

THE POSITION OF THE INTERNATIONAL COMMUNITY TOWARDS RUSSIA'S AGGRESSION AGAINST GEORGIA (LEGAL OUTCOMES AND OVERVIEW OF THE CASE LAW)*

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Abstract. The 2008 Russian-Georgian war began during the Olympic Games, but the conflict had pre-existing roots and did not conclude with the official ceasefire. The international community's immediate reaction was delayed, yet over time, both political and legal efforts to establish accountability for the war emerged. Georgia used international legal mechanisms, including claims to the European Court of Human Rights, the International Court of Justice, and the International Criminal Court. While some efforts were unsuccessful, many produced significant results. These legal processes led to the formal recognition and legal assessment of the Russian occupation of Georgian territories and responsibility for human rights violations. This article reviews international case law concerning the legal evaluation and recognition of the occupation of Georgian territories by Russia, as well as the prospects for establishing the legal responsibility of the Russian Federation.

Keywords: Russian-Georgian War; ECtHR; Case Law; International Responsibility.

INTRODUCTION

International law is the law of civilized nations, which respect each other and uphold their responsibilities [Kaczorowska-Ireland 2015, 1, 4]. This is a primary reason why international law has little effect on the Russian Federation: they do not recognize civilized negotiations, nor do they respect other nations and their will to be independent [Mälksoo 2015, 184-89]. In 2008, Russia breached an unwritten rule dating back to antiquity by initiating a war against Georgia during the Olympic Games in Beijing [Cohen 2008]. The international community's reaction and response were neither immediate nor widespread; democratic states were unprepared, and despite many

* The article was prepared as a part of the project "Legal Analysis of Russia's Actions in Ukraine Since 2014 in Terms of Crimes of Aggression, War Crimes and Genocide, as well as Legal Solutions of Ukraine's Neighbouring Countries Regarding the Status of Ukrainian Citizens" (the agreement number MEIN/2023/DPI/2965).

warnings, most of the international community did not believe that Russia would launch military aggression against Georgia [Goradze 2023, 58-59].

Political reactions and support from key international partners prevented Russia from fully realizing its objectives. The United States, the European Union, and the personal interventions of leaders from Poland, Lithuania, Latvia, Estonia, and Ukraine encouraged Georgia to resist what they perceived as the “Empire of Evil” [Lašas 2012], a symbol for the Soviet Union, now transformed under the guise of a formally modern nation.

The legal qualification of any action is crucial, not only for personal or national reasons but also for historical understanding and future prevention. This prevention is directed not at the lawbreaker and aggressor but at partners and the international community, enabling them to prepare legal or political instruments, both national and international, to prevent aggression. The Russian-Georgian war and its legal consequences are particularly important now, as the civilized world confronts Russia’s increasing international crimes and inhumane actions in Ukraine.

The paper overviews reaction of the international community towards Russian-Georgian war of 2008 in the light of legal aspects, describes basic international legal mechanisms, used by Georgia against the Russian Federation, judgements and decisions by the international courts regarding the war and its qualification. The article pays attention to the international and domestic legal instruments, which can (or at least could) be used for the individual and state responsibility.

1. INTERNATIONAL RECOGNITION OF OCCUPATION

Terminology and legal definitions are fundamental pillars of legal concepts in general [Van Hoecke 2002, 1-20]. This understanding, rooted in Roman law, remains crucial, if not even more so, today. In the 19th century, the historical school of law emphasized the importance of meanings and their power in understanding the entire process of jurisprudence [Bix 2003, 5-6]. Lawyers operate with words, and everything in legal practice is linked to the semantic and logical concepts of specific terms [Gegenava 2010, 9-10]. Terms like “occupation” and “occupier” are particularly contentious, as these statuses recognize not only facts concerning war, annexation, and unjust actions, but also carry significant legal implications for nations. Therefore, every legal act that defines and qualifies such actions plays a crucial role in the international community.

