Parliamentary Assembly
Assemblée parlementaire
https://pace.coe.int

COUNCIL OF EUROPE
CONSEIL DE L'EUROPE

Recommendation 2315 (2026)[1]

How to ensure the implementation of judgments of the European Court of Human Rights concerning the Russian Federation, including payment of the compensation awarded

Parliamentary Assembly

1. The Parliamentary Assembly draws the Committee of Ministers' attention to Resolution 2678 (2026) "How to ensure the implementation of judgments of the European Court of Human Rights concerning the Russian Federation, including payment of the compensation awarded", which explores ways in which the Council of Europe should address Russia's failure to comply with its binding legal obligation to implement judgments of the Court.

2. To ensure the payment of just satisfaction awarded by the European Court of Human Rights against the Russian Federation, the Assembly recommends that:

2.1. an ad hoc funding mechanism be created, under the auspices of the Council of Europe, with the mandate to recover Russian State-owned assets and proportionately disburse them to applicants who have been awarded just satisfaction by the Court in cases against the Russian Federation; the amounts disbursed through the mechanism should be credited against the just satisfaction owed by the Russian Federation;

2.2. any assets of the Russian Central Bank that have already been frozen or immobilised and are transferred to the funding mechanism referred to in paragraph 2.1, or any other suitable mechanism, are used exclusively to pay the just satisfaction to be awarded by the Court to Ukraine in inter-state cases against the Russian Federation concerning the war of aggression;

2.3. the Committee of Ministers should mandate a Council of Europe inter-governmental body to carry out a comprehensive study of the legal frameworks of Council of Europe member States, identifying jurisdictions which permit domestic enforcement of just satisfaction awards against the Russian Federation, as well as any changes that would be necessary and legally feasible to facilitate such enforcement;

2.4. the Committee of Ministers examine the feasibility of elaborating a recommendation inviting member States to take any steps necessary, whenever legally possible, to ensure that their national legal frameworks allow for the domestic enforcement of the European Court of Human Rights' just satisfaction awards against the Russian Federation, for as long as Russia refuses to pay them.

1. *Assembly debate* on 30 September 2026 (33rd sitting) (see Doc. 16478, report of the Committee on Legal Affairs and Human Rights, rapporteur: Mr Tony Vaughan). *Text adopted by the Assembly* on 30 September 2026 (33rd sitting).
Provisional version subject to editorial review.

3. Furthermore, the Assembly recommends that the Committee of Ministers:

3.1. prepare a list of individuals who – according to the findings of the European Court of Human Rights – have participated in committing human rights violations, where the following criteria are met:

3.1.1. there is a final judgment of the Court concerning the Russian Federation that has found the Russian authorities responsible for a violation of the right to life under Article 2 of the European Convention on Human Rights (ETS N°5), the prohibition of torture and inhuman or degrading treatment under Article 3, or the prohibition of slavery and forced labour under Article 4;

3.1.2. the violation is of notable scale and/or impact, for example due to the number of victims, the targeted and deliberate nature of the violation, and/or its repetitive character;

3.1.3. one or more State agents, or persons linked to the State, are responsible for the violation and are either identified in the judgment or are otherwise identifiable;

3.1.4. the judgment of the Court, and/or the supervision process before the Committee of Ministers, indicate a failure by the Russian authorities to hold the individual(s) concerned accountable;

3.2. invite submissions from civil society groups and others under Rule 9 of the Rules of the Committee of Ministers for the supervision of the execution of judgments and of the terms of friendly settlements, in order to assist with the preparation of the list;

3.3. communicate the list of individuals to member and observer States, the European Union, the International Criminal Court, and other relevant bodies, inviting them to consider applying targeted individual sanctions against the named individuals and/or, where appropriate, to consider undertaking criminal investigations and prosecutions;

3.4. ensure that the list is updated periodically and communicated to relevant stakeholders, as new judgments are delivered by the Court;

3.5. make the list public, together with a record of the sanctions which have been imposed on the individuals concerned.

4. The Assembly further recommends that the Committee of Ministers provide the Court with the resources necessary to preserve the complete files of all applications lodged against the Russian Federation until the Russian Federation resumes its obligations under the Convention, and examine, with due regard to the applicants' consent and data protection, how these files could assist national and international bodies investigating serious human rights violations.