COLOMBIA

Impunity perpetuates ongoing human rights violations.

Amnesty International Submission to the UN Universal Periodic Review, April-May 2013

AMNESTY INTERNATIONAL



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INTRODUCTION

In this submission, prepared for the UN Universal Periodic Review of Colombia in April-May 2013, Amnesty International evaluates the implementation of recommendations that Colombia supported during its previous UPR in 2008, concerning human rights defenders, violence against women, the rule of law and justice, and international standards and UN mechanisms.

The two sides in the conflict in Colombia – the security forces, acting alone or in collusion with paramilitaries, and guerrilla groups – continue to be responsible for grave human rights abuses and violations of international humanitarian law (IHL), including forced displacement, unlawful killings, forcible disappearances and abductions, and sexual violence. The failure by the authorities to bring to justice those responsible for such international crimes sends a powerful message to the perpetrators that they can continue to kill without fear of being held to account.

The government and the Revolutionary Armed Forces of Colombia (FARC) began formal peace talks in October 2012. Respect for human rights must be at the top of the agenda for these talks; as without human rights, including truth, justice and reparation for victims, there can be no lasting peace. The two parties must immediately commit to ending human rights abuses and violations of IHL. The government must also ensure that those responsible for international crimes do not benefit from de facto amnesties.

FOLLOW UP TO THE PREVIOUS REVIEW

During its previous review in 2008, Colombia supported a number of recommendations on human rights defenders, violence against women, the rule of law and justice, including impunity, and on international standards and UN mechanisms.²

HUMAN RIGHTS DEFENDERS

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Colombia supported 21 recommendations on the issue of human rights defenders, including to ensure their effective protection, to denounce attacks against them and to recognize the legitimacy of their work.³ Amnesty International notes that President Juan Manuel Santos has adopted a less hostile stance towards human rights issues in general, and human rights defenders in particular, than his predecessor, and that the government has engaged in constructive dialogue with human rights defenders and made public statements condemning human rights abuses against them. However, high-ranking government and state officials continue to make statements that threaten to undermine the legitimacy of human rights work.

Amnesty International also notes the establishment of a new National Protection Programme (NPP) to replace the plethora of protection programmes run by the Interior Ministry for, among others, human rights defenders, and the decision to disband the discredited civilian intelligence service, the Administrative Department of Security

(Departamento Administrativo de Seguridad, DAS).⁴ However, many NPP staff, some of whom have been engaged in protective duties, are believed to be former members of the DAS. Amnesty International is concerned that no effective controls are in place to ensure that private security companies, some of which are providing bodyguards for human rights defenders, as well as the NPP, do not employ former paramilitaries, guerrillas or members of the security forces implicated in human rights violations.⁵

Amnesty International continues to receive reports of human rights defenders being threatened and killed, especially those working on land restitution. ⁶ Criminal investigations into threats and attacks against human rights defenders have made little progress, and most perpetrators have not been identified, let alone brought to justice. ⁷

VIOLENCE AGAINST WOMEN

Colombia accepted key recommendations to address gender-based violence and Amnesty International notes that the authorities are now demonstrating a greater degree of commitment to combat such violence as well as the impunity that has marked such cases.⁸ Amnesty International welcomes the introduction in recent years of several new laws, decrees and resolutions to address the problem.⁹ However, most of these have not been implemented effectively, and have therefore had little discernible impact on survivors' access to justice. A bill currently before Congress "to guarantee access to justice for victims of sexual violence, especially sexual violence in the context of the armed conflict", ¹⁰ could, if approved and implemented effectively, make a real difference in efforts to combat sexual violence.¹¹ The Constitutional Court has affirmed that sexual violence is widespread as well as systematic; however, the state's implementation of Judicial Ruling 092 of 2008 (Auto 092) on combating conflict-related sexual violence and the overwhelming impunity which plagues such crimes, has been poor.¹²

RULE OF LAW, JUSTICE AND IMPUNITY FOR HUMAN RIGHTS ABUSES

Colombia accepted a number of recommendations to ensure appropriate investigation of human rights abuses and to combat impunity for such crimes. ¹³ Amnesty International welcomes progress in recent years to bring to justice a few of those responsible for human rights abuses; however, this remains the exception rather the rule. Those participating in human rights criminal investigations, such as witnesses and lawyers, continue to be threatened and killed.