In September 2008, the European Parliament adopted a resolution regarding the Russian-Georgian war, using the term “occupation” for the first time [Goradze 2023, 58]. It supported Georgia and condemned the disproportionate aggression and violation of international law by the Russian

Federation.¹ This process continued with the resolution of the Parliamentary Assembly of the Council of Europe in October 2008.² In October 2010, the NATO Parliamentary Assembly also classified the Russian military aggression against Georgia and the control of Georgian provinces as an occupation.³ In 2011, the European Parliament issued a more direct resolution, officially designating Abkhazia and South Ossetia as occupied territories.⁴

The final and most significant stage in the recognition of the occupation was the judgment of the European Court of Human Rights (ECtHR) in the case of *Georgia v. Russia (II)* on January 21, 2021.⁵ The concept of occupation was further elaborated in the case of *Mamasakhlisi and Others v. Georgia and Russia*, where the ECtHR detailed the annexation and occupation of Georgia by Russia.⁶ Due to the precedential nature of ECtHR case law, this judgment became legally binding and marked a significant legal victory.

Georgia has no choice but to utilize all legal instruments to declare and label the actions of the Russian Federation. This is crucial for the future and has a substantial impact on the international level.

2. INTERNATIONAL COURTS AND LEGAL EFFECT OF THEIR JUDGMENTS

2.1. International Court of Justice

In 2008, Georgia filed a case with the International Court of Justice (ICJ), based on violations of the International Convention on the Elimination of All Forms of Racial Discrimination (CERD) in 1999-2008.⁷ It was

¹ Resolution P6_TA(2008)0396 of 3 September 2008 of the European Parliament on the Situation in Georgia.

² Resolution 1633(2008) of 2 October 2008 of the Parliamentary Assembly of Council of Europe on The Consequences of the War between Georgia and Russia.

³ Resolution 382 of 16 November 2010 of the NATO Parliamentary Assembly on the Situation in Georgia.

⁴ Resolution P7_TA(2011)0514 of 17 November 2011 of the European Parliament Containing the European Parliament's Recommendations to the Council, the Commission and the EEAS on the Negotiations of the EU-Georgia Association Agreement (2011/2133(INI)).

⁵ See: *Georgia v. Russia (II)*, Judgement of the European Court of Human Rights of 21 January 2021, App. No. 38263/08.

⁶ See: *Mamasakhlisi and Others v. Georgia and Russia*, Judgement of the European Court of Human Rights of 7 March 2023, App. Nos. 29999/04 and 41424/04.

⁷ Summary, Application of the International Convention on the Elimination of All Forms of Racial Discrimination (*Georgia v. Russian Federation*) Request for the indication of Provisional Measures, 15 October 2008, <https://www.icj-cij.org/sites/default/files/case-related/140/14809.pdf> [accessed: 25.07.2024].

challenging to find appropriate, adequate, and direct legal grounds for an international dispute at the ICJ because the Russian Federation had not signed many important international instruments that could have been useful in seeking justice. CERD was considered one of the few available options.

The ICJ issued interim documents, provisional measures⁸ (seven judges dissented⁹). The Russian Federation filed preliminary objections: with one objection, it requested to declare the complaint inadmissible on the grounds that there was no dispute between Russia and Georgia and that the Russian Federation was not a party. With the other objection, it pointed to Article 22 of the CERD, which mandates mechanisms of alternative dispute resolution before filing the case before the ICJ.¹⁰ The court rejected the first objection and agreed with the second one.¹¹ Despite numerous attempts and the official notes sent by the Ministry of Foreign Affairs, Georgia did not receive a response from the Ministry of Foreign Affairs of the Russian Federation.¹² ICJ did not make final judgement and qualification for the actions of Russia.

Formally, the ICJ acted in accordance with international standards and the provisions of CERD. However, this was a narrow interpretation of the convention. Subsequent case law from the European Court of Human Rights demonstrated numerous instances of discrimination and breaches of human rights related to equality and ethnicity.

2.2. International Criminal Court and International Crimes of Russian-Georgian War

The International Criminal Court (ICC) operates under a strict mandate within the framework of the Rome Statute.¹³ Many countries are not parties to the Statute, making it challenging to legally address the consequences of war, military aggression, and other forms of international crimes. However, there is one nuance, the ICC has a mandate if an international crime is committed on the territory of a state party to the Rome Statute. Referring to this, in 2010, the ICC Prosecutor's Office published a press release and

⁸ Order of 15 October 2008 of the International Court of Justice (Georgia v. Russian Federation).

⁹ Joint Dissenting Opinion of Vice-President Al-Khasawneh and Judges Ranjeva, Shi, Koroma, Tomka, Bennouna and Skotnikov, International Court of Justice (Georgia v. Russian Federation), 15 October 2008; Declaration of Judge ad hoc Gaja, International Court of Justice (Georgia v. Russian Federation), 15 October 2008.

