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Commentary: Shifting Standards? The ECtHR's Evolving Approach to Minority Rights

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Abstract

This commentary critically examines the European Court of Human Rights' (ECtHR) approach to minority rights within the broader human rights framework. The analysis assesses how the Court's reasoning has reinforced or, recently, deviated from established principles. Through a doctrinal and critical analysis of key judgments, the commentary identifies trends in the Court's reliance on pluralism, non-discrimination, and democratic participation as guiding principles. While earlier rulings underscored the necessity of protecting cultural, linguistic, and religious identities, recent decisions – particularly regarding Russian-speaking minorities in Latvia – signal a shift, raising concerns on judicial reasoning. The findings highlight inconsistencies in the Court's application of international minority rights instruments and question the broader implications for legal certainty in minority rights protection.

Keywords: European minority law; mother tongue education; language rights; judicial retreat on minority rights; pluralism

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Introduction

Post-World War II international law addressed minority rights as a distinct legal domain separate from the broader human rights framework. During the drafting of the Universal Declaration of Human Rights (UDHR), extensive discussions were held on the inclusion of a specific provision on minorities. However, these proposals were ultimately rejected (Eide, 1999, pp. 702-707). It was not until 1992, 44 years after the adoption of the UDHR, that the United Nations General Assembly adopted the Declaration on the Rights of Persons Belonging to National or Ethnic, Religious and Linguistic Minorities, a nine-article soft law instrument (Philips, 2015). Another fifteen years later, in 2007, the General Assembly adopted a second soft law document, the United Nations Declaration on the Rights of Indigenous Peoples.

At the Council of Europe (CoE) level, a similar trajectory unfolded. During the negotiations leading to the adoption of the European Convention on Human Rights (ECHR), some member states proposed the inclusion of a minority rights provision. However, as in the UN framework, these proposals were ultimately dismissed (Åkermark, 1997, p. 202).

This clear rejection of minority rights as part of post-World War II international human rights law marked the end of the special legal status minorities had held in international law between the two world wars. This shift was aptly summarized by Josef L. Kunz, who observed:

> At the end of the First World War, 'international protection of minorities' was the great fashion: treaties in abundance, conferences, League of Nations activities, an enormous literature. Recently, this fashion has become nearly obsolete. Today the well-dressed international lawyer wears 'human rights' (Kunz, 1954, p. 282).

Nevertheless, the question of a dedicated minority rights provision remained a recurring subject of debate in both UN and CoE fora.

A partial breakthrough came in 1966, when the UN General Assembly adopted the twin human rights covenants: the International Covenant on Civil and Political Rights (ICCPR) and the International Covenant on Economic, Social and Cultural Rights. The ICCPR, unlike the UDHR, included a dedicated minority rights provision in Article 27, which remains the only binding minority rights provision in a general human rights treaty under the UN framework. Further minority-specific provisions were later incorporated into thematic instruments, such as the Convention on the Rights of the Child (Articles 17(d), 29(c), and 30).

Within the CoE, two major attempts were made to adopt an additional protocol to the ECHR focusing on minority rights: first between 1959 and 1963, and later between 1990 and 1996. Both efforts failed. Instead of integrating minority rights within the general human rights framework, the Council of Europe adopted two instruments establishing broad principles: the European Charter for Regional or Minority Languages (ECRML, 1992) and the Framework Convention for the Protection of National Minorities (FCNM, 1995).

Despite the absence of dedicated minority rights provisions in the core human rights treaties, the monitoring bodies operating under the UN and CoE, particularly the UN

Human Rights Committee and the European Court of Human Rights (ECtHR), have provided protection to minorities through their interpretation and, at times, expansion of general human rights norms.

This commentary examines the protection of minorities under the general human rights framework over the past 70 years, with a particular focus on the jurisprudence of the ECtHR. While compiling an exhaustive list is challenging, this analysis explores general principles of minority protection and key landmark judgments to illuminate the current state of minority rights as shaped by the Court's evolving case law. The conclusion reflects on the future trajectory of minority rights protection within the European human rights system.

Fundamental Principles in Minority Protection under the ECHR

Against the historical background of the emergence of minority rights under international and European law, as a general principle, the ECtHR approaches minority issues from the point of pluralism.

