

**INTER-AMERICAN COMMISSION ON HUMAN RIGHTS
RESOLUTION OF PRECAUTIONARY MEASURES 76/2023**

Precautionary Measure No. 449-22

Identified members of the “União dos Povos Indígenas do Vale de Javari” -UNIVAJA (Union of Indigenous Peoples of Vale do Javari - UNIVAJA) regarding Brazil

December 9, 2023

Follow-up

Original: Portuguese

I. BACKGROUND INFORMATION

1. The Inter-American Commission granted precautionary measures in favor of Bruno Araújo Pereira and Don Phillips on June 11, 2022, through Resolution No. 24/2022¹. On that occasion, considering that their whereabouts or destination were unknown as of June 5, 2022, the IACHR requested that Brazil redouble its efforts to determine the situation and whereabouts of Bruno Araújo Pereira and Dom Phillips, in order to protect their rights to life and personal integrity, and that they may continue to carry out their human rights defense work or journalistic activities, as appropriate; and report on the actions taken to investigate the alleged facts that led to the adoption of this precautionary measure, so as to prevent such events from reoccurring.
2. Considering that the precautionary measures were granted without requesting information from the State, since the immediacy of the potential damage did not allow for delay, the Commission reviewed the decision adopted under the terms of Article 25(5) of its Rules of Procedure. In this regard, on October 27, 2022, it issued Resolution No. 59/2022,² in which it followed up on the situation of the beneficiaries Bruno Araújo Pereira and Dom Phillips, as well as the extension of precautionary measures PM-449-22 in favor of 11 identified members of the União dos Povos Indígena dos Vale do Javari (UNIVAJA). In adopting this decision, the IACHR considered that the beneficiaries are at risk due to their work to protect the indigenous peoples of the Vale do Javari and their territory, as well as their direct participation in the search for Bruno Araújo Pereira and Dom Phillips and the demand for justice for their murders. Consequently, the IACHR requested that Brazil:
 - a. adopt the necessary measures to protect the life and personal integrity of the 11 persons identified, taking into consideration the cultural appropriateness of the measures adopted;
 - b. adopt the necessary measures to guarantee that the proposed beneficiaries can continue to carry out their work as human rights defenders without being subjected to threats, harassment, or acts of violence during the exercise of their duties;
 - c. consult and agree upon the measures to be adopted with the beneficiaries and their representatives; and
 - d. report on the actions taken to investigate the alleged facts that led to the adoption of this precautionary measure, so as to prevent such events from reoccurring.
3. The Commission also appreciated the willingness of the Brazilian State to consider the proposal made by the representation to create “a special accompaniment team” focused on the investigation component, support for family members and structural measures to avoid a repetition of the events.

¹ IACHR. [Resolution 24/2022 \(PM 449-22\)](#). Bruno Araújo Pereira and Dom Phillips regarding Brazil. July 11, 2022.

² IACHR. [Resolution No. 59/22 \(extension and follow-up\)](#). PM 449-22 - Identified members of the Union of Indigenous Peoples of the Javari Valley - UNIVAJA, Brazil. October 27, 2022.

4. Thus, taking note of the openness to dialogue of the parties, the IACHR decided to convene a working meeting to evaluate the possibility presented by the proposal for representation. The said working meeting took place on April 11, 2023, during the 186th Period of Sessions. Subsequently, in order to continue the dialogue between the parties and the IACHR, a second working meeting was held on July 31, 2023, in which the Brazilian State, the beneficiaries of these precautionary measures and their representatives agreed to establish a Joint Working Group. On the same date, the State sent a document prepared jointly with the representation entitled “Joint Working Group on the Implementation of PM-449-22 (Bruno Araújo Pereira, Dom Phillips and 11 human rights defenders from the Javari Valley)” in which they establish objectives, structuring axes, activities and term of validity.
5. Within the framework of strengthening the actions aimed at complying with the precautionary measures and taking into account the position of the parties, the Inter-American Commission reported the creation of the Joint Working Group on the implementation of precautionary measures PM-449-22 in favor of Bruno Araújo Pereira, Dom Phillips and 11 members of the Union of Indigenous Peoples of the Javari Valley (UNIVAJA)³. The Joint Working Group aims to contribute to the full compliance with the precautionary measures, ensuring a space for coordination and complementarity between the national level and the Inter-American Commission on Human Rights. The Working Group is composed of three structuring axes of action, namely: the operation of a National Articulation and Coordination Group; the follow-up and monitoring actions of the precautionary measures by the IACHR; and the sessions of the Joint Working Group. The Working Group also foresees the preparation of an Action Plan by the parties within two months and has a planned duration of two years. The IACHR and its Office of the Special Rapporteurship for Freedom of Expression are available to collaborate technically in this regard⁴.

