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Mr Simeon Petrovski
Deputy Section Registrar of the Fourth Section
European Court of Human Rights
67075 Strasbourg CEDEX, France

16 January 2025

Application no. 6719/23
Ukrainian Helsinki Human Rights Union v. Russia

WRITTEN SUBMISSIONS
UNDER RULE 44 § 3 OF THE RULES OF COURT

Dear Sir,

1. On 17 December 2025, the Court granted International Partnership for Human Rights ("IPHR") and Yale School of Public Health - Humanitarian Research Lab ("HRL") leave under Rule 44 § 3 to submit written submissions in the above case. IPHR and HRL have, in accordance with the Court's instructions, coordinated their efforts and herewith submit their joint written comments.

2. Since 2014, IPHR has been actively engaged in documenting, analysing and litigating the mass transfer and adoption of Ukrainian children by the Russian government. HRL has extensively investigated Russia's programme for the adoption and fostering of Ukrainian children and tracked those affected by it.

3. The submissions, based on the evidence obtained by the third-party interveners, indicate that a large group of Ukrainian children, including at least some of the victims, were subjected to illegal adoption procedures administered by the Russian authorities. These adoptions were carried out in the context of widespread and systematic practices by the Russian State affecting Ukrainian children, including their forcible transfer, deportation, mass conferral of Russian citizenship (the so-called 'passportisation').

A. Illegal adoption and fostering of Ukrainian children

4. HRL's investigative work into the treatment of Ukrainian children transferred to the territory of Russia has identified that a large group of Ukrainian children (including at least four of the victims) were incorporated into State-run adoption processes.

5. Beginning from March 2023, HRL identified three interconnected Russian adoption databases that listed children from Ukraine for fostering or adoption. The databases are hosted on websites run by two Russian GONGOs – Change One Life[1] ("COL") and the Centre for Development of Social Projects ("ANO TsRSP"),[2] as well as Russia's Ministry of Education, who operate the "State data bank of orphans and children left without parental care" ("MoE").[3] All three databases are operated by, affiliated with, or coordinated with Russia's Government. Through the analysis of the three databases, HRL was able to identify children taken from Ukraine and listed for fostering and adoption. HRL further obtained evidence that Russia had been listing Ukraine's children for fostering and adoption on the aforementioned websites as early as 2015.

6. The three databases list children by the Russian regions in which they are available for adoption or fostering. The geography of the databases was also extended to the Russia-occupied territories of Ukraine. However, children available for adoption were listed only in the respective Crimea and Sevastopol sections of the ANO TsRSP and the COL databases. As of March 2023, each profile contained a headshot and substantial biographical information. ANO TsRSP and COL databases also indicate the date of the child's profile listing, with the former database also showing the date of the last update.

7. In March 2023, HRL archived profiles of children listed for adoption and fostering in Crimea and Sevastopol across the three databases. HRL shared the archive with the applicant, and jointly they were able to find four of the victims in ANO TsRSP database; at least two of them were also listed on the COL database. It is unknown if any of the victims were listed on Russia's Ministry of Education database.[4]

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[1] Headed by by Yana Leonova, a member of the expert council of Russia's Ministry of Education on issues related to the guardianship of unaccompanied children. *Vedomosti*, 'Спикер Яна Леонова, https://events.vedomosti.ru/speakers/leonova-yana-7444, accessed 15 January 2026.

[2] An organisation previously funded by Russia's Ministry of Education and the Administration of the Russian President. *Фонд президентских грантов*, 'Проекты', https://xn--80afcdbalict6afooklqi5o.xn--p1ai/public/application/item?id=7423B302-9E45-450B-AE60-E92DDF2F2474.

[3] 'Приказ Министерства просвещения РФ от 15 июня 2020 г. № 300 "Об утверждении Порядка формирования, ведения и использования государственного банка данных о детях, оставшихся без попечения родителей"' (11 August 2020) https://www.garant.ru/products/ipo/prime/doc/74392275/.

