

Serbia's Lobbying to Oppose the Srebrenica Genocide Resolution in the UN General Assembly and the Admission of Kosovo to the Council of Europe

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Introduction

The first half of 2024 was a very intense and difficult diplomatic period for Serbia, one could say the most strenuous since the Kosovo Advisory Opinion proceedings before the International Court of Justice (2008–2010). Firstly, Kosovo, which Serbia continues to treat as its autonomous province, was on the verge of joining the Council of Europe, the second most significant organization in Europe after the European Union. Secondly, the UN General Assembly voted on a resolution on Srebrenica, classifying the massacre as genocide—a designation Serbia does not recognize. This article provides detailed insights into the specifics, successes and repercussions of Serbian lobbying efforts at both regional and international levels, highlighting how deeply politics can polarize processes within international organizations. The extent and success of Serbian lobbying may signal its growing influence on the international stage, yet the decisions of states to block or endorse the membership of international organizations or passing of laws also underscore the epistemological divisions within the international community.

1. Lobbying in international law

Before proceeding to outline the specifics of the two analyzed lobbying instances, it is worth discussing what international law says about lobbying and whether states are allowed to promote the values they cherish most or their version of historical events, even if this contravenes basic facts or the positions taken by other states. Relatedly, does international law permit lobbying against important issues such as admission to an international organization or the recognition of past wrongs at the global level?

As a rule, general international law does not regulate lobbying, just as it does not regulate secession. Domestic statutes, as in the case of secession, may permit it and regulate the process or restrict and even prohibit it, but this has no bearing on international law.¹ For instance, the United States permits lobbying and regulates it through the Lobbying Disclosure Act (LDA) of 1995. This act aims to provide transparency in the activities of lobbyists and lobbying firms by requiring them to register and report their activities.² In China, formal lobbying as practiced in many Western democracies is not permitted. The government maintains tight control over political activities, and attempts to influence legislation or policy outside official channels can be viewed with suspicion and may lead to legal consequences.³ Similarly, the new controversial Georgian draft law requires nongovernmental groups and media outlets that receive more than 20 percent of their funding from foreign sources to register as “organizations carrying the interests of foreign power”. The proposal termed “Russian law”, was vetoed by the pro-EU president Salome Zourabichvili, yet it is a symbolic gesture as the bill will return to the parliament.⁴ Lobbying, even if it can hardly occur in this context, is deemed domestically prohibited when it violates principles and values valid in a country and the rights of other people, especially when there exists explicit law to this end. For instance, Article 13 of the Constitution of Poland restricts political pluralism by prohibiting the ‘political parties and other organizations whose programmes are based upon totalitarian methods and the modes of activity of nazism, fascism and communism, as well as

¹ The majority of states’ constitutions by protecting territorial integrity practically forbid secession. See Venice Commission, ‘Self-determination and secession in constitutional law’, CDL-INF (2000) 2. Consult art. 47 of the Constitution of Ethiopia, art. 113 of the Constitution of Saint Kitts and Nevis, and art. 75 of the Constitution of Uzbekistan, which permit/ regulate the process of secession.

² Lobbying Disclosure Act of 1995, Public Law No: 104-65.

³ D. Huang, M. Chen, *Business Lobbying within the Party-State: Embedding Lobbying and Political Co-optation in China*, China Journal 2020, no. 83.

⁴ The text of the draft law “On Transparency of Foreign Influence” is available under <https://rustavi2.ge/en/news/281656>.

those whose programmes or activities sanction racial or national hatred (...).⁵ Consequently, the propagation of these ideologies and pursuit of their direct or indirect recognition would be proscribed and could hardly be squared with the freedoms of assembly, opinion and thought.⁶

International law, on its end, may refer to lobbying and seek to inform its processes. For example, Article 12 of the United Nations Convention against Corruption encourages countries to enhance transparency in private sector transactions, which can encompass lobbying activities.⁷ International law may also prohibit lobbying implicitly or outright. Article 20 of the International Covenant on Civil and Political Rights prohibits war propaganda and adds that 'any advocacy of national, racial or religious hatred that constitutes incitement to discrimination, hostility or violence shall be prohibited by law'.⁸ Similarly, Article 3 of the Genocide Convention states that, in addition to genocide, conspiracy to commit genocide and direct and public incitement to commit genocide are punishable offenses.⁹ It might be doubtful whether the advocacy or propaganda to commit illegal acts fits within the generic meaning of lobbying, which is typically understood as influencing the actions or decisions of the judiciary, government, or lawmakers, not the general public. Yet, it is not inconceivable, especially in inter-state relations, that lobbying could take forms that overlap with these prohibited activities.¹⁰

⁵ The Constitution of the Republic of Poland (1997) Dziennik Ustaw No. 78, Item 483, Article 13. See also Article 256 of the Polish Penal Code (1997), which penalizes promoting a fascist or other totalitarian system with up to 3 years of imprisonment. Dziennik Ustaw No. 88, Item 553.

⁶ See the restrictions recognized in Articles 9(2), 10(2) and 11(2) of the Convention for the Protection of Human Rights and Fundamental Freedoms (4 Nov. 1950) CETS 5.

⁷ United Nations Convention against Corruption (31 Oct. 2003) 2349 UNTS 41, Article 12. The EU has a voluntary transparency register for organizations and self-employed individuals engaged in influencing the EU institutions. The Organisation for Economic Co-operation and Development (OECD) has issued guidelines on lobbying, advocating for transparency, integrity, and fairness. These guidelines recommend that countries implement clear rules for lobbying, ensure public access to information about lobbying activities, and promote ethical conduct among lobbyists and public officials.

⁸ International Covenant on Civil and Political Rights (16 Dec. 1966) 999 UNTS 171, Article 20.

⁹ Convention on the Prevention and Punishment of the Crime of Genocide (9 Dec. 1948) 78 UNTS 276, Article 3.

¹⁰ During World War II, Nazi Germany not only orchestrated the Holocaust but also persuaded and coerced its allies and occupied territories to participate in the genocide against Jews, Roma, and other targeted groups. Countries such as Hungary, Romania, and Croatia, under the influence or direct control of Nazi Germany, implemented their own genocidal policies or assisted in the deportation of Jews to concentration and extermination camps.