II. INFORMATION SENT DURING THE TIME THE PRECAUTIONARY MEASURE HAS BEEN IN FORCE AND FOLLOW-UP ACTIONS CARRIED OUT BY THE IACHR

5. The Inter-American Commission has been closely monitoring these precautionary measures. From the aforementioned Resolution No. 59/22 on the Follow-up and Extension of Precautionary Measures in favor of 11 identified members of the UNIVAJA, the IACHR has requested information from the State and the representation on six occasions, has held bilateral meetings with the parties and has convened two working meetings, in its 186th and 187th Period of Sessions respectively.
6. During this period, on November 22, 2022, the State reported on the implementation of the Program for the Protection of Human Rights Defenders, Communicators and Environmentalists of the State of Amazonas (PPDDH/AM), training the local technical team. The State indicated that it received requests for inclusion in the Protection Program of eight of the eleven cases of the beneficiaries, who were at that time under analysis, and detailed the initial steps for such inclusion, including the possibility of adopting the necessary protection measures even before formalizing inclusion in the PPDDH.
7. For its part, on January 4, 2023, the representation alleged that the establishment of the aforementioned Defender Protection Program in the state of Amazonas was carried out without

³ IACHR. [Press Release 179/2023](#). Brazil: IACHR reports the creation of the Joint Working Group on the implementation of precautionary measures in favor of Bruno Araújo, Dom Phillips and members of UNIVAJA. August 11, 2023

⁴ Ibid.

transparency or participation of civil society. It also pointed out that, despite the fact that the beneficiary UNIVAJA members were facing a known risk, no emergency protection measures have been implemented while the procedures for their formal inclusion in the State Protection Program are being carried out. In this regard, the representation provided information on each of the beneficiaries at that time:

- Eliésio Marubo: the PPDDH is said to be aware of the situation, but without applying effective security measures. He has reportedly taken personal measures, such as hiring private security;
 - Higson Dias Castelo Branco: there was contact with the PPDDH, but no effective security measures have been formalized, and he is unescorted;
 - Juliana Oliveira: there has been contact with the PPDDH, but no effective security measures have been formalized, and she is without a security escort or other form of security that guarantees her integrity;
 - Manoel Barbosa da Silva: reported that he “really does not have this support [from the State]”;
 - Natália France Neves Carvalho: reported that there has been no movement to ensure her safety and that she is taking self-protective measures;
 - Orlando Possuelo: There was contact with the PPDDH, but no formalization of effective security measures. He indicated that “I bought a vest when I had some threats and they were private initiatives”;
 - Paulo Dollis: there was contact with the PPDDH, but no effective security measures have been formalized, and he is without a security escort or support to ensure his safety;
 - Varnei Kanamary: there was contact with the PPDDH, but no effective security measures have been formalized, and he is unescorted and unsupported to ensure his safety;
 - Valdir Estevão Marubo: There was contact with the PPDDH, but no effective security measures have been formalized, and he is unescorted and unsupported to ensure his safety.
8. On May 10, 2023, the State presented new information indicating the creation of the Ministry of Indigenous Peoples, the budgetary recomposition of the National Foundation of Indigenous Peoples (FUNAI), the reactivation of the National Council of Indigenous Policy, the resumption of the National Policy of Territorial and Environmental Management of Indigenous Lands and the return of the Amazon Fund as an important financing instrument for environmental preservation efforts. In addition, it reported on the “Safer Amazon Plan (AMAs)”, which aims to “carry out public security actions that meet the specific needs of the states that make up the Legal Amazon, in order to adequately address crime in the region.”
9. The State reported that a delegation from the Federal Government, composed of the Minister of Indigenous Peoples, Sonia Guajajara, and the president of FUNAI, Joenia Wapichana, visited the Vale do Javari in February 2023. As a result of this visit, the Federal Government and UNIVAJA signed a Cooperation Agreement through which, with the support of the Special Secretariat of Indigenous Health, a Basic Fluvial Health Unit was inaugurated. The State also reported that FUNAI, through its president, issued a public retraction note in relation to a note published by the organization in 2022 in which statements were made against the indigenist Bruno Araújo and the journalist Dom Phillips⁵.

