Public International Law

International Law

Hugo Grotius – Father of International Law

↳ De Jure Belli ac Pacis (Law of War & Peace), 1625

Int. Law

- **Public**
  Governs relations between States (and other subjects of I.L).
- **Private** → Conflict of laws
  Decides which country's law applies, and which court has jurisdiction, in disputes with a foreign element.
  ↳ **Ulrich Huber**: De Conflictu Legum Diversarum in Diversis Imperiis

Jurists on Int. Law

Did not consider I.L as "True Law"

→ **John Austin** → Positive International Morality
No sovereign to command it and no sanction behind it.

→ **Bentham** → 1st person to use the term "International Law" → lacks legislative machinery & sanction

→ **Holland** → I.L → Vanishing point of Jurisprudence

Considered I.L as True Law

→ **Bynkershoek**

→ **Hall** and **Lawrence**

→ **Pollock** → since I.L is "binding", it is true law

→ **Pufendorf** → proponent of Natural law school → I.L in consonance with Natural law

Subjects of PIL

1. Realist Theory – only the State is a subject of PIL

i) **J.L. Brierly**: PIL → binding upon civilized states

ii) **Prof. L. Oppenheim**: I.L → legally binding by civilized states in their intercourse with each other

iii) **Queen v. Keyn** → usages that civilized states have agreed to observe in their dealings

2. Functional Theory – includes International Organisations within subjects of PIL

↳ **Schwarzenberger** – talks about international personality

3. Fictional Theory: subjects of PIL → individuals (Prof. Kelsen)

States act only through individuals, so ultimately I.L binds individuals.

i) States ii) Individuals iii) Int. Org. iv) Multinational Co.

Basis of I.L

Why is International Law binding on States?

i) **Naturalist theory** – higher reason

I.L is binding because it flows from natural law and reason.

ii) **Positivist theory**

I.L is binding because States have consented to it, through treaties and custom.

iii) **Eclectic theory** – combines the Naturalist & Positivist theories (Grotian view)

iv) **Consent theory** – State consent for binding

v) **F.R. theory** (Fundamental Rights theory)

Every State has certain basic rights, such as independence, equality and self-preservation.

vi) **Pacta Sunt Servanda** – "treaties shall be complied with" (good faith)

↳ Universally agreed principle

vii) **Jus Cogens** – certain principles which all states must observe (peremptory norm)

No derogation is permitted, for example the prohibition of genocide.

I.L & Municipal Law

i) **Monism**

I.L and municipal law are parts of one single legal order.

↳ **Delegation Theory**

I.L delegates to each State the power to decide how its rules take effect internally.

ii) **Dualism**

I.L and municipal law are two separate legal systems.

↳ **Transformation Theory**

A treaty applies within a State only after it is transformed into municipal law by legislation.

↳ **Specific Adoption Theory**

A rule of I.L applies within a State only when the State specifically adopts it.

iii) **Harmonization Theory**

Sources of I.L

Oppenheim & Lawrence: Common Consent → **Treaties** (express consent) & **Custom** (implied consent)

Art. 38(1) of the ICJ Statute IMP

(a) International Conventions

(b) International Custom, as evidence of a general practice accepted as law

(c) General principles of law recognised by civilised nations

(d) Judicial decisions & teachings of the most highly qualified publicists → subsidiary means

Art. 38(2) → Court may decide ex aequo et bono (equity), only if the parties agree

(a) International Conventions

> **Queen v. Keyn** 1876 (the Franconia case)
> Law of Nations → collection of usages which civilized states have agreed to observe in their dealings with one another

→ Codified law on treaties → **Vienna Convention on the Law of Treaties, 1969**

→ **Pacta tertiis nec nocent nec prosunt** – treaty binds only the parties IMP
VCLT, Art. 34: a treaty creates no rights or obligations for a third State without its consent.

Formation of Treaty

i) Appointment of representatives
ii) Negotiation & adoption
iii) Signature
iv) Ratification
v) Accession / Adhesion
vi) Entry into force
vii) Registration & Publication → last stage

Termination of Treaties

i) Consent
ii) Withdrawal
iii) Material breach
iv) Impossibility of performance
v) According to provision of treaty
vi) Outbreak of war
vii) Jus Cogens
viii) **Rebus sic stantibus** – fundamental change of circumstances (VCLT, Art. 62)

UK v. Iceland (Fisheries Jurisdiction) 1973
Iceland pleaded fundamental change of circumstances. The ICJ held the changes did not end its jurisdiction, and said VCLT Art. 62 largely codifies customary law.

