669; UKR.WS.680.

340 ODIHR Witness Interviews UKR.WS.589; UKR.WS.594; UKR.WS.607; UKR.WS.656; UKR.WS.661.

341 Information provided to ODIHR by the Permanent Mission of Ukraine to the International Organizations in Vienna.

342 See OSCE/ODIHR, [Fourth Interim Report](#), para. 62; [Fifth Interim Report](#), paras. 74-78; [Sixth Interim Report](#), paras. 93-100; [Seventh Interim Report](#), paras. 79-86.

343 See also [OSCE Moscow Mechanism Report](#), p. 52.

344 CIHL Rule 93; AP I, arts. 75(2)(b) and 76(1); ICC Statute, art. 8(2)(b)(xxii); ICTY Statute, art. 5(g); ICTR Statute, art. 3(g). See also OSCE/ODIHR, [Sixth Interim Report](#), para. 100, [Seventh Interim Report](#), para. 86.

90. Witnesses recounted a wide range of CRSV acts similar to those detailed in earlier ODIHR reports, including various instances of rape<sup>345</sup> (with and without objects),<sup>346</sup> group rape<sup>347</sup> and rape of minors.<sup>348</sup> Male survivors reported electric shocks to genitals,<sup>349</sup> being struck on the genitalia<sup>350</sup> and being forced to perform sexual acts with other detainees.<sup>351</sup> In one instance, two Ukrainian POWs were raped by another detainee as a disciplinary measure organized by the detention administration.<sup>352</sup> Two POWs held in in Kamyshin (Volgograd region) reported the use of tasers on genitals,<sup>353</sup> which aligns with previous findings from this facility.<sup>354</sup>
91. ODIHR also documented acts designed to humiliate victims. Male detainees were urinated on,<sup>355</sup> forced to perform sexual acts with objects<sup>356</sup> and made to crawl naked with bags on their heads while holding their underwear.<sup>357</sup> Female survivors reported sexual harassment<sup>358</sup> and verbal abuse of a sexual nature.<sup>359</sup> One survivor recalled how Russian soldiers referred to her as ‘meat’<sup>360</sup> during a two-day group rape, while another noted: *“They treated me like [a piece of] meat for them to have fun [with].”*<sup>361</sup>
92. Survivors further reported threats of sexualized torture, including rape,<sup>362</sup> insertion of objects into the anus<sup>363</sup> and castration by Russian guards and soldiers.<sup>364</sup> One witness recounted an interrogation in which Russian authorities attempted to coerce him into following instructions by threatening: *“If you don’t say it, I’ll use a rubber baton or get a gay man to do it to you.”*<sup>365</sup> In line with previous findings,<sup>366</sup> ODIHR also documented the use of homophobic slurs by Russian armed forces members,<sup>367</sup> as well as degrading comments of a sexual nature.<sup>368</sup>

345 ODIHR Witness Interviews UKR.WS.577, para. 49; UKR.WS.609, para. 36; UKR.WS.618, para. 20.

346 ODIHR Witness Interviews UKR.WS.577, paras. 32, 49; UKR.WS.666, para. 25; UKR.WS.680, para. 21.

347 ODIHR Witness Interviews UKR.WS.628, paras. 14, 15; UKR.WS.680, para. 5.

348 ODIHR Witness Interview UKR.WS.640, para. 32.

349 ODIHR Witness Interviews UKR.WS.584, paras. 30, 165; UKR.WS.589, para. 47; UKR.WS.600, para. 109.

350 ODIHR Witness Interviews UKR.WS.587, para. 70; UKR.WS.594, para. 103; UKR.WS.600, para. 109.

351 ODIHR Witness Interview UKR.WS.600, para. 142.

352 ODIHR Witness Interview UKR.WS.622, para. 31.

353 ODIHR Witness Interviews UKR.WS.589, para. 47; UKR.WS.607, para. 44.

354 OSCE/ODIHR, [Seventh Interim Report](#), para. 79.

355 ODIHR Witness Interview UKR.WS.577, para. 49.

356 ODIHR Witness Interviews UKR.WS.589, para. 92; UKR.WS.680, para. 13.

357 ODIHR Witness Interview UKR.WS.661, para. 32.

358 ODIHR Witness Interview UKR.WS.666, para. 32.

359 ODIHR Witness Interview UKR.WS.680, para. 16.

360 ODIHR Witness Interview UKR.WS.680, para. 16.

361 ODIHR Witness Interview UKR.WS.628, para. 14.

362 ODIHR Witness Interviews UKR.WS.579, para. 32; UKR.WS.587, para. 42; UKR.WS.589, para. 48; UKR.WS.593, para. 101; UKR.WS.594, paras. 101, 182; UKR.WS.600, para. 106; UKR.WS.607, paras. 72, 78; UKR.WS.633, para. 10; UKR.WS.656, para. 23; UKR.WS.669, para. 37.

363 ODIHR Witness Interview UKR.WS.587, para. 42.

364 ODIHR Witness Interview UKR.WS.622, para. 23.

365 ODIHR Witness Interview UKR.WS.600, para. 106.

366 See also OSCE/ODIHR, [Fifth Interim Report](#), para. 78; [Sixth Interim Report](#), para. 99; [Seventh Interim Report](#), para. 84.

367 ODIHR Witness Interviews UKR.WS.622, para. 18; UKR.WS.669, para. 37.

368 ODIHR Witness Interview UKR.WS.661, para. 17.

93. Similarly to the previous reporting period,<sup>369</sup> male survivors reported incidents of forced nudity,<sup>370</sup> beatings while nude,<sup>371</sup> electric shocks in showers<sup>372</sup> and pictures being taken of naked detainees.<sup>373</sup> One witness described being kept nude for up to four consecutive days.<sup>374</sup> Two witnesses reported being subjected to forced nudity in Pakino (Vladimir region), with one of them recounting being forced to walk naked in humiliating positions while performing sexualized gestures.<sup>375</sup>
94. Three witnesses described female detainees being coerced by the detention facility administration into sexual acts in exchange for food and cigarettes.<sup>376</sup> One witness described a situation where Russian soldiers offered alcohol to female detainees prior to committing sexual acts,<sup>377</sup> constituting sexual violence and/or rape.<sup>378</sup>
95. On 18 June 2025, Ukraine enacted the law “On the legal and social protection of survivors of sexual violence related to the armed aggression of the Russian Federation against Ukraine, and providing them with urgent interim reparations”, marking the first legal framework guaranteeing interim reparations for CRSV survivors during an active armed conflict.<sup>379</sup> However, implementing bylaws have not yet been issued, preventing victims from applying for reparations.<sup>380</sup> ODIHR was also informed that the medical, social and psychological assistance to which CRSV victims are entitled often remains insufficient, especially near the frontline and in territories brought back under the control of the Government of Ukraine.<sup>381</sup>

369 See OSCE/ODIHR, [Fifth Interim Report](#), para. 77; [Sixth Interim Report](#), paras. 96, 97, [Seventh Interim Report](#), paras. 80, 83.

370 ODIHR Witness Interviews UKR.WS.600, para. 123; UKR.WS.633, para. 10; UKR.WS.656, para. 23; UKR.WS.661, para. 32.

371 ODIHR Witness Interviews UKR.WS.594, para. 104; UKR.WS.607, para. 44.

372 ODIHR Witness Interview UKR.WS.607, para. 44.

373 ODIHR Witness Interviews UKR.WS.600, para. 70; UKR.WS.607, para. 79.

374 ODIHR Witness Interview UKR.WS.607, para. 81.

375 ODIHR Witness Interview UKR.WS.600, para. 142. See also UKR.WS.607, paras. 79, 81.

376 ODIHR Witness Interviews UKR.WS.577, para. 26; UKR.WS.604, paras. 25-27, 36; UKR.WS.666, para. 32.

377 ODIHR Witness Interview UKR.WS.604, paras. 31, 32.

378 The coercive environment of detention vitiates the ability of detainees to enter into consensual sexual relations. See ICTY, *Prosecutor v. Milutinović et al.*, IT-05-87-T, Judgement, vol. 1, 26 February 2009, para. 200; ICTY, *Prosecutor v. Đorđević*, IT-05-87/1-A, Judgement, 27 January 2014, para. 852. See also ICTR, *Prosecutor v. Akayesu*, ICTR-96-4-T, Judgement, 2 September 1998, para. 598; ICTY, *Prosecutor v. Kunarac et al.*, ICTY IT-96-23-T & IT-96-23/1-T, Judgement, 22 February 2001, paras. 436-460.

379 Закон України “Про правовий і соціальний захист осіб, постраждалих від сексуального насильства, пов’язаного із збройною агресією Російської Федерації проти України, та надання їм невідкладних проміжних репарацій” [Law of Ukraine “On legal and social protection of persons who have suffered from sexual violence related to the armed aggression of the Russian Federation against Ukraine, and on providing them with urgent interim reparations”], Supreme Council of Ukraine, 18 June 2025, in Ukrainian. See also [Ukraine](#), Global Survivors Fund.

380 Information provided to ODIHR by an NGO working on the issues of gender equality, prevention of gender-based violence and children’s rights.

381 [Accessibility, Challenges and Needs: An analysis of the CRSV survivor assistance system in Ukraine](#), JurFem, 2025.

## G. ADMINISTRATION OF OCCUPIED TERRITORIES AND RELATED VIOLATIONS

### Attempts to alter the status and character of the occupied territories

96. Under IHL, occupation is presumed to be a transitional and temporary regime, with the occupying power not acquiring sovereignty over the occupied territory. The local population is considered unable to freely consent to changes affecting the status of the territory or to waive their rights. Accordingly, the occupying power must refrain from measures that would bring about irreversible changes fundamentally altering the status or character of the territory. The so-called ‘annexation’ or occupation or ‘integration’ of areas of Ukraine by force by the Russian Federation remains illegal under international law and does not alter their status as Ukrainian sovereign territory or remove the protections afforded to civilians under IHL.<sup>382</sup> ODIHR has continued to receive accounts indicating that residents in the occupied territories of Ukraine were coerced into acquiring Russian citizenship and were subjected to Russian Federation educational curricula, including military-patriotic education for children. These measures suggest ongoing efforts by the Russian authorities to alter the demographic composition of the territory, enforce declarations of allegiance and change the social status quo.

#### *Forced adoption of Russian citizenship*

97. During the second half of 2025, ODIHR continued to receive accounts,<sup>383</sup> including through 25 witness testimonies,<sup>384</sup> on the sustained and systematic efforts by the Russian Federation to force residents of the occupied areas of Ukraine to acquire Russian citizenship, confirming previous findings.<sup>385</sup> Most witnesses left the occupied territories between April and September 2025. Russian citizenship was reportedly required to access health care, employment, education and various social services, to move freely within or out of the occupied territories and the Russian Federation, and to maintain property ownership. ODIHR also received new witness accounts of a requirement for Ukrainians without Russian citizenship to either register as foreigners and acquire a residency permit, or leave the Russian-occupied territories of Ukraine by 10 September 2025.<sup>386</sup>

382 GC IV, art. 47; Hague Regulations (1907), art. 43.

383 Information provided to ODIHR by eight NGOs working on IHRL and IHL issues in the occupied territories; Information provided to ODIHR by the Permanent Mission of Ukraine to the International Organizations in Vienna.