⁵ FUNAI. [Funai vem a público corrigir nota difamatória published in 2022, após o desaparecimento de Bruno Pereira e Dom Phillips](#). February 28, 2023.

In addition, the State indicated that the criminal proceedings against three people accused of the murder of Bruno Araújo and Dom Phillips, who were in pretrial detention, were in the preliminary hearing stage.

10. Specifically on the protection measures, the State indicated that “the Federal Team is awaiting a new meeting with the [Ministry of Justice and Public Security] to continue the initial consultations on the protection measures for the beneficiaries.” They also pointed out that, in March 2023, a river base of the Federal Police was created, “which will serve as a support point for carrying out activities to prevent and repress organized crime in the region.” The State added that meetings have been held between the public security authorities and UNIVAJA, as well as that the General Coordination of the Program for the Protection of Human Rights Defenders reportedly followed up for institutional coordination with the State Program for the Protection of Human Rights Defenders in March 2023. In this regard, the State recognized the obstacles they face to protect the beneficiaries given the complex logistics required to travel in the territories, the need to use individual security equipment, as well as the presence of security professionals. In this context, on April 6, 2023, the 11 members of UNIVAJA beneficiaries were included in the Program for the Protection of Defenders of the State of Amazonas, following the technical opinion.
11. The Commission also received information from the parties at the working meetings held. On both occasions, the representation alleged that the situation placing the beneficiaries at risk remained, without specific security measures having been adopted in their favor. At the same time, they acknowledged the beginning of the dialogue with the State. Both parties agreed to establish a Joint Working Group within the framework of these precautionary measures (see *supra* paras. 4-5), which must include follow-up and monitoring actions by the IACHR.
12. On September 29, 2023, the Brazilian State sent a new report, reiterating its commitment to the implementation of PM 449-22. In this regard, the State reported that on May 31, 2023, within the framework of the Interministerial Committee for Coordination, Planning and Monitoring of Indigenous Land Disintrustion Actions, the Vale do Javari Indigenous Land Protection and Territorial Security Working Group was established. Its objective would be to propose concrete measures “aimed at the territorial security and security of the local indigenous population, guided by a preventive approach, as well as aimed at the repression of crimes of various kinds committed within the indigenous lands of the Vale do Javari, in Amazonas.”
13. Similarly, the State reported on progress in the preparation of an Action Plan of the Joint Working Group, indicating that, together with the representatives and beneficiaries of this precautionary measure, it had defined three main objectives: “(I) contribute to full compliance with Precautionary Measure PM-449-22; (II) ensure a coordinated space for articulation and complementarity between the national and international levels (IACHR); and (III) guarantee the direct participation of the beneficiaries, the requesting organizations and their representatives.” In this vein, the Working Group had been discussing issues related to individualized protection measures for the beneficiaries, structural protection measures and the non-repetition of the events that gave rise to the precautionary measure. The state report also mentioned the restructuring of the Program for the Protection of Human Rights Defenders, through the creation of the Sales Pimenta Working Group.
14. Specifically, regarding the security situation of the beneficiaries, the State indicated that it carried out periodic police patrols in their workplaces, as well as police escorts for their movements. A

telephone number on call from the Protection Program has also been made available to beneficiaries. In this scenario, the State does recognize challenges, such as building bonds of trust and maintaining communication with the beneficiaries when they carry out field activities, where access to the internet and telephone is usually restricted. Therefore, the State indicated that it is developing plans to regionalize a Protection Program team, including an exclusive team for the Vale do Javari.

15. The State also sent information on the progress of the investigations into the murders of Bruno Araújo Pereira and Dom Phillips, indicating that the requests for *habeas corpus* in favor of the three defendants had been filed. At the time of submission of the state report, a decision was pending as to whether the defendants would be tried by a jury.

III. JOINT WORKING GROUP AND ACTION PLAN

16. After being granted a two-month extension to present the Action Plan envisaged by the Joint Working Group, on November 29, 2023, the Brazilian State sent the Action Plan prepared jointly with the representation of the beneficiaries and with the accompaniment of the Inter-American Commission, which is detailed below:

Action Plan for the implementation of precautionary measures PM-449-22

This Action Plan was prepared based on five meetings of the National Articulation and Coordination Group created within the framework of the Working Group⁶ on the implementation of precautionary measures PM-449-22 (Bruno Pereira, Dom Phillips and 11 identified members of UNIVAJA), granted by the Inter-American Commission on Human Rights (IACHR), which also accompanied the meetings.