The Court has emphasized pluralism, tolerance, and broadmindedness as fundamental hallmarks of a "democratic society". It has consistently held that democracy does not merely entail the supremacy of majority views; rather, it requires a balance that guarantees the fair and proper treatment of minorities while preventing any abuse of a dominant position. For the Court, pluralism is grounded in the genuine recognition of and respect for diversity, encompassing cultural traditions, ethnic and cultural identities, and religious beliefs. The harmonious interaction of individuals and groups with diverse identities is essential for fostering social cohesion.[1]

In *Ádám and Others v. Romania,* where the applicants were ethnic Hungarians belonging to a minority group, the Court acknowledged an emerging international consensus among European states recognizing the special needs of minorities and the corresponding obligation to protect their security, identity, and way of life. This obligation is not only aimed at safeguarding the interests of minority communities themselves but also at preserving cultural diversity, which is of value to society as a whole.[2]

Similarly, in cases concerning the Roma community, the Court has held that while belonging to a minority with a traditional lifestyle distinct from that of the majority does not confer immunity from general laws designed to protect the broader community (such as environmental regulations), it does affect how such laws should be applied. As established in its previous rulings, the vulnerable position of Roma communities necessitates special consideration of their needs and way of life, both within regulatory planning frameworks and in decision-making processes in specific cases. The Court thus concluded that states have a positive obligation to facilitate the Roma way of life.[3]

With regard to the role of minority associations in pluralistic democracies, the Court has recognized that associations dedicated to preserving cultural or spiritual heritage, promoting religious teachings, fostering ethnic identity, or asserting minority consciousness are integral to the proper functioning of democracy and the safeguarding of pluralism.

Accordingly, the formation of associations aimed at expressing and promoting minority identity is instrumental in enabling minorities to preserve and uphold their rights.[4]

The Court's protection of minority rights under the principle of pluralism extends to religious pluralism as well. In the *Case of Supreme Holy Council of the Muslim Community v. Bulgaria*, the Court reaffirmed that the autonomous existence of religious communities is essential to pluralism in a democratic society. While state intervention may sometimes be necessary to reconcile the interests of various religious groups coexisting within a democracy, the state is nonetheless obligated to remain neutral and impartial in exercising its regulatory authority and in its relations with different religions, denominations, and beliefs. At stake is not only the preservation of pluralism but also the proper functioning of democracy, which fundamentally relies on resolving societal issues through dialogue.[5]

When limiting or protecting ECHR rights, the Court has also placed particular importance on whether measures taken by the state parties prevent minorities from expressing or promoting their distinctive ethnic and cultural features or are directed against the practical objectives of minority groups.[6]

As a general approach, the ECtHR again refers to the CoE's specific instruments as well as to national laws on minorities as means of interpreting the ECHR provisions. To this end, the ECtHR, in many of its judgments, has approached the two CoE instruments on minorities positively: namely, the FCNM and the ECRML together with the explanatory reports attached to them.[7] In this regard, as laid down in the preamble to the FCNM, the Court restated that "a pluralist and genuinely democratic society should not only respect the ethnic, cultural, linguistic and religious identity of each person belonging to a national minority, but also create appropriate conditions enabling them to express, preserve and develop this identity".[8]

The Court also pays particular attention to whether a state has submitted declarations upon ratifying the two CoE instruments. In this context, the Court emphasized the element of "citizenship" in Poland's definition of a minority.[9]

Furthermore, as part of the general principles it has established in minority-related cases, the Court has linked minority protection with stability, democratic security, territorial integrity, and peace on the European continent.[10]

Against this backdrop, the Court has addressed a wide range of issues affecting minorities across Europe, including discrimination, recognition of legal personality, land rights, traditional ways of life, religious freedoms of minority groups, religious weddings, language choice in interactions with public authorities, language rights before the courts, minority-language media, police harassment, effective participation in public life, establishment of educational and cultural institutions, as well as the preservation, maintenance, and development of language, customs, traditions, and culture. It has also examined the political rights of minority parties, property rights, electoral rights, the rights of minority religious organizations, religious education, and mother-tongue education (Hillgruber & Jestaedt, 1994; Thornberry & Estébanez, 2004; Henrard, 2000). Two of these issues are analysed in detail below before focusing on the current trend in the Court's case law.

