

**YEMEN: INTERNATIONAL  
HUMANITARIAN LAW (IHL),  
INTERNATIONAL HUMAN RIGHTS LAW  
(IHRL) & THE USE OF FORCE BY A STATE  
(*JUS AD BELLUM*)**

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# YEMEN: INTERNATIONAL HUMANITARIAN LAW (IHL), INTERNATIONAL HUMAN RIGHTS LAW (IHRL) & THE USE OF FORCE BY A STATE (*JUS AD BELLUM*)

This short paper addresses the principal international humanitarian law (IHL) and international human rights law (IHRL) issues arising in the Yemen conflict. In addition, and as a postscript, it includes a commentary on the use of force by a state.

## INTERNATIONAL & NON-INTERNATIONAL ARMED CONFLICTS

IHL draws a distinction between an international armed conflict (IAC) and a non-international armed conflict (NIAC) and it is a distinction that carries with it a number of legal and practical consequences.

Under the Geneva Conventions (1949) and their two Additional Protocols (1977), the laws of war applicable to an IAC apply to any armed conflict that is between two or more states. Although the conflict in Yemen and the involvement therein of the Saudi-led coalition entails the involvement of a number of states, it is not a conflict between states. It is, instead, a conflict between the forces of the Yemeni Government and a non-state armed group/groups, making it a NIAC. (Note: There are no grounds to conclude that, under international law, the Houthis are able to lay claim themselves to 'statehood').

The conflict in Yemen might give rise to the argument that the current distinction between IAC and NIAC is unhelpful and not particularly appropriate in many 21st century armed conflicts, especially where there is an international context/consequences and a factual scenario not envisaged in the immediate post-WWII period. It can be said that Yemen reflects a type of armed conflict that has emerged more markedly in the current millennia, where a multinational force or forces join with those of the host state against an organised armed group, with the conflict occurring within the host state's territory. Such critics of the present IAC/NIAC distinction might even argue that the situation in Yemen demonstrates that an armed conflict should be defined simply as that, without any international/national divide.

Turning to the practical effect of the conflict as an NIAC, it should be emphasised that, excluding issues of maritime warfare, the means and methods of war are almost entirely the same whether a conflict is international or non-international. The key protective difference, however, is the existence of prisoner of war status in an IAC, which means that any captured combatants (i.e. a member of a national armed force or one of its associated militia) must be afforded full prisoner of war protection.

## IHL APPLICABLE TO A NIAC

As a NIAC, the key provision of treaty law applicable in the Yemen conflict is Common Article 3 of the Geneva Conventions (to which all members of the coalition are states parties). The effect of that Article is to create a minimum protective set of standards applicable to every party in a NIAC. Although the status of combatant does not feature in NIAC-applicable treaty law, Common Article 3 provides a framework of safeguards or protections for both civilians and those no longer taking part in hostilities (i.e. the captured, the surrendered and those hors de combat). The principal aims of the protections are to prohibit the use of violence (including torture) and degrading or humiliating treatment against such persons.

Further reinforcing Common Article 3 is Additional Protocol II (1977), which was adopted in order to develop and supplement the standards set out in Common Article 3. Both Common Article 3 and APII apply with equal force to all parties in the Yemen conflict, whether government and coalition forces or non-state armed groups.

In addition to treaty law, the importance of customary international law in a NIAC should not be overlooked. Over the last twenty years, there have been concerted efforts to demonstrate that those customary norms traditionally associated with IACs are, in large part, equally applicable to NIACs. Indeed, the Customary Law Study of the ICRC (2005) concluded that most of the rules of the Additional Protocols are applicable in both types of conflict, even though the precise detail of those common rules will not always be the same. The commonality is, however, in the principle, even if not in the word by word detail. Thus, in the Study, the following customary law rules are said to be common to both IACs and NIACs:

- Rule 11: Prohibition of indiscriminate attacks;
- Rule 22: Duty of parties to the conflict to take all feasible precautions to protect the civilian population and civilian objects;
- Rule 25: Respect and protection of medical personnel;
- Rule 53: Prohibition of the use of starvation of the civilian population as a method of warfare;
- Rule 74: Prohibition of the use of chemical weapons; and
- Rule 90: Prohibition of torture, cruel or inhumane treatment.