384 ODIHR Witness Interviews UKR.WS.577; UKR.WS.581; UKR.WS.585; UKR.WS.596; UKR.WS.591; UKR.WS.593; UKR.WS.596; UKR.WS.597; UKR.WS.605; UKR.WS.608; UKR.WS.609; UKR.WS.611; UKR.WS.619; UKR.WS.621; UKR.WS.631; UKR.WS.638; UKR.WS.640; UKR.WS.645; UKR.WS.653; UKR.WS.659; UKR.WS.663; UKR.WS.664; UKR.WS.665; UKR.WS.677; UKR.WS.679.

385 See also OSCE/ODIHR, *First Interim Report*, para. 80; *Second Interim Report*, paras. 57-60; *Third Interim Report*, paras. 91-97; *Fourth Interim Report*, paras. 98-95; *Fifth Interim Report*, paras. 80-87; *Sixth Interim Report*, paras. 103-108; *Seventh Interim Report*, paras. 88-95.

386 Указ Президента Российской Федерации от 20.03.2025 № 159 “Об особенностях правового положения отдельных категорий иностранных граждан и лиц без гражданства в Российской Федерации, изменении и признании утратившими силу некоторых указов Президента

98. Such measures may violate the IHL framework on belligerent occupation and could constitute discrimination based on nationality.<sup>387</sup> They may also amount to forced declarations of allegiance to the occupying power.<sup>388</sup> Furthermore, the imposition of Russian citizenship may expose Ukrainian residents in the occupied territories to conscription into the Russian armed forces, which is prohibited under IHL.<sup>389</sup>
99. Sixteen witnesses stated that Russian citizenship and health insurance were required to access public healthcare services,<sup>390</sup> including emergency care. One witness living close to the front line in Kherson region noted how when “[she] was injured during [a drone] attack and went to the hospital in Henichesk, the doctors refused to provide any medical assistance without a [Russian] passport”.<sup>391</sup> Another witness from the same region indicated that access to the local hospital was completely restricted to holders of Russian passports.<sup>392</sup>
100. Thirteen witnesses reported that a Russian passport was necessary for free movement within the occupied territories, to pass checkpoints or to travel via the Russian Federation.<sup>393</sup> A witness from Luhansk region indicated that individuals without Russian documents risked being taken to police stations under martial law.<sup>394</sup> Additionally, witnesses reported that Ukrainian car number plates had to be replaced with Russian ones by 1 January 2026.<sup>395</sup> Operating a vehicle with a Ukrainian driving licence was, however, already prohibited and residents needed a Russian one, for which Russian citizenship was a prerequisite.<sup>396</sup>
101. One witness from Luhansk region reported that leaving Russian-occupied territories was possible with an internal Russian passport. However, leaving the Russian Federation towards third countries required a Russian international passport, which entailed military registration for men.<sup>397</sup> Four

[Российской Федерации](#) [Decree of the President of the Russian Federation of 20.03.2025 No. 159 “On the specifics of the legal status of certain categories of foreign citizens and stateless persons in the Russian Federation, amendments and recognition of certain decrees of the President of the Russian Federation as invalid”], 20 March 2025, in Russian.

387 Particularly as it relates to the provision of essential services, see GC IV, art. 27(3); AP I, arts. 69-70.

388 Hague Regulations (1907), art. 45.

389 GC IV, art. 51. The conscription of citizens of an occupied territory to the armed forces of the occupying authority constitutes a war crime, see GC IV, art. 147; ICC Statute, art. 8(2)(a)(v). For more details, see [Section IV.g.ii. Forced conscription and mobilization into the armed forces of the Russian Federation](#).

390 UKR.WS.577, para. 44; UKR.WS.591, paras. 46, 142; UKR.WS.596, paras. 25, 30; UKR.WS.597, para. 41; UKR.WS.608, paras. 44, 77; UKR.WS.609, para. 114; UKR.WS.611, para. 17; UKR.WS.619, para. 18; UKR.WS.631, paras. 12, 15; UKR.WS.638, para. 41; UKR.WS.640, para. 47; UKR.WS.645, para. 31; UKR.WS.653, para. 18; UKR.WS.659, para. 51; UKR.WS.663, para. 12; UKR.WS.679, para. 78.

391 ODIHR Witness Interview UKR.WS.596, para. 25.

392 ODIHR Witness Interviews UKR.WS.638, para. 41.

393 ODIHR Witness Interviews UKR.WS.591, paras. 13, 15, 44; UKR.WS.593, paras. 91, 92; UKR.WS.596, para. 28; UKR.WS.605, para. 31; UKR.WS.611, paras. 18, 54; UKR.WS.619, paras. 18, 20; UKR.WS.621, paras. 9, 29; UKR.WS.631, para. 59; UKR.WS.638, paras. 16, 44; UKR.WS.645, paras. 18, 20, 21, 33; UKR.WS.659, para. 51; UKR.WS.663, para. 12; UKR.WS.677, para. 87.

394 ODIHR Witness Interview UKR.WS.645, para. 33.

395 ODIHR Witness Interviews UKR.WS.611, para. 24; UKR.WS.640, paras. 47; 48; UKR.WS.679, para. 78.

396 ODIHR Witness Interview UKR.WS.638, para. 44.

397 ODIHR Witness Interview UKR.WS.645, paras.18, 20.

other witnesses reported that civilians in the occupied territories were required to register with the military after acquiring Russian citizenship, thus putting them at risk of conscription.<sup>398</sup>

102. Eleven witnesses reported that Russian citizenship was needed to re-register their properties under Russian law by 1 January 2026. Failure to do so reportedly risked the ‘nationalization’ of their property.<sup>399</sup> The occupation authorities prioritized the properties of Ukrainians that had left the occupied territories for ‘nationalization’, declaring them ‘ownerless’ and issuing short notices for re-registration. As a result, many displaced Ukrainians reportedly had to go back to Russian-occupied territories of Ukraine to retain their property rights.
103. Six witnesses also reported that Russian citizenship was also required to pay utility bills and access electricity, heating and water.<sup>400</sup> A witness from the occupied part of Zaporizhzhia region of Ukraine explained: “*To have electricity and gas you would need to sign a contract, and the contract was tied to a Russian passport*”.<sup>401</sup> Similarly, a witness from the occupied part of Kherson region noted: “*The local water company visited houses. If people wanted to keep the supply of water, then they had to sign a contract and get a [Russian] passport*”.<sup>402</sup> Non-compliance reportedly led to the ‘nationalization’ of property.<sup>403</sup>
104. According to eight witnesses, Russian citizenship was also necessary to retain or obtain employment in the public or private sectors.<sup>404</sup> Moreover, three witnesses stated that private businesses had to register under Russian law if they wanted to continue operating, for which Russian citizenship was a prerequisite.<sup>405</sup> Witnesses also reported that Russian citizenship was a requirement to access humanitarian aid,<sup>406</sup> as well as Russian pensions, often critical for elderly residents unable to access their Ukrainian pensions.<sup>407</sup> Two witnesses reported that parents were required to hold Russian citizenship for their children to go to school,<sup>408</sup> while a university student from Luhansk

398 ODIHR Witness Interviews UKR.WS.596, para. 37; UKR.WS.608, para. 82; UKR.WS.619, para. 20; UKR.WS.638, para. 46. For more details, see [Section IV.g.ii. Forced conscription and mobilization into the armed forces of the Russian Federation](#).

399 ODIHR Witness Interviews UKR.WS.591, para. 45; UKR.WS.596, para. 23, UKR.WS.597, para. 41; UKR.WS.609, para. 107; UKR.WS.611, para. 55; UKR.WS.619, para. 18; UKR.WS.621, para. 26; UKR.WS.638, para. 43; UKR.WS.640, paras. 47, 48; UKR.WS.645, paras.24, 26, 28; UKR.WS.677, para. 92.

400 ODIHR Witness Interviews UKR.WS.591, paras. 14, 46, 55; UKR.WS.596, para. 40; UKR.WS.597, para. 41; UKR.WS.608, paras. 44-45; UKR.WS.619, para. 13.

401 ODIHR Witness Interview UKR.WS.591, para.46.

402 ODIHR Witness Interview UKR.WS.619, para.13.

403 ODIHR Witness Interview UKR.WS.645, para. 26.

404 ODIHR Witness Interviews UKR.WS.597, para. 42; UKR.WS.605, paras. 29, 48; UKR.WS.608, paras. 14, 44, 85; UKR.WS.609, paras. 10, 112; UKR.WS.631, paras. 19, 30; UKR.WS.645, para.24; UKR.WS.663, para. 12; UKR.WS.677, para. 58.

405 ODIHR Witness Interviews UKR.WS.619, para. 18; UKR.WS.631, para. 20; UKR.WS.638, para. 43.

406 ODIHR Witness Interviews UKR.WS.596, para. 31; UKR.WS.608, para. 44; UKR.WS.619, para. 18.

407 ODIHR Witness Interviews UKR.WS.581, para. 22; UKR.WS.631, para. 19; UKR.WS.653, para. 18; UKR.WS.664, para. 68; UKR.WS.665, para. 89.

408 ODIHR Witness Interviews UKR.WS.609, para. 10; UKR.WS.677, para. 29.

region added: *“If you did not have a Russian passport, you would be expelled from university.”*<sup>409</sup>

105. Two witnesses indicated that Ukrainian prisoners without Russian citizenship serving sentences unrelated to the current conflict were not released upon completion, but instead were held indefinitely in temporary detention centres for foreign citizens.<sup>410</sup> There, they were either pressured to get Russian citizenship and/or sign a contract with the Russian armed forces, and some were later included in POW exchanges.<sup>411</sup> These prisoners were people who were either illegally transferred from the occupied territories to the Russian Federation during the course of their prison sentence, or already serving a sentence there.
106. Finally, witnesses also reflected on a new Russian Federation law requiring Ukrainians without Russian citizenship to either register as foreigners and acquire a residency permit, or leave the occupied territories and the Russian Federation.<sup>412</sup> According to a witness from Zaporizhzhia region, while some residents in larger urban settlements applied for residency permits for foreigners to be able to stay in the occupied territories as Ukrainians, that option was not available for his village, forcing people to acquire Russian citizenship.<sup>413</sup> A witness from Donetsk region who left the occupied territories in August 2025 summarized the situation: *“My whole family has Russian passports. Many people do, even if they are pro-Ukrainian. For civilians who live there, there is no other choice. Putin has said that if you don’t have a Russian passport by 10 September 2025, you will be deported.”*<sup>414</sup>

#### *Grave and systematic changes related to education*

107. During the second half of 2025, ODIHR continued to receive accounts,<sup>415</sup> including through 18 witness testimonies,<sup>416</sup> describing grave and systematic changes to the provision of education in the Russian-occupied territories of Ukraine. This included the imposition of a Russian educational curriculum

409 ODIHR Witness Interview UKR.WS.645, para. 32. For more details, see [Section IV.g.i.\(b\). Grave and systematic changes related to education](#).

410 ODIHR Witness Interview UKR.WS.577, paras. 28, 29, 39, 40; UKR.WS.593, paras. 58, 60-61, 105.

411 For more details, see [Section IV.e. Exchanges of civilians](#).

412 [Указ Президента Российской Федерации от 20.03.2025 № 159 “Об особенностях правового положения отдельных категорий иностранных граждан и лиц без гражданства в Российской Федерации, изменении и признании утратившими силу некоторых указов Президента Российской Федерации](#) [Decree of the President of the Russian Federation of 20.03.2025 No. 159 “On the specifics of the legal status of certain categories of foreign citizens and stateless persons in the Russian Federation, amendments and recognition of certain decrees of the President of the Russian Federation as invalid”], 20 March 2025, in Russian.

