

The Special Tribunal for the Crime of Aggression against Ukraine: An *Ad Hoc* Response to the ICC's Accountability Gap

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1. Introduction

The Special Tribunal for the Crime of Aggression against Ukraine ('Special Tribunal' or 'Tribunal') will serve as an international criminal tribunal mandated to prosecute individuals bearing responsibility for conduct connected to the Russian Federation's full-scale invasion of Ukraine initiated on 24 February 2022, as well as for preceding violations of Ukrainian sovereignty dating back to 2014.

The legal basis of the Tribunal is constituted by its Statute ('Statute'),¹ which delineates the scope of its jurisdiction, defines its institutional structure, and establishes the procedural and substantive framework governing its operation.

The establishment of the Special Tribunal must be understood against the background of a distinct accountability deficit within the existing framework of international criminal justice: the Tribunal constitutes an *ad hoc* institutional response to the jurisdictional limitations of the International Criminal Court ('ICC') with respect to the crime of aggression, limitations which prevent the ICC from fully exercising jurisdiction over the situation in Ukraine.² At the same time, notwithstanding its exceptional and context-specific origins, this brief argues that the Special Tribunal should not be regarded as a radical departure from prior practice. Rather, it can more convincingly be situated within the broader historical continuum of international and internationalized criminal accountability mechanisms that have emerged over the course of the last century in response to core international crimes.

Although the substantive focus of the Special Tribunal is narrow, centred exclusively on the crime of aggression,³ the institution nonetheless engages a range of broader and structurally significant questions situated at the intersection of international criminal law and public international law. Among the most prominent of these are the continued relevance and scope of immunities under international law, as well as the legal classification of the Tribunal itself, particularly the question of whether it should properly be characterized as an international, internationalized or hybrid criminal court. These issues are not peripheral to the Tribunal's operation; rather, they directly shape

both its legitimacy and its potential capacity to exercise jurisdiction over senior political and military leadership.

2. International Criminal Justice and the Crime of Aggression

The emergence of international criminal law as a distinct field during the twentieth century commenced with the establishment of the International Military Tribunal in Nuremberg, convened by the allied powers after World War II to prosecute leading Nazi officials. With the later creation of the *ad hoc* International Criminal Tribunal for the former Yugoslavia and the International Criminal Tribunal for Rwanda, these institutions laid the jurisprudential foundations for individual criminal responsibility with respect to core international crimes. In doing so, they integrated established principles of criminal law with novel procedural and institutional arrangements, thereby transforming the previously unprecedented concept of genuinely international individual criminal accountability into practice.

The adoption of the Rome Statute in 1998, which entered into force in 2002 and created the ICC, transformed previously fragmented practices into a permanent framework. Conceived both as the central institution of the international criminal justice system and as a complementary court of last resort, the ICC has significantly shaped the development of international criminal law. Its contribution extends beyond substantive jurisprudence on genocide, crimes against humanity and war crimes, encompassing also the refinement of procedural norms, the development of increasingly sophisticated frameworks of inter-State co-operation, and the institutionalization of mechanisms of enforcement and judicial collaboration within international criminal justice.

Nevertheless, the situation in Ukraine has exposed important structural and jurisdictional limitations within the existing framework of the ICC, particularly in relation to the crime of aggression. Although the ICC is conducting investigations into the situation in Ukraine, it remains unable to exercise jurisdiction over the crime of aggression itself. This jurisdictional gap results from the specific regime governing aggression under the Rome Statute. At the time of the full-scale invasion in February 2022, neither Ukraine nor the Russian Federation were States Parties, and neither had ratified the Kampala Amendments to the Rome Statute through which the crime of aggression was incorporated into the Court's jurisdictional framework. Moreover, Article 15*bis*(5) of the Rome Statute expressly excludes the exercise of jurisdiction over acts of aggression committed on the territory of, or by nationals of, non-States Parties – while for the other core international crimes, the territoriality principle enables the ICC to assert jurisdiction by virtue of the territorial nexus between the crime and a State Party, irrespective of the nationality of the alleged perpetrator.

Subsequent efforts to address these limitations within the frame-

¹ Statute of the Special Tribunal for the Crime of Aggression against Ukraine (<https://www.legal-tools.org/doc/njujq9bq/>), Annex to the Agreement between the Council of Europe and Ukraine on the Establishment of the Special Tribunal for the Crime of Aggression against Ukraine, 25 June 2025 (<https://www.legal-tools.org/doc/xqufguj5/>).