## TARGETING IN A NIAC

Given the aerial bombardment that has occurred in Yemen and that much of the conflict is being waged in populated areas, the issue of targeting is of central relevance. Common Article 3 and APII do not explicitly address targeting in a NIAC, but they do provide fundamental protections for civilians and for those no longer engaged in hostilities, including

a prohibition on violence to life and person. Importantly, and in addition, customary international law provides for the protection of civilians from being targeted, as was affirmed in the interlocutory appeal decision of Prosecutor v Tadic (ICTY), where it was held that customary law governing NIACs includes:

“protection of civilians from hostilities, in particular from indiscriminate attacks, protection of civilian objects, in particular cultural property, protection of all those who do not, or no longer, take part in hostilities, as well as prohibition of means of warfare proscribed in international armed conflicts and ban of certain methods of conducting hostilities”.

It is also appropriate to reinforce that, in the context of events in Yemen, key rules of custom prohibit attacks on civilians and apply with equal force in NIACs. The principal provisions are:

- Rule 11: Prohibition of indiscriminate attacks;
- Rule 14: Proportionality in attack;
- Rule 15 (and consequent Rules 16-21): Precautions in attack;
- Rule 22: Precautions against the effects of attacks.

In relation to targeting and the customary Rules, it should be had in mind that the main underlying general principles of IHL that must be applied are: the principle of limitation and the principle of distinction.

Applying this legal framework to Yemen, direct attacks on civilians and civilian objects are prohibited, as are indiscriminate attacks (in other words, any attack which targets military objectives and civilians/civilian objects without distinguishing between them). Thus, the bombardment of a whole area on the basis that it is a single military objective, as it contains a number of adjacent but distinct military objectives, would be prohibited as indiscriminate if that same area also contains a concentration of civilian objects. In short, an attack that contravenes the principle of proportionality amounts to a breach of IHL.

At the same time, the effect of IHL is not to impose a blanket prohibition on conducting hostilities in a populated area. Rather, the greater the proportion of civilians or civilian objects, the greater the responsibilities on the parties to the conflict to minimise the risk of civilian harm. As highlighted in respect of the customary Rules, all feasible precautions must be taken to avoid or minimise collateral or incidental civilian loss of life and damage to civilian objects. Feasible precautions will include using intelligence and information to verify that an object of an attack is indeed a military objective, giving effective advance warning (where practicable) and taking steps to remove civilians from the location intended to be the target of the attack.

On the issue of giving a warning, it must be remembered that a civilian that remains and does not evacuate is still protected by IHL even if he/she has not heeded the warning. Were it otherwise, an ill-intentioned party would be able to issue a warning to bring about forced displacement by threatening violence or other harm if civilians do not move. After a warning has been given, there is still a requirement for an attacking party to take all feasible precautions, even if that involves postponing or cancelling an attack.

The issue of targeting within the conflict also raises issues as to attacks on infrastructure, such as roads, bridges and, of course, airports. Although such locations are ordinarily civilian, they may become military objectives (and, therefore, liable to being targeted) if being used for a military purpose, or if a military objective is located on or in them. However, the principle of proportionality is the determining factor in this instance. If it is concluded that the location is a military objective, the decision-maker must make every effort to minimise civilian loss and damage and must be satisfied that definite military advantage outweighs that loss and damage. In a similar fashion, the targeting of radio or television stations will only be legitimate if they can properly be said to be military objectives. In that regard, it must be borne in mind that a civilian station does not become a military objective because it is broadcasting propaganda, whether on behalf of the government or an armed group.

A medical unit, meanwhile, is a civilian object but, over and above that, it has particular protection under IHL. A medical unit might be a civilian or military establishment and could be a hospital, clinic or other medical facility. Whereas a civilian object can become a military objective if being used for a military purpose, a medical unit will only become a legitimate target if it is being used, outside of its humanitarian function, to commit an act or acts harmful to the enemy. This test is, therefore, a stringent one.

## THE NOTION OF 'CIVILIAN' IN A NIAC

In a NIAC, there is no notion of 'combatant' and the privileges that are accorded to combatant status are, therefore, limited to an IAC. The rationale is that states will not accept that insurgents or paramilitary groups be granted a status internationally that will enable them to commit acts of belligerence lawfully and without the risk of prosecution. Thus, in a situation like Yemen, it is important to recognise that those civilians who are directly participating in hostilities are targetable according to the rules of direct participation, but are not combatants. Certainly, forces of a state and members of armed groups that have been engaged in combat will be referred to 'fighters', but that is simply to keep the divide in relation to the principle of distinction.

