

Amendments to the Crime of Aggression for Activation - A study in the light of the Kampala Review Conference -

التعديلات التي طرأت على جريمة العدوان من أجل التفعيل

- دراسة في ضوء تعديلات كمبالا -

Dr . Ismahane Aoun *

University of El-Manar, Tunis,,Tunisia

ismahane.aoun@yahoo.com

Wade Ndèye

University Of Genoa (Università Degli Studi Di Genova), Italy

mamacodou1@gmail.com

The date of Submission: 2025-01-15

The date of revision: 2025-07-06

date of publication: 10-07-2025

Abstract:

Aggression has always been one of mankind's greatest offenses perpetrated throughout history. One of the greatest crimes, however, has many consequences and should be carefully contemplated by the world and legislative measures aimed at curbing its occurrence implemented. There is currently ongoing confinement of suspense and the International Criminal Court determined the time fusion which was to be attended in its bills and these also included alterations on its 2010 political conference held in Kampala, Uganda.

The nations in every region was able to reach an accord and therefore alter the landscape of global outlaw justice system by extending the plan of service of the Court beyond 2018. It must be demonstrated that the Court is capable of dealing with such a serious offense by enforcing the recent laws that target violence and aggression.

key words: aggression crime, Kampala Amendments, Rome Statute, the ICC, international criminal justice...

المخلص:

جريمة العدوان تُعتبر من أبرز الجرائم التي ارتكبت ضد الإنسانية على مر العصور، ونظرا لما تخلفه هذه الجريمة من آثار مدمرة، فكان لازما على المجتمع الدولي التفكير والعمل على الحد منها، وبعد الانتظار تبنت المحكمة الجنائية الدولية تعريف العدوان كما تم تعديله خلال المؤتمر الدبلوماسي للمحكمة في كمبالا، أوغندا، عام 2010. نجحت الدول الأعضاء في تحقيق توافق مشترك وإجراء تعديلات على نظام العدالة الجنائية الدولية، وذلك من خلال الموافقة على تفعيل اختصاص المحكمة بعد عام 2018. وقد شكّل التطبيق العملي للنص القانوني المعدل الخاص بجريمة العدوان عنصراً رئيسياً في إثبات قدرة المحكمة على التصدي لهذه القضية الخطيرة باعتبارها جريمة دولية. الكلمات المفتاحية: جريمة العدوان، تعديلات كمبالا، نظام روما الأساسي، المحكمة الجنائية الدولية، العدالة الجنائية الدولية...

* Corresponding Author: Aoun Ismahane

Introduction:

Beginning with the Association of Nations, the transnational community was encouraged to counter the wrong doing of hostility - which was initially prohibited - relationships around forceful wars, which increase riches to the winning nations, but notwithstanding that, their impacts on a total mankind are torment, and to that arrive, the Assembled Countries's part towards exertions which fills in as focal point to abridge these wars. Help Extend criminalized forcefulness in a 1923 arrange its collective without definition.

On October 24, 1945, a milestone in transnational law was an organization of the United Nations. The effort to define aggression continued. The United Nations Charter established the principle of the non-use of force and the non-recourse to force in international relations. The Korean War brought a realization in the international community that there needed to be an international legal definition of aggression, and the Soviet Union had brought such a definition to the UN. In 1953, the UN General Assembly established a commission to address aggressive hostility, but it proved to lack a comprehensive understanding of the issue.

On December 14, 1974, the Genital Acts Paradigma was authorized by the Joined Countries Gathering, amid its 29th session, wherein Resolution 3314, a detailed description of acts of aggression. Anyway, this assurance did not define the misdeed of animosity or grow person transnational malevolence duty. In 1967, the commission was reconfigured and began to examine this subject from multiple point of view.

According to Article 5(2) of the Rome Statute, the Court has the power to impose punishments for crimes committed by the enemies provided to the rules of construction aligned with those in the provisions of articles 121 and 123 of the Rome Statute deal with certain issues, but so far, the classification of enemy crimes – determined by the Committee of the Whole at the Rome Conference, which established the ICC – remains unclear.