Specific Protections Awarded to Linguistic Minorities under the ECHR

Language Rights of Minorities during the Electoral Processes

The article on electoral rights in the Protocol No. 1 to the ECHR (A. 3) is framed as imposing certain obligations on states rather than explicitly guaranteeing individuals the right to vote and stand for election. States are required to ensure democratic elections at reasonable intervals, conducted by secret ballot, and designed to reflect the free expression of the people's will in choosing the "legislature" only (Schabas, 2015, p. 1018). Despite this general formulation, the ECtHR has consistently emphasized the significance of electoral rights in pluralist democracies, scrutinizing national rules and practices that directly or indirectly hinder minorities' access to elected office.

In the *Case of Podkolzina v. Latvia*, the ECtHR examined the removal of a minority candidate from the Russian-speaking community from Latvia's parliamentary elections due to alleged insufficient proficiency in the official language, Latvian. Latvian law required candidates to demonstrate fluency in the official language, and the administrative body disqualified the applicant despite her prior certification. The Court emphasized that while states may require linguistic proficiency for public officials, such measures must be transparent and not arbitrarily exclude minorities from political participation. This case underscored the importance of non-discriminatory linguistic regulations to ensure equal political representation for minorities.[11] In a series of other cases, the ECtHR provided remedy for minority representatives to run for elected offices when they were blocked by unnecessary regulations.

It is also worth noting that similar applications were filed with the UN Human Rights Committee which, like the ECtHR in *Podkolzina*, also found a violation of electoral rights.[12]

Right to a Mother Tongue Education

The ECHR does not contain a specific provision guaranteeing the right to education in one's mother tongue. Article 2 of Protocol No. 1 (A. 2 Pr. 1) to the ECHR establishes the right to education but – unlike post-World War II international human rights instruments where the right to education is framed as an economic, social, and cultural right – this provision is formulated in a negative sense, prohibiting the denial of education rather than explicitly affirming a substantive right to it (Schabas, 2015, p. 995).

Despite the absence of a general right to education in one's mother tongue under Art. 2, Para. 1 of the ECHR, the ECtHR has nonetheless provided significant protection to minority language education across Europe. This position is reinforced by references to other international legal instruments, as reflected in the Court's assessment as follows:

> The rights of persons belonging to national minorities to use their mother tongue and receive education in this language, as well as the State's corresponding obligation to protect and encourage the development of minority languages, are among the principles safeguarded by the international instruments on the matter, to which the respondent State is a party.[13]

As early as 1968 in the landmark *Belgian Linguistics Case* (which concerned the rights of French-speaking parents in Flemish-speaking areas of Belgium), the ECtHR found that Belgian laws restricting access to French-language education in certain regions were discriminatory and in violation of the right to education as enshrined in the ECHR.[14]

The ECtHR had another opportunity to further elaborate on the right to mother tongue education for minorities in *Catan and Others v. Republic of Moldova and Russia*.[15] The applicants in this case were children and parents from the Moldovan/Romanian-speaking community in Transdniestria, a breakaway region of Moldova. Following the adoption of a language policy by the *de facto* administration of the self-proclaimed "Moldovan Republic of Transdniestria", in 1992 and 1994, the use of the Latin alphabet in schools was prohibited.

As a result, pupils and teachers were forcibly evicted from Moldovan/Romanian-language schools, and several schools were closed down and subsequently reopened in different premises under pressure from the separatist authorities. The ECtHR found that these measures constituted a clear violation of the right to education under Article 2 of Protocol No. 1 to the ECHR. Furthermore, the ECtHR underlined the fact that, the right in question also aims at safeguarding the possibility of pluralism in education which possibility is essential for the preservation of the "democratic society" as conceived in the ECHR (Case, para. 138).

Since the *de facto* regime in Transdniestria was able to function only due to Russia's political, financial, and military support, the Court held that the Russian Federation was responsible for the violation of the applicants' rights.

Similarly, in the *Case of Ukraine v. Russia* (*Re Crimea*), the Court analysed the state of Ukrainian language education in Russian-annexed Crimea. Following the determination of a significant decline in the number of educational facilities and classes teaching in Ukrainian, as compared with the number previously available in Crimea, the Court found a full denial of the substance of the right to education.[16]

Even at the graduation stage, the ECtHR has examined whether minority students receiving mother-tongue education enjoy equal standing with their peers educated in the majority language. In *Ádám and Others v. Romania*, the applicants, ethnic Hungarians, alleged discrimination in the baccalaureate (school-leaving) qualification process for minority students studying in their native language. They were required to take two additional exams (oral and written, in their mother tongue) within the same relatively short period designated for the final exams nationwide. Additionally, the Romanian language and literature exams proved particularly challenging for them. As a result, ethnic Hungarian students had less time than their Romanian peers to prepare for or recuperate between exams, reducing their chances of success in the baccalaureate.[17]