413 ODIHR Witness Interview UKR.WS.631, para. 19.

414 ODIHR Witness Interview UKR.WS.664, para. 83.

415 Information provided to ODIHR by six NGOs working on, among other IHRL and IHL issues, the education of children in the occupied territories; Information provided to ODIHR by the Permanent Mission of Ukraine to the International Organizations in Vienna.

416 ODIHR Witness Interviews UKR.WS.591; UKR.WS.605; UKR.WS.608; UKR.WS.609; UKR.WS.611; UKR.WS.612; UKR.WS.619; UKR.WS.621; UKR.WS.631; UKR.WS.638; UKR.WS.640; UKR.WS.645; UKR.WS.646; UKR.WS.659; UKR.WS.663; UKR.WS.672; UKR.WS.675; UKR.WS.677.

and pro-Russian, military-patriotic education for children, confirming earlier findings.<sup>417</sup> For the first time, ODIHR also received first-hand information on military-patriotic education at universities, as well as more detailed accounts of the militarization of children and the encouragement of students to join the Russian armed forces.<sup>418</sup> Most witnesses interviewed by ODIHR had left the occupied territory between spring and late summer 2025, and reported on what they observed or experienced up to that point.

108. Under IHL, an occupying power must respect the laws and institutions in place at the time the occupation commenced, unless absolutely prevented from doing so.<sup>419</sup> It may arrange children’s education only where local institutions are inadequate and should, where possible, rely on persons of the same nationality, language and religion as the children.<sup>420</sup> An occupying power must further refrain from raising obstacles to the exercise of economic, social and cultural rights. The education of children separated from their parents must, in so far as possible, be entrusted to persons with similar cultural traditions as their parents in order to “exclude any religious or political propaganda designed to wean children from their natural milieu”.<sup>421</sup> Moreover, under IHL, “it is forbidden to compel the inhabitants of occupied territory to swear allegiance to the hostile Power”.<sup>422</sup> The widespread replacement of the Ukrainian curriculum with that of the Russian Federation, combined with the introduction of Russian military-patriotic education for school-aged children, appears to violate these international obligations and fundamentally alter the status quo ante.
109. Seven witnesses interviewed by ODIHR described the replacement of the Ukrainian educational curriculum with that of the Russian Federation in the schools in the Russian-occupied territories of Ukraine.<sup>423</sup> Twelve witnesses, including former students, school staff and parents, explained how schools were modified in the occupied territories to impose pro-Russian, military-patriotic education.<sup>424</sup> Two witnesses stated that the occupying authorities removed all Ukrainian textbooks and replaced them with Russian ones, while

417 See also OSCE/ODIHR, *Second Interim Report*, paras. 83-86; *Fifth Interim Report*, paras. 88-96; *Sixth Interim Report*, paras. 109-114; *Seventh Interim Report*, paras. 96-107.

418 ODIHR Witness Interviews UKR.WS.605, para. 42; URK.WS.608, para. 57; UKR.WS.609, paras. 68, 73; UKR.WS.611, para. 45; UKR.WS.612, para. 16; UKR.WS.631, para. 41; UKR.WS.645, paras. 41, 42; UKR.WS.672, para. 18; UKR.WS.675, paras. 16, 18, 46; UKR.WS.677, para. 54.

419 Hague Regulations (1907), art. 43. See further GC IV, art. 64, which allows for derogation from local legislation only for security reasons or where such legislation is an obstacle to the application of IHL, or where it is “essential” to “maintain the orderly government in the territory”.

420 GC IV, art. 50(3). See also CRC, art. 29(1)(c); Committee on the Rights of the Child, Day of General Discussion on the ‘Right of the Child to Education in Emergency Situations’, 19 September 2008, para. 45.

421 GC IV, art. 24. See also ICRC, Commentary to the GC IV (1958), art. 24, p. 188; ICRC, Commentary to GC IV (2025), art. 24, para. 2092.

422 Hague Regulations (1907), art. 45.

423 ODIHR Witness Interviews UKR.WS.591, paras. 64, 65, 81; UKR.WS.608, paras. 9, 55; UKR.WS.611, para. 28; UKR.WS.612, para. 15; UKR.WS.631, para. 41; UKR.WS.638, para. 52; UKR.WS.675, para. 15; UKR.WS.677, para. 32.

424 ODIHR Witness Interviews UKR.WS.591, paras. 66, 69, 75, 77, 81; UKR.WS.605, paras. 14, 19, 25; URK.WS.608, paras. 53, 54, 57; UKR.WS.609, paras. 54, 65, 68, 73, 97; UKR.WS.611, paras. 40, 44; UKR.WS.612, paras. 15, 17; UKR.WS.631, paras. 41, 42; UKR.WS.640, para. 44; UKR.WS.659, paras. 48, 49; UKR.WS.663, para. 7; UKR.WS.675, paras. 7, 11; UKR.WS.677, paras. 36, 44, 52, 54.

in one case, Ukrainian books were reportedly burned in the school yard.<sup>425</sup> A witness from Donetsk region explained: *“There were changes in the history books. [...] These were new editions, and they included information about the ‘Special Military Operation’.”*<sup>426</sup> A student from Zaporizhzhia region added: *The books spoke about the ‘denazification’ and ‘demilitarization’ [of Ukraine].*<sup>427</sup> Witnesses also reported that there were history classes with topics such as ‘Russia is our motherland’,<sup>428</sup> while geography maps at school were showing the Russian-occupied territories of Ukraine as part of the Russian Federation.<sup>429</sup> According to information received by the Ukrainian authorities, as of 1 September 2025, children in the occupied territories started receiving unified Russian history textbooks for grades 5-9, containing information on the so-called ‘Crimean Spring’ and ‘Special Military Operation’, in line with changes introduced for grades 10-11 since September 2023.

110. Five witnesses stated that, in some schools and grades, the Ukrainian language could only be studied as an optional subject.<sup>430</sup> In that respect, a witness from Zaporizhzhia region explained: *“There was an optional, extracurricular Ukrainian language class for those who wanted it. It was officially called ‘the language of ethnic minorities’. However, people were afraid to send their children to these classes.”*<sup>431</sup>
111. Six witnesses reported that, every Monday, school started with a special class designed to instil Russian patriotism and promote ‘real Russian values’, known as ‘conversations about important things’ (*разговоры о важном*).<sup>432</sup> One witness described this class as intended to *“promote the history and greatness of Russia, while at the same time justifying the ‘Special Military Operation’ by erasing Ukrainian identity and sovereignty”*.<sup>433</sup>
112. Nine witnesses reported that students were required to raise the Russian Federation flag and sing the Russian national anthem before classes, either every Monday or every day.<sup>434</sup> To that end, a witness from Donetsk region recalled: *“My sister had to raise the [Russian] flag every morning and sing the [Russian] anthem before classes started.”*<sup>435</sup> In one case, a witness reported that students who refused to sing the Russian national anthem were visited by the

425 ODIHR Witness Interviews UKR.WS.591, para. 81; UKR.WS.612, para. 15.

426 ODIHR Witness Interview UKR.WS.605, para. 14.

427 ODIHR Witness Interview UKR.WS.677, para. 43.

428 ODIHR Witness Interview UKR.WS.608, para. 53.

429 ODIHR Witness Interview UKR.WS.605, para. 25.

430 ODIHR Witness Interviews UKR.WS.591, para. 65; UKR.WS.608, para. 55; UKR.WS.631, para. 41; UKR.WS.638, para. 52; UKR.WS.677, para. 32.

431 ODIHR Witness Interview UKR.WS.608, para. 55.

432 ODIHR Witness Interviews UKR.WS.591, para. 75; UKR.WS.609, para. 65; UKR.WS.612, para. 17; UKR.WS.663, para. 7; UKR.WS.677, paras. 36, 44.

433 ODIHR Witness Interview UKR.WS.612, para. 17.

434 ODIHR Witness Interviews UKR.WS.591, para. 66; UKR.WS.605, paras. 19, 42; UKR.WS.609, paras. 54, 97; UKR.WS.611, para. 41; UKR.WS.612, para. 16; UKR.WS.631, para. 42; UKR.WS.659, para. 49; UKR.WS.675, para. 7; UKR.WS.677, para. 44.

435 ODIHR Witness Interview UKR.WS.605, para. 19.

police and forced to sing it on camera.<sup>436</sup> Four witnesses further reported that schools were decorated with Russian flags and portraits of the President of the Russian Federation.<sup>437</sup>

113. Ten witnesses shared accounts of the militarization of children in schools and encouragement to support or join the Russian armed forces.<sup>438</sup> A student from Crimea who left in August 2025 reported: “*We learned how to assemble and disassemble a gun (during fundamentals of life safety lessons)*”, adding: “*By the 8th and 9th grade, teachers were openly encouraging boys and girls to serve the motherland by joining the [Russian] army*”.<sup>439</sup> Moreover, ODIHR received accounts of visits and lectures in schools by Russian military personnel to promote service in the Russian armed forces,<sup>440</sup> excursions to military facilities and participation in drone pilot training courses.<sup>441</sup>
114. Additionally, according to a student from Luhansk region: “*Everybody was very much encouraged to join this Cadet Corps at school [where] you have regular school education and military education at the same time, from 5th to 11th grade*”.<sup>442</sup> Five witnesses, including former students, reported that children at school were required to write letters and postcards, and draw pictures for Russian soldiers.<sup>443</sup> Similarly, according to four ODIHR witnesses, students had to participate in parades celebrating Russian national holidays, wearing military uniforms and carrying the Russian flag.<sup>444</sup>
115. Five witnesses reported that children were encouraged to attend recreational camps in Crimea and the Russian Federation in order to improve grades at school.<sup>445</sup> According to a student from Kherson region, children at these recreational camps received patriotic instruction, wore military-style uniforms and participated in military-style competitions.<sup>446</sup>
116. Eight witnesses told ODIHR that children were encouraged to join military-patriotic youth organizations, such as the Youth Army (*Юнармия*), the Movement of the First (*Движение первых*), the Eaglets of Russia (*Орлята России*), the Little Octobrists (*Октябрята*) and the All-Russian Student Rescue

436 ODIHR Witness Interview UKR.WS.612, para. 18.

437 ODIHR Witness Interviews UKR.WS.605, para. 25; URK.WS.608, para. 57; UKR.WS.609, para. 54; UKR.WS.659, para. 48.

438 ODIHR Witness Interviews UKR.WS.605, para. 42; URK.WS.608, para. 57; UKR.WS.609, paras. 68, 73; UKR.WS.611, para. 45; UKR.WS.612, para. 16; UKR.WS.631, para. 41; UKR.WS.645, paras. 41, 42; UKR.WS.672, para. 18; UKR.WS.675, paras. 16, 18, 46; UKR.WS.677, para. 54.

439 ODIHR Witness Interview UKR.WS.675, paras. 12, 13. See also UKR.WS.612, para. 16.

440 ODIHR Witness Interviews UKR.WS.611, para. 42; UKR.WS.612, para. 16; UKR.WS.675, para. 14.

441 ODIHR Witness Interview UKR.WS.611, para. 42.

442 ODIHR Witness Interview UKR.WS.645, para. 41.

443 ODIHR Witness Interviews URK.WS.608, para. 57; UKR.WS.609, para. 73; UKR.WS.612, para. 16; UKR.WS.631, para. 41; UKR.WS.677, para. 54.