Returning to the question of the lawfulness of lobbying against admission to an international organization or adopting a law, it follows that international law remains neutral on these actions, especially since they are not *per se* prohibited by international law. More specifically, since international law neither grants a right to statehood and regulates the process of creation of states nor imposes an obligation to recognize a statehood claimant,¹¹ Serbia is a fortiori allowed to politically and legally oppose Kosovo's admission to international organizations, unless an agreement to this end has been reached.¹² International law also does not bar states from holding different opinions and advocating for their vital national interests, as long as these actions comply with international law. As a result, Serbia is entitled to present its own view on history and lob against any document, both at regional and global levels, classifying the Srebrenica massacre as a genocide. An intriguing situation arises when an international law establishes certain facts and forbids questioning them afterward, as with the UN General Assembly resolution on Srebrenica, which calls for the non-denial of the Srebrenica genocide. Irrespective of its non-binding nature, it will not bind Serbia as a prime objector or states voting against it. However, it will likely bar states supporting the resolution from denying genocide in the future based on the principle of estoppel.¹³

Even if international law neither explicitly permits nor bans lawful positive and negative lobbying, it may contain presumptions or guidelines that support or disfavor lobbying in certain instances.¹⁴ For instance, lobbying against admission to an international organization might be seen as an unfriendly act, potentially

¹¹ 'A declaration of independence (...) constitutes a purely internal legal act and not an international legal act.' See ICJ, *Kosovo Advisory Opinion*, Public sitting held on Friday 4 December 2009, CR 2009/28, 27 [31] (argument of Jean d'Aspremont on behalf of Burundi, emphasis in original); 'A declaration [of independence] issued by persons within a State is a collection of words writ in water (...) What matters is what is done subsequently, especially the reaction of the international community.' See ICJ, *Kosovo Advisory Opinion*, Public sitting held on Thursday 10 December 2009, CR 2009/32, 47 [6] (argument of James Crawford on behalf of the United Kingdom).

¹² The 2023 Ohrid Agreement, for instance, provided for the mutual recognition of the territorial integrity of Serbia and Kosovo and the non-obstruction of Kosovo's membership in international organizations. See the Agreement on the path to normalisation between Kosovo and Serbia, https://www.eeas.europa.eu/eeas/belgrade-pristina-dialogue-agreement-path-normalisation-between-kosovo-and-serbia_en.

¹³ Cf. UNSC Res. 955 on Rwanda UN Doc. S/RES/955 (8 Nov. 1994) and UNGA Res. 234 on the International Day of Reflection on the 1994 Genocide in Rwanda UN, which was adopted without a vote. UN Doc. A/RES/58/234 (23 Dec. 2003).

¹⁴ See A. Peters, *Does Kosovo Lie in the Lotus-Land of Freedom?*, Leiden Journal of International Law 2011, no. 99 (argues that in addition to prohibitions and permissions, international law can offer a middle ground on secession, encompassing various recommendations and guidelines).

contravening the UN Friendly Relations Declaration.¹⁵ Similarly, lobbying against the enactment of a law favorable to another state might be viewed as a violation of the principles of self-determination, non-intervention, sovereign equality, and peaceful resolution of disputes as enshrined in the UN Charter.¹⁶ However, international law is often shaped by powerful states, with realism being a dominant perspective. This approach tends to prioritize state interests, sometimes at the expense of ethics and morality.

2. Background to the Challenging Events

The UN General Assembly resolution on Srebrenica was sponsored by Rwanda and Germany. Despite Germany's active involvement in international genocide commemoration activities, particularly in Holocaust remembrance and preventing genocide, one could interpret the initiative through a broader political lens. Notably, the resolution on Srebrenica doesn't coincide with a round anniversary—it has been 29 years since the massacre. It could thus be perhaps seen in light of Serbia's preceding efforts to organize a debate in the UN Security Council regarding the 25th anniversary of the NATO air campaign against the Federal Republic of Yugoslavia, Serbia's predecessor. Russia, Serbia's primary ally alongside China in the UN, orchestrated this debate. However, the effort failed as only Russia, China, and Algeria voted to include it on the agenda under 'Threats to international peace and security,' while 12 other Council Members abstained.¹⁷ The debate would represent a significant initiative at the UN potentially providing moral and political satisfaction for Serbia, aiming to declare the illegality of the 1999 NATO air strikes. This effort follows a series of unsuccessful attempts in the International Court of Justice (ICJ) against participating states, hindered by Serbia's UN membership only from 2000 onwards under Article 35(1) of the ICJ Statute.¹⁸ France, while not ruling out future discussion in an Arria Formula meeting, did not commit to holding a debate on the issue, leading Serbia to express 'disappointment'.¹⁹

The resolution on Srebrenica is not, in fact, the first of its kind. In 2009, the European Parliament adopted a resolution on the genocide in Srebrenica,

¹⁵ Declaration on Principles of International Law concerning Friendly Relations and Cooperation among States in accordance with the Charter of the United Nations (24 Oct. 1970) UN Doc. A/RES/2625(XXV).

¹⁶ UN Charter, preamble, chapters I and VI.

¹⁷ UN Doc. S/PV.9587 (25 Mar. 2024).

¹⁸ See, among others, *Legality of Use of Force (Serbia and Montenegro v. Belgium)*, Preliminary Objections Judgement, ICJ Rep (2004) para 91.

¹⁹ UN Doc. S/PV.9587, *op. cit.*, 2/6 and 3/6 (France).

urging the Council, Commission, and Western Balkan states to annually commemorate July 11th as the day of the massacre.²⁰ However, the UN resolution aims to elevate July 11th to the status of the world's Remembrance Day for the Srebrenica *genocide*, a move that has heightened tensions. This proposal has sparked controversy, particularly because there are numerous massacres globally that could similarly be characterized as genocide by the UN. Furthermore, a similar resolution was rejected by the UN Security Council in 2015 due to a veto from Russia.²¹ Besides the discussed resolution, the General Assembly was able to adopt only two country-targeting resolutions: a) commemorating the Rwandan genocide, which was first adopted in 2003 without objections and subsequently confirmed through the silence procedure²² and b) establishing January 27th as the International Day of Commemoration in Memory of the Victims of the Holocaust in 2005, also adopted by consensus.²³

The events leading to the consideration of Kosovo's admission to the Council of Europe by the Committee of Ministers were not as coincidental as those in the UN procedure. The lead-up to the crucial decision of the Committee of Ministers can be seen as a natural progression of Kosovo's membership application that commenced on the 12th of May 2022, when it officially applied for membership in the Council of Europe.²⁴ Almost a year later, on the 24th of April 2023, the Committee of Ministers turned to the Parliamentary Assembly to consult Kosovo's accession, in pursuance of Statutory Resolution (51)30.²⁵ On the 28th of March 2024, Dora Bakoyannis, Rapporteur of the Committee on Political Affairs and Democracy of the Parliamentary Assembly of the Council of Europe (PACE) prepared a report acknowledging Kosovo's progress in human rights, democracy, and the

²⁰ European Parliament resolution of 15 January 2009 on Srebrenica, OJ C 46 E (24 Feb. 2010) 111.

