

A background graphic consisting of a network of interconnected nodes and lines. The nodes are represented by circles of varying sizes and colors, including shades of blue, grey, and light blue. The lines connecting them are thin and light blue, creating a complex web-like structure that fills the page.

# **Implementation of decisions of the Inter-American Commission on Human Rights**

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Discussion Paper of ESCR-Net's Strategic Litigation Working Group



Foro Ciudadano de Participación por  
la Justicia y los Derechos Humanos



الشبكة العالمية  
للحقوق الاقتصادية  
والاجتماعية والثقافية



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# Introduction

The ESCR-Net<sup>1</sup> Strategic Litigation Working Group began focusing on the implementation of positive legal decisions, particularly related to economic, social and cultural rights (ESCR), in 2008. While many courts and legal bodies were consistently finding violations of ESCR, their decisions were often not being implemented. Over the past decade, this work had engaged with UN treaty bodies, regional systems and many national-level courts. Over the past few years and building on wider working group exchanges, a group of members in the Americas has been discussing, in various scenarios, initiatives to promote the capacity of Inter-American Human Rights System (IASHR) bodies to implement their decisions and recommendations. AIDA (regional), CEJIL (regional), CESR (USA), Dejusticia (Colombia), DPLF (regional), FOCO (Argentina), Tierraviva (Paraguay), CELS (Argentina) FESPAD (El Salvador) and CRR (regional), as well as a close ally, the Human Rights Clinic of the University of Washington (USA), deserve particular thanks for the following discussion paper.

This reflection is based on concern with the low level of compliance with decisions of both the Inter-American Commission on Human Rights (hereinafter, IACHR or Commission) and the Inter-American Court of Human Rights (hereinafter, IACtHR) as one of the problems that most impacts the effectiveness of the case system.

In effect, various academic and civil society studies have concluded that in general, IACHR recommendations and IACtHR orders related to judicial reparations are those with the lowest level of compliance. Quantitative research, carried out in 2010, focused on the level of compliance with decisions adopted within the petitions system and concluded that “29 percent of Court ordered remedies and 11 percent of the recommendations included in the Commission’s final reports have been completely fulfilled.”<sup>2</sup>

Moreover, States are still far from fulfilling other reparation measures (satisfaction, non-repetition, compensation, cessation, etc.) in a timely manner, even when there is a greater level of compliance with these measures in comparison with judicial reparations. To illustrate, research published in 2010 found that as of 2009, the IACHR had received approximately 14,000 petitions. In 2009 alone it received 1,431 petitions, and was processing 1,450. According to data from this research, of the 128 cases that the Commission resolved through friendly settlements and reports on the merits between 2000 (when the IACHR began to collect information) and 2009, States had

1 ESCR-Net - International Network for Economic, Social and Cultural Rights connects over 280 NGOs, social movements and advocates across more than 75 countries to build a global movement to make human rights and social justice a reality for all.

2 F Basch et al., “La Efectividad del Sistema Interamericano de Protección de Derechos Humanos: Un Enfoque del Cuantitativo sobre su Funcionamiento y sobre el Cumplimiento de sus Decisiones” 7 Sur Revista Internacional de Derechos Humanos R 20 (2010), p. 9

completely complied with recommendations in 12.5 percent of cases and partially complied with recommendations in 69.5 percent of cases.<sup>3</sup>

In consideration of this landscape, the ESCR-Net Strategic Litigation Working Group (SLWG) presents this document, based on meetings with members of the Network held during the Commission's 161st Period of Sessions and additional meetings held between March and August 2017, as a preliminary contribution that addresses possible areas of action regarding changes in IACHR practices that could lead to improved levels of compliance with recommendations. The SLWG is aware of the approval of the 2017-2021 Strategic Plan of the IACHR and seeks to support the IACHR in adopting a follow up and compliance protocol with more detailed rules and standards.

Although the SLWG is aware that compliance with IASHR decisions involves an analysis of three dimensions: the IACHR, the IACtHR, and States, as a starting point, we have focused our initial work on the Inter-American Commission. This approach is based on three objectives and considerations: strengthening the IACHR (with the understanding that its recommendations are binding), the number of cases that cannot be brought before the IACtHR, and the fact that the Court already issues periodic resolutions regarding compliance with decisions with a greater level of detail and scrutiny. With these considerations in mind, in this document we will concentrate on the analysis, practice, and mechanisms that could strengthen the capacity of the IACHR to follow up on its recommendations, taking into consideration:

1. The applicable normative framework;
2. The policies and practices that could be improved; and
3. The possible changes to these policies in the short, medium, and long term.