¹⁰ Preliminary Objections of the Russian Federation, Case Concerning Application of the International Convention on the Elimination of All Forms of Racial Discrimination (Georgia v. Russian Federation), International Court of Justice, 1 December 2009.

¹¹ Georgia v. Russian Federation, Judgement of 1 April 2011 of the International Court of Justice

¹² Correspondence N01/5646 of the Ministry of Foreign Affairs of Georgia, 16 February 2017.

¹³ Rome Statute of the International Criminal Court, adopted 17 July 1998, entered into force 1 July 2002, Articles 5-21.

noted that the court would potentially have jurisdiction over international crimes committed on the territory of Georgia.¹⁴ Georgian government could not or did not investigate crimes committed during the war of 2008.¹⁵ This paved the way for the ICC, which only intervenes when a case cannot or will not be investigated at the domestic, national level¹⁶ [Tskitishvili 2012].

On January 27, 2016, the ICC's Office of the Prosecutor opened an investigation into the situation in Georgia, focusing on crimes against humanity and war crimes committed between July 1 and October 10, 2008.¹⁷ The Prosecutor's proprio motu request was authorized by the pre-trial chamber of the court [Bezhanishvili 2023]. The Chamber confirmed "existence of a reasonable doubt that the war crimes of wilful killing, destroying the enemy's property and pillage, intentionally directing attacks against peacekeeping mission and crimes against humanity of murder, deportation or forcible transfer of population and persecution against an identifiable group of ethnic grounds were committed in the context of the conflicts"¹⁸ [ibid.]. It was first ever investigation of the European case in the history of the court, all the previous ones were concerned to African conflicts.¹⁹ In 2018, the ICC established a local office in Georgia to begin questioning and collecting evidence. Even more than a decade after the Russian-Georgian war, the repercussions of this conflict and other international crimes continue to affect civilians directly and indirectly.

In 2022, based on its investigations, the ICC issued arrest warrants against three separatists.²⁰ The Prosecutor's office also identified the involvement of General Borisov of the Russian army, who was the Deputy Commander of the

¹⁴ ICC Press Release, *No Impunity for Crimes Committed in Georgia: OTP Concludes Second Visit to Georgia in Context of Preliminary Examination*, 25 June 2010, <https://www.icc-cpi.int/news/no-impunity-crimes-committed-georgia-otp-concludes-second-visit-georgia-context-preliminary> [accessed: 25.07.2024].

¹⁵ Norwegian Helsinki Committee Report, 2011, *Unable or Unwilling? Georgia's Faulty Investigation of Crimes Committed During and After the Russo-Georgian War of August 2008*, http://www.humanrights.ge/admin/editor/uploads/pdf/Report_2_11_web.pdf [accessed: 25.07.2024].

¹⁶ ICC Press Release, *ICC Prosecutor Confirms Situation in Georgia under Analysis*, 20 August 2008, <https://www.icc-cpi.int/news/icc-prosecutor-confirms-situation-georgia-under-analysis> [accessed: 25.07.2024].

¹⁷ ICC Prosecutor, *The Prosecutor of the International Criminal Court, Karim A.A. Khan KC, announces conclusion of the investigation phase in the Situation in Georgia*, 16 December 2022, <https://www.icc-cpi.int/news/prosecutor-international-criminal-court-karim-aa-khan-kc-announces-conclusion-investigation> [accessed: 25.07.2024].

¹⁸ See: Pre-trial Chamber of the International Criminal Court, No. ICC-01/15, 27 January 2016.

¹⁹ FIDH Report, *The Russia-Georgia War: The Forgotten Victims 10 Years On*, 05 February 2018, <https://www.fidh.org/en/issues/international-justice/international-criminal-court-icc/the-russia-georgia-war-the-forgotten-victims-10-years-on> [accessed: 25.07.2024].

²⁰ ICC Prosecutor, *The Prosecutor of the International Criminal Court, Karim A.A. Khan KC, announces conclusion of the investigation phase in the Situation in Georgia*.

Airborne Forces in 2008, although he had since died.²¹ This investigation has been labeled “the ICC’s most delayed investigation” [Bezhanishvili 2023]. Final decisions and judgments are not expected in the near future. Unfortunately, international investigations and the pursuit of justice at the international level are complex processes, but they remain without any viable alternatives.