²¹ See Draft resolution S/2015/508, which gained 10 votes in favour, four abstentions (Angola, China, Nigeria and Venezuela) and the Russian Federation vote against. The inability of the SC to adopt the resolution is frequently lamented, especially in the EU. See European Parliament resolution of 9 July 2015 on the Srebrenica Commemoration (2015/2747(RSP)) OJ C 265 (11 Aug. 2017) 142.

²² UN Doc. A/RES/58/234, *op. cit.*, and UN Doc. A/RES/74/273 (20 Apr. 2020).

²³ UN Doc. A/RES/60/7 (1 Nov. 2005).

²⁴ A letter by Ms Donika Gërvalla-Schwarz, Deputy Prime Minister and Minister of Foreign Affairs and Diaspora of Kosovo, attached to 'Current political questions – Document distributed at the request of the Chair of the Ministers' Deputies' (13 May 2022), DD(2022)200.

²⁵ PACE, Application by Kosovo for membership of the Council of Europe, Opinion 302 (2024)1, Provisional version.

rule of law. The report stated that 'Kosovo's aspirations to join the Council of Europe should be met with a positive response,' yet emphasized that 'this would not be the end but the beginning of a process' due to some outstanding important issues.²⁶ On the 16th of April 2024, the PACE recommended Kosovo for membership with a decisive majority: 131 votes in favor, 29 against, and 11 abstentions, marking the final stages of Kosovo's application process.²⁷ The decision now rests with the Committee of Ministers as to when it would like to see Kosovo's admission question on its agenda. If that happens, the admission will be determined by a vote at the ministerial session given the lack of consensus among member states on Kosovo's statehood and the fulfillment of membership criteria.²⁸ However, since its unilateral declaration of independence in 2008, Kosovo has practically functioned as an independent state and has joined several international organizations, including those associated with the Council of Europe, such as the Council of Europe Development Bank (CEB) in 2013 and the Venice Commission in 2014.²⁹

3. Specifics, Success and Ramifications of Serbian Lobbying

3.1. UN General Assembly Resolution on the Genocide in Srebrenica

Serbia engaged in wide-ranging lobbying activities to oppose the adoption of the resolution. President Vučić made two extended trips to the East River to personally engage with representatives of African and Asian states, whom he views as crucial, 'libertarian' allies. Additionally, a meeting of Asian state ambassadors was convened in Belgrade to discuss significant geostrategic issues, and Vuk Jeremic, the Serbian President's envoy and former president of the UN General Assembly, held discussions with the incumbent president, Dennis Francis, among others. As a result, Serbia managed to defer the envisaged voting on a draft resolution three times (it was initially planned for the 27th of April, then for the 2nd of May and later for

²⁶ PACE Committee on Political Affairs and Democracy, Report of Dora Bakoyannis on the Application by Kosovo for membership of the Council of Europe. Doc. 15958 (28 Mar. 2024) para 71.

²⁷ PACE, Application by Kosovo for membership of the Council of Europe, Vote on Opinion – Doc. 15958, <https://pace.coe.int/en/votes/39707>.

²⁸ The decision could have been adopted at a lower level, that is, at Minister's Deputies, but it would need to be unanimous, which is not the case with Kosovo. See Rules of Procedures for the meetings of the Minister's Deputies, Article 9.1(f).

²⁹ Consult G. Visoka, *Acting Like a State: Kosovo and the Everyday Making of Statehood*, Routledge, 2018.

the 15th of May) but eventually failed to realise its paramount objective, that is, to prevent the document from being put to the vote.

On the 1st of May, Zlatko Lagumdžija, the ambassador of Bosnia and Herzegovina to the UN, announced the submission of the final proposal titled 'International Day of Reflection and Remembrance of the 1995 Srebrenica Genocide' to the president of the General Assembly and all permanent missions at the UN.³⁰ Nevertheless, due to significant political tensions, the United States requested additional consultations to align the text of the resolution, thereby delaying its placement on the agenda for the mid-May General Assembly session. Lagumdžija indicated that decisions on accepting or rejecting any proposed text adjustments would be promptly resolved, and the meeting would proceed under Item 14, 'Culture of Peace,' at the next available opportunity.³¹ Indeed, on the 15th of May, the General Assembly decided to include the draft resolution on the Srebrenica's genocide in its 82nd plenary meeting, scheduled for the 23rd of May.³² On the 17th of May, Lagumdžija announced that the resolution would incorporate two additional amendments introduced by Montenegro, underscoring the intensity and tensions surrounding the adoption of the document.³³

During the deferral period, Serbia did not succeed in changing substantially the text of the draft resolution. The resolution's preamble mentions high-ranking Serbian officials of the Republika Srpska convicted of the crime of genocide by the International Tribunal for the Former Yugoslavia (ICTY) (Karadžić, Mladić, Krstić), prohibits their glorification (para 3), and above all, 'condemns without reservation any denial of the Srebrenica Genocide' urging 'Member States to preserve the established facts, including through their educational systems' (para 2).³⁴ In 2010, the Serbian

³⁰ <https://x.com/LagumdžijaZ/status/1785772154564297112> (1 May 2024).

³¹ S. Sovrlić, *Rezolucija o Srebrenici u UN odložena „na neko vreme“; ali su duhovi prošlosti uzburkani*, N1 (15 May 2024) <https://n1info.rs/vesti/rezolucija-o-srebrenici-u-un-odlozena-na-neko-vreme-ali-su-duhovi-proslosti-uzburkani>.

³² UNGA, Schedule of General Assembly Plenary and Related Meetings: 78th Session <https://www.un.org/en/ga/info/meetings/78schedule.shtml>.

³³ <https://x.com/LagumdžijaZ/status/1791576059554521542/photo/2> (17 May 2024). The amendments are explained later. See footnote no. 43.