444 ODIHR Witness Interviews UKR.WS.591, para. 77; UKR.WS.605, para. 42; UKR.WS.611, para. 45; UKR.WS.612, para. 16.

445 ODIHR Witness Interviews UKR.WS.591, para. 78; URK.WS.608, para. 56; UKR.WS.611, paras. 49, 51; UKR.WS.663, para. 8; UKR.WS.675, paras. 24, 26.

446 ODIHR Witness Interview UKR.WS.611, para. 49.

Corps (*Всероссийский студенческий корпус спасателей*).<sup>447</sup> According to a student from Crimea: “*Participation in these organizations was encouraged as a way to show loyalty to Russia. But, in reality, many children joined not because they supported Russia but because they wanted better grades*”.<sup>448</sup>

117. Four witnesses described the introduction of military-patriotic instruction at universities and the growing promotion of service in the Russian armed forces among university students.<sup>449</sup> In this regard, a former student from Donetsk region told ODIHR: “*There was a lot of propaganda to join the Russian army. Russian soldiers were portrayed as heroes, and it was shown as prestigious to be part of the Russian army.*”<sup>450</sup> The witness further added: “*They brought AK rifles to our college and told us to assemble and disassemble them and taught us how to shoot at targets. Everybody had to do it. These were additional lessons, replacing physical education classes. [...] Girls were given nursing classes, and boys were given military training.*”<sup>451</sup> According to three former students, soldiers visited universities to promote enlistment in the Russian armed forces.<sup>452</sup> Students were also trained in using gas masks, applying bandages and tourniquets, and were instructed to write letters to Russian soldiers.<sup>453</sup>
118. Five witnesses explained that attendance at Russian-curriculum schools, except for university education, was mandatory, and parents who did not let their children attend Russian schools were threatened with deprivation of parental rights.<sup>454</sup> In this regard, one witness from Kherson region described a case where a man who had hidden his child for three years to avoid Russian-curriculum schooling was discovered. The witness noted how: “*within a few days, social services came to [his] house, in spring 2025*”, after which “*He, too, had to send his child to the Russian school.*”<sup>455</sup> Moreover, a witness from Zaporizhzhia region told ODIHR how Russian representatives, accompanied by soldiers: “*went from house to house, visiting families with small children and forcing parents to send their children to school. [...] They threatened parents with taking their children away, mostly accusing them of not taking proper care of their children*”.<sup>456</sup> Five witnesses indicated that parents who did not want to send their children to Russian curriculum schools left the occupied

447 ODIHR Witness Interviews UKR.WS.591, para. 68; UKR.WS.605, para. 19; UKR.WS.609, para. 99; UKR.WS.611, paras. 42, 44; UKR.WS.612, para. 16; UKR.WS.663, para. 7; UKR.WS.675, para. 24; UKR.WS.677, para. 50.

448 ODIHR Witness Interview UKR.WS.675, para. 24.

449 ODIHR Witness Interviews UKR.WS.605, paras. 8, 9, 27; UKR.WS.659, paras. 48, 49; UKR.WS.672, paras. 18, 20, 24; UKR.WS.675, paras. 13, 29, 45. For more details, see [Section IV.g.ii. Forced conscription and mobilization into the armed forces of the Russian Federation](#).

450 ODIHR Witness Interview UKR.WS.605, para. 27.

451 ODIHR Witness Interview UKR.WS.605, para. 11.

452 ODIHR Witness Interviews UKR.WS.659, paras. 48, 49; UKR.WS.672, paras. 18, 20, 24; UKR.WS.675, paras. 29, 45.

453 ODIHR Witness Interview UKR.WS.675, para. 13.

454 ODIHR Witness Interviews UKR.WS.608, para. 43; UKR.WS.611, paras. 30, 38; UKR.WS.619, para. 16, 17; UKR.WS.631, para. 39; UKR.WS.638, para. 53.

455 ODIHR Witness Interview UKR.WS.638, para. 53.

456 ODIHR Witness Interview UKR.WS.608, para. 43. See also UKR.WS.640, para. 39; UKR.WS.646, para. 7.

territories,<sup>457</sup> with one witness from Kherson region stating: “*The reason to evacuate my family was that the Russian authorities told my wife to put my children into a Russian school, and we are categorically against that.*”<sup>458</sup>

119. Finally, nine witnesses reported that some children attended Russian-curriculum schools by day, while secretly following Ukrainian online education in the evenings.<sup>459</sup> Parents were threatened with the loss of parental rights or had their homes searched if their children were caught attending Ukrainian-curriculum schools online.<sup>460</sup> In one case, the parents were threatened with deportation.<sup>461</sup> Witnesses also reported that children experienced difficulties attending Ukrainian-curriculum classes online, as they had to constantly erase the data from their devices to avoid detection during searches.<sup>462</sup>

### Forced conscription and mobilization into the armed forces of the Russian Federation

120. During the second half of 2025, ODIHR continued to receive accounts,<sup>463</sup> including 30 witness testimonies,<sup>464</sup> on the forced conscription and mobilization of Ukrainian civilians into the Russian armed forces,<sup>465</sup> confirming findings from previous Interim Reports.<sup>466</sup> Most testimonies referred to events witnessed or experienced in 2025. For the first time, in addition to more detailed accounts of forced conscription in Crimea, Luhansk and Donetsk regions, including on killed and injured conscripts and mobilized civilians, ODIHR also received accounts on forced conscription from Zaporizhzhia and Kherson regions.

457 ODIHR Witness Interviews UKR.WS.591, para. 68; UKR.WS.611, para. 30; UKR.WS.621, para. 3; UKR.WS.640, para. 39; UKR.WS.646, para. 7.

458 ODIHR Witness Interview UKR.WS.621, para. 3.

459 ODIHR Witness Interviews UKR.WS.605, para. 35; UKR.WS.608, paras. 41, 42, 58; UKR.WS.609, paras. 103, 104; UKR.WS.611, paras. 25, 28, 33, 35, 36; UKR.WS.619, para. 15; UKR.WS.631, para. 37; UKR.WS.638, paras. 52, 53; UKR.WS.640, para. 40; UKR.WS.646, para. 8.

460 ODIHR Witness Interviews UKR.WS.605, para. 35; UKR.WS.612, para. 18; UKR.WS.638, paras. 53, 52.

461 ODIHR Witness Interview UKR.WS.608, para. 58.

462 ODIHR Witness Interview UKR.WS.609, paras. 103, 104.

463 Information provided to ODIHR by seven NGOs working on human rights and humanitarian law issues in the occupied territories; Information provided to ODIHR by the Permanent Mission of Ukraine to the International Organizations in Vienna.

464 ODIHR Witness Interviews UKR.WS.577; UKR.WS.581; UKR.WS.587; UKR.WS.591; UKR.WS.593; UKR.WS.596; UKR.WS.605; UKR.WS.608; UKR.WS.609; UKR.WS.611; UKR.WS.612; UKR.WS.619; UKR.WS.620; UKR.WS.621; UKR.WS.622; UKR.WS.631; UKR.WS.638; UKR.WS.640; UKR.WS.645; UKR.WS.647; UKR.WS.650; UKR.WS.659; UKR.WS.660; UKR.WS.661; UKR.WS.662; UKR.WS.663; UKR.WS.664; UKR.WS.665; UKR.WS.672; UKR.WS.675.

465 ‘Forced conscription’ refers to the forcible enlistment of Ukrainian civilians for regular military service with the Russian armed forces for a period of 12 months, presumably without directly taking part in hostilities. ‘Forced mobilization’ refers to forcing Ukrainian civilians into active military service with the Russian armed forces, with participation in hostilities against the Ukrainian armed forces

466 See also OSCE/ODIHR, [Second Interim Report](#), paras. 64-68; [Third Interim Report](#), para. 95; [Fourth Interim Report](#), para. 78; [Fifth Interim Report](#), paras. 97-104; [Sixth Interim Report](#), paras. 115-120; [Seventh Interim Report](#), paras. 108-115.

121. Under IHL, it is prohibited to compel the inhabitants of an occupied territory to swear allegiance to the occupying power<sup>467</sup> or to serve in its armed or auxiliary forces, including through propaganda promoting voluntary enlistment.<sup>468</sup> The conscription of residents of an occupied territory into the occupying power's armed forces constitutes a grave breach of the Fourth Geneva Convention and may amount to a war crime.<sup>469</sup>
122. Five witnesses described instances of forced mobilization of civilians from Crimea, Luhansk and Donetsk regions into the Russian armed forces or forces under its command in the initial stages of the Russian Federation's invasion of Ukraine in 2022.<sup>470</sup> This practice largely continued until summer 2023, with the most recent case reported in June 2024. A witness from Crimea recounted casualties among mobilized civilians: *"My friend had a brother who was forcibly mobilized and later killed during combat."*<sup>471</sup> Another witness from Luhansk region, talking about people that were mobilized, stated: *"Many died. Some came back with serious injuries."*<sup>472</sup>
123. Nine witnesses reported the forced conscription of Ukrainian civilians from the occupied territories into the Russian armed forces, mostly during the spring 2025 conscription campaign.<sup>473</sup> In this regard, a witness from Zaporizhzhia region described: *"This year [2025], there was a conscription campaign into the regular army service. I know a family where the son is now serving in Crimea. He is almost 30 years old."*<sup>474</sup> A witness from Kherson region noted: *"There were also several men who were conscripted for regular military service. My son's classmate was taken. He is 29."*<sup>475</sup> A witness from Crimea furthermore reported: *"People who did not want to serve were simply taken by force. [...] Many people were also taken straight from their workplaces."*<sup>476</sup> A second witness from Crimea added that it was not uncommon for conscripts to be pressured to sign contracts with the Russian armed forces to become professional soldiers and take part in hostilities.<sup>477</sup>
124. Even though conscripts were not usually sent to areas of active hostilities without signing a contract for service with the armed forces, a witness from Luhansk region indicated to ODIHR how an acquaintance of his: *"was taken and then sent to Kursk for combat. This was [...] during the spring conscription"*

467 Hague Regulations (1907), art. 45.

468 GC IV, art. 51.

469 GC IV, art. 147; ICC Statute, art. 8(2)(a)(v).

470 ODIHR Witness Interviews UKR.WS.605, para. 68; UKR.WS.609, paras. 43, 57, 59; UKR.WS.645, paras. 7-14; UKR.WS.663, para. 11; UKR.WS.675, para. 34.

471 ODIHR Witness Interview UKR.WS.675, para. 34.

472 ODIHR Witness Interview UKR.WS.645, para. 7.

473 ODIHR Witness Interviews UKR.WS.591, paras. 74, 144-145; UKR.WS.596, para. 37; UKR.WS.608, para. 82; UKR.WS.619, para. 20; UKR.WS.631, para. 44; UKR.WS.638, paras. 47, 49; UKR.WS.645, paras. 17, 22, 35, 51; UKR.WS.672, paras. 22, 25, 42; UKR.WS.675, paras. 29, 30-33.