Additionally, the SLWG has prioritized practices that could and should be adopted immediately, as they would not involve additional costs and are politically feasible, as well as practices that could be adopted in the mid and long term, and which would involve more structural improvements.

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<sup>3</sup> Open Society Justice Initiative, "From Judgement to Justice: Implementing International and Regional Human Rights Decisions," (New York: Open Society Foundations, 2010) p.64–65

# I. Applicable normative framework

The binding nature of the IACHR's decisions rests on two fundamental pillars: 1) the international public law principle of “*pacta sunt servanda*,” described in the Vienna Convention on the Law of Treaties, and which constitutes a basic principle of international law that implies the obligatory nature of decisions; and 2) the right to an effective legal remedy in accordance with the provisions of the American Convention on Human Rights.

## 1. Binding nature of IACHR decisions

The binding nature of IACHR decisions has legal support in the fact that the countries in the region form part of the Organization of American States, have signed the American Declaration of the Rights and Duties of Man, and the majority have also ratified the American Convention on Human Rights. Additionally, in virtue of the principles of international public law, States commit to fulfilling in good faith the obligations derived from international treaties. In this way, fulfillment with obligations forms part of the essence of the IACHR. Issuing recommendations is part of the Commission's basic functions. And if they are systematically ignored, the mechanism loses an important part of its *raison d'être*.

In a large number of countries in the region, the American Convention forms part of the so-called “constitutional block,” and several constitutional courts have ratified the binding nature of Commission decisions. For example, the Supreme Court of Justice of the Nation (Argentina) stated in a 2013 precedent that IACHR decisions are binding on the State:

*“It is appropriate to dismiss the National Government's complaint and recognize the obligatory nature of the recommendations of article 51.2 of the American Convention formulated in the Commission's report on the State [...] and [this interpretation is that] which best fits the principles of “good faith” and “useful effect” of this regime, thus avoiding the “weakening” of the system” which is designed to serve human beings.”<sup>4</sup>*

Additionally, the Constitutional Court of Colombia “has had to consider international human rights jurisprudence or doctrine authorized on such issues and those stable criteria developed by judicial or quasi-judicial bodies on human rights issues, such as the Inter-American Court of Human Rights [...] and the IACHR.”<sup>5</sup>

4 Carranza Latrubesse Gustavo c/ Estado Nacional - Ministerio de Relaciones Exteriores Argentino - Provincia del Chubut - s/ proceso de conocimiento, c. 568. xlv. Rhe 06/08/2013, fallos: 336:1024.

5 Rodrigo Uprimny, La fuerza vinculante de las decisiones de los organismos internacionales de derechos humanos en Colombia: un examen de la evolución de la jurisprudencia constitucional, en “Implementación de las Decisiones del Sistema Interamericano de Derechos Humanos,” p. 137 (Washington, D.C. CEJIL, 2007)

The recognition of this binding nature of IACHR recommendations is relevant not only to strengthen the IACHR, especially with respect to cases that cannot be brought before the IACtHR, but also to give meaning and efficacy to the obligations the State parties to the IASHR committed.<sup>6</sup> The lack of a normative, judicial, and administrative response to implement IACHR decisions would create a new breach of obligations derived from the American Convention and other treaties of the IASHR.<sup>7</sup>

## 2. Legal due process and effective judicial protection

The adoption of institutional practices to follow up decisions of the IASHR is also justified by the guarantee of legal due process (art. 8.1 ACHR) and its fundamental components, the rights of victims to obtain a decision within a reasonable timeframe, and the right to effective judicial protection (art. 25.1 ACHR), meaning the obligation of States to provide fast, simple, and effective remedies for the satisfaction of affected rights.