³⁴ UNGA, Draft resolution on Srebrenica (2 May 2024), UN Doc. A/78/L.67. On the acknowledgment of genocide by ICTY see *Prosecutor v. Radislav Krstić* (19 Apr. 2004) para 35; *Prosecutor v. Karadžić* (20 Mar. 2019) paras 3, 6; *Prosecutor v. Ratko Mladić* (8 Jun 2021) paras 576–583. For a discussion on the competence of the UNSC to create ad hoc tribunals see R. Śliwa, *Międzynarodowy trybunał ds. ścigania osób odpowiedzialnych za poważne łamanie międzynarodowych praw człowieka na terytorium byłej Jugosławii poczynwszy od 1991 r.* [in:] P. Czubik (ed.) *Balkany u progu zjednoczonej Europy*, Instytut Multimedialny, 2008,

Parliament adopted a declaration calling the Srebrenica massacre a 'crime', yet Serbia stopped short of regarding it as an act of genocide.³⁵ The selection of terminology for the title of the declaration and the text contained therein is a sign of political expediency. The declaration underlines that 'the National Assembly of the Republic of Serbia most severely condemns the *crime* committed against the Bosniak population in Srebrenica in July 1995' even though it juxtaposed it with the ruling of the International Court of Justice in *Bosnia v. Serbia*, which established that genocide occurred Srebrenica.³⁶ This is obviously not an isolated incident in state and institutional practice, where contentious issues are reformulated, neglected, depreciated, or even distorted.³⁷ The execution of a few thousand Bosniak men and boys and the forced deportation of about 25,000 women, children, and elderly people in Srebrenica in July 1995, during the Bosnian War, in a supposed UN-protected safe area, has been labeled as a 'massacre', a 'terrible crime', and 'genocide' by statespersons, institutions and commentators.³⁸ The ICTY's final ruling against *Krstić* established that 'by seeking to eliminate a part of the Bosnian Muslims, the Bosnian Serb forces committed genocide. They targeted for extinction the 40,000 Bosnian Muslims living in Srebrenica, a group which was emblematic of the Bosnian Muslims in general'.³⁹ Similarly, the ICTY appellate panel in *Prosecutor v. Zdravko Tolimir* determined that 'the killing of at least 5,749 Bosnian Muslim men from Srebrenica' constituted a genocidal *actus reus*, carried out with the necessary genocidal intent.⁴⁰ However,

p. 107. This problem was ultimately resolved through the creation of the International Criminal Court in 2002, which is based on consensual jurisdiction.

³⁵ Deklaracija Narodne Skupštine Republike Srbije o osudi zločina u Srebrenici, Sluzbeni Glasnik RS, No. 6 (31 Mar. 2010). Out of 250 MPs, 127 voted in favour of the resolution, 21 deputies voted against the resolution, with one abstention.

³⁶ *Application of the Convention on the Prevention and Punishment of the Crime of Genocide (Bosnia and Herzegovina v. Serbia and Montenegro)*, Judgment, ICJ Rep. (2007) para 297.

³⁷ While examining the complaint of a French comedian known for his anti-Israeli and anti-Semitic views, the European Court of Human Rights expressed a firm opinion on the dangers associated with spreading anti-Semitic and negationist content in the public space. Judgment of 20 October 2015, App. No 25239/13, *M'Bala M'Bala v. France*. Consult A. Gliszczyńska-Grabias, *Pamięć o Holokauście chroniona prawem*, Review of International, European and Comparative Law 2022, no. 20, pp. 175–201.

³⁸ See. K. Annan, 'May We All Learn and Act on the Lessons of Srebrenica', Says Secretary-General, in Message to Anniversary Ceremony', UN Press Release SG/SM/9993 (11 Jul 2005); 109th Congress (2005–2006), 'A resolution expressing the sense of the Senate regarding the massacre at Srebrenica in July 1995'. S. Res.134.

³⁹ *Prosecutor v. Krstić*, Appeals Chamber Judgement of 19 April 2004, para 37.

⁴⁰ *Prosecutor v. Zdravko Tolimir*, Judgement of 8 April 2015, IT-05-88/2-A, paras 222, 227, 637.

several learned scholars, including those of Jewish descent such as Bauer, Greif, Zuroff and Vilan disagree with the verdicts of the ICTY, ICJ in *Bosnia v. Serbia* and other domestic courts that term the massacre as genocide.⁴¹ These scholars argue, among others, that the intent to destroy, as defined by Lemkin and phrased in the Genocide Convention,⁴² was absent, that only men were killed in Srebrenica and that the massacre was 'local' and its extent was not sufficient compared to the Holocaust.⁴³

Serbia had expressed concerns that the resolution might imply its responsibility under international law and subsequent war reparations. In advance of the resolution's adoption, Ademović argued that legal teams would contend that Radovan Karadžić, former President of Republika Srpska, committed crimes not as an individual but as a public official and political leader of a regime that ordered the military to commit those crimes. They were likely to argue in enforcement proceedings that the regime, rather than Karadžić himself, should be held responsible.⁴⁴ Consequently, one of the two 'last minute' amendments introduced by Montenegro, involved adding a preambular paragraph stating that 'criminal accountability under international law for the crime of genocide cannot be attributed to any ethnic, religious or other group or community as a whole'.⁴⁵ Thus, any group responsibility, such as that of the Serbian nation, would not arise. Even if this could be considered appeasement, or indeed the success of Serbia's efforts, President Vučić

⁴¹ The following cases refer to the charges of genocide in Srebrenica before the Bosnian courts: *Prosecutor's Office of Bosnia and Herzegovina v. Stupar and Others* X-KR-05/24; *Prosecutor v. Stevanović* X-KR-05/24-2; *Prosecutor v. Mitrović*, X-KR-05/24-1, and *Prosecutor v. Trbić*, X-KR-07/386. See also the ECtHR's judgment *Jorgić v. Germany* Judgment, App. No. 74613/01, where the applicant disputes the competence of the German court to convict him of genocide.

⁴² R. Lemkin, *Axis Rule in Occupied Europe*, Chapter IX: *Genocide*, Carnegie Endowment for International Peace, 1944, p. 79. See also N. Naimark, *The Nazis and the Slavs – Poles and Soviet Prisoners of War* [in:] B. Kiernan, W. Lower, N. Naimark and S. Straus (eds.) *The Cambridge World History of Genocide*. Vol. 3: *Genocide in the Contemporary Era, 1914–2020*. Cambridge University Press 2023, pp. 368, 369.