474 ODIHR Witness Interview UKR.WS.631, para. 44.

475 ODIHR Witness Interview UKR.WS.638, para. 47.

476 ODIHR Witness Interview UKR.WS.675, para. 33.

477 ODIHR Witness Interview UKR.WS.672, paras. 22, 25.

*campaign which started in April 2025*”.<sup>478</sup> A witness from Crimea further stated: *“There was a strike at a military storage and 27 conscripts died there [Crimea], mixed with regular soldiers.”*<sup>479</sup> According to the Ukrainian authorities, as of November 2025, at least 2,351 soldiers from units of the Russian armed forces based in occupied Crimea had been killed, of whom 1,349 are believed to have been Ukrainian citizens.<sup>480</sup>

125. Witnesses further stated that sometimes civilians were exempt from conscription if they were essential workers,<sup>481</sup> university students<sup>482</sup> or suffered from serious medical issues.<sup>483</sup> However, these exemptions were not always respected, as according to a witness from Crimea: *“Military representatives even came to the university, and boys were taken directly from there.”* The same witness added: *“In theory, male students at university were not supposed to be mobilized, but, in reality, they were forced to go to the military office, update their data, and then, after graduation, they were mobilized.”*<sup>484</sup>
126. Ten witnesses told ODIHR that it was mandatory for men of conscription age to register with the military administration offices.<sup>485</sup> A witness from Crimea told ODIHR: *“All male students had to register with the military office. Every year, they had to undergo a medical examination. My boyfriend, for example, had severe asthma [...], but the doctors did not care. They often wrote that the boys were ‘fit for service’ anyway.”*<sup>486</sup> A witness from Kherson region added: *“I have a nephew. He was 16 years old as of April 2025. He received a notice [...] that he should register with the military office.”*<sup>487</sup> Without registering with the military offices, people were unable to be employed in public institutions, receive their school diplomas or cross checkpoints successfully.<sup>488</sup>
127. Five witnesses interviewed by ODIHR described the link between military registration and conscription with Russian citizenship.<sup>489</sup> A woman from

478 ODIHR Witness Interview UKR.WS.645, para. 17.

479 ODIHR Witness Interview UKR.WS.672, para. 22.

480 [Оперативна інформація щодо ситуації на тимчасово окупованій території Автономної Республіки Крим та міста Севастополя станом на 24 листопада 2025 року](#) [Operational information on the situation in the temporarily occupied territory of the Autonomous Republic of Crimea and the city of Sevastopol as of November 24, 2025], Представництво Президента України в Автономній Республіці Крим [Mission of the President of Ukraine in the Autonomous Republic of Crimea], 24 November 2025, in Ukrainian.

481 ODIHR Witness Interview UKR.WS.672, para. 42.

482 ODIHR Witness Interviews UKR.WS.645, para. 35; UKR.WS.675, para. 30.

483 ODIHR Witness Interview UKR.WS.638, para. 49.

484 ODIHR Witness Interview UKR.WS.675, paras. 29, 32, 33.

485 ODIHR Witness Interviews UKR.WS.577, para. 39; UKR.WS.591, paras. 146-148; UKR.WS.608, para. 82; UKR.WS.611, paras. 51, 52; UKR.WS.638, paras. 46, 49; UKR.WS.645, paras. 14, 16; UKR.WS.659, para. 53; UKR.WS.672, para. 22. UKR.WS.675, paras. 29, 32. See also UKR.WS.621, paras. 10, 13, 15.

486 ODIHR Witness Interview UKR.WS.675, para. 29.

487 ODIHR Witness Interview UKR.WS.638, paras. 46, 49.

488 ODIHR Witness Interviews UKR.WS.591, paras. 146-148; UKR.WS.672, para. 22.

489 ODIHR Witness Interviews UKR.WS.596, para. 37; UKR.WS.608, para. 82; UKR.WS.619, para. 20; UKR.WS.638, para. 46; UKR.WS.645, paras. 18, 20. Given the widespread reports of forced imposition of Russian citizenship on residents of the occupied territories, instances in which Ukrainian men were forced to acquire Russian citizenship and then subsequently conscripted, should be understood as forced conscription. For more details, see [Section IV.g.i.\(a\). Forced adoption of Russian citizenship](#).

Kherson region informed ODIHR that, after her son had to get a Russian passport in March 2025, he was immediately requested to go for military registration,<sup>490</sup> which several witnesses confirmed was common practice.<sup>491</sup> Also, a witness from Zaporizhzhia region described how Ukrainians with Russian passports were being conscripted in 2025.<sup>492</sup> Moreover, according to a witness from Luhansk region: *“Men were required to register with the military office to be able to obtain a Russian international passport”*, which is what the witness had to do before he could cross the border into Belarus.<sup>493</sup>

128. Two witnesses indicated that the Russian authorities were offering recently sentenced civilians in the occupied territories the option to either serve their sentence in prison or enlist in the armed forces.<sup>494</sup> More generally, four witnesses informed ODIHR about offers of financial incentives and the use of propaganda to promote voluntary enlistment in the Russian armed forces.<sup>495</sup> A witness from Luhansk region stated: *“Army service was promoted everywhere. Every street, corner and shop. The authorities offered a signing bonus of 1,200,000 roubles.”*<sup>496</sup> Moreover, a witness from Crimea explained that his university was full of posters with the slogan: *“If you’re a real man, sign a contract”*, while *“[recruiters] were coming and campaigning [at the university], offered good benefits and salary [200,000 roubles], said your parents will be proud, women will be at your feet”*.<sup>497</sup> This resulted in a few students from his group signing a contract with the Russian armed forces.<sup>498</sup> Three other witnesses reported cases where civilians joined the Russian armed forces due to financial incentives or based on their own beliefs and convictions.<sup>499</sup>
129. Witnesses also described evasive measures by young men to circumvent conscription, including hiding, avoiding registration or enrolling in university.<sup>500</sup> Four witnesses further stated that young men were trying to leave the occupied territories out of fear of conscription, with one witness from Luhansk region telling ODIHR: *“I received a summons [for military registration] in May 2025. I did not keep it. I just threw it away, and I left the territory the next day.”*<sup>501</sup>
130. According to information received by the Ukrainian authorities, from February 2022 to November 2025, seven conscription campaigns were conducted in

490 ODIHR Witness Interview UKR.WS.619, para. 20.

491 ODIHR Witness Interviews UKR.WS.596, para. 37; UKR.WS.638, para. 46.

492 ODIHR Witness Interview UKR.WS.608, para. 82.

493 ODIHR Witness Interview UKR.WS.645, paras. 18, 20.

494 ODIHR Witness Interviews UKR.WS.608, para. 83; UKR.WS.640, para. 43.

495 ODIHR Witness Interviews UKR.WS.612, para. 16; UKR.WS.638, para. 50; UKR.WS.645, para. 23; UKR.WS.672, paras. 18, 20, 24.

496 ODIHR Witness Interview UKR.WS.645, para. 23. See also UKR.WS.609, para. 56.

497 ODIHR Witness Interview UKR.WS.672 paras. 18, 20.

498 ODIHR Witness Interview UKR.WS.672 para. 24. See also UKR.WS.605, paras. 22, 27; UKR.WS.659, paras. 48, 49; UKR.WS.675, 45.

499 ODIHR Witness Interviews UKR.WS.591, para. 149; UKR.WS.631, para. 46; UKR.WS.645, para. 23.

500 ODIHR Witness Interviews UKR.WS.672 paras. 25, 27; UKR.WS.675, paras. 30, 33.

501 ODIHR Witness Interview UKR.WS.645, para. 14. See also UKR.WS.619, para. 20; UKR.WS.672, para. 44; UKR.WS.675, paras. 30, 33.

Crimea, resulting in approximately 20,400 people being illegally conscripted into the armed forces of the Russian Federation, with an eighth campaign underway. Moreover, 317 criminal cases had been opened under Article 328 of the Russian Criminal Code against draft evaders, a third of whom were Crimean Tatars. To date, conscription campaigns were conducted twice per year (spring and autumn). However, from 1 January 2026, a bill signed by the President of the Russian Federation on 4 November 2025<sup>502</sup> enables year-round conscription and mobilization of reservists for service in ‘peacetime’, placing Ukrainian men in the occupied territories at further risk of forced service in the Russian armed forces.

## Suppression of dissent

131. During the second half of 2025, ODIHR continued to receive accounts,<sup>503</sup> including through 11 witness testimonies,<sup>504</sup> on the use of measures aimed to suppress peaceful dissent by civilians in the Russian-occupied territories of Ukraine, including by Crimean Tatars. Such measures consisted of arbitrary detentions, deportations, home searches, questioning by police, closure of private businesses, being forced to sing the Russian national anthem on camera or being charged with ‘discrediting the Russian armed forces’, confirming findings outlined in earlier Interim Reports.<sup>505</sup>
132. Three witnesses reported that, in the initial stages of the Russian Federation’s invasion of Ukraine, there were cases of arbitrary deprivation of liberty of civilians in the occupied territories for their perceived pro-Ukrainian views, for refusal to cooperate with the Russian authorities or for peaceful opposition to the occupation.<sup>506</sup> A witness from Zaporizhzhia region, who was 16 years old at the time, told ODIHR how, after he and a group of other minors took down a Russian and a Soviet flag and burned them, they were detained by the police

502 Федеральный закон от 04.11.2025 № 412-ФЗ «О внесении изменений в Федеральный закон «О воинской обязанности и военной службе» и статью 11 Федерального закона “Об альтернативной гражданской службе” [Federal Law of 04.11.2025 No 412-FZ “On Amendments to the Federal Law “On Military Duty and Military Service” and Article 11 of the Federal Law “On Alternative Civilian Service”], 4 November 2025, in Russian.

503 Information provided to ODIHR by nine NGOs working on IHRL and IHL issues in the occupied territories; Information provided to ODIHR by the Permanent Mission of Ukraine to the International Organizations in Vienna. See also [Аналіз порушень прав людини в окупованому Криму за 9 місяців 2025 року](#) [Analysis of human rights violations in the occupied Crimea for 9 months of 2025], Crimean Tatar Resource Centre, 7 October 2025, in Ukrainian; [Review on the human rights situation in Crimea July-September 2025](#), Crimean Human Rights Group, 29 October 2025; [Crimea Situation Reports](#), Crimea SOS, in Ukrainian.

504 ODIHR Witness Interviews UKR.WS.605; UKR.WS.608; UKR.WS.609; UKR.WS.612; UKR.WS.619; UKR.WS.628; UKR.WS.640, UKR.WS.659; UKR.WS.663; UKR.WS.672; UKR.WS.675.

505 See also OSCE/ODIHR, [Interim Report](#), paras. 106-111; [Second Interim Report](#), paras. 146-150; [Third Interim Report](#), paras. 42, 84-89; [Fourth Interim Report](#), paras. 43, 86-88, 96-100; [Fifth Interim Report](#), para. 34; [Sixth Interim Report](#), paras. 41, 121-124; [Seventh Interim Report](#), paras. 116-121.