This Group consists of representatives of the organizations representing the PM (UNIVAJA, Article 19, Reporters Without Borders, OPI, ABRAJI, WBO and Instituto Tornavoz) and beneficiaries of the precautionary measures and representatives of the following bodies of the Brazilian State: Ministry of Foreign Affairs, Ministry of Human Rights and Citizenship, Ministry of Indigenous Peoples, Ministry of Justice and Public Security, Ministry of Environment and Climate Change, National Foundation of Indigenous Peoples (FUNAI), and Office of the Attorney General of the Republic. The National Council of Justice will assist in monitoring the implementation of the Plan.

I) Focal point for monitoring urgent protection measures

The implementation of the urgent measures to protect the beneficiaries is carried out from the initial contact between the General Coordination of the Program for the Protection of Human Rights Defenders, Communicators and Environmentalists (PPDDH) with the defenders, and will be monitored separately from the Action Plan, which has a period of two years to be implemented.

In this sense, in parallel with the construction schedule of the Action Plan, meetings will be held to supervise the process of (i) carrying out the risk analysis of the 11 beneficiaries, (ii) construction of the corresponding individual protection plans, and (iii) implementation thereof. Point (i) will be carried out by a team specialized in risk analysis, in collaboration with the Ministry of Justice; points (ii) and (iii) will be carried

⁶ IACHR, Press Release Brazil: IACHR Reports the Creation of the Joint Working Group on the Implementation of Precautionary Measures in Favor of Bruno Araújo, Dom Phillips, and Members of UNIVAJA, August 11, 2023, available at <https://www.oas.org/pt/cidh/jsForm/?File=/pt/cidh/prensa/notas/2023/179.asp>

out in accordance with Ordinance No. 507/2022. All actions will be followed and supervised by the General Coordination of the PPDDH.

Once this first stage of implementation of urgent protection measures has been completed, a focal point of monthly meetings will be held, regardless of the axes of the Action Plan, which will serve as a space for listening to the beneficiaries, capable of receiving criticism and suggestions on the implementation of the measures adopted and to be adopted and their effectiveness.

II) Scope of the Action Plan

The members of the Joint Working Group for the implementation of PM-449-22 commit to work to fulfill the actions listed below within two years from the public launch of this action plan.

1) Measures directly related to the beneficiaries of the precautionary measures

a) OBJECTIVES

- i) Follow-up to investigations and judicial procedures for the responsibility of those involved in the crimes against Bruno Araújo.
- ii) Follow-up to the investigations and judicial processes for the responsibility of those involved in the crimes against Dom Phillips, with the support of the technical advice of the Inter-American Commission on Human Rights, observing the rules of criminal procedure, to be defined within the framework of the cooperation and technical assistance project object of axis 3 of this Action Plan.
- iii) Follow-up to investigations and judicial procedures so that the responsibility for threats against the beneficiaries.
- iv) Establishment of an active and passive transparency channel to promote access to information on research results.
- v) Promotion of communication strategies on the progress of the Working Group aimed specifically at the populations of the Vale do Javari.
- vi) Retraction of the State through an official apology from the highest authorities of the State for the defamation and promotion of hatred against Dom and Bruno in the context of their disappearance and death in 2022. The apology would also imply the recognition of the fundamental role of indigenous peoples in the search and location of the bodies; the recognition of the fundamental role of local journalism and popular and community communication in the investigation and dissemination of truthful information about the case; and the recognition of the fundamental work of Dom and Bruno in the region.
- vii) Establishment of a memory framework for human rights defenders in the Vale do Javari.

b) PRODUCTS

- i) Preparation of a semi-annual report for presentation to the Inter-American Commission, in preparation for the Joint Working Group, which brings together the State, the IACHR, and the Representatives.

2) Structural measures of non-repetition of the events that gave rise to the precautionary measures

a) OBJECTIVES

- i) Strengthening of the Program for the Protection of Human Rights Defenders, Communicators and Environmentalists at the federal level, as guaranteed by the budget and the existence of a team sufficiently equipped and trained to work quickly in the

context that gave rise to the violations that led to the granting of PM-449-22, taking into account the specificities of the protected population.