⁴³ See The Independent International Commission of Inquiry on Suffering of All People in the Srebrenica Region Between 1992 And 1995, Concluding Report (2020), pp. 55–77. Cf. M. Z. Rosensaft, *Refuting Srebrenica Genocide Denial Yet Again, as UN Debates Draft Resolution*, Just Security (29 Apr. 2024). Note the US criticism of the issuance of the arrest warrant for Netanyahu by the ICC Prosecutor.

⁴⁴ Politika, *Hoće li će Srbija platiti milijarde za 'genocid'?* (13 May 2024) <https://www.politika.rs/scc/clanak/614263/Hoce-li-Srbija-placati-milijarde-za-genocid>.

⁴⁵ UN Doc. A/78/L.67/Rev/1. The second preambular amendment underlined 'unwavering commitment to maintaining stability and fostering unity in diversity in Bosnia and Herzegovina, the respect for the unity of the BiH'.

considered it as 'a dirty game' of Montenegro, Serbia's current neighbor and former state union partner, as the amendment could weaken Serbia's position during the voting. Serbia's argument was precisely about the consequences of opening Pandora's box of genocidal cases. President Vučić also noted that the amendment deliberately leaves room for clear conclusions regarding moral and political responsibility and questioned why a resolution is needed when international and domestic courts have already issued judgments on individual accountability.⁴⁶

In truth, the amendment did not entirely eliminate the responsibility of the Serbian political regime, that is, the state, and any potential consequences stemming from this fact, but it must be remembered that the UN General Assembly resolutions are non-binding, unlike court judgments that find someone guilty and demand compensation. Nevertheless, these resolutions are treated as authoritative pronouncements, which may contribute to reviving or inciting prospective reparation claims and actions,⁴⁷ even at the international level.⁴⁸ In 2007, the ICJ in *Bosnia v. Serbia* ruled that Serbia was not responsible for the commission of genocide in Srebrenica, but failed to comply with its obligations under the Genocide Convention in respect of the prevention and punishment of genocide. In consequence, the ICJ rejected any monetary compensation but suggested reparation in the form of satisfaction – by a declaration in the said judgment that Serbia failed to prevent genocide.⁴⁹ Bosnia did not successfully institute new proceedings within the timeframe of 10 years after the issuance of the judgment pursuant to Article 61 of the ICJ Statute, and it is doubtful that any new sponsor-states could rely on furnishing new evidence in this regard based on the text of the

⁴⁶ Aljazeera, *Vučić amandmane Crne Gore na Rezoluciju o Srebrenici nazvao 'prljavom igrom'* (19 May 2024) <https://balkans.aljazeera.net/news/balkan/2024/5/19/vucic-nazvao-crnogorske-amandmane-na-rezoluciju-o-srebrenici-prljavom-igrom>.

⁴⁷ From 1945 to 2018, the German government paid approximately \$86.8 billion in restitution and compensation to Holocaust victims and their heirs. <https://www.state.gov/reports/just-act-report-to-congress/germany>. See also UNGA resolution on holocaust denial (13 Jan. 2023) UN Doc. A/76/L.30.

⁴⁸ UNGA in its resolution 59/137 of 2004 'Assistance to survivors of the 1994 genocide in Rwanda, particularly orphans, widows and victims of sexual violence' explicitly referred to its resolution 58/234 of 2003, by which it declared 7 April 2004 the International Day of Reflection on the Genocide in Rwanda.

⁴⁹ *Application of the Convention on the Prevention and Punishment of the Crime of Genocide (Bosnia and Herzegovina v. Serbia and Montenegro)*, Judgment, ICJ Rep. (2007) paras 459–562.

resolution.⁵⁰ Regardless of the success of such an action, its initiation cannot be entirely excluded bearing in mind the political climate and the recent growth of akin proceedings (*The Gambia v. Myanmar*, *Ukraine v. Russia or South Africa v. Israel*) based on the *erga omnes* obligation of all states in the implementation of the Genocide Convention.⁵¹

On the other end of the reparation spectrum lie proceedings in domestic courts. The Mothers of Srebrenica, an organization representing the relatives of victims based in the Netherlands, initially failed to sue the UN in the Dutch courts for complicity in the genocide in Srebrenica (designated as a 'Safe Area' and was supposed to be protected by Dutch peacekeepers) on account of the immunity granted by the UN Convention on the Privileges and Immunities of the United Nations.⁵² This reasoning was confirmed by the European Court of Human Rights in 2014.⁵³ However, in 2019, the Dutch Supreme Court conceded Dutch liability for the genocide, though, it amounted to just 10%, and ordered compensation for 350 men who were handed over by the Dutch battalion to Bosnian Serb forces.⁵⁴ As it stands, Serbian courts will most likely reject any compensation claims. However, this might change if the opposition party, Serbia Against Violence, comes into power, as they openly endorse the recognition of genocide in Srebrenica.

In terms of procedural aspects, Serbia was unable to influence the change in the voting process, which did not apply a two-thirds majority as prescribed by Article 18(2) of the UN Charter for important issues, most notably those related to international peace and security. Instead, the vote was carried out by a simple majority rule, where abstentions (which Serbia correctly

⁵⁰ The President of the ICJ in 2017 made a statement announcing that the Court was "not properly" seised of a request for revision of the Court's merits Judgment of 26 February 2007 in the Bosnian Genocide Convention Case (Mr. Sakib Softić, a former Agent of the BIH, was deemed unauthorized to represent the country this time).

⁵¹ See *Application of the Convention on the Prevention and Punishment of the Crime of Genocide (The Gambia v. Myanmar)*, Preliminary Objections, Judgment (2022); *Allegations of Genocide under the Convention on the Prevention and Punishment of the Crime of Genocide (Ukraine v. Russian Federation)*, Judgement, Preliminary Objections (2024) (this is a genocide case in reverse); *Application of the Convention on the Prevention and Punishment of the Crime of Genocide in the Gaza Strip (South Africa v. Israel)* Order of 26 January 2024 on the indication of provisional measures.

⁵² Supreme Court of the Netherlands, First Division 10/04437 EV/AS (2012).

⁵³ *Stichting Mothers of Srebrenica and Others v. the Netherlands*, Dec. No 65542/12 (2013).