There is currently a Working Group focused on addressing Violent Crimes. Resolution Res.Rc6, which established the definitions of aggression, was adopted on June 10, 2010, during the Kampala Conference in Uganda, thanks to the efforts of this group. This resolution was informed by UN General Assembly Resolution No. 3314. Although there was interest from the international community regarding this crime, defining it proved challenging, and even after the Kampala Conference, significant difficulties persisted, particularly concerning its practical application and enforcement. This situation underscores the ongoing problematic involved:

How did the Kampala Amendment influence the final characterization of the illegal aspects of the Aggression Pact?

To resolve the earlier issue, we explored the matter through two distinct parts outlined below:

THE FIRST CHAPTER:

Elements of the aggression crime defined by the States Parties during the Kampala Conference

It is widely recognized that the interplay of these elements forms the fundamental aspects of a serious crime. Since each crime is unique, it is essential to identify its individual components. Care must be taken when discussing the specific elements associated with violent offenses. This is the reason I was tasked with evaluating it, primarily based on the amendments from the Kampala Conference, which were derived from an analysis of Article 8 bis of the International Criminal Court Statute.

1. The material element

A- The state's behavior (aggressive act)

Violent actions are considered essential and crucial components of conflicts. Indeed, during the Assembly of Member Nations, certain representatives claimed that there is an

inherent link between acts of aggression and their repudiation. The term "act of aggression" was referenced extensively at the Kampala Conference in various documents generated by the Assembly of States Parties to the Court.⁽¹⁾

When one state uses force against another, it is deemed an act of aggression, contravening fundamental tenets of transnational law, particularly when such actions are not sanctioned by these legal frameworks.⁽²⁾ In the context of passage 1, Article 8 bis 2 defines an "act of aggression" as any conflict that contradicts the United Nations Charter, specifically involving a state employing armed force to undermine the political independence, territorial integrity, or sovereignty of another state.⁽³⁾

The introduction was followed by a compilation of actions that, under Common Assembly Resolution No.29/3314, adopted on December 14, 1974, are classified as aggression acts, regardless of whether they include a declaration of war.⁽⁴⁾ Aggression act is regarded as a necessary condition for the perpetration of the offense of aggression. Resolution 3314 was put forward as a foundational reference and, after extensive deliberation, garnered widespread acceptance among nations.

B- The criminal activity (individual behavior)

In a marauder state, ordinary citizens do not engage in acts of aggression. Instead, it is those in positions of authority who orchestrate a nation's internal or external operations, whether through incitement or execution, that are deemed the offenders.

According to the initial section of Article 8 bis of the Rome Statute, aggression is characterized as "An individual who has the ability to manage or influence a country's political or military actions, or who initiates, approves, or carries out a hostile or aggressive act." ⁽⁵⁾

Resolution 3314 indicates that an individual can be deemed guilty of a crime if they engage in organizing, planning, initiating, or executing an act that conveys a threatening atmosphere. Significant differences have emerged in the interpretation of the elements necessary for defining the offense, which have been discussed in subsequent corporate dialogues and earlier panels. These developments are linked to the identification of the mastermind responsible for this heinous criminal act.⁽⁶⁾

The initial decision to initiate an invasion or engage in an act of aggression should rest with the highest-ranking military official and the nation's leader—be it the Lord, the President of the Republic, the Chief, the supreme commander of the armed forces, or another individual

(1)- Between January 29 and February 1, 2007, the Working Bunch on the Wrongdoing of Hostility assembled at the Liechtenstein Founded. Amid the assembly, there was an energetic talk about almost whether an forceful act that's acknowledged by a state ought to be classified concurring to its reason, nature, and result. Much appreciated to its utilize within the Nuremburg trials, the concept of "forceful war" gotten impressive acknowledgment in terms of barefaced breaches of the Joined together Countries Constitution, see Robert Heinsch, The Crime of Aggression After Kampala: Success or Burden for the Future?, *Goettingen Journal of International Law*, volume 2, issue 2, 2010, pp.713-743.

(2)- Michael Wood, International Law and the Use of Force: What Happens in Practice?, *Indian Journal of International Law*, volume 53, 2013, pp.345-366.

(3)- See *Resolution RC/Res.6*, adopted at the 13th plenary meeting, on 11 June 2010, by consensus.
- United Nations General Assembly *Resolution 3314 (XXIX)* (Definition of Aggression) was adopted by the [United Nations General Assembly](#) on December 14th, 1974 as a non-binding recommendation to the [United Nations Security Council](#) on the definition it should use for the [crime of aggression](#).