This is a necessary process, as international accountability is crucial for addressing war crimes. It holds significant symbolic value, highlighting the international community’s reaction and making a clear statement based on the principles of the rule of law and human rights. The international community and each nation must possess all legal instruments for declaration and recognition because, in the modern era of information and technology, information holds real power for planning a better future.

2.3. European Court of Human Rights and Responsibility for Russian-Georgian War

The European Court of Human Rights (ECtHR) has a significant influence on legal and political processes in Europe and worldwide. As one of the most authoritative and powerful international courts, its judgments shape the framework of the modern concept of human rights. The ECtHR has heard numerous cases concerning the Russian-Georgian war: some filed by Georgia and Georgian citizens against the Russian Federation, while others were instigated by Russia, supporting individuals to submit claims against Georgia.

In the judgments of the European Court of Human Rights (ECtHR) related to the Russia-Georgia war, several key issues stand out as particularly significant in the context of war and occupation (this does not imply that individual claims against the Russian Federation for rights violations are insignificant): The legal qualification and assessment of the Russia-Georgia war; The legal recognition of the occupation of Georgian territories by Russia; Human rights violations of Georgian citizens by Russia during and before the war of August 2008.

(1) Georgia v. Russia (I): First Steps towards Recognizing the Responsibility of the Russian Federation

In many cases, the European Court did not find any breach of human rights by Georgia, and some cases did not meet the criteria of admissibility. In 2014, the ECtHR delivered its first major judgment on the matter in *Georgia v. Russia (I)*. Georgia utilized the opportunity provided by Article

²¹ Ministry of Justice of Georgia, Another Victory of Georgia Over the August 2008 War, 11 March 2022, <https://justice.gov.ge/?m=articles&id=UpL8kINlaj&lang=2> [accessed: 25.07.2024].

41 of the European Convention to initiate an interstate dispute against the Russian Federation. The case concerned the mass deportation of Georgian citizens from Russia in 2006 and the violation of European Convention articles during this deportation. The ECtHR recognized the interstate dispute on this issue as admissible, noting that Georgia's complaint met the admissibility criteria outlined in its 2014 judgment on the case *Cyprus v. Turkey*.²²

European Court recognised responsibility of the Russian Federation and uphold Georgia's claim.²³ Regarding the number of the subjects whose rights were violated four judges made partly concurring opinion²⁴, and one – dissenting opinion.²⁵

Although the judgement was not directly related to the 2008 war, it is extremely important as it marked the first precedent of an interstate dispute between Georgia and Russia. The judgement officially recognized that the 2008 war was not an isolated event, but was preceded by deliberate aggressive actions and human rights violations committed by the Russian Federation against Georgia and its citizens. This legal recognition reinforced subsequent judgments by the European Court regarding other interstate disputes between Georgia and Russia, as well as individual complaints arising from the 2008 war.

(2) Determination of Jurisdiction, Effective Control and Occupation (Georgia v. Russia (II))

In 2021, the European Court of Human Rights delivered a landmark judgment regarding the interstate disputes between Russia and Georgia, recognizing the responsibility of the Russian Federation for the war of August 2008. The ECtHR outlined two main issues: The extent to which the Russian Federation had jurisdiction over the territory where the human rights violations occurred; The degree to which Russia exercised jurisdiction and effective control, and its consequent responsibility for human rights violations.²⁶

²² "(i) the type of complaint made by the applicant Government, which had to concern the violation of basic human rights of its nationals (or other victims); (ii) whether the victims could be identified; and (iii) the main purpose of bringing the proceedings." See: *Cyprus v. Turkey*, Judgment of the European Court of Human Rights of 12 May 2014, App. No. 25781/94, paras. 43-45.

²³ See: *Georgia v. Russia (I)*, Judgment of the European Court of Human Rights of 31 January 2019, App. No. 13255/07.

²⁴ Partly Concurring Opinion of Judges Yudkivska, Mits, Hüseyinov and Chanturia on *Georgia v. Russia (I)*, Judgment of the European Court of Human Rights of 31 January 2019, App. No. 13255/07.

²⁵ Dissenting Opinion of Judge Dedov on *Georgia v. Russia (I)*, Judgment of the European Court of Human Rights of 31 January 2019, App. No. 13255/07.

²⁶ See: *Georgia v. Russia (II)*, Judgment of the European Court of Human Rights of 21 January 2021, App. No. 38263/08.