⁵⁴ *Mothers of Srebrenica Association et al. v. The Netherlands*, Supreme Court, Judgment of 19 July 2019, ECLI:NL:HR:2019:1223.

predicted would account for the most votes) did not predispose the result.⁵⁵ Serbia also expressed discontent that Germany would be the only country to deliver an introductory speech at the UN General Assembly session, where support for the draft resolution on Srebrenica would be sought.⁵⁶

On the 23rd of May, the UN General Assembly adopted the resolution titled 'International Day of Reflection and Commemoration of the 1995 Genocide in Srebrenica' with 84 votes in favour, 19 against and 68 abstentions. Arithmetically, this means that the majority of states did not endorse the resolution. Stretching the statistics even further, only 43% of the General Assembly collective supported the motion. This calculation excludes those who deliberately did not participate in the voting (were absent), such as Israel and Azerbaijan, or those who, like Venezuela, are in arrears in the payment of their financial contributions under Article 19 of the UN Charter, and thus could not vote.⁵⁷ The resolution was co-sponsored by 36 states, among which were 4 of the 6 countries that formed the former Yugoslavia, except for Montenegro, which, after huge domestic pressure withdrew its co-sponsorship (but supported the resolution) and Serbia.

The voting result indicates a pyrrhic victory for the sponsors since the resolution did not manage to unite the world around such a painful event in the history of the Balkans. The representative of the United Arab Emirates expressed 'severe misgivings about the timing and process' of the adoption of the resolution, which exacerbated the otherwise fragile peace in the Balkan region. Representatives of Namibia and the Democratic Republic of Congo alluded to 'selective amnesia' and indifference to other cases of genocide, including those in their countries and the ongoing situation in Palestine (Congo also accused Rwanda, one of the sponsors, of committing genocidal practices).⁵⁸ As a result, Serbia managed to garner considerable support in the General Assembly, significantly more than Russia, whose invasion of Ukraine was condemned by 141 states (5 voted against, and 35 abstentions)

⁵⁵ Paradoxically, 2 states voting for and 1 against could decide the fate of a document. See Rule 86 of the rules of procedures of General Assembly (Meaning of the phrase "members present and voting") UN Doc. A/520/Rev.20.

⁵⁶ N1, 'Vucic ahead of UN vote: Montenegro played a "dirty role" with its amendments' (21 May 2024) <https://n1info.rs/english/news/vucic-ahead-of-un-vote-montenegro-played-a-dirty-role-with-its-amendments>.

⁵⁷ As of 23 May 2024, five Member States are subject to the provisions of Article 19 of the Charter: Afghanistan Comoros, Sao Tome and Principe, Somalia, and Venezuela.

⁵⁸ UN Meeting Coverage, 'General Assembly Adopts Resolution on Srebrenica Genocide, Designating International Day of Reflection, Commemoration Many Decry 'Politicized' Nature of Text, Note Action May Exacerbate Tensions' (23 May 2024) GA/12601.

or Israel, which was discontent with the upgrade of Palestine's rights at the United Nations as an observer State, (143 in favour to 9 against with 25 abstentions).⁵⁹

In consequence, Serbian lobbying, leveraging its maneuvering skills between the East and the West reminiscent of Tito's strategy in Yugoslavia, and capitalizing on the initiative's weaknesses due to its one-sidedness and concerning regional ramifications, yielded results.⁶⁰ The UN resolution will most likely not be treated as the authoritative pronouncement and will be declared as non-valid by the parliament of the Republika Srpska. In the long term, it may expedite the dismemberment of the Republic of Bosnia and Hercegovina, created in the wake of the Dayton Agreement in 1995 as two-entities and the three-peoples state, since the Republika Srpska, whose voice was disregarded in the preparation and voting on the resolution in the UN, has felt disfranchised.⁶¹ Dodik, the leader of the Republika Srpska, has seen the adoption of the resolution as a 'symbolic end of multiethnic Bosnia' and suggested the proposal for the 'peaceful dissolution of Bosnia' to be enacted by the Srpska government.⁶² Vučić, on the other hand, announced that Serbia would treat all the countries which voted for the resolution as 'unfriendly partners', a pattern prominently implemented by Russia.⁶³ Therefore, the passing of the resolution has neither benefited the (co)sponsors nor Serbia and stands in clear contrast with the practice of achieving win-win outcomes.

3.2. The Admission of Kosovo to the Council of Europe

In comparison to the UN General Assembly resolution, Serbia succeeded in postponing the much hoped-for voting during the mid-May session of the Committee

⁵⁹ On Russia, UN Doc. A/RES/ES-11/1 (2 Mar. 2022) on Israel, UN Doc. A/ES-10/L.30/REV.1 (9 May 2024).

⁶⁰ The generalized commemoration dates at the UN level include the victims of slavery (25 March), torture (26 June), terrorism (21 August), and acts of violence based on religion or belief (22 August). Note that genocides, in general, are commemorated on the 9th of December. See UN Doc. A/RES/69/323 (29 Sep. 2015).

⁶¹ Consult the General Framework Agreement for Peace in Bosnia and Herzegovina, Article III. Letter dated 29 November 1995 from the Permanent Representative of the United States of America to the United Nations addressed to the Secretary-General UN Doc. A/50/79C-S/1995/999 (30 Nov. 1995).

⁶² Politika, *Dodik: Usvajanje Rezolucije o Srebrenici Bio bi Simboličan Kraj BiH* (22 May 2024) <https://www.politika.rs/sr/clanak/615792/Dodik-Usvajanje-rezolucije-o-Srebrenici-bio-bi-simbolican-kraj-BiH>.

⁶³ See Presidential Decree No. 243 of April 23, 2021 "On the application of measures to influence (counteract) unfriendly actions of foreign states." See also Order No. 2075-r dated August 2, 2023 on adding Norway to the list.

of Ministers of the Council of Europe (CoM) in Strasbourg on the admission of Kosovo. This can be hailed as a victory of the Serbian diplomatic team and President Vučić who met beforehand with the French President Macron. It is worth adding that President Macron received in April Chinese President Xi Jinping, who subsequently paid a visit to Serbia during his trip to Europe.