(4)- See For more details, see *General Assembly Resolution 3314 (XXIX)*.

(5)- See the first paragraph of Article 8 bis of the Statute of the International Criminal Court.

(6)- Jennifer Trahan, Revisiting the History of the Crime of Aggression in Light of Russia's Invasion of Ukraine, *Insights Journal*, volume 26, issue 2, 2022, pp.1-7.

designated by the Constitution. This authority is essential for ensuring that such significant actions are taken with the utmost consideration and responsibility.⁽¹⁾

It is essential to recognize that, unlike domestic criminal legislation, which initiates or attempts to initiate first, criminal liability for acts of violence arises from the processes of drug use and association. Essentially, this offense is the responsibility of those who oversee the discourse once it has commenced.⁽²⁾

2. Emerging Aspects of the Offense of Aggression

A- Hostile endeavors carried out under the guise of sovereign authority

The terms "leaders" or "organizers" in the Working Group's report on the Crime of Aggression refer to those who engage in aggressive acts. Additionally, the Kampala document provides a clear definition of this offense, highlighting that acts of aggression can only be orchestrated, planned, attempted, or executed by individuals who possess the authority to direct or manage a state's military or political actions. This indicates that aggression constitutes a crime against authority, as these definitions clearly illustrate.

An individual who may be held criminally responsible for acts of aggression must possess control over the state's political or military operations, and this authority must be substantiated, as outlined in Article 8 bis of the Rome Statute. For example, in a monarchy, the monarch may act as a figurehead but lacks actual authority over the state's political and military endeavors. Consequently, it can be asserted that the political structures of various nations significantly impact their approaches to addressing and prosecuting those responsible for acts of aggression..

B- The aggressive act reaching a certain level of gravity and severity

The idea of strong nations entering into conflict is fundamental to the study of warfare,⁽³⁾ It is crucial to evaluate the characteristics of the actions undertaken and to ascertain the presence of any hostility. In this context, a criminal court will consider the seriousness of the offense, focusing on legal rather than political factors. Regardless of whether the actions are violent, the final wording of the Rome Statute highlights the importance of assessing the context and consistency of the application of violent actions, thereby distinguishing hostile acts from other types of behavior.⁽⁴⁾

To emphasize the importance of focusing the criminal judge's attention solely on genuine offenses, it is essential to distinguish between acts of hostility and other similar behaviors. Additionally, minor disturbances that disrupt peaceful and friendly relations between nations and violate international law should not be classified as significant actions. Moreover, acts of hostility represent some of the most prominent and severe offenses that the International Criminal Court (ICC) was established to tackle.

THE SECOND CHAPTER:

Distinctive Aspects of the Court's Jurisdiction Regarding the Crime of Aggression Following the Kampala Amendments

At the conference in Rome, attendees participated in dialogues concerning the interplay between the Security Committee's regulations and the operational structure of the Universal Criminal Court, particularly in the context of unlawful acts of war. These discussions

(1)- Avdic, Faruk H., The Leadership Requirement of the Crime of Aggression under the Rome Statute of the International Criminal Court, *Journal of Liberty and International Affairs*, volume 7, issue 3, 2021, pp.157-178.

(2)- See Nikola Hajdin, *Individual Criminal Responsibility for the Crime of Aggression: Tracking Down the Leaders of a State*, Master Thesis, Lund University, Sweden, 2015, pp.1-67.

(3)- Michael Wood, Op.Cit., p.345 and beyond.

(4)- Véronique Michèle Metangmo, *le crime d'agression: recherche sur l'originalité d'un crime a la croisée du droit international pénal et du droit international du maintien de la paix*, thèse de Doctorat, université Lille2, 2012, p.335.

extended into the subsequent Preparatory Committee meeting following the conference. The established rules and expectations regarding accountability and the oversight of general criminal courts in addressing violent crimes were formulated through consensus among the drafters of the Rome Statute variant.

Handling relationships between the ICC and The SC for Aggression crime

A- The first decision about taking strong action by the Security Council.

Recently, the determination of whether transnational information constitutes an aggressive act that threatens global peace falls solely within the purview of the Security Council, which is the only authority capable of making such assessments.⁽¹⁾ This authority is grounded in Article 39 of the United Nations Charter, which serves as the basis for the Council's decisions.