² Evhen Tsybulenko and Henna Rinta-Pollari, "Legal Challenges in Prosecuting the Crime of Aggression in the Russo-Ukrainian War", in *Review of Central and East European Law*, 2023, vol. 48, nos. 3–4, p. 331.

³ This brief does not develop further the substantive elements of the crime of aggression. For a brief overview in the context of the Russian invasion of Ukraine, see Philippe Sands, "Putin's Use of Military Force is a Crime of Aggression", in *Revue Belge de Droit International*, 2022, nos. 1–2, p. 184.

work of the Assembly of States Parties proved unsuccessful.⁴ In particular, the Special Session convened in July 2025 to review the amendments relating to the crime of aggression did not produce substantial reform capable of enabling the ICC to exercise jurisdiction anytime soon.⁵ Against this background, the establishment of the Special Tribunal is intended to remedy a persisting accountability gap for the crime of aggression, while operating alongside, rather than in place of, existing ICC proceedings.

3. The Establishment of the Special Tribunal

Since February 2022, preparations for the establishment of the Special Tribunal have proceeded through a complex combination of legal, political and institutional initiatives involving a broad range of international actors. The process unfolded against the backdrop of extensive international condemnation of the Russian invasion of Ukraine. In Resolution A/RES/ES-11/1 of 2 March 2022, the UN General Assembly deplored the aggression against Ukraine, while shortly thereafter, on 16 March 2022, the International Court of Justice ('ICJ'), in its order on provisional measures in the *Allegations of Genocide under the Convention on the Prevention and Punishment of the Crime of Genocide* case, directed the Russian Federation to immediately suspend its military operations in the territory of Ukraine.⁶ Alongside these developments, institutional efforts aimed specifically at criminal accountability also began to emerge. In particular, the European Union ('EU') and Eurojust facilitated the creation of the International Centre for the Prosecution of the Crime of Aggression against Ukraine in The Hague, bringing together members of the EU Joint Investigation Team and operating in co-operation with the legal services of the Council of Europe.

These initiatives were accompanied by increasing political support for the creation of a dedicated tribunal addressing the crime of aggression. In January 2023, the European Parliament called for the establishment of a specialized tribunal,⁷ a position subsequently reinforced by the Parliamentary Assembly of the Council of Europe.⁸

The Core Group, composed of senior legal experts from approximately 40 States, finalized the three founding instruments in March 2025. These consisted, first, of the bilateral Agreement between the Council of Europe and Ukraine on the Establishment of the Special Tribunal for the Crime of Aggression against Ukraine ('Agreement');⁹ second, the Statute, annexed to the Agreement pursuant to Article 1(2) of the Agreement; and third, the Enlarged Partial Agreement on the Management Committee of the Special Tribunal for the Crime of Aggression against Ukraine ('Enlarged Partial Agreement'). The latter instrument establishes the mechanism responsible for the financing, administration and managerial oversight of the Tribunal in

accordance with Articles 5 and 6(1) of the Agreement. At the 1530th meeting of the Ministers' Deputies of the Committee of Ministers on 4 June 2025, an *ad hoc* working party was established, open not only to member States but also to observer States and the EU. Following the working party's endorsement of the negotiated instruments, the Deputies authorized the Secretary General at their 1532nd meeting to sign the Agreement and its annexed Statute in their finalized form.¹⁰

The Agreement was formally signed by the President of Ukraine and the Secretary General of the Council of Europe on 25 June 2025. Pursuant to Article 9, it will enter into force once the Enlarged Partial Agreement itself has entered into force. In January 2026, the Council of Europe and the EU agreed to establish an advance team tasked with preparing the Tribunal's future functioning. Subsequently, on 15 May 2026, the Committee of Ministers adopted the Enlarged Partial Agreement, with 36 States and the EU indicating their intention to initiate the necessary domestic procedures for accession.¹¹

4. Jurisdiction, Structure and Procedure

The jurisdictional framework of the Special Tribunal is defined in considerable detail by its Statute, which in both structure and drafting technique bears closer resemblance to the Rome Statute than to the comparatively concise constitutive instruments of earlier *ad hoc* tribunals. Jurisdiction *ratione loci* is derived from the territorial jurisdiction of Ukraine (Article 1), while jurisdiction *ratione personae* extends to individuals bearing the greatest responsibility for the crime of aggression (Articles 1, 4(1)). With regard to jurisdiction *ratione materiae*, the Statute adopts a definition of the crime of aggression that is substantively almost identical to Article 8*bis* of the Rome Statute (Article 2(1)). The Statute does not establish an explicit temporal limitation on the Tribunal's jurisdiction *ratione temporis*.

