



28 October 2025

His Excellency, António Guterres
Secretary-General of the United Nations
United Nations Headquarters
405 East 42nd Street
New York, NY 10017
USA

Dear Secretary-General,

Re: Listing the Russian Federation in the Annex to the Annual Report of the United Nations Secretary-General on Conflict-Related Sexual Violence

We, the undersigned non-governmental organisations and survivor-led groups, write to urge your office to take immediate steps to ensure that the forthcoming Annual Report of the UN Secretary-General on Conflict-Related Sexual Violence (CRSV) lists relevant actors of the Russian Federation as parties credibly suspected of patterns of conflict-related sexual violence.

We welcome your recent report (S/2025/389) and its appendix noting the credible information of violations by Russian armed and security forces and affiliated armed groups, as well as Russia's persistent non-engagement with your Special Representative. However, we are deeply concerned that the report did not proceed to the formal listing of relevant actors of the Russian Federation in the annex as a party credibly suspected of committing or being responsible for patterns of rape or other forms of sexual violence in situations of armed conflict on the agenda of the Security Council. We trust that you will find the evidence supporting the listing of Russian actors clearly meets the established criteria of the UN conflict-related sexual violence listing framework, as set out in Security Council Resolution 1960 (2010) and reaffirmed in resolutions 2106 (2013) and 2467 (2019).

The available evidence suggests that the threshold of credible suspicion and patterned conduct required for listing under the Monitoring, Analysis and Reporting Arrangements (MARA) framework (S/RES/1960 (2010)) has been met with respect to relevant actors of the Russian Federation. Verified cases documented by the Office of the United Nations High Commissioner for Human Rights (OHCHR) (OHCHR, June 2025) and the Independent International Commission of Inquiry on Ukraine (A/HRC/55/66) indicate systematic and widespread sexual violence, including sexualised torture and ill-treatment in detention facilities affecting civilians and prisoners of war.

These findings have been judicially corroborated by the European Court of Human Rights, which determined that sexual violence, including rape, was deployed by the Russian state in Ukraine as part of a military strategy and characterised the use of rape in this context as “an act of extreme atrocity that amounts to torture” (Ukraine and the Netherlands v. Russia, Grand Chamber, 9 July 2025, para 1078).

The threshold deemed sufficient to warrant listing has been met in other contexts when there were significantly smaller bodies of verified evidence available. In the case of Ukraine, OHCHR has documented 484 cases of CRSV perpetrated by armed forces and associated actors of the Russian Federation since 2022, an evidentiary record that extends beyond prior listing precedents in both scale and independent corroboration.



Against this backdrop, the justified listing of relevant actors affiliated with the Russian Federation in the annex of the Secretary-General's report would be consistent with the letter and spirit of the Security Council's framework on conflict-related sexual violence (resolutions 1820, 1888, 1960, 2106, and 2467). Consistent application of established criteria is essential to the credibility of the MARA mechanism and the UN's broader commitment to survivor-centred accountability. Uneven application sends survivors the message that accountability depends on political context rather than principles of justice.

Formally listing Russia would also support the UN's commitment to a survivor-centred approach. The Security Council has emphasised that prevention and response must "respect the rights and prioritise the needs of survivors" (S/RES/2467 (2019), para. 16). General Assembly resolutions reinforce this standard, affirming its application to access to justice, remedies and assistance (A/RES/76/304 (2022)) and mandating victim- and survivor-centred practice for newly established UN mechanisms (A/RES/77/301 (2023)).

Survivors and survivor-led organisations in Ukraine have repeatedly called for the listing of relevant Russian actors as an essential measure of accountability, recognition, and protection. A survivor-centred response requires action on credible evidence that ensures survivors' participation, safety and confidentiality, access to services and remedy, and measures that prevent recurrence. Continued omission of Russian actors would risk further marginalising survivors and undermining confidence in the UN's leadership on CRSV. Listing would translate existing commitments into practical protections and visible consequences, consistent with the survivor-centred approach.

The Russian Federation has shown no meaningful willingness to adopt time-bound commitments or to cooperate to prevent further violations. On the contrary, violations continue to be documented, including in testimonies from former detainees describing patterns consistent with the systematic and widespread use of sexualised torture. With recent estimates indicating that approximately 1,800 Ukrainian civilians remain in detention by the Russian Federation in occupied territories (OHCHR, September 2025), alongside thousands of prisoners of war, there is heightened urgency for additional pressure to be placed on the Russian Federation to end such abuses.

Given the volume, consistency, and verification of information already before the United Nations system, and the repeated calls from survivor-led and non-governmental organisations involved in documentation, the question is no longer whether the evidentiary threshold has been met, but how quickly can Russian actors be added to the annex.

Listing Russian actors in the forthcoming annual report will not only strengthen the credibility of the Secretary-General's listing process, but will confirm the UN's broader commitment to survivor-centred accountability. We stand ready to engage with your office and relevant UN mechanisms to support these objectives and to advance the rights of survivors to recognition, justice, and reparation.

We thank you for your leadership and remain available for further engagement on this matter.

Yours sincerely,

All Survivors Project

Alumni Network of Ukrainian Men who Survived Captivity and Torture

The Andreiev Family Foundation



Ceasefire Centre for Civilian Rights

Civilian Prisoners

Dr Denis Mukwege Foundation

The Eastern Ukrainian Centre for Civic Initiatives

Free to Live

Global Rights Compliance

Global Survivors Fund

Human Rights Centre ZMINA

Human Rights Watch

Interjust

Legal Action Worldwide

Media Initiative for Human Rights

New Lines Institute

Numo Sisters

Physicians for Human Rights

REDRESS

SEMA Ukraine

Synergy for Justice

Truth Hounds

Ukrainian Legal Advisory Group (ULAG)

Ukrainian Women Lawyers Association “JurFem”

Way of the Freeman

Women’s Initiatives for Gender Justice

29th December