During a study session held in Kampala, the participating countries were categorized into three distinct groups. The first group comprised the five permanent members of the Security Council—China, France, Russia, the United States, and the United Kingdom—along with their allies, who advocated for granting the Security Council exclusive authority to evaluate situations related to aggression.

The third group consists of a diverse array of nations that advocated for the restriction of the Security Council's aggressive actions and authoritarian governance, which is not the only perspective on aggression. This alternative coalition includes several Latin American countries alongside a handful of European states. Ultimately, a consensus was reached regarding the Security Council's interpretation of aggression.⁽²⁾

B- Cases of Aggression Without Prior Authorization by the Security Council

The designations raised theoretical inquiries regarding the lack of prior recognition of hostile circumstances. Two potential outcomes or trends emerged from this discussion. A significant consensus among most Security Council members is that the court should refrain from initiating an investigation if there is no evidence of aggression or if the Security Chamber concludes that hostility is absent.

Conversely, proponents of the court's independence and fairness argue that the court should continue its inquiry if it deems it necessary, even in the absence of evidence indicating hostile intent or negative consequences.⁽³⁾

According to Article 15, paragraph 2 of the updated Crime of Aggression, the court retains the authority to investigate acts of aggression, irrespective of the Security Council's role in defining the context of such aggressive actions. Furthermore, the Office of the Prosecutor may initiate an inquiry into the crime of aggression if, after notifying the UN Secretary-General, the Security Council fails to determine within six months whether the aggressive conduct occurred..⁽⁴⁾

In a unique context, the question arises as to whether the Open Prosecutor is able to document a criminal investigation within a six-month timeframe or prior to the Security Committee's determination that the alleged aggressive conduct was ineffective..

According to our explanation, the Open Prosecutor is prohibited from initiating a criminal investigation that violates the provisions outlined in Article 15 bis, paragraph seven. Additionally, the Public Prosecutor is not permitted to notify the Court's Administration in

(1)- Monica Lourdes de la Serna Galvan, Interpretation of Article 39 of the UN Charter (Threats to peace) by the Security Council, *Mexican yearbook of international law*, volume 11, 2011, pp.147-185.

(2)- Elizabeth Wilmshurst, *Definition of Aggression*, United Nations Audiovisual Library of International Law, 2008, pp.1-4.

(3)- Véronique Michèle Metangmo, Op.Cit p.61 .

(4)- The eighth paragraph of Article 15 bis relating to the amendments to the crime of aggression at the Rome Statute Review Conference in Kampala in 2010.

writing of his intention to escalate a criminal investigation to a felony unless there is a guarantee that a violent act has occurred.⁽¹⁾

2. Rules about starting and handling court cases for the crime of aggression

Aggression is often regarded as a unique crime, leading to extensive discussions about how the Court should exercise its authority in this area and how individuals can be held accountable for such actions. Ultimately, the drafters of the amendments to the International Criminal Court Statute established provisions that govern the ICC's responsibilities concerning the management of conflicts and the criteria for individual liability, while also clarifying the powers of the Security Council.

A- Ratione Temporis over the crime of aggression based on the Kampala Amendments

The member of the delegates dialogue expressed concerns regarding the court's management of worldly affairs. It was agreed during the discussions that the decisions pertaining to this misconduct would not be relevant in a historical context. Consequently, the decisions documented in the record, along with the amendments, were subject to the general consensus that textbooks do not apply to real-world situations. ⁽²⁾

Articles 15 bis and 15 bis 2 of the Kampala amendments introduce specific outcomes: the amendments can only be applied to all state parties if they have been accepted by at least 30 state parties and ratified by a conference that aligns with the ICC's established Composition 121. Palestine met these conditions by ratifying the amendments and becoming a member of the court.

B- The referral system after Kampala amendments

- The referral by a state party

Article 15 bis of the International Criminal Court Statute stipulates that the Court is authorized to take measures regarding the crime of aggression in accordance with article 13, sections (a) and (c), and in alignment with the established regulations of this document. "

Furthermore, article 13, section (a) of the Rome Statute allows a state party to notify the Prosecutor of any situation they suspect involves a crime related to conflict. In such cases, the Prosecutor has the authority to initiate an investigation to assess whether there are grounds to issue a warrant for the prosecution of one or more individuals for the crime of aggression..⁽³⁾

- The referral by The Security Council

Article 13, passage "b" of the Statute indicates that the Security Council has the authority to refer cases involving acts of hostility or other transnational offenses that fall within the Court's jurisdiction, provided they adhere to Chapter Seven of the UN Charter.⁽⁴⁾ Consequently, one of the three main avenues through which the International Criminal Court adjudicates cases is via referrals from the Security Council.⁽⁵⁾

(1)- See Carrie McDougall, Expanding the ICC's Jurisdiction Over the Crime of Aggression, *Journal of International Criminal Justice*, 2024, pp.1-21.

