IPHR International Partnership for Human Rights

11th EU-Ukraine Human Rights Dialogue:

IPHR written contribution

Throughout the four years of Russia's full-scale invasion of Ukraine, IPHR's documentation and reporting work has focused on Russian aerial attacks in Ukraine-controlled territories and a range of atrocity crimes committed against civilians in territories under Russian occupation. Below is the compilation of reports, overarching conclusions, and recommendations relevant to the 11th EU–Ukraine Human Rights Dialogue's focus, particularly the human rights situation in Ukraine, accountability for Russian international crimes, and the growing importance of holistic international cooperation in responding to the transnational dimensions of Russia's war and related human rights and security threats.

I. RUSSIAN AERIAL ATTACKS TRIGGERING DIRECT RESPONSIBILITY OF RUSSIAN OFFICIALS AND ACCESSORIAL LIABILITY OF BUSINESSES AND THIRD STATES' REPRESENTATIVES, ENABLING RUSSIAN AERIAL ATTACKS AGAINST CIVILIAN INFRASTRUCTURE.

Relevant reports:

1. Report *From Tehran to Kyiv: The Islamic Republic of Iran's Role in Russia's Drone War* (short version with main findings *here*), April 2026 — demonstrates Iran's direct, sustained, and vital role in enabling Russia's drone terror campaign against Ukraine, including supplying Shahed-style drones, related technology, and training, and supporting joint production, thereby contributing to relentless and escalating attacks on civilians. The report explores Iran's secondary liability for war crimes and crimes against humanity committed by Russia in Ukraine. It underscores that Russo-Iranian cooperation has scaled and industrialized Shahed-style drone attacks, escalating civilian harm, and asserts that Iranian officials and businesses can and should be held liable for these crimes..

2. Report *Airstrikes and Atrocities: A Legal Assessment of Russia's Aerial Campaign in Ukraine* (short version with main findings *here*), May 2025 — presents evidence from Russia's aerial campaign (2022–2024) demonstrating that, as part of Russia's "total war" policy, these attacks amount to war crimes and crimes against humanity. It analyses 22 emblematic strikes reflecting broader patterns—targeting of vital energy and civilian infrastructure—and develops legal frameworks to prosecute them not only as isolated war crimes of unlawful attacks, but also as widespread and systematic crimes against humanity of extermination, persecution, and starvation. It provides an actionable legal framework addressing the key challenge of proving intent behind these crimes, which can be used by Ukrainian and foreign investigative bodies..

3. Report *Parts of the Problem: Tracing Western Technologies in Russia's Deadliest Jets*, July 2025 — analyses Russian aerial attacks on Ukrainian civilian and energy infrastructure launched from SU-35 fighter jets, and identifies Western companies whose components were found in SU-35 jets. Importantly, the report describes IPHR contacting 143 companies and their responses (44 in total) ranging from acknowledged risks linked to legacy stock and distributors to denying involvement or generically citing sanctions compliance, which highlights persistent gaps in supply-chain transparency and diversion controls.

4. Report *Terror in the details: Western-made Components in Russia's Shahed-136 Attacks*, 3 July 2023 — focuses on Russian Shahed-style drone attacks on Ukrainian civilian infrastructure, including critical energy infrastructure, and identifies Western companies that manufactured some of the Shahed components.

5. Report *Enabling War Crimes? Western-Made Components in Russia's War Against Ukraine'*, 28 February 2023 — looks at four types of Russian missiles with Western components used to attack civilian infrastructure in Ukraine.

Overarching conclusion on developments to date:

- IPHR and partners' analysis shows that Russia's aerial campaign against Ukraine is **not a series of isolated incidents but a state policy aimed at inflicting maximum civilian harm**. In pursuit of this aim, Russia is systematically targeting civilians, civilian infrastructure, and the systems necessary for civilian survival, including energy infrastructure, all over Ukraine. Presented evidence supports accountability efforts for war crimes and crimes against humanity, including extermination, persecution, and starvation, that can be pursued in Ukraine, at the ICC, and under the universal jurisdiction principle in EU states.

- The findings of **critical Western technology in Russia's weapons** and weapon systems attacking Ukraine demonstrate the urgent need for **stronger EU and international action to close sanctions, export-control, and corporate due diligence gaps** that continue to allow critical Western tech diversion to Russia and its enablers.

- The **case study of Russo-Iranian cooperation to scale up Shahed-style drone production**, benefiting both repressive regimes—now engaged in conflicts in Ukraine and the Middle East—requires a **coordinated legal and policy response that treats Russia and its enablers**, including Iran, China, North Korea, and Belarus, as one security threat, not isolated bad actors.

II. RUSSIA'S ATROCITY CRIMES IN OCCUPIED TERRITORIES

Relevant reports:

IPHR has conducted a series of field missions to de-occupied regions and collected hundreds of interviews of witnesses and survivors of Russian forces' crimes of unlawful confinement, torture and inhuman treatment, sexual violence, extrajudicial killings, and deportation of Ukrainian children, as well as an OSINT-based report on the pillage of grain

1. Reports covering the Kyiv region are available *here*, *here*, and *here*
2. Reports covering the Kharkiv region are available *here*, *here*, and *here*
3. Reports covering the Kherson region are available *here*
4. Reports covering the Donetsk region are available *here*
5. Report covering complex scheme of Russia's pillage of Ukrainian grain from Luhansk, Donetsk, Kherson, and Zaporizhzhia regions available *here*.