In its judgment, the ECtHR, referring to the relevant provisions of the CoE FCNM and the ECRML, emphasized the need to balance the use of the official language together with minority languages in education. However, the Court found that students studying in Hungarian/the minority language were required to take two more exams on consecutive days than their peers studying in Romanian/the majority language. It concluded that the

inconvenience suffered by the minority applicants was sufficiently severe to meet the threshold of discrimination.[18]

The Turning Point: The ECtHR's Changing Interpretative Approach

The approach outlined above seemed to have changed in recent judgments of the ECtHR on mother-tongue education rights of the Russian-speaking minority in Latvia. In a series of judgments released in 2023 and 2024, the ECtHR totally disregarded its previous case law and demonstrated a negative approach to minority victims, which labelled as "hijacking human rights" by some scholars (Ganty & Kochenov, 2023).

The crux of the Latvian cases was the legislative reforms implemented in 2018, which increased the use of the official language (Latvian) as the language of instruction, thereby reducing the use of the minority language (Russian) in schools. The applicants, comprising Latvian nationals and non-citizens belonging to the Russian-speaking minority, contended that these legislative amendments infringed upon their rights under Art. 2 para. 1 and Art. 14 (prohibition of discrimination). They argued that the reforms curtailed their children's access to education in their mother tongue and constituted discrimination based on language.

The first case, *Valiullina and Others v. Latvia*, addressed amendments affecting public schools. The reforms mandated that from grades 1 to 6, at least 50% of teaching had to be conducted in Latvian; from grades 7 to 9, this increased to 80%; and for grades 10 to 12, instruction was to be entirely in Latvian, except for subjects related to minority languages, culture, and identity. The applicants argued that these changes infringed upon their right to education, and constituted discrimination based on language and ethnicity. The Court, by making a great emphasis on the promotion of official language and the margin of appreciation awarded to states on the matter, found no violation.[19]

According to the ECtHR, the reforms pursued legitimate aims, notably the protection and strengthening of the Latvian language and the promotion of unity within the education system. The Court acknowledged that the reforms had been implemented gradually, allowing time for adaptation, and had not entirely eliminated instruction in minority languages, as provisions remained for the teaching of subjects related to minority language and culture. Furthermore, the ECtHR noted that, since Latvian is the sole official language of Latvia, the applicants could not claim a violation of Art. 2 para. 1 merely on the basis of the reduced use of Russian as a language of instruction in Latvian schools.[20]

In assessing the discrimination claim, the Court reiterated that, due to their direct and continuous contact with the vital forces of their countries, national authorities (particularly domestic courts) are, in principle, better placed than an international judge to assess the necessity of interference in matters as specific and sensitive as the preservation and development of an official language. In this case, Latvian, having been subject to repression during more than fifty years of Soviet rule, merited special consideration in the Court's approach. Granting a wide margin of appreciation to the national authorities, the Court found that the difference in treatment pursued legitimate aims and was proportionate.

Accordingly, the Court found no violation of the prohibition of discrimination on the grounds of language.[21]

The second case, *Dzibuti and Others v. Latvia*, was about private schools. The legislative changes required private educational institutions to adhere to the same language instruction proportions as public schools, effectively limiting the use of Russian in private minority schools. The applicants contended that this imposition on private institutions violated their rights to education and non-discrimination, as it restricted their ability to receive education in their mother tongue. The Court acknowledged that private schools receiving public funding and issuing state-recognised certificates formed part of the national education framework, thereby justifying state regulation. The Court, with similar arguments to the previous case, found no violation of the right to education.[22] Regarding the discrimination claims, the Court once more emphasised the wide margin of appreciation afforded to states in organising their education systems, particularly concerning the language of instruction, and found the measures proportionate and non-discriminatory.[23]

The third case, *Djeri and Others v Latvia*, also challenged the same reforms but focused specifically on their application in pre-schools.[24] The applicants argued that increasing Latvian language use in early childhood education discriminated against them and violated their right to education. As the third case arising from the same context, the ECtHR approached this matter primarily from the standpoint of differential treatment. The Court observed that the result of the educational reform was that Russian-speaking pupils (such as the applicants' children enrolled in pre-school education programmes) could no longer pursue an education with substantial parts of the curriculum taught in Russian. In contrast, Latvian-speaking pupils were able to continue their education in Latvian. Thus, following the legislative amendments, both Russian-speaking and Latvian-speaking pupils at the same stage of pre-school education, regardless of the specific school they attended or the education programme followed, were required to follow a curriculum that placed emphasis on the use of Latvian.[25]