North Sea Continental Shelf cases (Germany v. Denmark; Germany v. Netherlands) 1969
The equidistance rule was not customary law. The ICJ laid down the two elements of custom: State practice and opinio juris.

(b) International Custom

i) Uniform state practice for a continuous period
ii) Belief that such practice is obligatory (opinio juris)

Portugal v. India (Right of Passage case) 1960
Right of passage over Indian territory
A local custom can exist between just two States. Portugal had a right of passage for private persons, civil officials and goods, but not for armed forces, armed police, arms or ammunition.

Paquete Habana case 1900 (US Supreme Court)
Coastal fishing boats are exempt from capture in war under customary I.L.
"International law is part of our law."

(c) General Principles accepted by civilized nations

i) **Pacta Sunt Servanda** (agreements made in good faith)
   - ↳ Art. 26 of Vienna Convention: every treaty in force is binding on the parties and must be performed in good faith
   - ↳ Exception: i) new state comes into existence ii) Clausula Rebus Sic Stantibus

ii) **Jus Cogens**
   - ↳ Art. 53 of V.C → a treaty conflicting with a peremptory norm is void

iii) Natural Justice
iv) Res Judicata

Right of Self Defence

Caroline Case 1837
Self-defence must be necessary, "instant, overwhelming, leaving no choice of means", and proportionate.

Republic of Nicaragua v. USA 1986

Prohibition of use of force and the right of self-defence are part of customary I.L, not only of the UN Charter.

Prescription

↳ Acquiring territory through long, continuous and peaceful exercise of sovereignty, without protest from the earlier sovereign. I.L fixes no exact period.

Temple of Preah Vihear case (Cambodia v. Thailand) 1962

↳ **Principle of Acquiescence**

Thailand accepted the map for years without objecting, so it could not deny it later.

Island of Palmas Arbitration (Netherlands v. USA) 1928

↳ **Doctrine of Intertemporal Law** IMP

A right is judged by the I.L as it existed at the point of time when the right arose. Sole arbitrator: Max Huber.

Eastern Greenland case (Denmark v. Norway) 1933

In thinly populated areas, very little actual exercise of sovereignty is enough, if it is continuous. Also, an oral statement by a Foreign Minister (Ihlen Declaration) can bind the State.

UK v. Norway (Anglo-Norwegian Fisheries case) 1951

↳ **Persistent Objector rule** IMP

An existing customary law rule would not apply to a State if it objected to the rule itself from the initial stages.

Quick recall

→ Temple of Preah Vihear → Principle of Acquiescence
→ Island of Palmas → Doctrine of Intertemporal Law
→ Anglo-Norwegian Fisheries case → Persistent Objector rule

State Jurisdiction

i) Territorial Principle

↳ Everything falling within the territory
↳ **Subjective**: crime is committed within the territory
↳ **Objective**: crime has its effect within the territory

ii) Extra-territorial Principle

> **SS Lotus case (France v. Turkey)** 1927
> ↳ **Lotus Principle**: sovereign States can act in any way they wish so long as they do not contravene an express prohibition

iii) Nationality Principle

- **Jus Sanguinis**: descent from parents who are nationals
- **Jus Soli**: being born within the territory

> **Mavrommatis Palestine Concessions case (Greece v. UK)** 1924
> By taking up the claim of its national, a State asserts its own right (diplomatic protection).

> **Nottebohm case (Liechtenstein v. Guatemala)** 1955 IMP
> ↳ **Nottebohm principle**: nationality granted by a State can be relied on against another State (for diplomatic protection) only if there is a genuine link / connection between the individual and that State

iv) Passive Personality Principle

↳ State can claim jurisdiction to try an offence if it affects the nationals of that State

v) Universality Principle

↳ State can take jurisdiction over certain crimes by anyone, anywhere in the world, without any link to its territory
For example, piracy, war crimes, genocide.

vi) Protective Principle

↳ Exercise of jurisdiction outside the territory, over acts that threaten the security of the State

↳ Criticism: can undermine the sovereignty of other States

Recognition

Art. 1, Montevideo Convention on the Rights & Duties of States, 1933

A State should possess:

i) Permanent population
ii) Defined territory
iii) Government
iv) Capacity to enter into relations with other States

→ **Insurgency**: when rebels do not control a good enough portion of the State

→ **Belligerency**: territory + population under control of people fighting against the Govt.