The visit was circumstantial because the voting in the CoM on the invitation of new states to become members of the Council of Europe, in case of a lack of consensus, requires approval by a two-thirds majority. According to Serbian diplomatic sources prior to the CoM meeting, Kosovo could count on 29–33 votes, which oscillated around the required threshold of 31 votes out of a total of 46.⁶⁴ In that regard, Serbia necessitated a Western ally to bolster its fragile position following the withdrawal of Russia in March 2022 from the organization and the positive recommendation for Kosovo's admission issued by the Parliamentary Assembly of the Council of Europe in late March 2024.⁶⁵

France, joined by Italy and Germany, indeed chose a balanced approach, informed by the longevity of the EU integration process of the Balkan states on the one hand, and the desire to avoid divisions between member states on sensitive precedential issues on the other. They were also aware of the potential consequences of a failed motion, as member states have so far not questioned the statehood of new candidates, which were admitted unanimously or by consensus.⁶⁶ The three states, however, voiced their arguments in legal terms. Namely, France recommended other member states to postpone the admission of Kosovo until it implements a basic provision of the 2013 EU-facilitated Brussels Agreement on the establishment of the Community of Serb Municipalities (CSM).⁶⁷ The Italian ambassador to Serbia likewise noted that the formation of the CSM is essential for the Belgrade-Prishtina normalization process.⁶⁸ Germany, although a staunch supporter of Kosovo,

⁶⁴ Article 20c of the Statute of the Council of Europe provides that resolutions of the Committee under Articles 4 and 5 (the invitation to become a member) require a two-thirds majority of all the representatives entitled to sit on the Committee. ETS No 1 (5 May 1949).

⁶⁵ See A. Zimmermann, *Council of Europe: Kosovo Ante Portas?* (13 May 2024) EJIL:Talk! <https://www.ejiltalk.org/council-of-europe-kosovo-ante-portas>.

⁶⁶ In the history of the Council of Europe, decisions on admissions have always been made at the level of Deputies (unanimously), with the exception of the admissions of Armenia and Azerbaijan which were decided by the Ministers by consensus.

⁶⁷ B92, *France requests the postponement of decision on admission of the so-called of Kosovo in the Council of Europe* (7 May 2024) <https://www.b92.net/english/politics/19880/france-requests-the-postponement-of-decision-on-admission-of-the-so-called-of-kosovo-in-the-council-of-europe/vest>.

⁶⁸ N1, *Italian Ambassador: Not yet time for Kosovo to join CoE* (8 May 2024) <https://n1info.rs/english/news/italian-ambassador-not-yet-time-for-kosovo-to-join-coe>.

concurred with Italy and France in demanding the CSM, emphasizing the importance of the constitutional court's revision of the CSM statute.⁶⁹ All three states sent a joint letter to Kosovo's Prime Minister Kurti in which they implied that they do not see Kosovo willing to accept the principles of the rule of law, a prerequisite for admission to the Council of Europe formulated in Article 4 of Statute of the Council of Europe.⁷⁰ Three leaders noted that in order to secure membership, Kosovo should draft a statute of the CSM based on the EU Special Representative for Dialogue, Mr Lajcak's, proposal, consult it with the legitimate mayors or deputies of the northern (Serb) municipalities and forward it to the Constitutional Court of Kosovo.⁷¹

In 2015, the Constitutional Court of Kosovo ruled that the Community of Serb Municipalities could not hold executive powers, asserting that any autonomy extending beyond the municipal administrative level was unconstitutional.⁷² The Court yet noted that the Community of Municipalities with a Serbian majority shall be established as provided for in the Brussels (First) Agreement, ratified by the Assembly of the Republic of Kosovo and proclaimed by the President of the Republic of Kosovo.⁷³ However, Kosovo has not done virtually anything in that regard, and it has a long concurrent track of not implementing decisions of the constitutional court, especially those relating to Serbian issues.⁷⁴ Only ahead of the accession procedure to the Council of Europe, Prime Minister Kurti, maintained that the 2016 constitutional court decision, awarding 24 hectares of land to the Visoki Decani Monastery, medieval Serbian Orthodox monastery, must be implemented.⁷⁵ The rapporteur for Kosovo in the Council of Europe, Dora Bakoyannis, highlighted this issue in her March report, alongside the land expropriation in municipalities with a Serbian majority, which she labelled as contrary to the rule of law, Article 44 of the Kosovo's Constitution and the Ahtisaari Plan.⁷⁶

⁶⁹ Euronews, *Why the green light for Kosovo joining the Council of Europe is likely to be delayed* (9 May 2024) <https://www.euronews.com/2024/05/09/why-the-green-light-for-kosovo-joining-the-council-of-europe-is-likely-to-be-delayed>.

⁷⁰ Key fragments of the letter are available under <https://euronews.al/en/kosovos-proposal-for-association-france-germany-and-italy-letter-to-kurti> (17 May 2024).

⁷¹ *Ibid.* See also Report of the Secretary-General on the United Nations Interim Administration Mission in Kosovo (2 Apr. 2024) UN Doc. S/2024/282 paras 9–11. Consult the proposal of the European Institute of Peace (EIP) and Friedrich-Ebert-Stiftung (FES) Pristina Office 'Association of Municipalities in the Republic of Kosovo in which the Kosovo Serb Community is in the Majority' (2023) <https://library.fes.de/pdf-files/bueros/kosovo/19981.pdf>.

⁷² Judgement of 23 December 2015 No. K0130/15.

⁷³ *Ibid.* paras 112–113, 189.

⁷⁴ Report of Dora Bakoyannis, *op. cit.* paras 16, 39, 72.

⁷⁵ Report of Dora Bakoyannis, *op. cit.* para 10.

⁷⁶ *Ibid.* para 42.

As noted, however, the non-establishment of the CSM was taken as the decisive compromising factor substantiating the decision to defer the issue of Kosovo's admission. Prior to the mid-May ministerial session, Council of Europe's officials maintained that Kosovo's issue 'is at the moment not on the agenda'.⁷⁷

It is hard to predict how long Serbia has managed to defer Kosovo's membership process, which some commentators perceive as unavoidable.⁷⁸ The outcome will undoubtedly depend on Kosovo's response on the recommendations posed and the geopolitical situation of the moment.⁷⁹ Serbia's ability to block Kosovo's admission to European organizations is hampered by the fact that Kosovo is recognized by the great majority of the European states (with slight variations possible: Hungary was said to vote against admission) and the 2023 Agreement on the path to normalization (Ohrid Agreement), which in Article 4 explicitly sets forth that Serbia will not oppose the membership of Kosovo in *any* international organisation.⁸⁰ Yet, as observed, this is a political agreement, not a legally binding act, unlike the German Basic Law for the unification of Germany, on which the agreement is based.⁸¹ On the other hand, Kosovo also failed to fully implement the Ohrid Agreement, and by applying for admission to the Council of Europe in May 2022, it breached the 2020 Washington Agreement on Economic Normalization. This agreement originally placed a one-year moratorium on Kosovo's application for admission to international organizations, which was extended in good faith even after the specified period in the text.⁸²

The ramifications of Serbian lobbying against Kosovo's admission to the Council of Europe have a regional character. Serbia has announced it will reevaluate its relationships with states based on their votes in the Committee of Ministers.