[4]

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8. As of January 2026, these profiles have been removed from the database on which they were found.[5] HRL has found that the removal of a child's profile occurs at such a time as they are placed in a family or has reached the age of majority. The link that once contained the child's profile displays an error message saying "page not found" on the ANO TsRSP database. HRL does not possess any information on the current whereabouts of the victims and was unable to confirm whether the four aforementioned children had been placed in a family for adoption or fostering. However, the above information and the results of the analysis conducted by HRL indicate that Russia has established a substantial, state-backed system for arranging family placements, including for children from Ukrainian territories occupied by Russia in 2014 and 2022. It is possible that some of the victims were placed with families through this system.

B. Systemic and widespread practices of forcible transfer, deportation, conferral of citizenship, and adoption of Ukrainian children by Russia

9. The third-party interveners submit that there is extensive and consistent evidentiary material demonstrating a pattern of widespread and systematic practices by Russia involving transfer, deportation, 'passportisation', and adoption of Ukrainian children. These practices began with the occupation of Crimea and parts of eastern Ukraine in 2014,[6] and intensified significantly after February 2022. Accordingly, the evidence provided herewith focuses primarily on the post-February 2022 period, when the documentary record of these unlawful practices became more accessible.

10. Given their coordinated and institutionalised character, as demonstrated below, these practices cannot have arisen spontaneously. The evidence presented, therefore, provides a sufficient basis for the Court to draw inferences as to their earlier stages. Such an approach, grounded in Rule 44C of the Rules of Court, was adopted by the Grand Chamber in Ukraine and the Netherlands v. Russia (nos. 8019/16, 43800/14 and 28525/20, §§ 1096–1098, 1571) and is warranted here in light of the Respondent State's exclusive control over the relevant information and its failure to engage with the Court.

11. Indicative figures point to the large scale practices affecting Ukrainian children. As of 14 January 2026, the "Children of the War" portal maintained by the Ministry of Reintegration of Ukraine, recorded approximately 20,000 children as deported and or forcibly displaced, of whom, 1,961 had been returned by that date.[7] In addition, HRL has documented at least 314 cases in which Ukrainian children were listed for adoption or fostering or placed with families in Russia, following Russia's full-scale invasion of 2022.[8]

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[6] «Потяг надії»: Росія незаконно вивозить сиріт з окупованого Криму з 2014 року' *Українська молодь-online* (2 June 2020, 11:25) https://umoloda.kyiv.ua/number/0/188/146762.

[7] *Children of the War*, https://childrenofwar.gov.ua, accessed 14 January 2026. In 2022, Russia's Commissioner for Children's Rights, Maria Lvova-Belova, publicly stated that following Russia's invasion of Ukraine in 2022, 744,000 Ukrainian children had been transferred to Russia. Forbes.ru, "Львова-Белова сообщила о более чем 700 000 вывезенных в Россию украинских детей', 30 July 2023, https://www.forbes.ru/society/493721-l-vova-belova-soobsila-o-bolee-cem-700-000-vyvezennyh-v-rossiu-ukrainskih-detah.

[8] HRL, "Intentional, Systematic, & Widespread: Russia's Program of Coerced Adoption and Fostering of Ukraine's Children.", op. cit.