As to the nature of fighters and directly participating civilians, there have been reports that Houthi forces have included child soldiers. The recruitment or use of a child by a party to a

conflict (whether an IAC or a NIAC) is a war crime and, moreover, The Optional Protocol to the Convention on the Rights of the Child on the Involvement of Children in Armed Conflict (to which Yemen is a state party) provides that a non-state armed group should not recruit or use in hostilities any person aged under eighteen.

A civilian that participates, from time to time, in hostilities will remain as a civilian, but a participating one. Fighters may be targeted throughout their armed engagement (even, for instance, whilst sleeping), whereas civilians directly participating in hostilities may only be targeted on a sporadic basis during their phase of active engagement. Importantly, upon capture, neither a fighter nor civilian directly participating in a NIAC is entitled to prisoner of war status. (Indeed, as already mentioned, there are no prisoners of war in an NIAC, unless the parties to the conflict have agreed to the contrary or there is a decision by one or both sides to treat any captives no less favourably than a prisoner of war.)

### **PROHIBITED MUNITIONS**

As to the type of munitions used in attacks within Yemen, there have been reports of, for instance, the use of cluster bombs being dropped, particularly in the Saada Governate. Cluster munitions are subject to a ban under the Convention on Cluster Munitions (2008). The basis for that ban is their indiscriminate effect and danger to civilians. Although no members of the Saudi-led coalition are a state party to that instrument, there is international consensus that cluster munitions should not be used in any circumstance.

### **DETENTION AND CUSTODY IN A NIAC**

There are two forms of detention to have in mind: internment and criminal detention. The nature of the latter is obvious, but the former may be usefully defined as the non-criminal detention of a person on the grounds that he or she poses a serious threat to security (of the party seeking to detain him) in an armed conflict.

Criminal detention will be in accordance with domestic law and will be subject to international human rights law (IHRL) considerations and obligations. However, internment presents the real difficulties. Common Article 3 contains no specific safeguards for the internee, but APII does expressly mention internment, albeit it does not detail specific procedural rules or safeguards.

The starting point in a NIAC is that domestic law provides the legal framework, albeit it will be informed by the state's IHRL obligations and by IHL (Common Article 3, APII and customary norms). Some would argue that domestic law may only allow internment in a NIAC if there is derogation from the International Covenant on Civil and political rights (1966) (ICCPR), even if domestic law provides for a judicial review mechanism in accordance

with Article 9(4) of the ICCPR. Others would argue, to the contrary, that derogation would only be necessary if the right to habeas corpus was suspended (even if there was still a mechanism for administrative review of a decision to intern, in accordance with IHL). A third argument might be that the right to habeas corpus may never be derogated from.

## **HUMANITARIAN ACCESS & RELIEF**

IHL provides that parties to a conflict (IAC or NIAC) must grant humanitarian organisations rapid and unimpeded access to an affected population. However, states should not overlook their own humanitarian duties: indeed, it is the state that has the primary responsibility for ensuring the essential needs of civilians under their control. It is when a state is unwilling or unable to comply with that responsibility that IHL provides for relief actions by others, principally, humanitarian organisations (such as the ICRC).

In a NIAC, Common Article 3 and Article 18 of APII provide the legal framework for humanitarian access and assistance, along with customary norms on the rapid and unimpeded passage of relief and the freedom of movement and protection afforded to relief personnel.

A relief action shall be undertaken when the population lacks the essential supplies for its survival, but it is subject to the consent of the state concerned. However, consent may not be arbitrarily refused, so long as the relief is humanitarian, impartial and is to be delivered without any adverse distinction.

## **THE INTERFACE BETWEEN IHL & IHRL**

IHRL applies during an armed conflict and co-exists with IHL. IHL norms may not be derogated from, whereas subject to some restriction and conditions, some IHRL norms may be the subject of derogation during, for instance, an armed conflict. The interplay between IHL and IHRL regular causes confusion!