Effects of Recognition

i) Can sue in courts of the recognising State
ii) Gets sovereign immunity
iii) Can enter into diplomatic relations
iv) Retroactive effect
v) Entitled to succession & possession of property

Theories of Recognition

i) **Constitutive Theory** (Hegel, Anzilotti, Oppenheim)
An entity becomes a State only when other States recognise it.

ii) **Declaratory / Evidentiary Theory** (Hall, Wagner, Brierly, Fischer)
A State exists prior to, and independent of, recognition by other States.

iii) **Modified Constitutive Theory** (Kelsen)
Natural statehood: has the essential elements. Juridical statehood: only when recognised by other States.

Doctrines of Recognition NET / JRF

1. **Tobar Doctrine** (Ecuador, 1907)
Named after Carlos Tobar, Foreign Minister of Ecuador. A Govt. that comes to power by unconstitutional means should be recognised only when legitimised by democratic means.
2. **Estrada Doctrine** (Mexico, 1930)
Named after Genaro Estrada, Secretary of Foreign Affairs, Mexico. Recognition of a Govt. should be based on its de facto existence rather than its legitimacy. Mexico would not pass judgment on other Govts.; it would simply continue or withdraw diplomatic relations. Based on non-intervention and self-determination.
3. **Betancourt Doctrine** (Venezuela)
No recognition for regimes that come to power through military coups.
4. **Stimson Doctrine** (USA, 1932)
Named after Henry Stimson, US Secretary of State. No recognition of territorial changes brought about by aggression.
    ↳ **Ex injuria jus non oritur**: an illegal act cannot create law IMP

Quick recall

i) Tobar (Ecuador Foreign Minister) → legitimate democratic means

ii) Estrada (Mexico Foreign Secretary) → de facto recognition, not legitimacy

iii) Betancourt → no recognition of military rule

iv) Stimson (US Secretary of State) → no recognition of aggression

De Facto & De Jure Recognition NET / JRF

De Facto	De Jure
i) Provisional & temporary	i) Formal & definitive
ii) Can be withdrawn	ii) Cannot be withdrawn
iii) Often of a Govt. formed through revolt	iii) Govt. established peaceably
iv) No full diplomatic relations	iv) Full diplomatic relations

> **Luther v. Sagor** 1921 IMP
> No distinction between de facto & de jure recognition for the purpose of giving effect to the internal acts of the recognised Govt.

Cases in chronological order

1. Luther v. Sagor → 1921
2. Bank of Ethiopia v. National Bank of Egypt → 1937
3. Arantzazu Mendi case → 1939
4. Bank of China v. Wells Fargo → 1952
5. Civil Air Transport Inc. v. Central Air Transport Corp. → 1953

Statelessness & Refugees

Nationality can be acquired by:

i) Birth (Jus Soli / Jus Sanguinis)

ii) Naturalisation

iii) Resumption

iv) Subjugation & Cession

Statelessness

> **Stoeck v. Public Trustee** 1921
> Statelessness defined → a person who is not a citizen of any State

Conventions IMP

i) Convention relating to the Status of Refugees, **1951** (+ Protocol, **1967**)

ii) Convention relating to the Status of Stateless Persons, **1954**

iii) Convention on the Reduction of Statelessness, **1961**

→ **UNHCR** → also deals with statelessness

Refugees

→ 1951 Convention relating to the Status of Refugees

→ **1967** → Protocol relating to the Status of Refugees

Removed the time limit (events before 1 January 1951) and the geographical limit of the 1951 Convention (except where a State had already declared such a limit).

Essentials:

i) Outside home country

ii) Well-founded fear of persecution

iii) Unable or unwilling to avail the protection of own State

Asylum

↳ From the Greek **Asylia** – inviolable place

→ **Territorial** – inside the territory of the State

Exception: not for war crimes, crimes against peace and crimes against humanity.

→ **Extra-territorial** (Diplomatic) – in embassies, int. organisations

> **Colombia v. Peru (Asylum case)** 1950
> Colombia could not prove a regional custom of diplomatic asylum binding on Peru.