Colombia also accepted a recommendation to ensure that the military justice system does not have jurisdiction in human rights cases involving members of the security forces, yet the military justice system continues to refuse to hand over many such cases to the civilian prosecuting authorities.¹⁴

INTERNATIONAL HUMAN RIGHTS STANDARDS AND MECHANISMS

Colombia ratified the International Convention for the Protection of All Persons from Enforced Disappearance in July 2012, in line with recommendations it supported at its 2008 review. However, it has not recognized the competence of the Committee to receive and consider communications from or on behalf of victims or from other states parties, leaving survivors and victims' families without an important recourse to justice. Colombian human rights NGOs estimate there have been more than 30,000 forced disappearances in the course of the conflict, although the real figure could be higher.

THE NATIONAL HUMAN RIGHTS FRAMEWORK

VICTIMS AND LAND RESTITUTION LAW

On 10 June 2011, President Santos signed the Victims and Land Restitution Law, the centrepiece of his human rights agenda. The law, which came into force on 1 January 2012, provides for reparations for some survivors of human rights abuses committed in the context of the conflict and contains measures to return millions of hectares of lands, misappropriated mainly by paramilitary groups, to their rightful owners. However, the law has several significant shortcomings. For example, many victims of abuses by paramilitary groups will be excluded from its protections because, since the supposed demobilization of paramilitaries in the mid-2000, the government sees such victims as victims of criminal gangs rather than of the parties to the conflict.

In September 2012, Colombia's Constitutional Court ruled that parts of the law were unconstitutional. These included measures that exempted from prosecution "strawmen" who surrendered misappropriated lands. The Court also declared unconstitutional wording that would have denied land restitution to victims deemed to have taken "illegal" action to campaign for the return of occupied lands that had been misappropriated from them.

JUSTICE AND PEACE LAW

The Justice and Peace process, which began in 2005, is another example of how the state fails to meet international standards on the right of victims to truth, justice and reparation. Under the Justice and Peace Law (Law 975 of 2005), some 10 per cent of the more than 30,000 paramilitaries, who supposedly demobilized in a government-sponsored process that began in 2003, can qualify for reduced prison sentences in return for laying down their arms, confessing to human rights violations and returning misappropriated land and property to their rightful owners.²⁰ The remaining 90 percent have never been investigated effectively over their possible complicity in human rights violations. According to the Office of the Attorney General, only 14 paramilitaries have been convicted for human rights violations under the Justice and Peace process.²¹

Despite government claims that paramilitary groups have demobilized, such groups, albeit under new names, continue to operate and are again consolidating their presence in many areas of the country, sometimes in collusion with the security forces. However, the government denies that paramilitaries still exist, and classifies human rights violations committed by such groups as the actions of criminal gangs (bandas criminales, Bacrim).

LEGISLATIVE MEASURES THAT COULD STRENGTHEN IMPUNITY

The government has supported legislation which raises concerns about its commitment to end impunity. In June 2012, Congress approved a constitutional reform, denominated the "legal framework for peace", which could enable human rights abusers to evade justice. The legal framework for peace will give Congress the power to suspend the prison sentences of members of the parties to the conflict, including of the security forces. The law also allows the Attorney General to prioritize some investigations over others. While states may prioritize cases, under international law they are still obliged to investigate all cases of serious human rights abuses and violations of international humanitarian law.

In December 2012, Congress approved a reform to the Constitution which will give the military greater control over criminal investigations implicating members of the security forces in human rights violations and could see many cases of human rights violations transferred to the military justice system, contrary to international human rights standards. The law gives the military justice system greater control over the initial stages of the investigation. This risks human rights violations being defined in the early stages of investigation as purely combat-related actions and thus within the jurisdiction of the military justice system.

Also in December 2012, Congress passed a reform of the Justice and Peace Law, which again extended the deadline for demobilizations, thereby allowing members of illegal armed groups to benefit from its provisions despite not having laid down their arms at the time the law was approved in 2005. This sends a dangerous message to the parties to the conflict that they can continue to commit human rights abuses and still benefit from the generous provisions in the Justice and Peace Law

HUMAN RIGHTS SITUATION ON THE GROUND

Civilians – especially Indigenous Peoples, Afro-descendant and peasant farmer communities, human rights defenders and trade unionists – continue to be the main victims of the armed conflict. In 2011 alone, over 259,000 civilians were forcibly displaced, most as the result of hostilities.²²

HUMAN RIGHTS DEFENDERS

Despite some welcome stances adopted by the government, human rights defenders and trade unionists continue to suffer killings, threats, judicial persecution and the theft of sensitive case information, and the government is failing to bring the perpetrators to justice. In 2012, at least 40 human rights defenders and community leaders and 20 trade union members were killed.