Thus, a remedy may be ineffective to protect a fundamental right when it does not provide an appropriate mechanism to execute decisions and is not able to overcome common problems that tend to appear in the implementation of decisions imposing obligations on the State to take some action. On this point, both the IACHR and the IACtHR have recognized the relevance of improving effective fulfillment and execution of an effective judicial remedy.<sup>8</sup>

The IACHR has indicated that

*“Complete compliance with the decisions of the Inter-American Commission is essential for ensuring that human rights have full force in the OAS member states, and for helping to strengthen the Inter-American system for the protection of human rights.”<sup>9</sup> [...].”*

6 La falta de voluntad política es un obstáculo al cumplimiento, levantado por muchos de los miembros del GTLE. Mientras no sea suficiente, el reconocimiento más amplio del carácter vinculante de dictámenes podría aumentar los costos políticos del incumplimiento.

7 En este sentido, ver Cançado Trindade, Otavio Augusto Drummond. Os efeitos das decisoes dos tribunais internacionais de direitos humanos no direito interno dos estados, en “Rumbos del Derecho Internacional de los Derechos Humanos: Estudios en homenaje al Profesor Antonio Augusto Cançado Trindade” Tomo V. (Porto Alegre, Brasil: Sergio Antonio Fabris Editor, 2005)

8 Comisión Interamericana de Derechos Humanos. Capítulo V: El Contenido del Derecho a la Tutela Judicial Efectiva en materia de Derechos Sociales; Apartado D: El derecho a un recurso judicial efectivo y el desarrollo de mecanismos adecuados de ejecución de sentencias, en “El Acceso a la Justicia como Garantía de los Derechos Económicos Sociales y Culturales. Estudio de los estándares fijados por el Sistema Interamericano de Derechos Humanos” OEA/Ser.L/V/II.129, Doc. 4, 7 septiembre 2007, Original: Español

9 Comisión Interamericana de Derechos Humanos. “Informe Anual, 2016: Estado del cumplimiento de las recomendaciones y soluciones amistosas en casos individuales,” párrafo. 76, disponible en <https://www.oas.org/es/cidh/docs/anual/2016/docs/informeannual2016cap2dseguimiento-es.pdf>

## II. Policies and practices of the IACHR that could be improved

In this section, we will mention the policies and practices that the IACHR could improve to ensure fulfillment with its decisions, both generally, as well as with respect to those related specifically to the compliance of economic, social, cultural and environmental rights (ESCER).

### 1. General policies and practices (applicable to all categories of rights)

#### a. Necessary guidelines for the compliance with IACHR recommendations

Discussions regarding the need to supervise IACHR decisions trace back to the 1990s, and progressed in 2002, when the Commission's capacity to supervise compliance through various measures was crystallized and legitimized. Specifically, since 2002, the IACHR publishes a chapter called "state of compliance with IACHR recommendations" in its annual report. This chapter narrates the measures States report having taken, and the position of petitioners with respect to compliance with recommendations issued in the Commission's final reports on the merits (Reports art. 51) and commitments adopted in the framework of friendly settlements approved by the Commission (Reports art. 49). Although the 2002 changes constitute important progress, the current situation requires that the Commission take new steps to maintain the credibility of the IACHR and strengthen the IACHR.

In accordance with the current structure of the aforementioned chapter of the Annual Report, the IACHR includes a table that lists the registration number of article 49 and 51 reports of the IACHR and classifies them into three possible categories: total compliance, partial compliance, pending compliance. Following the table, the IACHR summarizes the measures the State reports to have taken to fulfill the recommendations or commitments and the position of the petitioners with respect to these measures. The information from the State and petitioners is generally sent in the form of a letter to the IACHR during the second semester of each year, following a letter requesting information regarding progress with compliance.

It is worth mentioning that if a given State reports having taken a symbolic measure of satisfaction, such as a public apology or the publication of a section of the art. 51 report, the case may move from "pending compliance"



to “partial compliance” in spite of non-compliance with other measures of reparation. Thus, the existence of these aforementioned categories does not reflect the broad measures of reparation that the IACHR tends to issue in its reports and the actual state of their fulfillment.

A second aspect of this chapter of the Annual Report is related to the inclusion of information provided by the parties in a rigid format, without any type of concrete statement regarding the measures of reparation to be fulfilled or the reasons for which the IACHR reaches that conclusion. In essence, the narrative part of this chapter consists in a long list of measures reported by the State and the position of the petitioners. This procedure does not undertake a real and serious examination of compliance with the State’s recommendations, and also fails to reflect the situation of the victims, and if, in effect, the State has ensured the reestablishment of his or her rights.