Extradition

India → **Extradition Act, 1962**

i) **Principle of Double Criminality**

The act must be punishable as an offence in both States (requesting & requested).

ii) **Rule of Speciality**

The person extradited can be tried only for the offences for which he was extradited, and not any other offence.

iii) **Attentat Clause** (Belgian clause)

Assassination or attempt of assassination of the Head of State is not a mere political offence, therefore eligible for extradition.

United Nations & its Organs NET / JRF

League of Nations

→ HQ → **Geneva**

→ Came into existence on **10 Jan 1920** → Covenant drawn up at the **Paris Peace Conference**, 1919 (part of the Treaty of Versailles)

→ Organs → Assembly, Council, Secretariat

→ LON dissolved → **20 April 1946**

Towards the UN

→ **Atlantic Charter**, 1941 → US President Roosevelt & UK PM Churchill
Context: Second World War, Allies against the Axis powers (Germany, Italy, Japan).

→ **Dumbarton Oaks Proposals**, 1944 → submitted by the Big 4: China, UK, USSR, US

→ **25 April 1945** → San Francisco Conference → final structure of the UN Charter

→ **Uniting for Peace Resolution** → 3 Nov 1950

UN at a glance

→ HQ → **New York**

→ Official languages (6) → English, French, Russian, Arabic, Chinese & Spanish

→ Non-member observer States (2) → State of Palestine & Holy See

→ Charter signed on → **26 June 1945**

→ Came into force on → **24 Oct 1945**

Preamble of the UN

→ Starts with → **"WE THE PEOPLES OF THE UNITED NATIONS"** IMP

→ Reaffirm faith in fundamental human rights

→ Justice & respect for treaties

→ Social progress & better standards of life

→ Practise tolerance & live together in peace

→ International peace & security

→ Armed force shall not be used, save in the common interest

Chapter I: Purposes & Principles IMP

Art. 1(1) Maintain international peace & security; adjustment & settlement of international disputes which may lead to a breach of the peace

Art. 1(2) Develop friendly relations among nations, based on equal rights & self-determination

Art. 1(3) International co-operation in solving international problems

Art. 1(4) Centre for harmonizing the actions of nations for common ends

Art. 2(1) Sovereign equality of all members

Art. 2(2) Members fulfil obligations in good faith (Pacta Sunt Servanda)

Art. 2(3) Members settle international disputes by peaceful means

Art. 2(4) Members refrain from the threat or use of force against the territorial integrity or political independence of any State

Art. 2(5) Members give every assistance to the UN in any action it takes under the Charter

Art. 2(6) UN ensures that non-member States act in accordance with these principles, as far as necessary for peace & security

Art. 2(7) UN shall not intervene in matters essentially within the domestic jurisdiction of any State (does not affect Chapter VII enforcement)

Chapter II: Membership

Art. 3 Original members → States that took part in the San Francisco Conference, or had signed the Declaration by United Nations of 1 Jan 1942, and then signed & ratified the Charter

Art. 4 Membership open to all peace-loving States

Art. 5 **Suspension** → a member against which preventive or enforcement action has been taken by the Security Council can be suspended by the General Assembly on the recommendation of the Security Council

Art. 6 **Expulsion** → a member which has persistently violated the principles of the Charter can be expelled by the General Assembly on the recommendation of the Security Council

Organs of the UN

→ **Chapter III** – Art. 7 – Organs of the UN

→ **Chapter IV – General Assembly**

- ↳ Composition – all members of the UN (Art. 9)
- ↳ Functions & powers – Arts. 10 to 17
- ↳ Voting – Arts. 18 & 19

  Important questions need a 2/3 majority of members present & voting, e.g. peace & security, budget, elections, admission (Art. 18). A member in arrears equal to or more than its contributions due for the preceding 2 full years has no vote, unless the G.A. is satisfied that the failure is due to conditions beyond its control (Art. 19).