- ii) Construction of spaces for dialogue between this Working Group and the Sales Pimenta Technical Working Group (TWG) for the construction of the National Protection Policy and the bill that will support it, for example, through the participation of its representatives, including the IACHR, in public hearings and spaces where the participation of observers is possible.
- iii) Proposal of measures for the strengthening of the Program for the Protection of Human Rights Defenders, Communicators and Environmentalists in Amazonas based on the dialogue with local civil society, the requesting entities and with the technical advice of the IACHR on protection matters, such as the construction of the legitimacy of the program in the territories, the budget guarantee and the provision of adequate measures for its operation and the existence of a sufficiently equipped, trained and territorialized team to work quickly in the context that gave rise to the violations that led to the granting of PM 449-22, taking into account the specificities of the protected population.
- iv) Implementation of the IACHR technical assistance and cooperation with the Program for the Protection of Human Rights Defenders, Communicators, and Environmentalists, especially regarding the protection of indigenous peoples, communicators, and environmentalists. Such assistance could include:
 - (1) Accompaniment of the discussions in the Sales Pimenta TWG regarding the territory, collective protection strategies, communicators and indigenous peoples, in consultation with the Working Group;
 - (2) Follow up on the development and implementation of the individual protection plan for beneficiaries, developed and implemented by the PPDDH;
 - (3) Accompanying consultations and discussions on the Protection Program for human rights defenders, communicators and environmentalists in the Amazon;
 - (4) Accompaniment of the debates on the territory and the case within the Observatory of Violence against Journalists and Social Communicators of the National Secretariat of Justice;
 - (5) Technical guidance for the construction of Brazilian parameters to investigate and hold accountable those involved in crimes against indigenous peoples, communicators and environmentalists.
- v) Identification of opportunities and challenges for the security of indigenous peoples, communicators and environmentalists in the region, in respect and in line with the self-determination of the peoples who inhabit the territory, with a view to the development and implementation of collective protection plans, such as:
 - (1) Accompaniment of the installation and strengthening of the bases of FUNAI and IBAMA in the territory;
 - (2) Strengthen the dialogue between the PPDDH and local police forces;
 - (3) Referral of the suggestion to territorialize the PPDDH in Amazonas;
- vi) Measures to improve the processes of investigation of crimes against indigenous peoples, communicators and environmentalists, such as:

- (1) Strengthen the dialogue between the PPDDH, the local police and the Public Prosecutor's Office to better and effectively deal with the development of these cases;
 - (2) Propose training programs for state prosecutors and state police;
 - (3) Liaison with the Observatory on Violence against Journalists and Social Communicators of the National Secretariat of Justice;
- vii) Intensification of efforts to accelerate the process of ratification and incorporation of the Escazú Agreement into Brazilian domestic law, with attention to the following aspects:
- (1) Intensify efforts to ratify the Escazú Agreement, including, if appropriate, making available technical input to Congress;
 - (2) Subject to the ratification of the Agreement, the commitment to prepare a draft executive decree on the treaty and its respective explanatory memorandum, with a view to expediting its promulgation;
 - (3) Subject to ratification, the commitment to enable the preparation of a basic diagnosis for the future implementation of the Escazú Agreement by Brazil;
 - (4) Subject to ratification, consider additional measures to expedite the implementation of the Escazú Agreement.
- viii) Promote the recognition and enhancement of journalistic work in the Amazon in the appropriate forums, through projects and campaigns to prevent violence and raise awareness of the role of the press in schools, universities, public bodies and through alliances with local civil society.
- b) PRODUCTS
- i) Preparation of a semi-annual report for presentation to the Inter-American Commission, in preparation for the Joint Working Group, which brings together the State, the IACHR, and the Representatives.
 - ii) Internal report of the IACHR with recommendations for the strengthening of the Protection Program for Human Rights Defenders, Communicators and Environmentalists at the federal level and in the state of Amazonas.
- 3) International cooperation and technical assistance measures
- i) Prepare and sign a cooperation and technical assistance project of the Inter-American Commission on Human Rights to contribute to the implementation of the objectives selected in axes 1 and 2 of this plan, in areas, modalities and conditions to be proposed and agreed among the members of the Working Group.
 - ii) Actively seek, throughout the implementation of the plan, additional opportunities for international cooperation and technical assistance to advance the objectives of the Working Table, which will be agreed among the members of the Table.

III) Governance

- 1) The specific activities that will be carried out to meet the objectives of the three axes of the Action Plan will be proposed and supervised by Thematic Clusters (NTs), whose composition will be determined by the thematic relevance.