In addition to the aforementioned annual report, the IACHR has hearings and meetings that it may call *ex officio* or at the request of the parties, in order to evaluate the level of compliance with final recommendations or commitments in friendly settlements.

Although this is an important opportunity to motivate the State to advance in complying with recommendations, it is necessary to take into account that State delegations present in these meetings and hearings are often composed of members of permanent missions, secretariats, or ministries without any institutional capacity, mandate, or political power to make decisions within their countries. This is the case, for example, in federal States in which non-compliance is tied to the actions or omissions of state authorities, and whose delegation for a hearing or working meeting is limited to federal secretaries or members of country missions to the OAS. This situation, in addition to the difficulties the IACHR faces in following up on the commitments made in these meetings, means that the efforts made to create these spaces do not translate into progress in compliance with recommendations.

Thus, the IACHR lacks more consistent practices regarding the monitoring of its recommendations. Neither its Statute nor the American Convention contain specific provisions regarding mechanisms to supervise recommendations, such as the merits reports published in terms of article 51 of the American Convention, or reports on friendly settlements, adopted according to article 49 of the same Convention. The proposals and guidelines identified in item 3 of this document should, therefore



form part of a more expansive protocol to be adopted by the IACHR, determining follow up and implementation rules.

## b. Creation of an internal State mechanism for IACHR decisions

In addition to measures the IACHR may directly adopt, to improve its implementation policies and processes, it is important to consider the measures the IACHR could suggest States adopt with respect to internal implementation laws and procedures. In particular, we would like to note that during the strengthening process, there was no discussion between States regarding the low level of compliance with decisions of IASHR bodies. This reality not only reflects the unwillingness of OAS member States to contribute to strengthening the case system, but also the high probability that the consolidation of an efficient system would lead to diplomatic resistance similar to that those seen during the strengthening process between 2011 and 2013.<sup>10</sup>

The aforementioned requires an analysis of the effectiveness of the case system, which, in addition to obtaining justice in a specific case, examines national authorities' incorporation of Inter-American standards. This examination does not only consider the appropriateness of legislation and public polices, but also the existence of internal mechanisms to implement the decisions of the IACHR.

The IACHR does not tend to systematically evaluate States' incorporation of Inter-American standards or the existence of internal mechanisms to carry out its recommendations. A first experience on this issue involves the 2013 Annual Report,<sup>11</sup> whose chapter IV.A includes a short analysis of the following issues: a) universal ratification of human rights treaties; b) incorporation of Inter-American standards and control of conventions; and c) compliance with IAHRRC decisions and recommendations.

With respect to the last point, regarding compliance with decisions, the IACHR concluded that the existence of specific implementation mechanisms tends to reduce the difficulties States face in implementing decisions from the organs of the IASHR. Nonetheless, it is important to note that the existence of institutional design and laws to carry out decisions of the IASHR have a greater effect regarding compliance with pecuniary

<sup>10</sup> Para un análisis más detallado sobre los efectos diplomáticos de la consolidación de un pilar de protección (sistema de casos y medidas cautelares) vigoroso a partir de la década de 2000, véase Cerqueira, D. y Katya Salazar. "Desafíos del Sistema Interamericano de Derechos Humanos: Nuevos tiempos, viejos retos." (Bogotá, Colombia. Dejusticia, 2015), p 144 - 189. Disponible en: [www.dplf.org/sites/default/files/desaf3ados20del20sistema20interamericano20de20derechos20humanos20versic3b3n20final20pdf20para20web-2.pdf](http://www.dplf.org/sites/default/files/desaf3ados20del20sistema20interamericano20de20derechos20humanos20versic3b3n20final20pdf20para20web-2.pdf)

<sup>11</sup> Disponible en: <http://www.oas.org/es/cidh/docs/anual/2013/docs-es/InformeAnual-Cap4-Intro-A.pdf>

recommendations. The information the IACHR receives periodically as part of following up implementation of its decisions demonstrates important obstacles for State compliance with recommendations that involve measures of non-repetition, investigation, and sanction of those responsible for human rights violations.<sup>12</sup>

Although the IACHR analysis included in chapter IV.A of its 2013 Annual Report is an important initial step we consider it fundamental to have this type of analysis, both by the IACHR as well as by civil society organizations.<sup>13</sup> IACHR recommendations that States promote internal mechanisms to implement Commissions decisions and the promotion and dissemination of best practices on the topic can lead to legislative, administrative, and judicial progress that strengthens the Inter-American system, the effectiveness of its decisions, and thus, its legitimacy as a supervisory body for the respect and guarantee of human rights on the continent. Discussions to this end have been held during the First Inter-American Human Rights Forum, based on the experiences of national legislation and official institutional mechanisms for compliance with decisions and recommendations. Members of the Network believe it is important to continue these spaces and incorporate experiences regarding best practices in the Commission's work.