→ **Chapter V – Security Council**

- ↳ Composition (Art. 23) – 15 members: 5 Permanent (US, UK, China, France, Russia) + 10 non-permanent
- ↳ Functions & powers – Arts. 24–26
- ↳ Voting – Art. 27

- → **Chapter X – Economic & Social Council** (Arts. 61–72)
  - ↳ Composition – Art. 61
  - ↳ Functions & powers – Arts. 62–66
  - ↳ Voting – Art. 67
- → **Chapter XIII – Trusteeship Council** (Arts. 86–91)
  - ↳ Palau, the last Trust Territory (part of the Trust Territory of the Pacific Islands), became independent in 1994 → no trust territories left

Chapter XIV – ICJ (Arts. 92–96) NET / JRF

- → HQ → The Hague, Netherlands
- → Successor court of the Permanent Court of International Justice (PCIJ) → 1922
- → Statute signed on 26 June 1945, San Francisco; first sitting on **18 April 1946**
- → ICJ submits its annual report to the General Assembly
- → Official languages of ICJ → English & French
- → Dispute resolution → needs the consent of the parties
- → General Assembly or Security Council → can ask for an advisory opinion of ICJ; other UN organs & specialised agencies can also ask, if authorised by the G.A. (Art. 96)
- → 15 judges; from India → Dalveer Bhandari

Chapter XV – The Secretariat (Arts. 97–101)

- → Secretary-General appointed by the General Assembly on the recommendation of the Security Council

World Trade Organization (WTO)

- → **Bretton Woods Conference**, 1944 (UN Monetary & Financial Conference) IMP
  - ↳ Established the International Bank for Reconstruction & Development (IBRD) and the International Monetary Fund (IMF)
- → **International Trade Organization (ITO)**: the Havana Charter (1948) was signed by 53 States, but the US Congress never ratified it, so the ITO never came into existence
- → International Criminal Tribunal for the former Yugoslavia → 1993 to 2017

General Agreement on Tariffs & Trade (GATT), 1947 NET / JRF

- → Signed: **30 Oct 1947**
- → 8 rounds of negotiation: 1st round → **Geneva**; last (8th) round → **Uruguay**

WTO

- → Established: **1 Jan 1995**
- → HQ: **Geneva**, Switzerland IMP
- → Official languages: English, French, Spanish
- → WTO replaced GATT (as an organisation)
- → Functions – trade laws & regulations, negotiating multilateral trade agreements, reviewing national trade policies

Structure of WTO

1. **Ministerial Conference** – highest authority; all WTO members; meets at least once in 2 years
2. **General Council** – works as the Ministerial Conference in between its sessions; meets many times a year in Geneva
3. **Secretariat** – administrative organ; headed by the Director-General (appointed by the Ministerial Conference); technical assistance to developing countries

Settlement of International Disputes

- → **Art. 51** – inherent right of self-defence if an armed attack occurs against a member of the UN IMP

Pacific Means – Chapter VI (Art. 33)

- → **Manila Declaration** (1982): States shall settle disputes by peaceful means in good faith & in a spirit of co-operation
- → Art. 2(3)

Various forms:

i) Negotiation
ii) Enquiry
iii) **Good Offices**: a third party brings both the parties together under the same roof
iv) **Mediation**: the mediator takes part in the talks and gives his views
v) **Conciliation**: finds out the facts and writes them in a report with proposals
vi) Arbitration
vii) Judicial Settlement
viii) Regional agencies

Compulsive (Coercive) Means – short of war

i) Complaints
ii) **Retorsion**: unfriendly but lawful act

e.g. severance of diplomatic relations; suspension of air, sea, land & other means of transport. India suspending diplomatic relations, sending Pakistani nationals back & closing transport between India & Pakistan is retorsion.

iii) **Reprisal**: an act that is otherwise unlawful, done in response to a prior unlawful act of the other State

Reprisals involving armed force are unlawful under the UN Charter. If Pakistan attacks and India responds with force, that is self-defence under Art. 51, not reprisal.

iv) **Embargo**: detention of ships

v) **Blockade**: one party blocks entry or departure from a defined part of the enemy territory

vi) Intervention

vii) War

Enforcement action by the Security Council is under **Chapter VII** (Arts. 39–51).