506 ODIHR Witness Interviews UKR.WS.619, para. 15; UKR.WS.628, paras. 6, 7, 8; UKR.WS.659, paras. 11-14. For more details, see [Section IV.b. Arbitrary deprivation of liberty and enforced disappearances in areas under the control of the Russian authorities](#).

for two months, where they were interrogated, tortured and pressured to make false confessions.<sup>507</sup>

133. Another witness from the same region explained how, when a classmate of hers took down a Russian flag from a building and replaced it with a Ukrainian one: *“He was forced to publicly sing the Russian National Anthem. They threatened him. If he would be caught again, they would send him to the frontline.”*<sup>508</sup> Singing the Russian national anthem on camera was also a measure used to suppress dissent among students who refused to do so at schools in the occupied areas, where it was mandatory.<sup>509</sup>
134. Moreover, a school director from Zaporizhzhia region described to ODIHR how the occupation authorities were pressuring pro-Ukrainian education staff who refused to teach the Russian curriculum by having armed Russian soldiers visit teachers at their homes. For refusing to work under the Russian school administration, the witness was subjected to multiple home searches by the police and military in 2023 and 2024 before, ultimately, being deported to Georgia in January 2025 and getting barred from entering the Russian Federation or the Russian-occupied territories of Ukraine for 40 years.<sup>510</sup>
135. A witness from Crimea stated: *“On the streets, girls were sometimes stopped by security forces, and their phones were checked. They searched through Telegram and other apps. If they found anything related to Ukraine, the person could be taken away.”*<sup>511</sup> Witnesses also reported that Ukrainian civilians were stopped by the police, searched and brought in for questioning if they were seen wearing clothes resembling the colours of the Ukrainian flag.<sup>512</sup>
136. Three witnesses further told ODIHR how the Russian authorities were persecuting civilians in the occupied territories for expression of pro-Ukrainian sentiment on social media.<sup>513</sup> A witness from Donetsk region explained: *“Searches would happen if someone saw that a person had posted something on their social media pages that was supportive of Ukraine. If someone posted something pro-Ukrainian, they would be questioned. People learned not to post anything online if they were supportive of Ukraine.”*<sup>514</sup> Moreover, a witness from Crimea added: *“Some of my friends posted [pro-Ukrainian] things on social media, and then the Secret Service came to them. [...] Some of those acquaintances were detained and interrogated.”*<sup>515</sup>

507 ODIHR Witness Interview UKR.WS.659, paras. 11-43.

508 ODIHR Witness Interview UKR.WS.640, para. 42.

509 ODIHR Witness Interview UKR.WS.612, para. 18. For more details, see [Section IV.g.i.\(b\). Grave and systematic changes related to education.](#)

510 ODIHR Witness Interview UKR.WS.608, paras. 9, 12, 14, 16, 17, 32, 94. See also UKR.WS.619, para. 15.

511 ODIHR Witness Interview UKR.WS.675, para. 9.

512 ODIHR Witness Interviews UKR.WS.609, para. 101; UKR.WS.675, para. 21.

513 ODIHR Witness Interviews UKR.WS.605, para. 21; UKR.WS.672, para. 37; UKR.WS.675, paras. 9, 11.

514 ODIHR Witness Interview UKR.WS.605, para. 21.

515 ODIHR Witness Interview UKR.WS.675, para. 11.

137. Another witness from Crimea added that owners of private business were forced to close down operations for posting pro-Ukrainian content on social media and were accused of discrediting the Russian army.<sup>516</sup> According to information received by the Ukrainian authorities, 1,632 cases of ‘discrediting the armed forces of the Russian Federation’, under Article 20.3.3 of the Code of Administrative Offences of the Russian Federation, were filed in courts in Crimea from April 2022 to November 2025 — 282 new cases since ODIHR’s Seventh Interim Report.<sup>517</sup> In most cases, this administrative measure has been used against Ukrainian citizens who expressed anti-war or pro-Ukrainian opinions, or who listened to Ukrainian songs or used Ukrainian symbols.

## H. TRIALS OF UKRAINIAN CIVILIANS AND POWS BY THE RUSSIAN AUTHORITIES

138. During the second half of 2025, ODIHR collected information, including 18 witness testimonies,<sup>518</sup> on various fair trial violations committed by the Russian authorities in conflict-related criminal cases against Ukrainian civilian detainees and POWs. As of 1 December 2025, the Ukrainian authorities had reported 1,158 criminal prosecutions of Ukrainian POWs facing, among others, war crimes or terrorism charges.<sup>519</sup>

139. Additionally, information gathered by ODIHR, including through open-source monitoring, indicates that Ukrainian POWs have been tried en masse in the Russian Federation under the provisions of the Russian Criminal Code, with the number of trials reportedly increasing.<sup>520</sup> Many Ukrainian detainees were tried multiple times, including for the same (alleged) conduct,<sup>521</sup> in clear violation of the principle of *ne bis in idem*.<sup>522</sup> Consistent with ODIHR’s previous findings,<sup>523</sup> the Russian authorities continued the unfair and unlawful prosecutions of Ukrainians in conflict-related cases, charging them with

516 ODIHR Witness Interview UKR.WS.672, para. 37.

517 OSCE/ODIHR, [Seventh Interim Report](#), para. 119.

518 ODIHR Witness Interviews UKR.WS.608; UKR.WS.617; UKR.WS.620; UKR.WS.626; UKR.WS.627; UKR.WS.633; UKR.WS.640; UKR.WS.642; UKR.WS.643; UKR.WS.646; UKR.WS.647; UKR.WS.649; UKR.WS.654; UKR.WS.660; UKR.WS.666; UKR.WS.668; UKR.WS.674; UKR.WS.679.

519 Information provided to ODIHR by the Permanent Mission of Ukraine to the International Organizations in Vienna.

520 Information provided to ODIHR by three NGOs working on war crimes investigations and human rights advocacy. There have reportedly been over 300 criminal cases of Ukrainian POWs captured during the Kursk incursion.

521 [Осужденных в России украинских пленных судят снова — во второй и иногда даже третий раз. Исследование «Медиазоны»](#) [Ukrainian prisoners convicted in Russia are tried again – for the second and sometimes even third time], *Mediavision*, 3 October 2025, in Russian.

522 ‘*Ne bis in idem*’, also known as ‘double jeopardy’, is the principle that prevents a person from being tried, prosecuted or punished more than once for the same offence. See GC III, art. 96; GC IV, art. 117; AP I, art. 75(4)(h).

523 OSCE/ODIHR, [Seventh Interim Report](#), paras. 125-126.

murder,<sup>524</sup> espionage,<sup>525</sup> terrorism,<sup>526</sup> extremism,<sup>527</sup> illegal possession of weapons and explosives,<sup>528</sup> *coup d'etat*,<sup>529</sup> sabotage<sup>530</sup> and use of prohibited means and methods of warfare (such as the intentional killing of civilians).<sup>531</sup> Prosecution of Ukrainian combatants for mere participation in hostilities violates IHL.<sup>532</sup> More generally, trials were compromised by coerced confessions, the widespread use of false witness testimonies and the lack of access to legal counsel.<sup>533</sup> ODIHR also received information that, as an increasing number of cases were heard in the Russian Federation's Kursk region rather than Rostov-on-Don, the treatment of the accused was worsening, with both civilian detainees and POWs held incommunicado without the ability to readily access their lawyers.<sup>534</sup> These trials breach a number of IHL provisions. Wilfully depriving POWs of a fair and regular trial constitutes a grave breach of the Geneva Conventions and may amount to a war crime.<sup>535</sup> Trials of civilians from occupied territories must be held within those territories, based on the penal laws applicable at the time of occupation. Bar exceptions, prosecuting Ukrainian civilians in Russian-occupied territories under the Russian Criminal Code is in violation of IHL.<sup>536</sup>

140. In line with the findings of the Seventh Interim Report,<sup>537</sup> four witnesses informed ODIHR that the Russian authorities resorted to torture and ill-

524 ODIHR Witness Interview UKR.WS.654, para. 16. See also [Комбата ВСУ заочно приговорили к 24 годам колонии за расстрел пленных бойцов РФ](#) [Ukrainian Armed Forces commander sentenced in absentia to 24 years of prison for executing Russian prisoners of war], *Russian Gazette*, 11 November 2025, in Russian.

525 ODIHR Witness Interviews UKR.WS.620, para. 10; UKR.WS.627, para. 24; UKR.WS.643, para. 20; UKR.WS.654, para. 16.

526 ODIHR Witness Interviews UKR.WS.626, para. 9; UKR.WS.634, para. 21; UKR.WS.639, para. 55; UKR.WS.642, para. 12; UKR.WS.643, para. 20; UKR.WS.647, para. 24; UKR.WS.666, para. 24; UKR.WS.668, para. 16; UKR.WS.674, para. 22; See also [«Ощущение, что это какой-то косплей на правосудие». Последние слова украинских разведчиков, взятых в плен в Брянской области](#) [«It feels like some kind of cosplay for justice.» The last words of Ukrainian intelligence officers captured in the Bryansk region], *Mediazone*, 3 September 2025, in Russian; [Южный окружной военный суд за день приговорил пятерых пленных бойцов «Азова» и «Айдара» к срокам от 8 до 18 лет](#) [The Southern District Military Court sentenced five captured Azov and Aidar fighters to terms ranging from 8 to 18 years in a day], *Mediazone*, 17 October 2025, in Russian; [Большое дело «Айдара» — история 18 пленников украинцев от пыток в Донецке до приговора в Ростове](#) [The big case of «Aidar» is the story of 18 captured Ukrainians from torture in Donetsk to the sentence in Rostov], *Mediazone*, 17 October 2025, in Russian.

527 ODIHR Witness Interview UKR.WS.634, para. 21.

528 ODIHR Witness Interviews UKR.WS.639, para. 55; UKR.WS.646, para. 45; UKR.WS.647, para. 24. See also [«Ощущение, что это какой-то косплей на правосудие». Последние слова украинских разведчиков, взятых в плен в Брянской области](#) [«It feels like some kind of cosplay for justice.» The last words of Ukrainian intelligence officers captured in the Bryansk region], *Mediazone*, 3 September 2025, in Russian.

529 ODIHR Witness Interviews UKR.WS.666, para. 38; UKR.WS.668, para. 16.

530 ODIHR Witness Interviews UKR.WS.639, para. 55; UKR.WS.646, para. 45.

531 ODIHR Witness Interview UKR.WS.649, para. 17.

532 GC III, art. 99; AP I, art. 43(2); ICRC, Commentary on the GC III (2020), para. 20. See also OSCE/ODIHR, [Seventh Interim Report](#), para. 126.

533 See e.g., ODIHR Witness Interviews UKR.WS.626, paras. 10-11, 15, 17; UKR.WS.633, paras. 11-16, 19. For more details, see [Section IV.b. Arbitrary deprivation of liberty and enforced disappearances in areas under the control of the Russian authorities](#).