In a NIAC it must be had in mind that IHL applies equally to state forces and non-state armed groups. It establishes an equality of rights and obligations which, of course, may not equate with domestic criminal law. A person behaving in accordance with the laws of war may, nonetheless, be guilty of crimes contrary to the criminal law.

Conversely, an armed group will not have the capability to comply with a full range of IHRL obligations since it does not perform a governmental or, at least, government-like (i.e. acting as a de facto state authority), function. IHRL, of course, binds only states and does not create legal obligations on non-state actors. In any event, the majority of obligations under IHRL

that an armed group could, in practice, perform would be binding on them in an armed conflict under IHL in any event.

## **INTERNATIONAL CRIMES & ENFORCEMENT**

The principal responsibility for investigations and prosecutions into international crimes lies with the state whose nationals are alleged to have committed the violations of IHL and/or the state in whose territory the violations are alleged to have been committed. Indeed, that is reflected in the wider ‘complementarity’ principle of the Rome Statute and the International Criminal Court (ICC).

The ICC is in a position to try those accused of war crimes, crimes against humanity or genocide in Yemen, provided any such crime was committed after 1st July 2002. However, such jurisdiction may only be exercised if one or more of the following applies:

- The crime allegedly occurred in the territory of a state party to the Rome Statute;
- The person suspected is a citizen of a state party;
- A state that is not a state party accepts the jurisdiction of the ICC;
- There is a referral by the UN Security Council.

Yemen is not a state party to the Rome Statute, but Jordan (a member of the Saudi-led coalition) is.

### **Postscript Note: The use of force by a state (*jus ad bellum*)**

This note is intended to aid general discussion. It should be noted that the use of force by the Government of Yemen within its own territory against armed/terrorist groups is governed by national law and IHRL (as to when force can be used) and by IHL and IHRL (as to how that force is used).

Up until the end of the Second World War in 1945 and the subsequent creation of the United Nations, international law regulating when a state is able to use force was largely undeveloped. That was in contrast to *jus in bello* (the law that regulates the conduct of hostilities during a conflict) which was, meanwhile, very much established and owed its origins to long-established ideas which had evolved through medieval times and had been further shaped by 17th century European conflicts. But, whilst various theories of a “just war” had been propagated by the fifteenth century and had been further shaped by legal thinkers such as Grotius, state practice and custom, even as late as the eighteenth century, allowed for the waging of war and the use of force short of war without any true constraint in law.

The nineteenth century saw attempts by various judiciaries to define the parameters of self-defence by states, but it was the level of destruction, both human and otherwise, brought about by competing armies in the First World War that resulted in gradual international agreement on limiting the circumstances in which force could be used by a state.

The first real example of such a change came with the Covenant of The League of Nations in 1919. The states parties gave their agreement to the Covenant in order to promote international co-operation and “...to achieve international peace and security [by the] acceptance of obligations not to resort to war [and by a] firm establishment of the understandings of international law as the actual rule of conduct among governments”. That having been said, the substance of the Covenant itself fell short of those ideals. In particular, states remained able to go to war if processes aimed at bringing about a peaceful settlement had been exhausted. Moreover, the US failed to become part of the League of Nations and Germany, Italy and Japan each withdrew during the course of the 1930s. The Covenant itself did not include a clear and normatively defined prohibition on the use of force; an omission that proved to be a major defect and a missed opportunity to impose a defined obligation.

That gap was, to some extent, addressed and rectified by the so called Kellogg Briand Pact of 1928 (otherwise known as the Pact of Paris or, to give it its full title, A Treaty Providing for the Renunciation of War as an Instrument of National Policy). Article 1 of the Pact contained a declaration by the states parties that they condemned “... a course to war for the solution of international controversies” and that they renounced the use of war as an “instrument of national policy”. In addition, Article 2 placed an obligation on the states parties to settle disputes by peaceful means rather than by resort to war. It is worthy of note that the Pact was agreed to by most of those states that had a true international presence during the 1920s and 30s. Indeed, before the beginning of the Second World War, Germany, Italy and Japan had all become parties. As history was to show, however, the Pact was not able to prevent state aggression and recourse to war. It should be noted, though, that it was the agreement of Germany and Japan to become parties that formed the basis of the prosecution of the major war criminals for crimes against peace (by waging aggressive war). Despite the well-intentioned aims of the Pact, it suffered a fundamental flaw in that it sought to prohibit ‘war’. Even by 1928 ‘war’ as a concept was becoming outmoded and was not seen as encompassing all uses of force by a state (i.e. when force was not accompanied by a declaration of war).