In addition to the core crime within its mandate, the Tribunal is also empowered, similarly to the ICC and prior *ad hoc* tribunals, to prosecute offences against the administration of justice. The Statute further codifies a range of fundamental principles of international criminal procedure in its third chapter, including the right to a fair trial, the presumption of innocence, *ne bis in idem*, and the rights of the accused. It also expressly permits proceedings *in absentia* under specified conditions, while safeguarding the right to retrial in the event of conviction. At the same time, the Statute introduces certain innovations of its own. Most notably, it is the first constitutive instrument of an international criminal tribunal to impose an explicit time limit on the delivery of judgments by the Trial Chamber, requiring a decision within a maximum period of 15 months.

The sentencing regime established by the Statute reflects established principles of international criminal justice. Penalties are to be determined through an individualized and proportionate sentencing assessment, ranging from imprisonment for a specified term of years up to a maximum of 30 years. Life imprisonment is reserved exclusively for cases deemed to involve 'extreme gravity'.

Procedurally, the Special Tribunal reflects substantial influence from the ICC framework, while incorporating several distinctive features. Proceedings are divided into pre-trial, trial and appeals phases, with the possibility of revision of convictions or sentences. Entry into the trial stage requires confirmation of the indictment by a pre-trial judge. Particularly notable is Article 23, which departs from the ICC model by withholding *proprio motu* investigative authority from the Prosecutor. Instead, investigative and prosecutorial activity may only proceed on the basis of referrals submitted by the Prosecutor Gen-

⁴ On the feasibility of lifting the jurisdictional gaps within the ICC framework, see Carrie McDougall, "Expanding the ICC's Jurisdiction Over the Crime of Aggression", in *Journal of International Criminal Justice*, 2024, vol. 22, nos. 3–4, pp. 543 ff.; William Schabas, "What Tribunal for the Crime of Aggression in Ukraine? Amend the Rome Statute", in *Revue Belge de Droit International*, 2022, nos. 1–2, pp. 259 ff.

⁵ The Resolution includes decisions to convene an intersessional meeting in 2027 and a Special Session in 2029: ICC, Assembly of States Parties, "The Review of the Amendments on the Crime of Aggression", ICC-ASP/S-1/Res.1, 9 July 2025 (<https://www.legal-tools.org/doc/hdyh6666t/>). See further, Claus Kieß, "On Recent Events Concerning the Crime of Aggression", in *Journal of International Criminal Justice*, 2025, vol. 23, nos. 3–4, pp. 405 ff.

⁶ ICJ, *Allegations of Genocide under the Convention on the Prevention and Punishment of the Crime of Genocide (Ukraine v. Russian Federation)*, Order on Provisional Measures, 16 March 2022, para. 86 (<https://www.legal-tools.org/doc/pw9myi/>).

⁷ European Parliament, Resolution on the Establishment of a Tribunal on the Crime of Aggression against Ukraine, 2022/3017(RSP), 19 January 2023 (<https://www.legal-tools.org/doc/a83f3pul/>).

⁸ Council of Europe, Parliamentary Assembly, "Legal and Human Rights Aspects of the Russian Federation's Aggression against Ukraine", Resolution 2482, 26 January 2023 (<https://www.legal-tools.org/doc/klksw89i/>).

⁹ See Agreement, 25 June 2025, *supra* note 1.

¹⁰ Council of Europe, Ministers' Deputies of the Committee of Ministers, Consequences of the Aggression of the Russian Federation against Ukraine: Special Tribunal for the Crime of Aggression against Ukraine, CM/Del/Dec(2025)1532/2.3, 24 June 2025 (<https://www.legal-tools.org/doc/u80h-fkbw/>).