(2)- See Isabelle Hassfurth, Accountability for the Crime of Aggression against Ukraine: An Immediate Call to Reform the ICC's Jurisdiction, 2024, on: <https://verfassungsblog.de/aggression-ukraine/>

(3)- See Dapo Akande et al., Treaty Law and ICC Jurisdiction over the Crime of Aggression, *European Journal of International Law*, Volume 29, Issue 3, August 2018, pp.939-959.

- With regard to a State that is not a party to the Statute, it cannot exercise jurisdiction in relation to the crime of aggression when it is committed by nationals of that State or committed on its territory, Nikolas Stürchler, The Activation of the Crime of Aggression in Perspective, 2018, on: <https://www.ejiltalk.org/the-activation-of-the-crime-of-aggression-in-perspective/>

(4)- Lawrence Moss, The UN Security Council and the International Criminal Court: Towards a More Principled Relationship, *International Policy Analysis*, 2012, pp.1-15.

(5)- See Jess Gifkins, The UN Security Council's First Referral to the ICC, Oxford University Press, 2023, pp.144-164.

It is important to highlight that every nation that is a signatory to the Statute of the International Criminal Court is under the authority of the Security Council.⁽¹⁾ Countries that are not signatories argue that they are not bound by the International Criminal Court, asserting that the Security Council is maintaining international peace and security in accordance with its mandate under the UN Charter by fulfilling its oversight role.⁽²⁾

- The referral by the prosecutor

The Rome Statute, along with the reading material on Article 15 bis, grants the Prosecutor of the Universal Criminal Court the authority to initiate an examination on their own accord regarding a case. This provision enables the Prosecutor to pursue an investigation following a reference from a state, thereby establishing the framework for the application of Article 13, section "C," which pertains to the offense of aggression.⁽³⁾

The Statute of the Universal Criminal Court indicates that, in accordance with Chapter Seven of the UN Charter, the Security Council has the authority to refer situations in any nation to the Court if it determines that these situations pose a threat to international peace and security.

The Court is not obligated to violate Article 12 of the Statute, which pertains to the consent of non-party states to exercise jurisdiction, when the Security Council refers a case to the Prosecutor under Chapter VII. It is crucial to note that the responsibilities of the Security Council encompass all states that have ratified the regulations of the International Criminal Court.

Conclusion:

- ✓ To strengthen international criminal justice, combat impunity, and ensure accountability for the most serious international crimes, it was decided to expand the court's jurisdiction to include issues related to violence or hostility. A significant resolution regarding the issue of violence was reached in 2010 when the International Criminal Court exercised its jurisdiction in this matter. Following our investigation, we arrived at several findings, which are summarized and explained below:
- ✓ The Kampala depiction of aggression is exact and careful, combining the aggression offence as a regular person's signal in light of the state's actions, the gravity of the offense necessitates the development of strategies and provisions for enacting a violent act that contravenes legal statutes..
- ✓ Animosity or aggression is different from other international wrongdoings because it involves the behavior of the person responsible. This means that the person needs to have real control and authority over military and political activity inside the state.
- ✓ Aggression is different from other international crimes because it needs the person who did it to have some level of authority, which incorporate real control over military and political activity inside the state. Based on the findings, we suggest the following recommendations:
- ✓ In arrange to anticipate the court from having as well few cases including aggression and from falling flat to rebuff those who commit the wrongdoing, it is fundamental to do absent with the requirement that both states engaged in the debate recognize the court's jurisdiction and the state party's ability to submit a prior affirmation to the recorder to deny ward.

(1)- See Monique Cormier, *The UN Security Council, the ICC and Nationals of Non-States Parties*, Cambridge University Press, 2020.

(2)- For details see Hemi Mistry and Deborah Ruiz Verduzco, *The UN Security Council and the International Criminal Court*, International Law Meeting Summary, with Parliamentarians for Global Action, London, 2012, pp.1-22.