12. The available evidence permits the identification of several principal waves of transfer and deportation of Ukrainian children: (a) from territories under the control of the so-called 'DPR' and 'LPR' in 2014-2016[9] and (b) later, immediately before and during the initial months of the full-scale invasion (early 2022);[10] (c) from occupied Mariupol and neighbouring settlements (March-May 2022);[11] (d) from occupied areas of Kharkiv oblast (August-November 2022);[12] (e) from Kherson oblast shortly before and during the Ukrainian counteroffensive and the Russian retreat (Autumn 2022);[13] and (f) ongoing sporadic and organised transfers from occupied territories in Mykolaiv, Zaporizhzhia, Kherson, and Donetsk oblasts throughout the full-scale invasion.[14]

13. These unlawful practices affected several categories of children:[15] (a) those separated from parents or guardians during so-called "filtration", including following the arbitrary detained of the parents; (b) children whose parents or guardians were killed; (c) removed directly from families, including through occupation-driven revocation of parental rights; (d) children in care institutions located in the occupied territories who were not permitted to evacuate to Ukraine; (e) transferred from occupied areas to camps in the Russian Federation under the pretext of "rehabilitation" or "recreation," including children who were retained or relocated without parental consent.[16]

14. Forced conferral of Russian citizenship ("passportisation") served as a key mechanism of administrative absorption. Following the annexation of Crimea, children residing there were granted Russian citizenship and brought within Russian adoption procedures.[17] Between 24 February and 4 October 2022, Ukrainian children transferred from other occupied territories were routinely placed under "preliminary guardianship" in Russia due to the lack of Russian citizenship. This regime allowed Russian citizens to assume care on the basis of presumed

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[9] 'Доктор Ліза, яка "рятувала дітей Донбасу". Що відомо про загиблу в катастрофі Ту-154 росіянку' *ТСН* (25 December 2016), https://tsn.ua/svit/doktor-liza-yaka-ryatuvala-ditey-donbasu-scho-vidomo-pro-zagiblu-v-katastrofi-tu-154-rosiyanku-853518.html.

[10] 'В Коми из ДНР и ЛНР прибыли 70 детей' *Газета «Новая жизнь» (Койгородок)* (8 April 2022) https://vk.com/wall-40126686_21555.

[11] Олександр Янковський, '«Вкрадені» діти. Що готує РФ для українських дітей з окупованих територій?' *Новини Приазов'я (Радіо Свобода)* (9 April 2022), https://www.radiosvoboda.org/a/novyny-pryazovya-viyna-rosiya-krade-ditey-ukrayini/31794816.html.

[12] Марія Солодовнік, 'Вивезення дітей з Харківщини під час окупації: як дітей повертають з російських таборів' *Суспільне* (20 October 2022). https://suspilne.media/kharkiv/298984-vivezenna-ditej-z-harkivsini-pid-cas-okupacii-ak-ditej-povertaut-z-rosijskih-taboriv/.

[13] *Sky News*, *Ukraine War: Chilling moment Russians came for Ukrainian orphans,* https://www.youtube.com/watch?v=c9js35juYBI, accessed 14 January 2026.

[14] Катерина Некреча and Богдан Логунов, '«Булили, обзивали, били». Уповноважена президента України розповіла про вивезених Росією дітей' *Радіо Свобода* (31 March 2023) https://www.radiosvoboda.org/a/svoboda-ranok-deportovani-dity-ukraina-gerasymchuk/32343495.html.

[15] 'Ukraine's abducted children: "List of suspects will grow"' (Deutsche Welle, 25 March 2023), https://www.dw.com/en/ukraines-abducted-children-the-list-of-suspects-will-grow-longer/a-65117416.

[16] IPHR and HRL most frequently worked on the last category of transfers.

[17] Federal Constitutional Law No 6 FKZ of 21 March 2014, Art. 4, http://static.kremlin.ru/media/acts/files/0001201403210014.pdf, accessed 13 January 2026.

parental absence, with minimal evidentiary requirements and no clear time limits, operating in practice as an interim legal mechanism pending further measures following the annexation of the four Ukrainian oblasts in 2022.[18]