Overarching conclusion on developments to date:

- IPHR's documentation of atrocities in occupied territories demonstrates that **Russian conduct is widespread, systematic, encompassing most prohibited acts against civilians** under international humanitarian and criminal law. Just like aerial attacks, these acts are **not isolated abuses, but part of a coherent pattern of violence in line with Russia's policy to inflict maximum civilian harm** and dismantle resistance to the occupation, social fabric and identity of Ukrainian communities under occupation.

- The evidence supports **accountability for war crimes and crimes against humanity, while also underpinning genocide arguments as a central rationale of Russia's conduct.** IPHR's ongoing legal analysis (forthcoming autumn 2026) emphasises that genocide turns on intent rather than scale. Russia's actions in occupied territories—combined with rhetoric denying the Ukrainian nation's existence and calling for "denazification" of those exhibiting Ukrainian identity—indicate an intent to destroy, in whole or in part, the Ukrainian national group. The documented pattern of killings, torture (including sexualised torture), filtration, child transfers, and creation of deadly living conditions, including through pillage, corresponds to acts prohibited under Article II of the Genocide Convention.
- Russia's ongoing **genocidal campaign—or at the very least the serious risk of genocide—must be central to EU and allied policy planning.** This risk should inform all approaches to peace negotiations and categorically preclude pressure on Ukraine to cede territory, as evidence from occupied areas indicates such concessions would expose additional populations to the same crimes.

KEY CONSIDERATIONS FOR THE EU–UKRAINE HUMAN RIGHTS DIALOGUE:

Expanding ongoing EU states' investigations into Russian atrocity crimes to include crimes against humanity and, potentially, genocide

Patterns documented in IPHR reports indicate that severe civilian harm in Ukraine is not 'collateral damage' of ongoing hostilities, but part of Russia's state policy aimed at inflicting maximum civilian suffering. Accordingly, the EU Member States' investigations into Russia's conduct in Ukraine, should qualify Russian atrocities not only as isolated war crimes, but also as crimes against humanity due to their widespread and systematic nature, and potentially as genocide, where sufficient evidence demonstrates the intent to destroy the Ukrainian national group — a body of evidence that continues to grow.

Integrating genocide risk into EU security and diplomatic policy

Russia's ongoing genocidal war—or at the very least the serious risk of genocide—must be central to EU and allied policy planning. This risk should **inform all** approaches to peace negotiations and categorically preclude pressure on Ukraine to cede territory, as evidence from occupied areas indicates that such concessions would expose additional populations to the same crimes. Russia's genocidal objectives also help explain its persistent bad-faith engagement with peace talks and ceasefire initiatives, requiring a fact-based EU reassessment of the diplomatic, legal, economic, and security tools used to end Russia's aggression and prevent it from spreading.

Expanding criminal accountability across actors involved

IPHR evidence demonstrates the need to prosecute direct perpetrators of war crimes, crimes against humanity, and genocide, as well as third-state enablers of Russian crimes (notably Iranian and other Russian allies' officials) and corporate entities in parallel to direct Russian perpetrators and their commanders to break mutually reinforcing impunity cycles of allied repressive regimes, stifle Russia's war machine and discourage material support of its aggression in Ukraine.

Closing gaps in sanctions, export controls, and due diligence

Russia's reliance on Western-made components exposes persistent enforcement failures. Strengthening compliance, end-use controls, and supply-chain transparency must be recognised and addressed as

a human rights priority and an acute EU security concern.

Holistically addressing the transnational and industrial nature of atrocities

Russia's air terror against Ukraine and drone incursions into EU and NATO space, enabled by Iran and other bad actors, show the cross-border and industrialised nature of modern atrocities, driven by interconnected supply chains and state partnerships that increase civilian harm and threaten broader transatlantic security. Russia's aerial attacks on Ukraine and their spillover into the EU and NATO space, nd growing war-related partnerships should be treated not as siloed problems but as a mutually reinforcing network of repressive regimes, which enable atrocities in Ukraine and threaten EU and NATO security. Coordinated EU and other allied states' response should include criminal prosecution of relevant actors under the secondary liability framework, mounting diplomatic pressure, and consistent, synchronized and scaled-up sanctions and export controls measures.

Strengthening coordination with Ukraine across prosecution, sanction enforcement, and preventive security

Truly effective action requires close cooperation between Ukraine, the EU, and its Member States and allies on criminal accountability, sanctions, and export controls expansion and enforcements, as well as military technology and intelligence exchange to address Russian perpetrators, the broader enabling ecosystem, and growing regional security threats they are posing.

Overall, coordinated accountability and prevention efforts must move beyond **addressing direct violence** alone to **target the global networks, technologies, supply chains, and state partnerships** that sustain and scale Russia's ongoing aggression and atrocities in Ukraine, and broader hybrid threats to the EU and transatlantic security.

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