Government and state officials at the highest level continue to make statements that threaten to undermine the legitimacy of the work of human rights defenders, and this puts them at risk of further attacks.²³

Women human rights defenders who support land restitution processes, accompany displaced communities, or represent survivors of conflict-related sexual violence, are also targeted, principally by paramilitary groups.²⁴ Some have been raped in order to punish and silence them. Most do not report the attacks; those who do have seen scant progress in criminal investigations into their cases.

ARMED GROUPS AND THE SECURITY FORCES

The FARC and the National Liberation Army (ELN) continue to commit serious human rights abuses and violations of IHL, including unlawful killings, hostage-taking, forced displacement, and recruitment of children, and use indiscriminate weapons to kill and injure civilians. In 2011, landmines, laid mostly by guerrilla groups, killed 20 civilians and 49 members of the security forces. In the same period, more than 305 civilians were kidnapped or taken hostage, mainly by common criminal groups, but also by the guerrilla groups and paramilitaries.

In February 2012, the FARC announced it would end all kidnappings of civilians for ransom. This is an important first step, but must be followed up by a firm commitment to put an immediate and unconditional end to all human rights abuses and violations of international humanitarian law, including all forms of kidnapping and hostage taking, the recruitment of child soldiers and the use land mines.

Despite their supposed demobilization, paramilitary groups, labelled "criminal gangs" (Bacrim) by the government, continue to expand and consolidate their presence across Colombia. They are responsible for serious human rights violations, sometimes committed with the collusion or acquiescence of the security forces, including killings and enforced disappearances, as well as "social cleansing" operations in poor urban neighbourhoods. Their victims are mainly trade unionists. human rights defenders and community leaders, as well as representatives of Indigenous Peoples and Afro-descendent and peasant farmer communities.²⁵

The security forces are also responsible for crimes under international law. Although the reported number of extrajudicial executions attributed to them has fallen from the high numbers recorded during the administration of President Álvaro Uribe, cases continue to be reported.

VIOLENCE AGAINST WOMEN

All the parties in the conflict commit sexual crimes; however, only very few of the perpetrators are ever brought to justice. Despite some efforts by the authorities to help survivors of sexual violence overcome barriers to justice, most are too frightened or lack confidence in the judicial system to report these crimes. The few who do report such crimes face insurmountable obstacles and many abandon their fight for justice.

INDIGENOUS PEOPLES

The impact of the conflict on Indigenous Peoples has become increasingly destructive, as hostilities rage in areas inhabited by Indigenous communities and Afro-descendent and peasant farmer communities.²⁶ According to the National Indigenous Organization of Colombia (ONIC), more than 84 Indigenous persons, including 21 leaders, were killed in 2012.

High-ranking government and state officials continue to make statements linking Indigenous leaders and the communities they represent with guerrilla groups. In August 2012, when Indigenous leaders in the south-western department of Cauca called for an end to fighting between the security forces and the FARC, during which several Indigenous persons had been killed and hundreds forcibly displaced, the Defence Minister responded by accusing the FARC of infiltrating the Indigenous movement. Such statements encourage a climate in which abuses against Indigenous Peoples are tolerated, encouraged or even facilitated.

In a ruling on Indigenous Peoples issued in January 2009.²⁷ the Constitutional Court criticized the inadequate response by the state to the problems faced by Indigenous Peoples in Colombia. The Court gave the government six months to devise and implement a plan to guarantee the rights of displaced and endangered Indigenous Peoples. However, more than three years on there is little evidence that effective progress has been made in this respect.

IMPUNITY FOR HUMAN RIGHTS VIOLATIONS OR ABUSES

There has been some progress in several key human rights investigations, including those linked to the "para-politics" scandal, which exposed the illegal links between dozens of legislators and paramilitaries, and the DAS scandal. However, most of the perpetrators of human rights abuses continue to evade justice.