15. In May 2022, Russian President signed decree introducing a simplified procedure for granting the Russian citizenship to orphans, children deprived of parental care, and legally incapacitated persons originating from Ukraine (including the occupied Donetsk and Luhansk oblasts), allowing applications to be submitted on their behalf without the consent of Ukrainian authorities, including by guardians and by heads of educational or medical institutions.[19] In practice, this process of 'passportisation' directly enabled the adoption of Ukrainian children and exposed them to the risk of irreversible identity alteration. Once Russian citizenship is conferred, Russian courts may authorise adoption,[20] exposing children to indoctrination and militarisation.[21] Identity misplacement include changes of names, the reissuance of birth certificates with altered dates and places of birth, complicating identification and return, as well as the appearance – and subsequent removal – of children's profiles on adoption websites.[22]

16. The Russian domestic framework has been further adapted to entrench these outcomes. Following the annexation of four Ukrainian regions in October 2022, children in those territories were deemed Russian citizens by default.[23] Under Russian law, guardians were permitted to renounce Ukrainian nationality on behalf of children under the age of 14.[24] Legislative amendments in June 2023 expanded this mechanism, allowing a parent or other lawful representative to renounce a child's Ukrainian citizenship while the child was in Russia, including

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[18] 'Российские власти передали под «предварительную опеку» более тысячи детей из Украины' (Vazhnyye istorii (IStories), 28 June 2023, https://istories.media/stories/2023/06/28/opeka/,.

[19] 'Указ Президента РФ от 30 мая 2022 г. N 330, https://www.garant.ru/hotlaw/federal/1546526/.

[20] *See e.g.* Типичное Енакиево, 'Каков механизм усыновления детей из Донбасса для жителей других регионов России?' (VKontakte, 14 January 2024), https://vk.com/wall-32205256_1788855.

[21] OSCE Parliamentary Assembly, 'Russian Abductions and Deportations of Ukrainian Children', https://www.oscepa.org/en/documents/ad-hoc-committees-and-working-groups/parliamentary-support-team-for-ukraine/5294-russian-abductions-and-deportations-of-ukrainian-children-by-carina-oedebrink-eng/file; Raymond, Nathaniel A., Oona A. Hathaway, Caitlin N. Howarth, and Kaveh Khoshnood et al., "Intentional, Systematic, & Widespread: Russia's Program of Coerced Adoption and Fostering of Ukraine's Children." 3 December 2024. Humanitarian Research Lab at Yale School of Public Health: New Haven. Available at https://medicine.yale.edu/lab/khoshnood/publications/reports/

[22] Mykola Kuleba (@MykolaKuleba), 'Russia isn't even trying to hide it anymore.' (X, 7 August 2025), https://x.com/MykolaKuleba/status/1953507503695688126, accessed 13 January 2026; Nazar Solomakha and Blake Spendley, 'We Found Ukrainian Kids on Russian Adoption Sites. The Evidence Disappeared, But Only After We Sent It To Prosecutors.' (Hunterbrook, 2 November 2025) https://hntrbrk.com/disappeared/ accessed 13 January 2026; Global Rights Compliance, 'Rewriting Childhood: The Russification of Ukrainian Children' (19 September 2025), https://globalrightscompliance.org/rewriting-childhood-the-russification-of-ukrainian-children/.

[23] Article 5 of the Federal Constitutional Laws Nos. 5-FKZ, 6-FKZ, 7-FKZ and 8-FKZ of 4 October 2022 (On the "admission" of Donetsk, Luhansk, Kherson, and Zaporizhzhia oblasts to Russia), common Art. 5.

[24] *Id.*, paragraph 10 of Article 10 in the four Federal Constitutional Laws details the process for children under 14 to obtain Russian citizenship.

in cases of adoption, guardianship, institutionalisation, or deprivation of parental care.[25] In July 2023, an additional measure was adopted requiring individuals who declared an intention to leave Ukrainian citizenship to refrain from exercising rights or performing obligations linked to Ukrainian nationality.[26] Despite the condemnation by the UN of "passportisation" and adoption of the Ukrainian children as violations of the "fundamental principles of child protection",[27] Russian authorities continued imposing nationality on Ukrainian children, including in Crimea.[28] The third party interveners worked on several cases illustrating these unlawful practices.