(3)- Dapo Akande, *Aggression Debate — How Should the ICC Investigate and ...*, on: <https://iccforum.com/aggression>

- ✓ In arrange to anticipate the court from having as well few cases including aggression and from falling flat to rebuff those who commit the wrongdoing, it is fundamental to be absent, the two states engaged in the debate must reach an agreement on the court's location, and the state has the option to submit an earlier statement to contest the court's authority.
- ✓ Rather than the Security Council, which is ruled by the vagrancies of its boundless part nations, a determination looking at the state of aggression ought to be supplanted by one issued by the UN General Assembly, which has the foremost individuals and no advantage over any other.

Bibliography list:

Books:

- (1)- Elizabeth Wilmshurst, Definition of Aggression, *United Nations Audiovisual Library of International Law*, 2008.
- (2)- Jess Gifkins, *The UN Security Council's First Referral to the ICC*, Oxford University Press, 2023.
- (3)- Lawrence Moss, The UN Security Council and the International Criminal Court: Towards a More Principled Relationship, *International Policy Analysis*, 2012.
- (4)- Monique Cormier, *The UN Security Council, the ICC and Nationals of Non-States Parties*, Cambridge University Press, 2020.

Dissertations and theses:

- (1)- Nikola Hajdin, Individual Criminal Responsibility for the Crime of Aggression: Tracking Down the Leaders of a State, Master Thesis, Lund University, Sweden, 2015.
- (2)- Véronique Michèle Metangmo, le crime d'agression: recherche sur l'originalité d'un crime a la croisée du droit international pénal et du droit international du maintien de la paix, thèse de Doctorat, université Lille 2, 2012.

Articles:

- (1)- Avdic, Faruk H., The Leadership Requirement of the Crime of Aggression under the Rome Statute of the International Criminal Court, *Journal of Liberty and International Affairs*, volume 7, issue 3, 2021.
- (2)- Carrie McDougall, Expanding the ICC's Jurisdiction Over the Crime of Aggression, *Journal of International Criminal Justice*, 2024.
- (3)- Dapo Akande et al., Treaty Law and ICC Jurisdiction over the Crime of Aggression, *European Journal of International Law*, Volume 29, Issue 3, August 2018.
- (4)- Jennifer Trahan, Revisiting the History of the Crime of Aggression in Light of Russia's Invasion of Ukraine, *Insights Journal*, volume 26, issue 2, 2022.
- (5)- Michael Wood, International Law and the Use of Force: What Happens in Practice?, *Indian Journal of International Law*, volume 53, 2013.
- (6)- Monica Lourdes de la Serna Galvan, Interpretation of Article 39 of the UN Charter (Threats to peace) by the Security Council, *Mexican yearbook of international law*, volume 11, 2011.
- (7)- Robert Heinsch, The Crime of Aggression After Kampala: Success or Burden for the Future?, *Goettingen Journal of International Law*, volume 2, issue 2, 2010.

International conventions and treaties:

- (1)- Resolution RC/Res.6, adopted at the 13th plenary meeting, on 11 June 2010, by consensus.
- (2)- United Nations General Assembly Resolution 3314 (XXIX) (Definition of Aggression) was adopted by the United Nations General Assembly on December 14th, 1974 as a non-binding recommendation to the United Nations Security Council on the definition it should use for the crime of aggression.
- (3)- General Assembly Resolution 3314 (XXIX).

(4)- Statute of the International Criminal Court.

(5)- The amendments to the crime of aggression at the Rome Statute Review Conference in Kampala in 2010.

Seminars:

(1)- Hemi Mistry and Deborah Ruiz Verduzco, The UN Security Council and the International Criminal Court, International Law Meeting Summary, with Parliamentarians for Global Action, London, 2012.

Websites:

(1)- Dapo Akande, Aggression Debate — How Should the ICC Investigate and ..., on: <https://iccforum.com/aggression>

(2)- Isabelle Hassfurth, Accountability for the Crime of Aggression against Ukraine: An Immediate Call to Reform the ICC's Jurisdiction, 2024, on:

<https://verfassungsblog.de/aggression-ukraine/>

(3)- Nikolas Stürchler, The Activation of the Crime of Aggression in Perspective, 2018, on:

<https://www.ejiltalk.org/the-activation-of-the-crime-of-aggression-in-perspective/>