¹¹ Council of Europe, Committee of Ministers, Resolution Establishing the Enlarged Partial Agreement on the Management Committee of the Special Tribunal for the Crime of Aggression against Ukraine, CM/Res(2026)5, 15 May 2026 (<https://www.legal-tools.org/doc/5uqd3bji/>).

eral of Ukraine. This close institutional connection to Ukraine as the territorial State is also reflected at the enforcement stage: absent enforcement agreements with third States, convicted persons may serve sentences in Ukraine itself.

Finally, the fourth chapter of the Statute elaborates the co-operation framework initially outlined in Article 7 of the Agreement. It regulates the Tribunal's relationship with the ICC, the United Nations, Ukrainian judicial authorities, and the member States participating in the Management Committee. In relation to the ICC, the Statute provides that the Special Tribunal must defer to the permanent court where conflicting proceedings concern a detained individual, thereby seeking to avoid competing exercises of jurisdiction and to preserve institutional co-ordination within the broader system of international criminal justice.

5. The Tribunal's Characterization and Immunities

The legal characterization of the Special Tribunal as either a genuinely international court or an internationalized tribunal closely connected to the Ukrainian legal order remains one of the central unresolved questions arising from its establishment.¹² Earlier proposals had envisaged the creation of the Tribunal under direct United Nations auspices, a model that would likely have strengthened claims to a fully international character through broader institutional legitimacy and wider State participation.¹³

The final institutional design, however, reflects a more complex structure, combining bilateral and multilateral elements and thereby complicating any straightforward classification.

Several features point toward a continued dependence on Ukrainian sovereign authority. Most notably, as mentioned, the Prosecutor does not enjoy *proprio motu* powers, as the initiation of investigations and prosecutions is limited to referrals submitted by the Prosecutor General of Ukraine pursuant to Article 23(1). This restriction may be interpreted as indicative of a tribunal fundamentally anchored within the Ukrainian jurisdictional framework and merely supplemented by international participation and assistance.¹⁴ Such an interpretation gains additional support from the practical role of Ukraine throughout the procedural framework, including the possibility that sentences may ultimately be enforced within Ukrainian territory.

At the same time, the jurisdictional basis of the Special Tribunal is formally not derived from Ukrainian domestic law, but from an international legal instrument, namely the bilateral Agreement concluded between Ukraine and the Council of Europe. The Tribunal therefore formally exercises jurisdiction on the basis of international law rather than delegated domestic jurisdiction. Nevertheless, the precise legal character of the Tribunal will depend to a considerable extent on the degree of participation in the Enlarged Partial Agreement, the entry into force of which conditions the functioning of the Tribunal itself. Should only a relatively limited number of States become parties to that multilateral instrument and participate in the Management Com-

¹² Tsybulenko and Rinta-Pollari, 2023, pp. 336 ff., see *supra* note 2; Kevin Jon Heller, "Options for Prosecuting Russian Aggression against Ukraine: A Critical Analysis", in *Journal of Genocide Research*, 2024, vol. 26, no. 1, pp. 7 ff.; Carrie McDougall, "Why Ukraine Needs an International – Not Internationalised – Tribunal to Prosecute the Crimes of Aggression Committed against It", in *Polish Review of International and European Law*, 2023, vol. 12, no. 2, pp. 65 ff.

¹³ Graham M. Glusman, "Justice from the General Assembly: An International Tribunal for the Crime of Aggression in Ukraine", in *Chicago Journal of International Law Online*, 2024, vol. 3, no. 1, p. 30; Patryk I. Labuda, "Making Counter-Hegemonic International Law: Should a Special Tribunal for Aggression be International or Hybrid?", in *Just Security*, 19 September 2023. For a more cautious view on this solution, see Kevin Jon Heller, "Why I am Skeptical of a General Assembly Resolution Endorsing an STCoA", in *Opinio Juris*, 11 May 2023.

¹⁴ For an interpretation of the Statute in this sense, see Noëlle Quéniwet, "Symposium on Prosecuting Heads of State for International Crimes: The Special Tribunal for the Crime of Aggression against Ukraine and Immunities", in *Opinio Juris*, 24 March 2026.

mittee, the Tribunal could be perceived less as an institution acting on behalf of the international community as a whole than as a mechanism established by a comparatively narrow coalition of States. The current circle of willing States, while representing a considerable initial number, consists primarily of European nations, lacking geographical diversity and broad international backing. Even assuming that the States ultimately party to the Enlarged Partial Agreement seek to enforce a prohibition possessing *ius cogens* status, namely the prohibition of aggression, international law does not provide a clear threshold at which collective State participation becomes sufficient to confer an unequivocally international character upon a tribunal.¹⁵