Medvezhonok Camp

17. In the summer of 2022, during the Russian occupation of parts of Kharkiv Oblast, occupying authorities promoted children's camps in Russia and Russian-controlled territory, pressuring parents – through insecurity, deprivation, and movement restrictions – to send their children. In August 2022, approximately 500 children from Kharkiv Oblast were transferred in two waves to the Medvezhonok camp in Russia, after parents were misled or coerced into consenting to a three-week stay with a promised return. The transfers were organised by the occupying authorities in coordination with Krasnodar Krai. Following Ukraine's liberation of Kharkiv Oblast, Russia unilaterally extended the children's stay, announcing successive extensions in September 2022 and ultimately ordering an indefinite stay "until conditions are safe," a position reiterated by Russia's UN representative in March 2023. Some children were later moved to other facilities without parental knowledge or consent, and were subjected to political indoctrination. Russian authorities refused to organise or facilitate the children's return, forcing parents to arrange repatriation independently. According to IPHR's investigation, these efforts were actively obstructed, with successful reunifications taking between five and seven months.[29]

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[25] Federal Law No 62 FZ of 18 March 2023, 'Об особенностях правового положения граждан Российской Федерации, имеющих гражданство Украины', https://www.consultant.ru/document/cons_doc_LAW_442337/, accessed 14 January 2026.

[26] Presidential Decree No 495 of 6 July 2023, 'О некоторых вопросах, связанных с особенностями правового положения граждан Российской Федерации, имеющих гражданство Украины', https://publication.pravo.gov.ru/document/0001202307060036. Additionally, under Russian law dual citizens are treated exclusively as Russian citizens (Federal Constitutional Law No 138 FZ of 28 April 2023 'On Citizenship of the Russian Federation', https://www.garant.ru/hotlaw/federal/1621755/).

[27] 'UN refugee chief: Russia violating principles of child protection in Ukraine' (Reuters, 27 January 2023), https://www.reuters.com/world/europe/un-refugee-chief-russia-violating-principles-child-protection-ukraine-2023-01-27/.

[28] Центр противодействия дезинформации, 'В 2025 году РФ принудительно выдала 511 паспортов детям в оккупированном лагере "Артек"' (CTR Center, 6 January 2026), https://ctrcenter.org/ru/v-2025-godu-rf-prinuditelno-vydala-511-pasportov-detyam-v-okkupirovannom-lagere-artek.

[29] International Partnership for Human Rights (IPHR), 'Medvezhonok Camp: The Story of 300 Ukrainian Children Kidnapped by Russian Authorities', https://iphronline.org/articles/medvezhonok-camp-the-story-of-300-ukrainian-children-kidnapped-by-russian-authorities/, pp. 12-27.

Oleshky Boarding School

18. Oleshky, in Kherson Oblast on the left bank of the Dnipro River, has been under Russian occupation since late February 2022. In October 2022, Russian occupation authorities transferred 84 Ukrainian children and young adults from the Oleshky Boarding School, initially to the facilities, including the Clinical Psychiatric Hospital No. 5 in occupied Simferopol and the Nadiia Rehabilitation Centre in occupied Skadovsk. The children were later separated and transferred to multiple locations in occupied Ukraine and Russia. Children who returned to Ukraine reported exposure to political indoctrination, ill-treatment, and poor living conditions.

19. In March 2023, IPHR interviewed a teacher and a parent connected to the Oleshky Boarding School. The teacher reported that 12 children had been taken to Crimea and 72 to Skadovsk, and assisted parents in locating their children. A mother of a child born in 2006 and diagnosed with epilepsy, stated that, in October 2022, she was given twenty minutes by the occupation-appointed director of Oleshky to consent to a purported two-week transfer to Crimea, under threat that the children would otherwise be abandoned. Her daughter was transferred on 20 October 2022 to a psychiatric hospital in Simferopol and later moved without notice to Krasnodar Krai, where she was located in November 2022 in the Kropotkin orphanage boarding school and from where she retrieved her in 2023.