For the ECtHR, the new educational policy was justified by the aim of preparing children for primary education in Latvian and ensuring coherence within the national education system. Accordingly, the Court found no violation of the right to education or the prohibition of discrimination.[26]

The ECtHR's approach in these cases was unprecedented for two reasons. First, instead of remedying the issue from a human rights perspective (as did in many of its previous judgments, some of which are described above), the Court hesitated to apply its well-established solutions to the Russian-speaking minority in Latvia. Secondly, contrary to its positive approach to other CoE instruments on minorities, this time the Court demonstrated a distanced approach to them. The following statements from the recent Latvian cases are worth citing here:

> That the principle of mother tongue instruction has been recommended by some international bodies, however, it does not seem to represent a common European consensus in the field of education.[27]

> Within the Council of Europe, the Framework Convention has not been signed and/or ratified by all member States.[28]
>
> Even in respect of those States which have ratified that Convention, its Article 14 does not contain an unequivocal principle regarding minorities receiving an education in their mother tongue.[29]
>
> While encouraging States to ensure teaching in minority languages and the learning of those languages, the Framework Convention allows for this to be provided in several ways: bilingual or multilingual education; classes in minority languages in public schools; and private minority language schools or "Sunday classes" organised by communities themselves.[30]
>
> In the wider framework of international human rights law, it appears to be accepted that the normative content of the right to education will depend on the conditions prevailing in a particular State.[31]
>
> Within the Council of Europe, the Framework Convention guarantees that persons belonging to a national minority have the right to set up and manage their own private educational establishments. Whilst not all member States of the Council of Europe have ratified and/or signed the Framework Convention, Latvia has done so, and it entered into effect on 1 October 2005 in respect of Latvia. However, the Framework Convention does not provide for an obligation to finance private schools.[32]
>
> The Court considers that the applicants' reference to the advisory opinion of the PCIJ concerning *Minority Schools in Albania* is misguided, as that opinion concerned the abolition of all private schools in Albania in 1933 (prior to the founding of the Council of Europe and the adoption of the Convention and its Protocols), whereas the present case does not relate to the closing of private schools.[33]
>
> In the context of pre-school education for young pupils aged five to seven, the practice of the member States of the Council of Europe is rather diverse. It is true that primary education, which provides basic literacy and numeracy skills and a child's integration into and first experiences of society, is compulsory in most countries. However, the same cannot be said of pre-primary education.[34]

The ECtHR also gave no importance to the opinion of the CoE Venice Commission issued on the subject matter.[35]

Conclusion

Since its establishment in 1962, the European human rights machinery institutionalised in the ECtHR has encountered numerous challenges. Throughout its history, the Court has upheld the rights and freedoms enshrined in the ECHR during the Cold War for individuals living in both western and eastern Europe. In the aftermath of the collapse of the eastern bloc, the Court's judgments contributed to building the liberal legal order in countries transitioning to liberal democracies. During domestic security operations, the Court's case law compelled states to plan and operate in accordance with the right to personal security. Following the events

of 9/11, the extraterritorial application of the ECHR during cross-border security operations became a significant issue for the Court. The ECtHR's jurisprudence on extraterritoriality has since been extended to apply to pushback cases arising from the ongoing refugee crisis. The Court has also withstood arguments for withdrawal from its jurisdiction in the context of economic crises. Despite these turbulent periods, the Court's judgments have, if not always, largely contributed to the stronger protection of human rights and the imposition of greater limitations on state power.

Throughout its existence, the Court has received considerable support from other organs of the CoE, particularly from the Committee of Ministers, which is responsible for the execution of the Court's judgments. However, since the onset of Russia's political, cyber, and ultimately military aggression towards the West, shifting interpretations of legal principles have been observed across the European continent. Rather than taking liberal steps and receiving institutional support from other CoE bodies, it appears that the Court is now aligning more closely with the political stance adopted by CoE member states in their relations with Russia.