Progress has been particularly slow in criminal investigations into the so-called "false positives" scandal, in which members of the security forces were implicated in the unlawful killing of thousands of civilians. Most of these killings were falsely presented as "guerrillas killed in combat". The Justice and Peace process has also been slow. Recent successes in bringing senior military officers to justice for human rights violations are tempered by the strong criticism of some of these convictions by President Santos and the Commander-in-Chief of the Armed Forces.²⁸

RECOMMENDATIONS FOR ACTION BY THE STATE UNDER REVIEW

Amnesty International calls on the government of Colombia:

On human rights defenders:

- To take more effective measures to ensure the protection of human rights defenders and trade unionists at risk, in strict accordance with their wishes, including by desisting from making statements that call into question the legitimacy of human rights work and thereby putting activists at greater risk of attack;
- To ensure that the judicial authorities carry out full and impartial criminal investigations and prosecutions into human rights abuses committed against human rights defenders:
- To end the misuse of the legal system to undermine the work of human rights defenders and trade unionists, including by prosecuting them on the basis of spurious charges.

On violence against women:

- To develop and effectively implement a comprehensive and inter-disciplinary plan of action to address violence against women in consultation with survivors and women's organizations, and based on the repeated recommendations made by the United Nations and the Inter-American human rights system:
- To support the bill before Congress "to guarantee access to justice for victims of sexual violence, especially sexual violence in the context of the armed conflict."

On impunity for human rights violations or abuses:

- To repeal constitutional reforms, such as the "legal framework for peace" and measures to strengthen the military justice system, which risk increasing impunity;
- To ensure that the military justice system does not claim jurisdiction in cases of human rights violations involving members of the security forces;

- To dismantle paramilitary groups and break their links with sectors of the armed forces and the police, including by effectively investigating and sanctioning those suspected of having such links;
- To amend the Criminal Code so that crimes against humanity and all war crimes are defined as crimes under national law;
- To recognize the competence of the Committee on Enforced Disappearances to receive and consider communications from or on behalf of victims or from other state parties to the International Convention for the Protection of All Persons from Enforced Disappearance.

On communities at risk:

- To ensure that effective measures are adopted to improve the protection of civilians, including internally displaced people, in line with UN human rights recommendations and the UN Guiding Principles on Internal Displacement. Civilians whose human rights have been violated by paramilitaries must be acknowledged by the state as victims of the conflict;
- To comply with the obligation to prevent the displacement of Indigenous Peoples from their lands and commit to uphold the rights contained in the UN Declaration on the Rights of Indigenous Peoples;
- To comply with the January 2009 Constitutional Court ruling on Indigenous Peoples and displacement, which calls on the government to devise and implement an effective plan to guarantee the rights of displaced and endangered Indigenous Peoples.

ENDNOTES

¹ Since making its submission of information for the UPR of Colombia in October 2012, a number of updates have been added to reflect recent developments in the country.