20. As of August 2025, only 14 former pupils of Oleshky had reportedly returned to Ukraine. According to the latest reports, the remaining children were relocated to a boarding facility in occupied Skadovsk, while adult residents were placed in institutions in the village of Strilkove and Penza (Russia).[30]

C. Widespread and systemic Russian state practices affecting Ukrainian children

21. The evidence shows that the impugned practices formed part of a centrally coordinated policy, implemented through legislation, presidential decrees, and executive direction, and carried out by multiple state actors.[31] The operations extended across Ukraine and Russia, targett children from all occupied regions,[32] and relying on a network of at least 210 facilities used to house and "re-educate" Ukrainian children in mainland Russia and Russian-occupied territory.[33]

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[30] iStories, 'How the War Destroyed the Orphanage in Oleshky' (23 October 2024), https://istories.media/en/stories/2024/10/23/how-the-war-destroyed-the-orphanage-in-oleshky/; New Lines Magazine, 'In a Propaganda Move, Russia Targeted and Deported Disabled Children From Ukraine' (22 October 2024), https://newlinesmag.com/reportage/in-a-propaganda-move-russia-targeted-and-deported-disabled-children-from-ukraine/; Meduza, 'How old do you think I am? Disabled Ukrainian man returns home nearly two years after deportation to facility run by Putin's children's rights commissioner's sister' (25 August 2025) https://meduza.io/en/feature/2025/08/25/how-old-do-you-think-i-am.

[31] IPHR, "Medvezhonok Camp", op. cit., p. 11.

[32] Conference Room Paper of the Independent International Commission of Inquiry on Ukraine (29 August 2023) UN Doc A/HRC/52/CRP.4, para 726, https://archive.ph/bJrmW; HRL, "Intentional, Systematic, & Widespread: Russia's Program of Coerced Adoption and Fostering of Ukraine's Children", op. cit.

[33] Farrenkopf, Paige, Caitlin N. Howarth, and Nathaniel A. Raymond et al., "Ukraine's Stolen Children: Inside Russia's Network of Re-Education and Militarization." 16 September 2025. Humanitarian Research Lab at Yale School of Public Health: New Haven. Available at https://medicine.yale.edu/lab/khoshnood/publications/reports

22. In March 2022, Russia's Presidential Commissioner for Children's Rights, Maria Lvova-Belova, discussed with President Putin the placement of Ukrainian orphaned children with Russian families and the removal of legal obstacles related to citizenship. She played a central role in advancing and publicly promoting initiatives aimed at the transfer, accommodation, and "integration" of Ukrainian children in Russia.[34] These initiatives were implemented with the direct involvement of State officials, including through logistical coordination, transportation, management of reception facilities and camps, fundraising, and public advocacy in both Russia and occupied Ukrainian territories.[35]

23. Russian authorities consistently relied on two official narratives:[36] first, that the removal of children from institutions in occupied territories constituted "evacuation" necessitated by hostilities;[37] and second, that transfers of children living with parental care were temporary "recreational" placements in summer camps in Russia or occupied Crimea.[38]

24. These narratives were supported by a tailored legislative and administrative framework regulating the transfer, legal reclassification, and permanent placement of Ukrainian children. Children removed from institutions in occupied territories were placed within a structured administrative process designed to sever their legal and national ties to Ukraine.[39]