## 2. Policies and practices specific to ESCER

In general, IACHR recommendations related to ESCER are given through their relationship with other rights the American Convention recognizes, such as the right to life, property, or personal integrity. Although this interpretive line has allowed the Commission to strengthen the breadth and content of various rights, the adoption of recommendations not only through the aforementioned rights, but also through article 26 is essential for the development of ESCER in the IASHR. This practice can help with the adoption of compliance plans that lead to structural social changes and promote the non-repetition of violations. The IACHR must advance in argumentative and interpretive efforts that recognize the binding nature of article 26 of the American Convention, the content and extent of this right, and the State obligations that derive from it.

Here it is worth mentioning that the recommendations regarding ESCER that the IACHR issues through its various mechanisms, in particular

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<sup>12</sup> Comisión Interamericana de Derechos Humanos. "Informe Anual de 2013", Capítulo IV.A, párrafo 97. Disponible en: <http://www.oas.org/es/cidh/docs/anual/2013/docs-es/InformeAnual-Cap4-Intro-A.pdf>

<sup>13</sup> Al respecto, cfr. "Implementación de las decisiones del Sistema Interamericano de Derechos Humanos: Aportes para los procesos legislativos" (Washington, D.C. CEJIL, 2009)

through monitoring and the case system, tend to be too general. In accordance with the experience of Network members, the adoption of more concrete and specific recommendations can also lead to higher levels of compliance. This is what members have observed as a result of ESCR monitoring efforts based on indicators similar to those of the San Salvador Protocol Monitoring Group.<sup>14</sup> To this end, the IACHR could promote the establishment of indicators and guides for compliance that allow for the verification of progress with its recommendations and lead to more tangible and verifiable commitments for States. Additionally, it is important to propose ways to integrate monitoring mechanisms in order to avoid duplicating efforts.

Collective measures involve high implementation costs and extensive coordination between different State agencies, non-governmental organizations, and affected groups, but the fact that a compliance and supervisory mechanism to provide suggestions regarding the need and form of coordination of these actors does not exist impedes the process of implementing recommendations.

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<sup>14</sup> Organización de Estados Americanos. “Indicadores de Progreso para Medición de Derechos Contemplados en el Protocolo de San Salvador”, OEA/Ser.L/XXV.2.1 GT/PSS/doc.2/11 rev.2 16 diciembre 2011 Original: Español. “i) recepción del derecho; ii) contexto financiero y compromiso presupuestario; y iii) capacidades institucionales o estatales.”

## III. Possible changes in IACHR policies and practices

The above diagnosis allows for the proposal of a series of recommendations that, ideally, could form part of a recommendation follow up protocol the IACHR adopts, materialized through the following actions:

### 1. General recommendations that do not require an additional budgetary allocation (immediate application)

- a. With respect to the **Annual Report**, the IACHR could expand the categories it uses regarding compliance levels, or, in any event, consider a **new methodology to quantify the level of State compliance**. The three possible categories (total compliance, partial compliance, and pending compliance) do not reflect the broad universe of reparation measures the Commission recommends. Thus, classification could be given, for example, on each type of recommendation separately, identifying total, partial, and pending compliance for each: restitution, rehabilitation, satisfaction, cessation, guarantees of non-repetition, obligation to investigate, prosecute, and sanction, and costs and expenses.
- b. Additionally, in its Annual Report, the IACHR could **refer more specifically to non-compliance, highlighting specific unfulfilled reparation measures**, beyond summarizing the information the State and petitioners provide. To this end, the IACHR should systematically evaluate, among other topics, the incorporation of Inter-American standards and the existence of internal execution mechanisms, and issue specific recommendations on these topics in its communications to States, and when relevant, in the chapter that examines compliance levels with final reports on the merits and friendly settlements. This would be the case when the failure to incorporate Inter-American standards and the lack of internal execution mechanisms negatively impacts compliance with recommendations issued in a specific case.
- c. With respect to working meetings and follow up hearings for recommendations and friendly settlements, it is important that the IACHR expressly request State delegations include authorities with the capacity to make progress in compliance. We are aware that the IACHR does not have the tools to force a country to send a specific authority to a hearing or working meeting. However, the Commission could make the relevant request in the letter calling the meeting, and where relevant, make a