These issues are not simple topics the court will highlight in the case, since the dispute was not typical and determining the jurisdiction of the states is not only related to law, it is, first of all, a political issue and a very delicate one, since it also involves determining the scope of the authority, responsibility and mandate of the European Court itself.

The court separated the phase of active hostilities – August 8-12, 2008 from the rest of the period (until October 10, 2008) and noted that Russia did not directly exercise jurisdiction in the zone of military actions during hostilities, therefore, the Russian Federation could not be responsible for the actions and human rights violations committed during this period.²⁷

The European Court recognized the “effective control” of the Russian Federation over the occupied territories of Georgia after August 12 and established Russia’s responsibility for actions committed during this period.²⁸ This judgment is significant not only in the context of Georgia-Russia relations but also more broadly. It marked the first time since the Banković case that the Court had to address the issue of jurisdiction in relation to military actions [Mchedlidze 2021].

The court followed the standard set forth in the Banković case and declined to extend extraterritorial jurisdiction. The judgment was criticized from different angles by the judges in concurring and partly different opinions.²⁹ Judge Chanturia’s dissenting opinion is particularly interesting, the court should not avoid its responsibility basing argumentation about difficulties regarding collection of evidence and interpretation of international humanitarian law.³⁰

Despite some controversial statements and limitations within its jurisdiction, the ECtHR made a very important decision that will have significant effects on other conflicts in the future. The judgement has already made a significant impact. ECtHR recognized human rights violations and factual war crimes by the Russian Federation beyond the reasonable doubt [ibid.]. It will play an important role in the Ukrainian cases too, – of course facts and circumstances are different, but the principles of legal qualification of the Russia’s military actions remain same [Cain 2023, 223-25].

²⁷ See: Ibid., paras. 105-144.

²⁸ Ibid., paras. 174-175.

²⁹ See: Concurring Opinion of Judge Keller, Partly Concurring Opinion of Judge Serghides, Partly Dissenting Opinion of Judge Lemmens, Partly Dissenting Opinion of Judge Grozev, Partly Dissenting Opinion of Judges Yudkivska, Pino de Albuquerque and Chanturia, Joint Partly Dissenting Opinion of Judges Yudkivska, Wojtyczek and Chanturia, Partly Dissenting Opinion of Judge Pinto de Albuquerque, Partly Dissenting Opinion of Judge Dedov, Partly Dissenting Opinion of Judge Chanturia on Georgia v. Russia (II), Judgement of the European Court of Human Rights of 21 January 2021, App. No. 38263/08.

³⁰ See: Partly Dissenting Opinion of Judge Chanturia on Georgia v. Russia (II), Judgement of the European Court of Human Rights of 21 January 2021, App. No. 38263/08.

(3) Responsibility of the Russian Federation for the Period Prior to the August 2008 War

The European Court approached the consideration of Russia-Georgia legal disputes in a planned and measured manner. Despite some controversial interpretations and evaluations, its practice is invaluable in establishing legal responsibility for the war (or at least for certain parts of it). The Court's efforts are particularly noteworthy in addressing the increasing number of artificial individual complaints against Georgia, which were inspired by Russia in an attempt to overload the Court [Mchedlidze 2021].

Impressive and significant work for the legal recognition and evaluation of the occupation was done by the court in the case – *Mamashakhlishi and others v. Georgia and Russia*. According to the assessment, before the 2008 war, since the conflict of the 1990s, the Russian Federation had influence over the separatist government of Abkhazia, Georgia could not exercise jurisdiction during this period, and logically, it could not be responsible for human rights violations in these territories, unlike Russia, which exercised effective control over this territory. Therefore, human rights violations within the administrative borders of Abkhazia came under the responsibility of Russia.³¹

This legal qualification is not merely symbolic; it also serves a highly practical purpose. During the conflict in Abkhazia, ethnic cleansing was perpetrated against Georgians, a fact recognized by authoritative international organizations [Goradze 2023, 59-60]. Consequently, this legal framework paves the way for holding the Russian Federation accountable for these actions, thereby establishing a foundation for legal responsibility in this matter as well.