- 2) The proposals approved in the NTs, where appropriate, will be submitted to a referendum at the subsequent plenary meeting of the National Articulation and Coordination Group, which will decide by consensus between the representatives and the State. The referenced proposals will be reported to the IACHR in the semi-annual reports.
- 3) In principle, there will be four Thematic Clusters:
 - a) Structural measures to avoid the repetition of the events that gave rise to the precautionary measures, from the perspective of the investigative actions (Cluster of Investigations)
 - b) Structural measures for the non-repetition of the events that gave rise to the precautionary measures, from the perspective of actions related to protection policies for human rights defenders, communicators and environmentalists (Cluster of Protection Policies)⁷.
 - c) Structural measures to avoid the repetition of the events that gave rise to the precautionary measure, from the perspective of territorial protection (Cluster of Territorial Security).
 - d) Measures directly related to the beneficiaries of PM 449-22 (Cluster of Integrity and Memory)
- 4) Each NT will have a focal point, chosen by the cluster's participants, which will be responsible for mobilizing members and facilitating dialogue with the other NTs.
- 5) Each NT will hold a monthly meeting, in principle, the frequency of which should be continuously re-evaluated by the participants.
- 6) Each NT at its first meeting, must propose indicators to evaluate the progress made in the implementation of the Bureau's objectives, which will then be submitted to the plenary of the Working Group for approval.
 - a) In the case of the Cluster of Integrity and Memory, one of its progress indicators must be the existence of individual protection plans for the beneficiaries of the PMs who are facing a situation presenting a risk.
- 7) A plenary meeting of the National Articulation and Coordination Group will be held every three months, at which the results of the actions carried out by each NT will be presented. This meeting will preferably be held in person.
- 8) The National Articulation and Coordination Group will prepare a report every six months, based on the reports of the NTs, on the status of implementation and compliance with the precautionary measures.
- 9) The semi-annual report of the National Articulation and Coordination Group must be made available to the Inter-American Commission and analyzed at the session of the Working Group that will take place in the context of the semi-annual work visit to follow up on the PMs.
- 10) The semiannual session of the Working Group will preferably be held in person.
- 11) It will be the responsibility of the Inter-American Commission to designate a focal point responsible for monitoring the activities of the Working Group.
- 12) During the implementation of the plan, the members of the Working Group must take into account the need to seek specific funding to ensure the effective implementation of the planned measures. Resources can be sought in the government budget, through specific budget allocations, without prejudice to other alternative sources, such as international cooperation projects.

V. DECISION

⁷ The follow-up of the ratification of the Escazú Agreement will be carried out by this NT.

17. The Inter-American Commission on Human Rights, taking into account the will of the parties, the exceptional circumstances of this matter and the context in which it is raised, decides to continue with the implementation of the Joint Working Group in the terms of the activities provided for in this Work Plan established in agreement with the parties and in Article 25 of its Rules of Procedure. The Commission is available to build and sign the cooperation and technical assistance project that will contribute to the implementation of the objectives defined in the work plan for its proper functioning.
18. The Rapporteur for Brazil, Commissioner Julissa Mantilla; and Rapporteur for Indigenous Peoples, Commissioner Esmeralda Arosemena de Troitiño, of the Inter-American Commission, will follow up on the activities of the Working Group. The IACHR has designated the Precautionary and Provisional Measures Section of its Executive Secretariat as the focal point for the management of this work plan.
19. The IACHR will maintain its competencies derived from the American Convention and other applicable human rights instruments binding on Brazil. The activities provided for in this mechanism will be carried out within the framework of precautionary measures and may not be interpreted to limit other mechanisms.
20. The Commission emphasizes that, pursuant to Article 25(8) of its Rules of Procedure, the granting of precautionary measures and their adoption by the State do not constitute prejudgment on possible violations of the rights protected in the Inter-American Convention and other applicable instruments.
21. The Commission instructs its Executive Secretariat to notify this resolution to the State of Brazil and the representation. Moreover, it instructs it to carry out the corresponding actions in the terms established in this resolution.
22. Approved on December 9, 2023, by Margarete May Macaulay, President; Esmeralda Arosemena de Troitiño, First Vice-President; Roberta Clarke, Second Vice-President; Julissa Mantilla Falcón; Edgar Stuardo Ralón Orellana; Carlos Bernal Pulido; and José Luis Caballero Ochoa, members of the IACHR.

Tania Reneaum Panszi
Executive Secretary