



STATEMENT BY UKRAINIAN SURVIVOR GROUPS REGARDING THE INTERNATIONAL COMPENSATION MECHANISM FOR VICTIMS OF RUSSIAN AGGRESSION AND ITS TEMPORAL SCOPE

16 December 2025

We welcome the establishment of an International Claims Commission for Ukraine – But Victims of pre-2022 Crimes Must Not Be Forgotten

The creation of the international compensation mechanism for victims of the Russian aggression marks an important step towards justice and reparation for Ukrainian victims and survivors. The Register of Damage Caused by the Aggression of the Russian Federation Against Ukraine (Register of Damage, or RoD) became operational in April 2024. On 16 December 2025, the [Convention](#) Establishing an International Claims Commission for Ukraine (Convention), will become open for signature and ratification by States, during a diplomatic conference in The Hague, The Netherlands. We, the undersigned Ukrainian survivor groups, welcome the progress made towards the full operationalisation of this compensation mechanism. We encourage States to sign and ratify the Convention, and to provide support to make it fully operational, so that it can start disbursing compensation to victims and survivors in the shortest timeframe possible.

We understand better than anyone else the urgent need for reparation for victims of Russia's aggression against Ukraine. As a result, we continue to raise our voices to remind States that victims of crimes committed by the Russian Federation *before* 24 February 2022 must not be forgotten. The Convention's current temporal limitation excludes victims of crimes committed since the beginning of the Russian aggression on 20 February 2014. This statement calls on States to support an amendment to the Convention, allowing for the expansion of the Claims Commission's mandate to include:

“[c]laims for compensation for damage, loss, or injury caused by the internationally wrongful acts committed by the Russian Federation in or against Ukraine on or after 20 February 2014.”

For Ukrainian victims waiting for accountability and reparation since the beginning of the Russian aggression, this amendment is not just a technical adjustment: it is a necessary - and long overdue - act for recognition, dignity, and justice.

The Claims Commission Must Respond to Victims’ Needs and Contribute to Lasting Peace

A victim-centred approach, endorsed across the UN system and reflected in the [UN](#), [EU](#), and the [Council of Europe’s](#) standards on victims’ rights, demands that accountability and reparation mechanisms respond to the lived experiences and needs of victims. The compensation mechanism’s current design arbitrarily excludes a large number of victims of serious international crimes committed since the beginning of the conflict in the eastern parts of Ukraine in February 2014, including torture, arbitrary detention, and displacement in Crimea, Donetsk, and Luhansk regions of Ukraine, among others. These victims suffered multiple and intersecting harms and were displaced several times; as a result, they are in a particular position of vulnerability.

The temporal scope currently included in the Convention risks creating perceptions of a hierarchy of suffering. Victims belonging to the same communities and having suffered similar crimes - inflicted by the same perpetrators - are divided into those who can access reparation and those who cannot. The current temporal limitation of the Claims Commission creates an arbitrary barrier, which risks dividing communities, compounding harm, affecting the deep tissue of Ukrainian society, and jeopardising lasting peace. Expanding the temporal scope of the compensation mechanism can prevent this.

Expanding the Temporal Scope is in Line with International Legal Standards on States’ Responsibility for Internationally Wrongful Acts

The Russian Federation’s aggression against Ukraine began in 2014. The [UN](#) and [human rights groups](#) have documented high numbers of crimes allegedly committed by Russian-backed groups and Russian forces. These acts are not separate episodes, but form part of a continuous chain of crimes, which escalated with the 2022 full-scale invasion. Under Articles 29, 30, and 31 of the Articles on Responsibility of States for Internationally Wrongful Acts, liability does not begin when violations intensify: it begins when the violations start occurring. There is no principled reason to compartmentalise harms that arise from the same continuous wrongful acts and to deny reparation to survivors based on this division.

An amendment expanding the temporal scope of the Claims Commission is already foreseen in Article 33(2) of the Convention. This provision stipulates that amendments to the Convention “may include a proposal to expand the temporal scope of this Convention to

include Claims for compensation for damage, loss, or injury caused by the internationally wrongful acts committed by the Russian Federation in or against Ukraine on or after 20 February 2014.” After the Claims Commission is established, the Register will be transferred to, and will continue to work as part of, the Claims Commission.

We hereby urge States to:

- Sign and ratify the Convention Establishing an International Claims Commission for Ukraine.
- Ensure that the Claims Commission is sufficiently funded and operational in the shortest timeframe possible.
- Amend the temporal scope of the Claims Commission’s mandate, in accordance with Article 33(2) of the Draft Convention to include damage, loss and injuries caused by the Russian Federation since 20 February 2014.
- Take measures to ensure the disbursement of the compensation to victims, including through directing a part of any potential “reparations loan” or a part of any other funding mechanism linked to frozen Russian assets, or related profits, towards the Fund.
- Ensure that the reparation process takes into account the nature and degree of harm suffered by individual victims, through an appropriate prioritisation strategy, which takes into account the needs of the most vulnerable groups.

Signatories:

“Alumni”

Association of Relatives of Political Prisoners of the Kremlin

Civilians in Captivity

Free Civilians

Numo, Sisters!

SEMA Ukraine

Way of Free Men

“29 December”

List of civil society organisations endorsing the statement:

Global Initiative Against Impunity (GIAI)*

All Survivors Project

Center for Civil Liberties (CCL)

Crimean Human Rights Group

Crimea Process

Dnistrianskyi Centre

European Center for Constitutional and Human Rights (ECCHR)

Human Rights Centre ZMINA

International Federation for Human Rights (FIDH)

JurFem

Kharkiv Human Rights Protection Group (KHRPG)

Legal Action Worldwide

Media Initiative for Human Rights (MIHR)

REDRESS

Social Action Centre

Synergy for Justice

Truth Hounds

Ukrainian Legal Advisory Group (ULAG)

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