25. Operationally, children were identified by occupation administrations, transferred by military or affiliated personnel, and placed in temporary accommodation centres or orphanages across Russia. There, they were enrolled in Russian educational programmes and subjected to ideological "rehabilitation" aimed at assimilation. Central to this process was the Ministry of Education and the "State Data Bank of Orphans and Children Left Without Parental Care", exclusively operated by it since 2005.[40] This database functions within a hierarchical system involving regional guardianship authorities and interlinked databases, including ANO TsRSP and COL, which exchange data under formal agreements and cross-reference children's profiles. The uniformity of procedures, centralised data management, and reliance on a single federal operator indicate central design, authorisation, and supervision of the adoption and "reintegration" by the Russian State at the highest level.[41]

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[34] Conference Room Paper of the Independent International Commission of Inquiry on Ukraine, paras. 716, 743.
[35] Kaveh and others, *Russia's Systematic Program*, 5.
[36] 'Российский детский омбудсмен признала депортацию украинских детей в РФ — ISW' *Интерфакс-Украина* (11 March 2023), https://ru.interfax.com.ua/news/general/896901.html.
[37] *AP News*, 'Russia says it has taken in orphans from Ukraine' (5 December 2022), https://apnews.com/article/russia-ukraine-health-europe-orphans-f283aa4d22fdab59a43a16ca0be54baf.
[38] Isobel Koshiw, 'Weeks turn to months as children become stuck at camps in Crimea' *The Guardian* (27 December 2022), https://www.theguardian.com/world/2022/dec/27/children-become-stuck-at-camps-in-crimea-ukraine-russia.
[39] Russian Presidential Administration, List of instructions following the results of the meeting with the mothers of servicemen participating in a special military operation (2 January 2023) http://kremlin.ru/acts/assignments/orders/70322.
[40] 'Постановление Правительства Российской Федерации от 10 марта 2005 г № 123 «О полномочиях Министерства просвещения Российской Федерации по оказанию содействия в устройстве детей, оставшихся без попечения родителей, на воспитание в семьи»' (27 August 2019), https://archive.ph/qaSwJ; https://docs.edu.gov.ru/document/97784a162695f799850dea1c141daf4b/.
[41] 'Приказ Министерства просвещения РФ от 15 июня 2020 г № 300'; Уполномоченный при Президенте Российской Федерации по правам ребёнка, 'Ответы по вопросам семейного устройства детей-сирот из ДНР и ЛНР в российские семьи' (16 March 2022) https://archive.ph/sxxr0; https://deti.gov.ru/Press-Centr/news/930; Министерство просвещения Российской Федерации, 'Соглашение об информационном

26. In parallel, the Presidential Administration coordinated programmes under which Russian regions "sponsored" the stays of Ukrainian children in summer camps in Russia and occupied Crimea.[42] Camp administrations frequently refused to allow children to return unless a parent appeared in person. Evidence indicates that many parents were unable to do so due to financial hardship, security risks, or concerns related to asylum claims abroad.[43] During these stays, children were subjected to "patriotic" re-education and Russian schooling.[44]

27. The organised, repetitive, and large-scale nature of these practices, and their integration into formal State administrative structures exclude any characterisation as isolated, unauthorised, or purely local conduct. This context could assist the Court in its analysis of the Russia's jurisdiction in the present case, including its extraterritoriality, as well as the attribution of conduct under general international law; engaging both spatial and personal models in respect of the affected children.[45]

D. Locus standi of the applicant

28. The present case invites the Court to develop its standards on the standing of associations acting in the interests of victims who are unable to authorise representation. In the Court's case-law, such situations have most often arisen where the victim was deceased (see *Centre for Legal Resources on behalf of Valentin Câmpeanu v. Romania* [GC], 2014; *Association for the Defence of Human Rights in Romania – Helsinki Committee on behalf of Ionel Garcea v. Romania*, 2015; *Kondrulin v. Russia*, 2016; *Association Innocence en Danger and Association Enfance et Partage v. France*, 2020). However, in our view, the rationale of this approach can be extended to cases where victims are presumed to be alive.