534 Information provided to ODIHR by an NGO working on issues of Ukrainian civilian detainees and POWs.

535 GC III, art. 99; ICC Statute, art. 8(2)(a)(vi).

536 GC IV, arts. 64, 66; ICC Statute, art. 8(2)(a)(vi). See also OSCE/ODIHR, [Seventh Interim Report](#), para. 123.

537 See OSCE/ODIHR, [Seventh Interim Report](#), para. 126.

treatment to coerce confessions and force witnesses to provide (false) testimony.<sup>538</sup> In four cases, that entailed beatings,<sup>539</sup> but in another case, the authorities threatened execution.<sup>540</sup> The witness recalled: “*They said that they will shoot me now, and I signed everything they asked me to sign. I signed the papers confirming that [the position of the prosecution].*”<sup>541</sup>

141. Access to legal counsel was vital to the defence but also the well-being of those on trial. ODIHR was told by witnesses and other observers of four important functions that independent lawyers can provide:<sup>542</sup> (i) building the defence case;<sup>543</sup> (ii) facilitating communication between the client and their family;<sup>544</sup> (iii) bringing parcels with food, medicine and other necessary items to the client;<sup>545</sup> and (iv) protecting the client from torture and ill-treatment in detention.<sup>546</sup> Additionally, one witness noted that privately – hired lawyers helped prepare documents needed for an exchange.<sup>547</sup> The quality of legal aid provided by state-appointed lawyers continued to be disputed, with one account of a detainee so dissatisfied that he refused to cooperate with the state-appointed lawyer altogether.<sup>548</sup> Family members of several Ukrainians tried in conflict-related cases complained about a lack of information provided on the criminal case against their loved ones.<sup>549</sup> Two witnesses reported that, although their family member had been given a free, state-appointed lawyer, they were still required to pay for the services provided.<sup>550</sup>
142. Witnesses, in addition, raised concerns over the potential cooperation between the state-appointed lawyers and the prosecution, to the detriment of the accused and/or their family.<sup>551</sup> In one case, a lawyer allegedly threatened a detainee’s relative with imprisonment unless they provided information to the authorities.<sup>552</sup> In another case, the state-appointed lawyer failed to take up allegations of abuse, saying that the threats made against his client, a POW, were “*voices in his head, that [...] never actually happened*”.<sup>553</sup>

538 ODIHR Witness Interviews UKR.WS.626, paras. 9, 10; UKR.WS.627, paras. 12, 16; UKR.WS.646, para. 46; UKR.WS.660, para. 32.

539 ODIHR Witness Interviews UKR.WS.626, para. 9; UKR.WS.627, para. 12; UKR.WS.646, para. 46; UKR.WS.660, paras. 30, 32.

540 ODIHR Witness Interview UKR.WS.627, para. 16.

541 ODIHR Witness Interview UKR.WS.627, para. 16.

542 Information provided to ODIHR by a human rights defender working on issues of Ukrainian civilian detainees and POWs; Information provided to ODIHR by an NGO working on human rights issues.

543 ODIHR Witness Interview UKR.WS.646, para. 45.

544 ODIHR Witness Interviews UKR.WS.654, para. 17; UKR.WS.666, para. 24; UKR.WS.668, para. 23; UKR.WS.679, para. 36.

545 ODIHR Witness Interview UKR.WS.640, para. 9.

546 Witness Interview UKR.WS.666, para. 39.

547 ODIHR Witness Interview UKR.WS.679, para. 42.

548 ODIHR Witness Interview UKR.WS.626, para. 11.

549 ODIHR Witness Interviews UKR.WS.617, para. 18; UKR.WS.642, para. 21; UKR.WS.654, para. 19; UKR.WS.674, para. 24.

550 ODIHR Witness Interviews UKR.WS.620, para. 10; UKR.WS.668, para. 23.

551 ODIHR Witness Interview UKR.WS.627, para. 27.

552 ODIHR Witness Interview UKR.WS.646, para. 40.

553 ODIHR Witness Interview UKR.WS.634, para. 16.

143. ODIHR remains concerned about reported pressures exerted on lawyers by the Russian authorities.<sup>554</sup> Russian lawyers remained reluctant to take conflict-related cases out of fear of punishment and retaliation.<sup>555</sup> One witness highlighted the reality of such consequences by indicating that, during a court hearing, a Russian lawyer was asked by a judge: “*Why are you talking about this? Do you want to sit on the bench next to him?*” Another witness recalled that the judge in their case did not let their lawyer speak at all during the proceedings.<sup>556</sup> ODIHR was also informed of a case where a Russian lawyer’s work in conflict-related cases led to charges under national security legislation being brought against them.<sup>557</sup>
144. Pressures were also felt by family members of the accused. Witnesses told ODIHR about their fear about staying in contact with independent Russian lawyers due to potential retaliation. One witness noted: “*It would be dangerous to call [Russian lawyers].*”<sup>558</sup> Another witness, a family member of an accused person, recounted how they rejected a lawyer offered by the Ukrainian Coordination Headquarters for the Treatment of Prisoners of War for fear of reprisals from the Russian authorities.<sup>559</sup>

## I. WAR CRIMES AND NATIONAL SECURITY TRIALS CONDUCTED BY THE UKRAINIAN AUTHORITIES

145. During the second half of 2025, ODIHR received information on reported violations of fair trial rights in the consideration of war crimes and national security cases in Ukraine.<sup>560</sup> One witness, a lawyer representing a person tried for collaboration, reported harassment by law enforcement officers and pressure exerted on witnesses to give false testimony against the accused.<sup>561</sup> Judges, in addition, reportedly did not issue acquittals in collaboration cases due to fear of harassment.<sup>562</sup>
146. Similarly, ODIHR was informed about persistent problems regarding *in absentia* trials under Article 438 “Violation of rules of the warfare” of the Ukrainian Criminal Code,<sup>563</sup> including that, in many cases, the Ukrainian

554 Information provided to ODIHR by an NGO working on issues of Ukrainian civilian detainees and POWs. See also OSCE/ODIHR, [Seventh Interim Report](#), para. 128.

555 ODIHR Witness Interview UKR.WS.617, para. 17.

556 ODIHR Witness Interview UKR.WS.647, para. 50.

557 Information provided to ODIHR by an NGO working on issues of Ukrainian civilian detainees and POWs.

558 ODIHR Witness Interview UKR.WS.643, para. 19.

559 ODIHR Witness Interview UKR.WS.620, para. 10.

560 For more details, see [Section IV.j. Coerced cooperation with the occupying power and accusations of collaboration](#).

561 ODIHR Witness Interview UKR.WS.583, para. 16.

562 ODIHR Witness Interview UKR.WS.583, para. 20; Information provided to ODIHR by an organization that unites legal professionals across Ukraine to promote the rule of law, protect human rights and strengthen the legal profession.

563 See Criminal Code of Ukraine, BVR, 2001, No. 25-26, Article 131, as amended.

authorities reportedly failed to adequately notify the accused about the trial proceedings.<sup>564</sup> Subpoenas were often published only on the authorities' own websites, running the risk that the accused never became aware of the proceedings initiated against them.

147. A further concern reportedly relates to the legal aid provided by state-appointed lawyers in Ukraine, with the defence described, in some cases, as passive and failing to prepare a sound case.<sup>565</sup> ODIHR also received worrying reports of pressure exerted against Ukrainian judges and defence lawyers working on war crime cases, both from the public and other legal professionals. Not only were lawyers criticized for accepting such cases, but were also portrayed as collaborators for performing their duties.<sup>566</sup>

## J. COERCED COOPERATION WITH THE OCCUPYING POWER AND ACCUSATIONS OF COLLABORATION

148. ODIHR received 22 testimonies in which witnesses discussed instances of coerced cooperation with the Russian authorities or accusations of collaboration by the Ukrainian authorities,<sup>567</sup> all of which confirm previous ODIHR findings.<sup>568</sup> Witnesses described how the Russian authorities coerced cooperation on the territories of Ukraine that they occupy.<sup>569</sup> In addition, ODIHR received information on how stigmatizing narratives about residents of the Russian-occupied territories of Ukraine hindered evacuations from these areas due to residents' fears of prosecution on relocation to Ukrainian Government-controlled territories, as well as the initiation by the Ukrainian authorities of unfair prosecutions for collaboration of individuals performing essential services in the occupied areas.<sup>570</sup>
149. Consistent with the findings of earlier Interim Reports, ODIHR continued to receive accounts of pressure applied by the Russian authorities on

564 See Criminal Procedure Code of Ukraine, art. 135.

565 See also [Monitoring of Court Proceedings and Analysis of Court Decisions in War Crimes Cases \(Under Article 438 of the Criminal Code of Ukraine\)](#), Ukrainian Bar Association, September 2025, p. 39.

566 Information provided to ODIHR by an organization that unites legal professionals across Ukraine to promote the rule of law, protect human rights and strengthen the legal profession; [Monitoring of Court Proceedings and Analysis of Court Decisions in War Crimes Cases \(Under Article 438 of the Criminal Code of Ukraine\)](#), Ukrainian Bar Association, September 2025, p. 40.

567 ODIHR Witness Interviews UKR.WS.577; UKR.WS.581; UKR.WS.582; UKR.WS.583; UKR.WS.584; UKR.WS.585; UKR.WS.587; UKR.WS.591; UKR.WS.593; UKR.WS.596; UKR.WS.608; UKR.WS.611; UKR.WS.618; UKR.WS.620; UKR.WS.621; UKR.WS.628; UKR.WS.631; UKR.WS.638; UKR.WS.653; UKR.WS.659; UKR.WS.660; UKR.WS.666.

568 See OSCE/ODIHR, [Fourth Interim Report](#), paras. 38-40; [Fifth Interim Report](#), paras. 105-113; [Sixth Interim Report](#), paras. 124-131; [Seventh Interim Report](#), paras. 131-134.

569 On being motivated by material gains, see ODIHR Witness Interview UKR.WS.611, para. 20; on the pressure exerted to coerce cooperation, see ODIHR Witness Interviews UKR.WS.582, paras. 55, 98; UKR.WS.608, paras. 19, 47; UKR.WS.618, paras. 12, 13; UKR.WS.628, para. 17; UKR.WS.659, para. 10; UKR.WS.666, para. 24.

570 On stigmatizing narratives hindering evacuations, see ODIHR Witness Interview UKR.WS.620, paras. 4, 14. On unfair prosecutions, see ODIHR Witness Interviews UKR.WS.583, para. 5; UKR.WS.585, paras. 15, 16-19, 28.

residents of the occupied areas to coerce cooperation.<sup>571</sup> The authorities used interrogations,<sup>572</sup> house visits,<sup>573</sup> arbitrary detention,<sup>574</sup> threats of criminal prosecution,<sup>575</sup> torture<sup>576</sup> and threats of torturing family members to exert pressure.<sup>577</sup> One witness explained that she and her family were deported after she refused to continue in her position as school principal.<sup>578</sup> Another witness recalled how an official who refused to cooperate with Russian authorities was later found dead, presumed murdered.<sup>579</sup>

150. A witness from Novomykilske (Luhansk region) told ODIHR that prevalent narratives in Ukraine — about people working in the provision of essential services being collaborators — discourage residents of the occupied territories of Ukraine from evacuating, since they believe that they will be labelled collaborators upon arrival in Ukrainian Government-controlled territory.<sup>580</sup> In one case relayed to ODIHR, this resulted in a resident from Luhansk region staying in the occupied territory and being detained by Russian authorities.<sup>581</sup>
151. ODIHR continued to receive accounts about unfair prosecutions of alleged collaborators by the Ukrainian authorities. For instance, in one such case, a woman was charged with treason and faced 15 years of imprisonment for her work at a local pension fund operating under the direction of the occupation administration.<sup>582</sup> The witness, who handled routine pension fund applications for civilian residents of the area, told ODIHR that she kept working, because she wanted to assist the local population and was herself in need of money to support her family.<sup>583</sup> The continued functioning of pension funds is essential for residents of the occupied territories, especially its most vulnerable groups, in order to ensure sufficient access to goods indispensable to the survival of the civilian population.
152. Under IHL, an occupying power may compel civilians to perform work necessary to satisfy the needs of the local population.<sup>584</sup> This raises questions about the fairness of prosecuting individuals performing essential services, especially where cooperation with the Russian authorities was largely coerced

571 See OSCE/ODIHR, [Fifth Interim Report](#), paras. 107, 109; [Sixth Interim Report](#), paras. 125, 127; [Seventh Interim Report](#), para. 132.