⁷⁷ Vjesti, *The admission of Kosovo to the Council of Europe is not on the agenda of the May meeting, for now* (6 May 2024) <https://en.vijesti.me/world/balkan/705852/Kosovo%27s-admission-to-the-Council-of-Europe-is-not-on-the-agenda-of-the-May-meeting-for-now>. See the Rules of Procedure of the Council of Europe's Committee of Ministers, Article 25 (the need of inclusion of a proposal for admission in the agenda of the session).

⁷⁸ A. Forde, *Able and Willing: Kosovo's Inevitable Membership of the Council of Europe*, *Opinio Juris* (19 Apr. 2024) <https://opiniojuris.org/2024/04/19/able-and-willing-kosovos-inevitable-membership-of-the-council-of-europe>.

⁷⁹ Consult, Procedure for accession of Armenia to Council of Europe membership, Document prepared by the Secretariat CM(2000)121 (16 Aug. 2000).

⁸⁰ Agreement on the path to normalisation between Kosovo and Serbia, *op. cit.*, Article 4.

⁸¹ M. Milanovic, *A Comment on the Proposed Basic Agreement between Serbia and Kosovo*, *Pescanik* (6 Feb. 2023) <https://pescanik.net/a-comment-on-the-proposed-basic-agreement-between-serbia-and-kosovo>.

⁸² R. Muharremi, *The "Washington Agreement" Between Kosovo and Serbia*, *ASIL Insights* 2021, no. 25(4).

During official visits from foreign dignitaries, Serbian counterparts always appreciate non-recognition of Kosovo and the consequences stemming from this fact. On the other hand, it is hard to expect states that have recognized Kosovo to take a different decision and sever relations with them on that basis. Serbia has also threatened to consider leaving the Council of Europe should Kosovo secure an invitation from the Committee of Ministers to become the 47th member.⁸³ Realistically, it sounds like a political grief-loaden statement, since it would entail legal, economic, and predominantly, political consequences for Serbia.

Conclusions

The article illustrates how strikingly contrasting the perspectives on the adoption of a document within an international organization and the admission of a claimant entity/state to an international organization can be. For a large number of states, the vote on the resolution regarding Srebrenica in the UN General Assembly signifies a path to ultimate reconciliation through the acknowledgment of past wrongs and provides redress to the victims. However, for other states, predominantly Serbia, it denotes the reignition of regional tensions and opens the door for similar claims both in the Balkans (e.g. Jasenovac) and worldwide.

The admission of Kosovo to the Council of Europe, for states supporting the move, signifies that Kosovo can be endowed with the privileges of membership, which can also benefit the Serbian minority (e.g. allowing them to petition the European Court of Human Rights). Conversely, for the states opposing the membership, it constitutes the affirmation of unilateral secession, which those states are unwilling to recognize.

While not diminishing the moral, ethical and other values of both analysed initiatives in international organizations, it is clear that they affect Serbia's national interests and policy. The lobbying activities undertaken by Serbia have proved sufficient to create substantial divisions on important issues. It would be in the interest of the entire international community to avoid such scenarios in the future and to engage in meaningful dialogue that could produce much more fruitful results.

⁸³ Bloomberg, *Serbia May Quit Council of Europe If Members Let Kosovo Join* (23 Mar. 2024). <https://www.bloomberg.com/news/articles/2024-03-23/serbia-may-quit-council-of-europe-if-members-let-kosovo-join>.

Abstract

In an effort to oppose the admission of Kosovo to the Council of Europe and the adoption of the resolution recognizing genocide in Srebrenica, Serbia engaged in international lobbying to protect its national interests and policy. The article outlines the specifics of Serbian lobbying in both instances, as well as illustrates its success through the influence of the actions of other states to support the Serbian stance. Furthermore, the article shows potential actions which Serbia might take in case the lobbying turns unsuccessful, which to a great extent coincide with the lobbying strategy (e.g. exerting pressure and threats). It is maintained that lobbying as a defensive reaction, although not illegal under international law as such, should not be provoked in critical issues for the sake of maintaining peace, unanimity and stability. The resolution of contentious issues should thus be carried out as much as possible through conciliatory methods in light of Articles 2(3) and 33(1) of the UN Charter.

Key words: Serbian lobbying, UNGA Resolution of the genocide in Srebrenica, Council of Europe, Kosovo, international organizations, peace and stability

Lobbying Serbii na rzecz sprzeciwu wobec rezolucji Zgromadzenia Ogólnego ONZ w sprawie ludobójstwa w Srebrenicy oraz przyjęcia Kosowa do Rady Europy

Streszczenie

W celu sprzeciwienia się przyjęciu Kosowa do Rady Europy oraz przyjęciu rezolucji uznającej ludobójstwo w Srebrenicy Serbia zaangażowała się w międzynarodowe lobbying, aby chronić swoje interesy narodowe i politykę. Artykuł przedstawia szczegóły serbskiego lobbyingu w obu przypadkach, a także ilustruje jego sukces poprzez wpływ na działania innych państw w celu poparcia serbskiego stanowiska. Ponadto artykuł pokazuje potencjalne działania, jakie Serbia może podjąć w przypadku niepowodzenia lobbyingu, które w dużej mierze pokrywają się ze strategią lobbyingową (np. wywieranie presji i groźby). Utrzymuje się, że lobbying jako reakcja strategiczno-obronna, choć nie jest nielegalny na gruncie prawa międzynarodowego, nie powinien być prowokowany w krytycznych kwestiach w celu zapewnienia pokoju, jednomyślności i stabilności. Rozwiązanie kwestii spornych powinno być zatem przeprowadzane w miarę możliwości za pomocą metod koncyliacyjnych w myśl art. 2 akapit trzeci oraz art. 33 akapit pierwszy Karty Narodów Zjednoczonych.

Słowa kluczowe: serbski lobbying, rezolucja Zgromadzenia Ogólnego ONZ dotycząca ludobójstwa w Srebrenicy, Rada Europy, Kosovo, organizacje międzynarodowe, pokój i stabilność