public pronouncement when the lack of representatives from bodies directly involved in the non-compliance with recommendations deprives the hearing or working meeting of useful effect.

- d. Specifically regarding working meetings, the IACHR should:
- i. Promote the elaboration of memoranda and exercise due control regarding their content, including the signatures of those present, including the commissioner, documenting the agreements reached.
  - ii. Periodically supervise the agreements signed by the parties and particularly commitments States assume in the memoranda.
- e. The IACHR should incorporate criteria used by other bodies in supranational human rights systems in similar cases, provided that the decisions of these bodies lead to higher compliance levels.
- f. Understanding that States have specific contexts and needs regarding the incorporation of regional decisions, the IACHR should include information regarding domestic laws and procedures that States should adopt to improve compliance with Commission decisions. These recommendations should address not only pecuniary compensation measures, but also compliance with measures of restitution, non-repetition, rehabilitation, satisfaction, cessation, investigation, prosecution, and sanction of those responsible for human rights violations, as well as the adoption of domestic legal frameworks for the incorporation of regional and international human rights decisions. In its 2011-2015 Strategic Plan, the IACHR had already highlighted the need for this, expressing that OAS member States should:

*“adopt the legislative measures necessary to establish a juridical mechanism that ensures enforcement at the domestic level of the decisions of the Court and the Commission. While important progress has been made with implementation of the Commission’s recommendations and compliance with the Court’s judgments, the level of compliance needed to ensure the effectiveness of the System’s decisions has not yet been achieved. The States have introduced legislative reforms to comply with decisions of the Commission. Both in terms of content and name, these reforms conform to the standards set by the Commission through its individual case system.”<sup>15</sup>*

<sup>15</sup> Comisión Interamericana de Derechos Humanos. “Plan Estratégico 2011-2015”, Parte I, p. 37

- g. The IACHR should incorporate **supervisory mechanisms with deadlines into its decisions**, so that the State presents implementation reports to which the other parties may respond.

## 2. General recommendations that may require a budgetary increase (mid to long-term application). The IACHR could consider publicly reproaching a given State's repeated or deliberate non-compliance.

- a. The IACHR could issue **press releases in more serious situations**, such as a given country's failure to comply with recommendations for several years, or the repeated failure to respond to requests for information.
  - i. Additionally, before and after the publication of a **report on the merits/friendly settlement, sending implementation letters** with specific recommendations to States could help activate implementation.
  - ii. The IACHR could suggest the adoption of coordination mechanisms between relevant agencies or ministries (including Treasury Departments) to establish the duty to coordinate the inclusion of necessary resources to fulfill Commission recommendations in annual budgets.
  - iii. The IACHR should ensure that during working visits, the Commissioners incorporate in their agendas a space to address compliance with recommendations issued in reports on the merits or friendly settlements.

## 3. Recommendations specific to ESCER issues

- a. Specific recommendations for immediate application
  - i. Recommendations regarding collective ESCER should be **more precise and concrete** to facilitate State compliance.
  - ii. The ESCER Rapporteur should include monitoring of ESCER in the region within its priorities, which makes including following up on compliance with IACHR recommendations regarding ESCER crucial.

b. Specific mid or long-term recommendations

- i. IACHR recommendations related to **ESCER** issues should also be issued **within the context of article 26** of the American Convention, and include structural changes, in accordance with the obligation of non-repetition.
- ii. The IACHR could **adopt a compliance mechanism** that makes suggestions with respect to the need for and form of **coordination between** various actors involved in recommendations regarding **collective measures**,<sup>16</sup> including **State agencies, non-governmental organizations and affected groups. This is particularly important for the implementation of ESCER.**

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<sup>16</sup> Measures found especially in the matter of ESCR, but not exclusively.



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