572 ODIHR Witness Interview UKR.WS.582, para. 98.

573 ODIHR Witness Interview UKR.WS.659, para. 10.

574 ODIHR Witness Interviews UKR.WS.608, para. 47; UKR.WS.618, para. 12; UKR.WS.628, para. 17; UKR.WS.666, para. 24.

575 ODIHR Witness Interviews UKR.WS.608, para. 19; UKR.WS.618, para. 12.

576 ODIHR Witness Interview UKR.WS.582, para. 55.

577 ODIHR Witness Interview UKR.WS.618, para. 13.

578 ODIHR Witness Interview UKR.WS.608, paras. 9, 17, 19, 20, 21.

579 ODIHR Witness Interview UKR.WS.618, para. 7.

580 ODIHR Witness Interview UKR.WS.620, para. 14.

581 ODIHR Witness Interview UKR.WS.620, paras. 4, 14.

582 ODIHR Witness Interview UKR.WS.585, para. 28.

583 ODIHR Witness Interview UKR.WS.585, para. 15.

584 GC IV, art. 51(2)-(3). This right to requisition work can be deemed a corollary to the obligation incumbent upon the occupying power to take “all the measures in his power to restore, and ensure, as far as possible, public order and civil life” for the population under its control. See Hague Regulations (1907), art. 43.

or necessary for survival. While collaboration with an occupying force can pose a legitimate national security risk that needs to be addressed, it remains essential that the Ukrainian authorities continue to uphold human rights and ensure compliance with IHL in the prosecution of such cases.

## K. USE OF CHILDREN IN HOSTILITIES

153. Information collected by ODIHR, including through witness testimonies,<sup>585</sup> suggests that both parties to the conflict may have relied on children for intelligence gathering, sharing military coordinates and/or engaging in espionage and sabotage activities.<sup>586</sup> Both IHL and IHRL prohibit the recruitment and use of children in hostilities, and such acts constitute a war crime when children under the age of 15 years are involved.<sup>587</sup>
154. Four witnesses stated to ODIHR that minors had been used by the Ukrainian authorities to obtain the coordinates of Russian military positions in the occupied territories, which resulted in targeted strikes by the Ukrainian armed forces.<sup>588</sup> In this regard, one witness, who himself had assisted the Ukrainian authorities, reported: *“I was sending the location of the Russian military for the Ukrainian military to hit. I was 15 at the time. I knew the risk, but I still did it. At the beginning, I was accessing a public chat bot which I understood to be an official channel intended for that, and then a person was assigned to work with me [a handler]. We communicated through Telegram. I sent him the coordinates, photos and information about the locations of Russian troops.”*<sup>589</sup>
155. The suspected cooperation of minors with the SBU resulted in increased checks of minors’ phones in the Russian-occupied territories of Ukraine,<sup>590</sup> putting them at danger if something were to be discovered. According to a witness, minors were detained and charged with terrorism due to suspected cooperation with the SBU.<sup>591</sup> Another witness described how her child relative was detained and convicted after they shared coordinates of Russian military positions with the Ukrainian authorities.<sup>592</sup>
156. On 17 November 2025, the President of the Russian Federation signed a law that toughens penalties for inciting children to commit acts of sabotage and

585 ODIHR Witness Interviews UKR.WS.504; UKR.WS.505; UKR.WS.548; UKR.WS.570; UKR.WS.572; UKR.WS. 631.

586 CRC, art. 1 indicates that “a child means every human being below the age of eighteen years, unless under the law applicable to the child, majority is attained earlier”.

587 ICC Statute, art. 8(2)(b)(xxvi); AP I, art. 77(2); CRC, art. 38(2). See also Optional Protocol to the Convention on the Rights of the Child on the involvement of children in armed conflict.

588 ODIHR Witness Interviews UKR.WS.505, paras. 5, 6, 39; UKR.WS.570, para. 25; UKR.WS.572, para. 25; UKR.WS.631, para. 50.

589 ODIHR Witness Interview UKR.WS.505, para. 5

590 ODIHR Witness Interview UKR.WS.548, para. 20.

591 ODIHR Witness Interview UKR.WS.504, paras. 26, 28, 30-32, 51.

592 ODIHR Witness Interview UKR.WS.572, para. 25.

lowers the age of criminal liability for such acts from 16 to 14 years-old.<sup>593</sup> The legislative amendment came in response to the alleged incitement of teenagers by Ukrainian intelligence to commit acts of sabotage for monetary rewards.<sup>594</sup>

157. ODIHR also received allegations of recruitment by the Russian Federation of children located in Ukrainian Government-controlled territory of Ukraine to carry out acts of espionage and sabotage.<sup>595</sup> Reports analysed by ODIHR suggest that Russian intelligence operatives contacted minors via social media platforms and attempted to recruit them through financial incentives or coercion. According to the Ukrainian authorities, minors constituted around 30 per cent of the overall number of Ukrainian civilians presumed to have been recruited by individuals affiliated with Russian security structures.<sup>596</sup>

593 [Федеральный закон от 17.11.2025 № 420-ФЗ “О внесении изменений в Уголовный кодекс Российской Федерации”](#) [Federal Law of 17.11.2025 No 420-FZ “On Amendments to the Criminal Code of the Russian Federation”], 17 November 2025, in Russian.

594 [Putin Hardens Sabotage Penalties, Targets Teenagers from 14 Up](#), *Kyiv Post*, 17 November 2025.

595 Information provided to ODIHR by the Permanent Mission of Ukraine to the International Organizations in Vienna. See also [SSU detains minor: FSB agent who guided Russian missiles on Dnipro and Poltava regions](#), Security Service of Ukraine (SSU), 24 June 2025; [SSU and National Police detain another six arsonists who carried out Russia’s orders in several regions of Ukraine](#), SSU, 10 July 2025; [SSU exposes Russia’s agent in Europe who helped organize terrorist attacks in Ukraine](#), SSU, 6 October 2025; [Following SSU investigation, traitor who attempted to install GPS tracker on specialized AFU transport convicted](#), SSU, 7 October 2025; [Russia’s exploitation of children in the war in Ukraine](#), International Bar Association, 31 October 2025; [Ukraine: Teenage saboteurs paid to attack their own country](#), *BBC News*, 20 November 2025.

596 Information provided to ODIHR by the Permanent Mission of Ukraine to the International Organizations in Vienna.



# Updated Interim Recommendations

### **ODIHR calls on the Russian Federation and Ukraine as parties to the conflict to:**

- Respect and ensure respect for IHL and IHRL in territories under their control;
- Take all feasible precautions to avoid, and in any event to minimize incidental loss of civilian life, injury to civilians and damage to civilian objects;
- Cease the use of explosive weapons with wide-area effects in densely populated areas;
- Ensure that military personnel operating short-range drones receive sufficient training in IHL, including on the principles of distinction and precaution;
- Ensure unimpeded access to the International Committee of the Red Cross and other relevant organizations to all places where POWs are detained;
- Refrain from prosecuting POWs for the mere fact of having directly participated in hostilities;
- Ensure that all POWs are held in places of internment that fully comply with Geneva Convention (III) relative to the Treatment of Prisoners of War of 12 August 1949; ensure they are treated with the full respect afforded to them under the Convention; and investigate and prosecute all cases of serious violations of IHL in relation to their treatment;
- Ensure that independent and impartial investigations are conducted into all allegations of serious violations of IHL and IHRL, including those committed by armed forces under parties' control, and that alleged perpetrators are brought to justice in fair trials in accordance with international law and standards;
- Respect, protect and ensure the full enjoyment of fair trial guarantees for all individuals charged with crimes in relation to the armed conflict; and
- End any involvement of minors in activities that relate to hostilities, including collecting and transmitting information, sharing coordinates of military positions or engaging in sabotage activities.

### **ODIHR calls on the Russian Federation to:**

- Cease attacks on the energy infrastructure critical to the civilian population of Ukraine;
- End short-range drone attacks against civilians and civilian objects, including those with special protection under IHL, such as medical facilities and personnel, as well as humanitarian workers and assets;

- Ensure the basic needs of civilians in occupied territories are met, in particular, access to adequate water must be restored;
- Cease summary executions, torture, ill-treatment and sexual violence against POWs and civilian detainees;
- Stop the unlawful and arbitrary deprivation of liberty of Ukrainian civilians, including through misuse of POW internment regimes, release all such individuals and ensure access to effective remedies;
- Halt the incommunicado detention and/or enforced disappearances of individuals and immediately provide information on the whereabouts of detainees to their families and legal representatives;
- Ensure that legal safeguards for people deprived of their liberty are fully respected in accordance with IHRL and IHL;
- Cease the forcible transfer or deportation of Ukrainian civilians to the Russian Federation and third countries;
- Ensure adequate conditions of internment for POWs and civilian detainees, including by granting regular, unimpeded and confidential access for independent monitors to all places (both in the occupied territory of Ukraine and in the Russian Federation) where protected people are interned or detained;
- Respect the main tenets of the law of occupation and refrain from introducing irreversible changes to the status of Ukrainian territories under military occupation by imposing Russian political, legal, administrative, educational and social systems;
- Immediately cease pressuring or coercing the civilian population to change their nationality and ensure that access to rights and services in occupied territories are not conditional upon the acquisition of Russian citizenship, including access to employment, pensions, social benefits, medical care, humanitarian aid, education, parental rights, property rights and freedom of movement;
- Immediately cease the practice of compelling Ukrainian nationals from occupied areas of Ukraine, including those with Russian citizenship, to serve in the armed forces of the Russian Federation;
- Immediately cease pressuring or coercing parents to send their children to Russian curriculum schools and stop imposing military-patriotic education for school-aged children;

- Immediately stop subjecting civilians in occupied territories, including Crimean Tatars, to prosecution for peacefully expressing their views and opinions; and
- Ensure the safe access and unimpeded passage of humanitarian relief for civilians in need.

#### **ODIHR calls on Ukraine to:**

- Strengthen the existing support to the most affected populations, including internally displaced and the most vulnerable individuals, such as the elderly and people with limited mobility;
- Amend its criminal legislation regarding ‘collaborative activity’ to dispel any legal uncertainty; provide prosecutorial guidelines that incorporate considerations of duress and lawful requisitions for work; and ensure that any criminal proceedings against alleged collaborators adhere to all fair trial rights;
- Adopt the bylaws necessary to implement the law on interim reparations for survivors of CRSV, and enable survivors to apply;
- Further improve the quality of medical, psychological and social assistance for CRSV survivors, including through better coordination between state institutions and civil society;
- Further facilitate communication with the families of civilians detained by the Russian Federation authorities; and
- Provide medical, psychological, social and other support to all civilians who have been released following arbitrary detention by the Russian Federation (and their families), especially those who have been subjected to conflict-related sexual violence and other types of torture.

#### **ODIHR calls on OSCE participating States to:**

- Ensure that rehabilitation, medical, psychological, social and other support is available to all Ukrainian former detainees on their territory, emphasizing help for survivors of conflict-related sexual violence and other types of torture;
- Enhance cross-state cooperation between domestic law enforcement and criminal justice authorities, ensuring the effective investigation and prosecution of war crimes, crimes against humanity and torture committed against arbitrarily detained civilians and prisoners of war; and

- Support and fund civil society in providing humanitarian assistance, documenting violations of IHL and IHRL, and/or contributing to related accountability efforts.