29. The justification for this exceptional approach is the inability of the victim to access the Court or to authorise representation. This understanding is consistent with broader international human rights practice. In particular, the UN Committee on the Rights of the Child in its jurisprudence has accepted representation by a lawyer acting on behalf of minor victims confined to an orphanage, notwithstanding the absence of access to the children or formal authorisation (Communication No. 144/2021).[46]

сотрудничестве № 20' (11 July 2019), https://8fe1ef8c-2a8c-4064-90f4-05c6ec3ffee8.filesusr.com/ugd/4a45d6_4910f39bec764b67aedcade1aec2b9ce.pdf.

[42] Isobel Koshiw, 'Weeks turn to months as children become stuck at camps in Crimea'.

[43] This information was provided to IPHR by SOS Children's Villages and Save Ukraine and is consistent with the findings of Amnesty International, reporting that authorities in the so-called 'DPR' have required parents or guardians to travel in person to the location of the child to secure their return. Amnesty International, *"Like a Prison Convoy": Russia's Unlawful Transfer and Abuse of Civilians in Ukraine During "Filtration"* (2022), https://eurasia.amnesty.org/wp-content/uploads/2022/11/eur-5061362022-en-forcible-transfers-embargoed-10-nov-2022.pdf

[44] Almenda, *«Кримський сценарій»: як Російська Федерація знищує українську ідентичність дітей на окупованих територіях* (2023), https://almenda.org/wp-content/uploads/2023/02/Analitychnyy-zvit-„Kryms'kyy-stsenariy-yak-Rosiys'ka-Federatsiya-znyshchuye-ukrayins'ku-identychnist'-ditey-na-okupovanykh-terytoriyakh_ukr_Almenda_2022.pdf, pp. 18, 23, 30–32.

[45] See, *Ukraine and the Netherlands v. Russia (*dec.) [GC], nos. 8019/16 and 2 others, 30 November 2022; *Ukraine and the Netherlands v. Russia* [GC], nos. 8019/16 and 3 others, 9 July 2025; and *Carter v. Russia*, no. 20914/07, 21 September 2021.

[46] UN CRC, Communication no. 144/2021, 12 September 2024, CRC/C/96/D/144/2021.

30. In the present case, the situation is aggravated by the nature of the violations complained of. The impugned conduct forms part of a centralised State policy, as shown above, and is further shielded by the secrecy inherent in adoption procedures, which are themselves designed to sever a child from their origin, nationality, and social and cultural ties. These features render contact with the victims and the possibility of informed consent or authorisation objectively impossible.

31. The context of armed conflict and military occupation reinforces these considerations. In such circumstances, NGOs play a role that goes beyond their function as "public watchdogs" (*Assotsiatsiya NGO Golos and Others v. Russia*, 2021, § 86). Where domestic justice and law-enforcement systems are overwhelmed by mass violations associated with armed aggression and occupation, NGOs become essential actors in documenting violations, preserving evidence, protecting victims, and preventing irreparable harm. Their initiative is often the only means by which victims' rights can be asserted. Their role is recognised at a domestic level through the ability of NGOs to participate in proceedings on behalf of victims who are unable to act or authorise representation themselves. Accordingly, it would be artificial to deny such organisations access to international mechanisms where they seek to act in the interests of the same victims, particularly in cases concerning the most serious violations, including conduct indicative of crimes against humanity and supported by extensive investigative material.

32. The third-party interveners therefore, invite the Court to take account of these exceptional circumstances and to continue the development of its jurisprudence so as to ensure effective protection for the most vulnerable victims, who would otherwise be left without any realistic access to justice.

Conclusion

33. The foregoing demonstrates that a large group of children, including at least some of those listed in the application, were subjected to unlawful adoption by the Russian authorities and that these individual cases form part of wider, widespread, and systematic State practices affecting Ukrainian children. The third-party interveners, therefore, respectfully invite the Court to take into consideration the broad context of the case, as presented in the submissions, as well as legal and evidentiary considerations set out herein.

Yours faithfully,

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