Those deficiencies were, at last, addressed in the UN Charter of 1945. Article 2(3) of the Charter obliges UN member states to resolve disputes by peaceful means, whilst article 2(4) obligates those states to

“... refrain in their relations from the threat or use of force against the territorial integrity or political independence of any state, or any other manner inconsistent with the Purposes of the United Nations”.

It is, then, the UN Charter that now sets out the fundamental principles on the use of force by the state. Article 2(4) is the key to international relations in the modern world, with its primary objective being the prevention of armed conflict. However, the Charter recognises that there cannot be an absolute prohibition on the use of force. Consequently, it allows (in Article 51) for the use of force in self-defence. Article 51 provides that:

“Nothing in the present Charter shall impair the inherent right of individual collective self-defence if an armed attack occurs against a Member of the United Nations, until the Security Council has taken measures necessary to maintain international peace and security. Measures taken by members in the exercise of this right of self-defence should be immediately reported to the Security Council and shall not in any way affect the authority and responsibility of the Security Council under the present Charter to take, at any time, such action as it deems necessary in order to maintain or restore international peace and security”.

This Article must, in fact, be read in conjunction with Articles 39-42 of the Charter. Those provisions allow for the Security Council to decide upon a range of measures, including the use of force by the military, in order to maintain or restore international peace and security or to address a threat to the peace, a breach of the peace or an act of aggression. It should be emphasised that the Security Council has measures short of force (by virtue of Article 41), as well as force itself (Article 42), available to it.

In addition to the right of self-defence and to the use of force mandated by the Security Council, there is a third circumstance where, arguably, force may be used as an exception to the general charter prohibition. That is in relation to so-called humanitarian intervention. That is to say, it may be argued that it can be lawful, in certain circumstances, for a state or states to intervene forcibly in another state in order to avert a humanitarian disaster and to protect the fundamental human rights of those in that state. Those who maintain that humanitarian intervention is not in violation of Article 2(4) rely, as one of their arguments, on the contention that such intervention is not directed against the territorial integrity or political independence of the state in question and is not, therefore, a violation. Opponents argue that whilst a state is able to, and indeed may even have a duty to, intervene and protect in such humanitarian circumstance, nevertheless, it must be recognised that

international law cannot be said to support unilateral intervention by the use of force. Perhaps a 'duty to protect' is indeed emerging as a customary norm, but it is hard to see how that duty may be carried out in the absence of Security Council authorisation.

A related, and even more contentious, issue is whether a state is able to use force on the territory of another state against a non-state actor (for instance, a terrorist organisation). The first issue is whether the application of the self-defence principle may be used against the non-state actor (such as an armed group), the second is the basis of the intervention within the other state's territory. That might be through the invitation of the territorial state (as in Yemen) or might be without invitation or in the face of opposition from the territorial state. It is that second scenario that causes most difficulty, with the principal argument used to justify such force that of self-defence. Thus, the US maintained the position of invoking self-defence in relation to its military operations against Al Qaeda in Afghanistan ; although self-defence was also the justification for the response to the Taliban regime, it should be noted that self-defence was invoked earlier in relation to Al Qaeda and in advance of alleging responsibility on the part of the Taliban government.

There are other examples where a state has relied on self-defence in response to the actions of non-state entities:

- Iran mounted that very argument following an attack against Kurdish groups in Iraq;
- Israel justified its attack on an Islamic Jihad training camp in Syria in 2003 on the basis of self-defence (given that the Jihad had allegedly carried out suicide bombings in Israel);
- Turkey relied on self-defence to attack Kurdish rebels in Iraq, following the death of 13 Turkish soldiers in 2007.

In order for self-defence to be relied upon in such circumstances in response to the actions of a non-state actor, it will need to be shown that an armed attack has occurred (i.e. in order to bring self-defence within Article 51). The question therefore arises whether the actions of a non-state actor may be regarded as an armed attack.