3. THE LEGAL BATTLE CONTINUES

Georgia should consider utilizing the concept of universal jurisdiction and begin collecting facts and initiating its own investigation processes. While international instruments and mechanisms are crucial, they often lack timeliness and efficiency. Many civil actors and organizations have been involved in gathering information, and this effort should be expanded. All victims of war, genocide, and ethnic discrimination, as well as witnesses, should be questioned. The government must gather all necessary information not only for inter-state disputes but also for establishing personal, individual responsibility. This is a principal matter that should be documented, at least at the national level.

³¹ See: *Mamasakhlishi and Others v. Georgia and Russia*, Judgement of the European Court of Human Rights of 7 March 2023, App. Nos. 29999/04 and 41424/04.

Another approach is to initiate an ad hoc tribunal for the Georgian case, which could also set a precedent for the Ukrainian case in the future. The ICC's jurisdiction is limited, and even though an investigation by the Prosecutor's office has been launched because Georgia is a party to the Statute, and crimes on its territory fall under ICC jurisdiction, an ad hoc tribunal could be more effective. It would not be confined by strict jurisdictional questions and could investigate all war crimes, establishing basic information and legal facts. This would play a significant role not only in achieving justice but also in maintaining political stability in Europe and worldwide.

The resources of the European Court must be utilized and comprehended. At this stage, both individual complaints and those submitted by Georgia against the Russian Federation are before the court. The case of Georgia v. Russia (III) involved the arrest of four minors in the Tskhinvali region in 2009. They were released following the intervention of the Commissioner for Human Rights of the Council of Europe, leading the European Court to remove the case from its list of pending cases [Mchedlidze 2021].

The fourth case concerns the so-called "borderisation," where Russia harasses the population of Georgia in the occupied territories and along the occupation line, illegally arresting, attacking, and killing people, including the murders of Tatunashvili, Otchozoria, and Basharuli. The Court declared its judgement and recognised human rights violation by the Russian Federation.³²

In a civilized world, establishing accountability through legal means is essential. The Russian Federation must be held responsible for the war, mass crimes, and human rights violations committed in the occupied territories of Georgia. This can be achieved through individual claims and remedies, domestic investigations, interstate complaints, and other legal mechanisms. Such efforts will significantly contribute to establishing accountability for Russia's actions in other states too. While this may not offer much solace to those who have lost their lives or had their families destroyed, it is crucial for the restoration of justice, the affirmation of the concept of justice and legal responsibility, and the prevention of future violations. There is no alternative to the legal battle in this context.

FINAL REMARKS

The recognition of the occupation of Georgian territories by Russia is both a political and legal issue. Any political recognition ultimately requires an appropriate legal framework. As previously mentioned, this recognition has occurred numerous times at the international level, notably by the

³² See: Georgia v. Russia (IV), Judgement of the European Court of Human Rights of 4 April 2024, App. No. 39611/18.

Council of Europe, the European Union, and NATO, which is of significant importance. While this reflects the correct and adequate response of the international community, it often serves more as an instrument of politics and international relations. For a comprehensive legal assessment, recognition at the level of international justice is of even greater importance.

Despite Russia no longer being a signatory to the European Convention, the European Court has recognized its responsibility for actions committed before its withdrawal from the Convention. The following findings regarding the Russian-Georgian war were established by the European Court of Human Rights: 1) Russia has occupied territories of Georgia; 2) Russia exercises effective control and jurisdiction over the occupied territories of Georgia; 3) The Russian Federation is responsible for human rights violations occurring in the occupied territories of Georgia.

ICJ is an ineffective mechanism for addressing disputes with Russia due to its limited scope of responsibility and jurisdiction. On the other hand, the ICC, while a long-term mechanism with enforcement dependent on various circumstances, remains a potentially effective tool with significant resources for future use. Developed states should consider establishing an ad hoc tribunal to address war crimes related to the Russian-Georgian and Russia-Ukrainian conflicts with a higher priority, in order to determine both individual and state responsibility. All available mechanisms should be employed to combat the actions of the terrorist state. Failing to act decisively, giving another second chance to Russia could lead to catastrophic consequences not only for specific individuals or states but also on a regional or even global scale. National investigations should be conducted to collect and document evidence, facts, and information concerning the circumstances of the war and human rights violations perpetrated by the Russian Federation.

While all these instruments and legal mechanisms are unfortunately post facto for the victims of the war in Georgia, there is hope for other people, particularly in light of the ongoing war in Ukraine. Such actions would have symbolic significance, demonstrating solidarity and preserving the principles forged since World War II.

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