Revision: Provisions of the UN Charter

- → Art. 1(1) → int. peace & security
- → Art. 1(2) → friendly relations among nations
- → Art. 1(3) → international co-operation
- → Art. 1(4) → harmonizing the actions of nations
- → Art. 2(1) → sovereign equality
- → Art. 2(2) → good faith (Pacta Sunt Servanda)
- → Art. 2(3) → settlement of disputes peacefully
- → Art. 2(4) → refrain from threat or use of force against territorial integrity
- → Art. 2(5) → assistance to the UN
- → Art. 2(6) → non-members to act per these principles
- → Art. 2(7) → domestic jurisdiction
- → Art. 3 → original membership (San Francisco Conference)
- → Art. 4 → peace-loving States
- → Art. 5 → suspension (General Assembly on recommendation of Security Council)
- → Art. 6 → expulsion (General Assembly on recommendation of Security Council)
- → Art. 7 → organs of the UN
- → Art. 9 → composition of G.A.; Arts. 10–17 → functions of G.A.; Art. 18 → voting → Chap. IV
- → Art. 23 → composition of S.C.; Arts. 24–26 → functions; Art. 27 → voting → Chap. V

- → Art. 61 → composition of ECOSOC; Arts. 62–66 → functions; Art. 67 → voting → Chap. X
- → Arts. 86–91 → Trusteeship Council → Chap. XIII
- → Arts. 92–96 → ICJ → Chap. XIV
- → Arts. 97–101 → The Secretariat → Chap. XV
- → UN HQ → New York, USA · ICJ HQ → The Hague, Netherlands · WTO HQ → Geneva, Switzerland

International Humanitarian Law

- → **Jus in Bello**: law on the conduct of parties engaged in armed conflict → basis of IHL
- → **Jus ad Bellum**: law on when a State may use force against another State (prohibition of the use of force)

Basic Principles of IHL

i) **Principle of Distinction**: distinction between civilians & combatants; protection of civilians, medical personnel, the sick & wounded

ii) **Principle of Military Necessity**: use only those measures that are necessary to achieve the legitimate military aim

iii) **Principle of Proportionality**: balancing between military necessity & humanity

iv) **Principle of Humanity**: avoid unnecessary suffering

Foundation of IHL

Henry Dunant

- Won the first Nobel Peace Prize, 1901 (shared with Frédéric Passy)
  The ICRC, which he founded, has won the Nobel Peace Prize three times: 1917, 1944 & 1963.
- Book: **A Memory of Solferino** (1862): described the suffering of wounded soldiers after the Battle of Solferino (1859) and called for relief societies to care for them
- Founded: International Committee of the Red Cross (ICRC), 1863 → Geneva, Switzerland (also HQ of WTO)

Francis Lieber

- Author: **Lieber Code**, aka Instructions for the Government of Armies of the United States in the Field (1863)
- Accepted as national law & not as international law

– Lieber Code → influenced the later codifications, including the Hague Conventions

Evolution of IHL

→ **Hague Conventions (1899 & 1907)** IMP → influenced by the Lieber Code

→ Preamble: **Martens Clause**: people caught up in armed conflict still have protection even when there is no specific IHL rule applicable

3 Declarations adopted in 1899:

1. Prohibiting the discharge of projectiles or explosives from balloons (renewed in 1907)
2. Prohibiting the use of asphyxiating gases (adopted in 1899, not renewed in 1907)
3. Prohibiting the use of dum-dum (expanding) bullets (adopted in 1899, not renewed in 1907)

Declaration NET / JRF	**Hague 1899**	**Hague 1907**
I. Projectiles / explosives from balloons	Adopted	Adopted again
II. Asphyxiating gases	Adopted	Not renewed
III. Dum-dum bullets	Adopted	Not renewed

Limitation of armaments: no Declaration; the 1899 Conference only passed a resolution (voeu) in its Final Act.

"Not renewed" in 1907 does not mean these were permitted: the 1899 Declarations on gases and dum-dum bullets stayed in force between the States that were parties to them.

Geneva Conventions

Earlier conventions:

→ 1864: wounded & sick soldiers on land (first Geneva Convention)

→ 1906: revised the 1864 Convention (wounded & sick in armies in the field)

→ 1929: treatment of prisoners of war (and a revision for the wounded & sick)

The four Geneva Conventions of 1949 (in force today) IMP

G.C. I Protects wounded & sick soldiers on land

G.C. II Protects wounded, sick & shipwrecked military personnel at sea

G.C. III Treatment of Prisoners of War

G.C. IV Protection of Civilian Persons

Additional Protocols

→ **AP I, 1977** → International Armed Conflicts & protection of civilians

→ **AP II, 1977** → Non-International Armed Conflicts

→ **AP III, 2005** → Additional Distinctive Emblem → **Red Crystal**