- ³ A/HRC/10/82, recommendations 87.2 (Hungary, Mexico), 87.4 (Romania), 87.12 (Sweden), 87.41 and 87.43-54 (Czech Republic, Norway, Switzerland, Uruguay, France, UK, Ireland, Australia, Spain, Albania, Germany, Canada, Azerbaijan, Hungary).
- ⁴ The DAS had been discredited following a "dirty tricks" scandal, which mainly took place during the government of President Uribe, involving the illegal surveillance and wiretapping of human rights defenders, journalists and judges, as well as death threats and killings carried out in collusion with paramilitary groups.
- ⁵ A/HRC/10/82, recommendation 87.51 (Spain).
- ⁶ A/HRC/10/82, recommendation 87.52 (Albania, Germany, Canada and Azerbaijan).
- ⁷ A/HRC/10/82, recommendation 87.50 (Norway and Australia).
- ⁸ A/HRC/10/82, recommendation 87.15 (Canada and Ireland).
- ⁹ For example, Ley No.1542 de 2012 "por la cual se reforma el Artículo 74 de la Ley 906 de 2004, código de procedimiento penal". On 5 January 2012, the Office of the Attorney General also published its equality and non-discrimination policy. This detailed how it would implement a differentiated approach, including on gender, in the investigation of crimes. According to the Office of the Attorney General, the aim of this policy, adopted on 12 March 2012 (Resolution No. 00450), is to improve access to justice for groups and communities at risk, such as women; lesbian, gay, bisexual, transgender and intersex people; Indigenous Peoples; children, and Afro-descendent communities. On 12 September 2012, President Santos also presented the government's National Public Policy for the Gender Equity of Women, which he claimed would help "guarantee the comprehensive rights of women", including those affected by the conflict.
- 10 Ley 037 de 2012 "Por el cual se modifican algunos artículos de las leyes 599 de 2000, 906 de 2004 y se adoptan medidas para garantizar el acceso a la justicia de las víctimas de violencia sexual, en especial la violencia sexual con ocasión al conflicto armado, y se dictan otras disposiciones".
- ¹¹ See Amnesty `international, Colombia: Hidden from Justice, Impunity for Conflict-Related sexual Violence, a Follow-up Report (AMR 23/031/2012), This is What we Demand. Justice! Impunity for sexual violence against women in Colombia's armed conflict (AMR 23/018/2011) and Colombia: "Scarred Bodies, Hidden Crimes": sexual violence against women in the armed conflict (AMR 23/040/2004).
- ¹² Constitutional Court Judicial Decision (Auto) 092 of 2008 called on the state to implement 13 programmes to prevent sexual violence and protect victims and called on the Office of the Attorney General to make progress in investigating 183 cases of sexual violence, some of which were included in Amnesty International's 2004 report. *Auto 092* was a follow-up report to a 2004 Constitutional Court sentence (T-025), which ruled that the lack of an integrated state policy towards displaced communities was unconstitutional. Since then, the Court has issued a series of judicial decisions on specific displaced communities, such as Indigenous Peoples and people with disabilities.
- ¹³ A/HRC/10/82, recommendation 87.24 (Chile), 87.24 (Switzerland, Chile and Turkey)
- ¹⁴ A/HRC/10/82, recommendation 87.28 (Portugal).

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² Human Rights Council. *Report of the Working Group on the Universal Periodic Review of Colombia*, A/HRC/10/82, 9 January 2009.

- ¹⁵ A/HRC/10/82, recommendation 87.1 (Argentina, Cuba and Mexico).
- ¹⁶ See Amnesty International public statement, Colombia: ratification of the enforced disappearance convention, a positive yet incomplete step forward, 17 July 2012, AMR 23/027/2012.
- ¹⁷ Ley 1448 de 2011 Por la cual se dictan medidas de atención, asistencia y reparación integral a las víctimas del conflicto armado interno y se dictan otras disposiciones.
- ¹⁸ The law also excludes other categories of victims: victims of forced displacement and other human rights abuses occurring before 1985 may only qualify for symbolic reparation, not land restitution or financial compensation; victims of abuses committed between 1985 and 1991 will be eligible for financial compensation, but not land restitution; and only victims whose lands were misappropriated or illegally occupied through abuses after 1991 will be eligible for land restitution and financial compensation. The impact of the Victims and Land Restitution Law may also be undermined by a number of additional factors, including the increase in threats and killings of those campaigning for land restitution or returning to their lands, coupled with a lack of effective state protection measures, the complex process that needs to be undertaken to identify misappropriated lands, provisions that may have the effect of legitimizing tenure of stolen lands, the lack of safeguards to ensure that returnees are not forced to again cede control over their land to those who had forcibly displaced them or to
- ¹⁹ For more details see Colombia: The Victims and Land Restitution Law. An Amnesty International analysis, AMR 23/018/2012, April 2012.
- ²⁰ According to data from the Office of the Attorney General from May 2012, of the 31,668 paramilitaries who demobilized, only 4,140 were registered in the Justice and Peace process. Of these, only 1,620 had confirmed their participation. This means that more than 90 per cent of those who supposedly demobilized were never investigated over their possible participation in human rights violations and still received de facto amnesties.
- ²¹ www.fiscalia.gov.co:8080/justiciapaz/index.htm, accessed on 14 February 2013.
- ²² Amnesty International, "Leave us in peace!": Targeting civilians in Colombia's internal armed conflict (Index: AMR 23/023/2008).
- ²³ In October 2011, the Attorney General announced that she would investigate claims that some victims of the Mapiripán massacre, in which dozens of people were killed and forcibly disappeared by paramilitaries in collusion with the army in July 1997, had not died and that the families of these "false victims" had, nevertheless, claimed and received financial compensation from the state. The investigation was opened following a statement by Mariela Contreras in which she revealed that her son, who had supposedly been killed in Mapiripán, was actually alive. Mariela Contreras, who was represented by the José Alvear Lawyers' Collective (CCAJAR), which also acted as the legal representative for other victims of Mapiripán, received compensation from the state. Following these allegations, the Procurator General accused CCAJAR of acting like a "criminal gang", while President Juan Manuel Santos reportedly said: "There are shadowy economic interests using this system making a mockery of it in order to profit from state resources... What we cannot imagine is that they should have recommended people who were not victims to lie and pass themselves off as such. What greater act of corruption can there be."
- ²⁴ See the following Amnesty International Urgent Actions: UA 26/12, (Index: AMR 23/004/2012); UA 72/12, (Index: AMR 23/012/2012); UA 133/12 (Index: AMR 23/020/2012): UA 141. (Index: AMR 23/021/2012): UA 190/12 (Index: AMR 23/024/2012); UA 361/11 (Index: AMR 23/038/2011); and UA 199/11 (Index: AMR 23/022/2011).
- ²⁵ The debate about whether paramilitaries still exist has raged since the mid-2000s, when the government-sponsored demobilization process began. The government claims