Some have taken the view that an armed attack, as envisaged by Article 51, must involve a state or, at least, must be in response to a group acting on behalf of the state. That indeed was the position taken by the International Court of Justice (ICJ) in its Advisory Opinion on the Legal Consequences of the Construction of a Wall in the Occupied Palestinian Territory . However, Article 51 itself does not mention the nature of the party who must be responsible for the armed attack that it envisages. In contrast, Articles such as Article 2(4) specifically do refer to states. On a natural reading of Article 51, therefore, it appears that self-defence

may be exercised by a state that is a member of the UN, but there is no qualification as to the nature of the entity that must be behind the armed attack. One would have to say that an 'armed attack', in Article 51 terms, may be said to include an attack by a non-state entity, such as a terrorist group, if that entity is operating from the territory of another state. However, not every use of force amounts to an armed attack; a certain threshold of intensity must be reached. Thus not every terrorist attack could possibly amount to an armed attack, just as a cross-border incursion by a state may not amount to an armed attack.

There is certainly support from the UN Security Council for the argument that Article 51 includes non-state actors. For instance, UNSCR 1368 (2001), which was adopted the day after 9/11 seems to endorse the right of self-defence in response to terrorist attacks (at least, when those attacks are of real magnitude). On that point, it is worth noting that, following 9/11, the US and UK only began the use of force against Afghanistan (on the basis that Al Qaeda was based there) in October. That, in itself, would amount to a reprisal, rather than self-defence. Save for reprisals under certain conditions in an armed conflict, reprisals are unlawful under international law. However, the argument relied upon was that future terrorist attacks were still be planned on Afghanistan territory and that, in such circumstances, anticipatory self-defence was justified as an attack was imminent.

In relation to anticipatory self-defence, it must be confined to responding to specific imminent attacks, rather than being a pre-emptive strike against a general threat. The principle of necessity means that such action in self-defence in the context of a non-state actor is only justifiable where the territorial state in which the terrorist group is based is unable or unwilling to prevent future attacks.

This highlights a real difficulty for a state considering anticipatory self-defence. If it uses force in such a manner so as to prevent an imminent attack, it will inevitably have to use that force in the territory of the other state where the terrorist group is based. But the mere fact that the other state, the so-called host state, has allowed terrorists to be on its soil, or that they are there as its sufferance, does not mean that the host state is itself an aggressor or an attacker in respect of the state that now regards itself as an imminent target. In the Nicaragua case (1986), the ICJ adopted the UN General Assembly's definition of aggression to determine when a state may be said to have committed an armed attack against another state by supporting an armed group. That case was an action brought by Nicaragua against the US in relation to the support given by the US to the Contra insurgency against the Nicaraguan government. That definition of aggression provides that an act of aggression is committed if a state sends "... armed bands, groups, irregulars or mercenaries, which carry out acts of armed force against another state of such gravity as to amount to the acts listed above". Those acts include invasion, attack and bombardment or substantial involvement

(by the host state) therein. The ICJ regarded that definition as being an accurate statement of customary international law. The net effect of all the above, then, is that if a state “hosts” a terrorist group, sends terrorists or is substantially involved in sending those terrorists or supporting them in their actions against another state, then it may be deemed to have itself committed an armed attack, justifying self-defence by the state targeted by the terrorist attack and by that state’s allies. If the host state has not crossed this threshold but has allowed its territory to be used for launching an attack, it will not have committed an attack itself, but would have committed a breach of international law by allowing its territory to be so used. In such circumstances, the targeted state may take defensive action against the terrorists, but should not aim that action at the host state in such a way as to undermine the political independence of that state’s government. If the host state is unable or unwilling to counter the threat of the terrorist group operating in its territory then, however, it may be said that it has lost at least some of its sovereign rights over part of its territory. That loss of sovereign rights is, of course, a temporary one. But, even then, it must be stressed that the host state itself is not a legitimate target.

For the avoidance of doubt, it must be emphasised that the primary and guiding principles on the use of force are necessity and proportionality. As already indicated, necessity will be satisfied as long as the attacking state has the intention to continue on attacking; but necessity, by its very nature, must be instant, overwhelming and, in effect, leave the defensive state with no other choice. As for proportionality, clearly the defensive response must be proportionate, yet, of course, capable of being effective as a defensive measure. In addition, it should be noted that the concept of necessity and proportionality are also key to the law of armed conflict as embodied in modern international humanitarian law.

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