This question of classification is not merely terminological or theoretical. It has direct implications for the applicability of immunities under international law, particularly personal immunity from criminal jurisdiction enjoyed by certain incumbent State officials.¹⁶

Unlike Article 27 of the Rome Statute, which expressly excludes personal immunity for serving members of the troika – heads of State, heads of government, and ministers of foreign affairs – the Statute of the Special Tribunal explicitly preserves such immunity in Article 23(5). While functional immunity is excluded with respect to indicted persons, personal immunity continues to apply to members of the troika for the duration of their tenure in office (Articles 23(4–5), 4(2)).

The relevance of the Tribunal's legal character to the immunity question is reflected in the jurisprudence of international courts. In its *Arrest Warrant of 11 April 2000* case, the ICJ observed *obiter dictum* that incumbent members of the troika may not benefit from personal immunity "before certain international criminal courts" (para. 61).¹⁷ The ICC Appeals Chamber subsequently gave full effect to Article 27(2) of the Rome Statute in its judgment in the *Omar al-Bashir* case in 2019, affirming that serving heads of State do not enjoy personal immunity before the ICC.¹⁸ By contrast, under the current state of customary international law, personal immunity continues to apply before domestic and internationalized courts in relation to the crime of aggression.¹⁹

Against this background, the explicit preservation of personal immunity within the Statute does not conclusively resolve the question of whether the Special Tribunal should itself be regarded as international or internationalized. The wording of the ICJ leaves room for competing interpretations. From a stricter positivist perspective, the inclusion of personal immunity may suggest that the Tribunal does not possess a genuinely international character.²⁰ On this view, the Tribunal lacks a universal mandate, operates only on behalf of participating States, and remains dependent upon Ukraine's sovereign authority in key respects, including the initiation of investigations.

¹⁵ Olivier Corten and Vaios Koutroulis, "In-Depth Analysis. Tribunal for the Crime of Aggression against Ukraine – A Legal Assessment", in *Revue Belge de Droit International*, 2022, nos. 1–2, pp. 224 ff.

¹⁶ Rebecca Hamilton, "Ukraine's Push to Prosecute Aggression: Implications for Immunity Ratione Personae and the Crime of Aggression", in *Case Western Reserve Journal of International Law*, 2023, vol. 55, no. 1, pp. 45 ff.; Corten and Koutroulis, 2022, pp. 220 ff., see *supra* note 15; Gaiane Nuridzhanian, "The Special Tribunal for the Crime of Aggression against Ukraine: Jurisdiction, Immunities and Due Process", in *Nordic Journal of International Law*, 2026, p. 21.

¹⁷ ICJ, *Case Concerning the Arrest Warrant of 11 April 2000 (Democratic Republic of the Congo v. Belgium)*, Judgment, 14 February 2002, para. 61 (<https://www.legal-tools.org/doc/c6bb20/>) ('Arrest Warrant case').

¹⁸ ICC, *Prosecutor v. Omar Hassan Ahmad Al Bashir*, Judgment in the Jordan Referral re Al-Bashir Appeal, Appeals Chamber, 6 May 2019, ICC-02/05-01/09-397-Corr, para. 117 (<http://www.legal-tools.org/doc/0c5307/>). For further analysis, see Claus Kreß, "Preliminary Observations on the ICC Appeals Chamber's Judgment of 6 May 2019 in the Jordan Referral re Al-Bashir Appeal", Occasional Paper Series No. 8 (2019), Torkel Opsahl Academic EPublisher, Brussels, 2019 (<https://www.toaep.org/ops-pdf/8-kress>).

¹⁹ Corten and Koutroulis, 2022, p. 218, see *supra* note 15.

²⁰ Similarly, Kevin Jon Heller, "The New STCoA: The Good, the Bad, the Curious, and the Terrible", in *Opinio Juris*, 11 July 2025.