paramilitaries no longer exist and that any violence attributed to them is being carried out by criminal gangs, known as *Bacrim*. What is not disputed is that many paramilitaries failed to demobilize, while a plethora of new groups began to emerge, recruiting both existing and new members. These "new" paramilitary groups continue to operate as "traditional" paramilitaries. They control territory and use the threat of force and actual violence to further their economic and political objectives, sometimes with the support or tolerance of the security forces. Their victims are the same as in the past – human rights defenders, trade unionists and community leaders. According to the think-tank, the Institute for Development and Peace Studies (*Instituto de Estudios para el Desarollo y la Paz*, INDEPAZ), groups that it defines as "narco- paramilitary groups" have increased their presence across the country in the last few years and are now active in all departments and in more than one third of municipalities. INDEPAZ suggests these groups now have some 7,000 combatants and a support network of between 8,200 and 14,500, and that they have in recent years undergone a process of consolidation, with the number of these groups falling from 43 in 2006 to 15 by the end of 2010.

- ²⁶ See Amnesty International, *The Struggle for Survival and Dignity: human rights abuses against Indigenous Peoples in Colombia*, February 2010, AMR 23/001/2010.
- ²⁷ Constitutional Court ruling (Auto No.004) of 2009, 26 January 2009.
- ²⁸ On 28 April 2011, a judge sentenced retired General Jesús Armando Arias Cabrales to 35 years' imprisonment for his role in the enforced disappearance of 11 people in November 1985 after the army stormed the Palace of Justice where people were being held hostage by members of the M-19 guerrilla group. The government and the military high command both made statements criticizing his conviction and that of retired Colonel Luis Alfonso Plazas Vega, sentenced in 2010 to 30 years' imprisonment in the same case. Retired General Iván Ramírez Quintero, who was charged with one of the disappearances, was acquitted in December.

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ANNEX

AMNESTY INTERNATIONAL DOCUMENTS FOR FURTHER REFERENCE¹

Americas: Transforming pain into hope: Human rights defenders in the Americas (AMR 01/006/2012)

Colombia: Reform will boost impunity for military and police human rights abusers (PRE01/597/2012)

Colombia: Hidden from justice: impunity for conflict-related sexual violence, a follow-up-report (AMR 23/031/2012)

Colombia: FARC must go further and put an end to all kidnapping and hostage-taking (PRE01/175/2012)

Colombia: The Victims and Land Restitution Law: An Amnesty International analysis (AMR 23/018/2012)

Colombia: The human rights situation in Colombia: Amnesty International written statement to the 19th session of the UN Human Rights Council (27 February – 23 March 2012) (AMR 23/007/2012)

Colombia: 'This is what we demand. Justice!': impunity for sexual violence against women in Colombia's armed conflict (AMR 23/018/2011)

Colombia: The struggle for survival and dignity: Human rights abuses against Indigenous Peoples in Colombia (AMR 23/001/2010)

Colombia: Everything left behind: Internal displacement in Colombia (AMR 23/015/2009)

Colombia: 'Leave us in peace!': Targeting civilians in Colombia's armed conflict (AMR 23/023/2008)

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¹ All of these documents are available on Amnesty International's website: http://www.amnesty.org/en/region/colombia

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