Russia has never been a reliable adherent to the principles of democracy, the rule of law, and human rights, even during its membership in the CoE. As a state with veto power in the UN Security Council, Russia did not feel compelled to engage with the CoE on the basis of its founding principles. Despite early efforts to align with ECtHR judgments, Russia quickly abandoned any real intention to execute the Court's rulings domestically. These disengagement policies were tolerated by other member states for an extended period, even following the annexation of Crimea and the occupation of parts of eastern Ukraine. Only after Russia escalated its ambitions to encompass the entire territory of Ukraine did the CoE initiate the process of terminating Russian membership.

Notably, the Court's supportive judgments concerning the limitation of the Russian language in certain cases emerged following the political developments of 2022. The Court's reference to Latvia's historical experience under Soviet rule, and accordingly providing a wide margin of appreciation to the state of Latvia raises concerns about the coherence of its jurisprudence on minority rights.

Furthermore, this evolution in the Court's case law vis-à-vis Russian minorities in Latvia raises questions as to whether it represents a departure from well-established interpretative methodologies, such as reliance on comparative European and international legal standards, in favour of a more textualist approach.

To properly assess the emerging case law since the initial Latvian judgment and to understand the current trajectory of the ECtHR's jurisprudence on minority rights more broadly, further in-depth research and analysis are essential. This commentary has sought to make a preliminary contribution to that endeavour.

Endnotes

1 Gorzelik and Others v. Poland, Application No. 44158/98, Grand Chamber Judgment of 17.02.2004, para. 92.

2 ECtHR, Ádám and Others v. Romania, Application Nos: 81114/17 and 5 others, 13.10.2020, para. 94.

3 ECtHR, Chapman v. UK, Application No: 27238/95, GC Judgment of 18.01.2001, para. 96.

4 *Supra* Gorzelik and Others v. Poland, paras. 92-93.

5 ECtHR, Supreme Holy Council of the Muslim Community v. Bulgaria, Application No. 39023/97, 16.12.2004, para. 93.

6 *Supra* Gorzelik and Others v. Poland, paras. 105-106.

7 For exemplary judgments *see supra* Adam and Others v. Romania and *ibid*.

8 *Ibid.* Ádám and Others v. Romania, para. 26; Gorzelik and Others v. Poland, para. 93.

9 *Ibid.* Gorzelik and Others v. Poland, para. 47.

10 *Ibid.* par. 68; *Supra* Ádám and Others v. Romania, para. 27.

11 ECtHR, Podkolzina v. Latvia, Application No. 46726/99, 09.4.2002.

12 UN HRC, Antonina Ignatane v. Latvia, Communication No. 884/1999, 25.07.2001.

13 *Supra Ádám and Others v. Romania*, para. 94.

14 ECtHR, Case "Relating to Certain Aspects of the Laws on the Use of Languages in Education in Belgium" v. Belgium, (App. Nos. 1474/62, 1677/62 1691/62, 1769/63, 1994/63 2126/6), Judgment of 23.07.1968.

15 ECtHR, Case of Catan and Others v. Republic of Moldova and Russia, (App. Nos. 43370/04, 8252/05, 18454/06), Grand Chamber Judgment of 19.10.2012.

16 ECtHR, Ukraine v. Russia (Re Crimea), Application Nos. 20958/14 and 38334/18, GC Judgment of 25.6.2024, para. 1165.

17 *Supra* Ádám and Others v. Romania, para. 1.

18 *Ibid.* paras. 101, 104.

19 ECtHR, Valiullina and Others v. Latvia, Application Nos. 56928/19 and 2 others, 14.9.2023.

20 *Ibid.* para. 135.

21 *Ibid.* paras. 208, 214.

22 ECtHR, Džibuti and Others v. Latvia, Application Nos. 225/20 and 2 others, 16.11.2023.

23 *Ibid.* para. 162.

24 ECtHR, Djeri and Others v. Latvia, Application Nos. 50942/20 and 2022/21, 18.7.2024.

25 *Ibid.* para. 142.

26 *Ibid.* para. 167.

27 *Supra* Valiullina and Others, par. 210.

28 *Ibid.* para. 211.

29 *Ibid.* para. 211.

30 *Ibid.* para. 211.

31 *Ibid.* para. 211.

32 *Supra* Džibuti and Others v. Latvia, para. 145.

33 *Ibid.* para. 147.

34 *Supra* Djeri and Others v. Latvia, para. 148.

35 *Supra* Džibuti and Others v. Latvia, paras. 114-115; *Ibid* para. 154.

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