It would therefore be required to apply the existing customary international law rules governing domestic and internationalized courts, under which personal immunity for incumbent members of the troika remains intact.²¹

Conversely, a more constitutive interpretation may point in the opposite direction. Precisely because the Tribunal considered it necessary to regulate the immunities of foreign State officials explicitly within its Statute, one might infer that it regarded itself as operating within the sphere of international adjudication.²² From this perspective, a purely domestic or straightforwardly internationalized tribunal would have had little reason to address the immunities of the troika at the statutory level at all. Such a reading would posit the Tribunal as the potential source of a shift in attitude of future international courts (back) towards full-fledged granting of personal immunity *de lege ferenda*, as before foreign national courts. This ‘voluntary’ respect for State sovereignty and customary boundaries, together with the remaining possibility of prosecution once office has been terminated, could assist in broader acceptance of convictions amongst the international community.

6. Conclusion: The Tribunal Will Be Judged by Its Substance, not Its Structure

The Special Tribunal demonstrates both the adaptability and the fragmentation of contemporary international criminal justice. On the one hand, there lies the aspirational model of a quasi-universal court capable of delivering comprehensive accountability across contexts, and, on the other hand, there is a recurring necessity of *ad hoc* institutional responses in situations marked by acute geopolitical contestation and limited consensus among States.

The creation of the Special Tribunal may therefore be interpreted as reflecting either a perceived functional limitation of the ICC, a broader legitimacy deficit within the existing system, or alternatively the increasing normalization of differentiated and selective accountability mechanisms in international criminal law. Yet the emergence of the Special Tribunal also demonstrates that the development of substantive international criminal law is not strictly dependent on the continuity or coherence of formal institutional architecture.

Rather, the evolution of the law may proceed through episodic institutionalization, in which different fora contribute incrementally to the articulation, clarification and consolidation of legal norms. Against this background, the legitimacy of any future convictions for the crime of aggression will depend less on the institutional ‘completeness’ or architectural coherence of the tribunal itself, and more on its substantive capacity to generate credible and authoritative stan-

dards of accountability. In this respect, the jurisprudential significance of the Special Tribunal will lie in its ability to produce legal determinations that may subsequently inform and structure the practice of other international courts, domestic jurisdictions, and potentially even the ICC, thereby contributing to the progressive development of the underlying substantive law.

Nevertheless, the example of the ICC has shown that the Special Tribunal must also actively cultivate its broader legitimacy through sustained co-operation and institutional engagement. It cannot rely solely on the formal validity of its legal framework to secure enduring authority. The experience of the ICC demonstrates that effective international criminal adjudication depends not only on doctrinal precision, but also on robust networks of State co-operation, reciprocal legal assistance, and sustained engagement with civil society and relevant stakeholders throughout all phases of proceedings.²³ Accordingly, if the Special Tribunal is to achieve both legal effectiveness and political durability, it will need to adopt proactive strategies of co-operation and outreach, ensuring that its findings are not only legally reasoned but also practically implemented and normatively influential beyond the courtroom.

At its core, however, it cannot yet be ascertained whether the Special Tribunal will be able to secure the necessary level of State co-operation to obtain custody over potential accused persons and thereby fully realize its mandate. In the final analysis, its long-term significance will likely depend less on institutional design than on its capacity to contribute meaningfully to the substantive articulation and enforcement of the prohibition of the crime of aggression within international criminal law.

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²¹ See *Arrest Warrant* case, paras. 54 ff., see *supra* note 17. On this reading, the exclusion of functional immunity in the Statute can be seen as a statutory exception to such immunity from *foreign* criminal jurisdiction, in line with (now) Article 6(g) of the Draft Articles on Immunity of State Officials from Foreign Criminal Jurisdiction adopted by the Drafting Committee of the International Law Commission on second reading. This version includes an exception also for the crime of aggression, which had not been included in the work up until 2025. See International Law Commission, Immunity of State Officials from Foreign Criminal Jurisdiction, Texts and Titles of the Draft Articles Adopted by the Drafting Committee on Second Reading, UN Doc. A/CN.4/L.1034, 8 May 2026 (<https://www.legal-tools.org/doc/czwqycp0/>).

²² Claus Kieß, “Russia’s War of Aggression Against Ukraine and the Crime of Aggression”, in Masahiko Asada and Dai Tamada (eds.), *The War in Ukraine and International Law*, Springer Nature, Singapore, 2024, p. 72.

²³ Elizabeth Evenson, “The International Criminal Court at 20: the Role of Civil Society”, in Carsten Stahn (ed.), *The International Criminal Court in its Third Decade*, Brill Nijhoff, Leiden, 2024, pp. 50 ff.



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