
INTER-AMERICAN COMMISSION ON HUMAN RIGHTS
RESOLUTION TO FOLLOW UP, EXTEND, AND LIFT PRECAUTIONARY MEASURES
37/2025

Precautionary Measure No. 137-23

Identified members of the *Comité Municipal de Defensa de los Bienes Comunes y Públicos de Tocoa* and *Bufete Justicia para los Pueblos* regarding Honduras
(Follow-up, Extension, and Lift)

May 1, 2025

Original: Spanish

I. SUMMARY

1. The Inter-American Commission on Human Rights (IACHR) issues this resolution to follow up, extend, and lift the precautionary measures pursuant to the terms of Article 25 of its Rules of Procedure. The IACHR analyzes the continued risk identified in its 2024 resolution granting precautionary measures, decides to extend them in favor of 13 identified individuals, and lift them regarding Juan Antonio López following his murder in September 2024.

II. BACKGROUND INFORMATION

2. On October 5, 2023, the Commission issued Resolution 55/2023 to grant precautionary measures in favor of 30 identified members of the Municipal Committee for the Defense of the Common and Public Goods of Tocoa (*Comité Municipal de Defensa de los Bienes Comunes y Públicos de Tocoa*, CMDBCPT) and the law firm Justice for the People (*Bufete Justicia para los Pueblos*)¹ in Honduras.² The request for precautionary measures alleged that these individuals had been received death threats, and been subjected to surveillance, harassment, and acts of violence over the past few years, particularly in the context of their work as environmental rights defenders and legal representatives of the Committee in relation to extractive and mining projects in the Bajo Aguán region. Consequently, in accordance with Article 25 of its Rules of Procedure, the Commission required that the State of Honduras adopt the necessary measures to protect the rights to life and personal integrity of the identified members of the Municipal Committee for the Defense of the Common and Public Goods of Tocoa and the law firm Justice for the People; adopt the necessary protection measures so that the beneficiaries can continue to carry out their activities in defense of human rights without being subjected to threats, intimidation, harassment, and acts of violence; consult and agree upon the measures to be implemented with the beneficiaries and their representatives; and report on the actions taken to investigate the alleged facts that gave rise to the adoption of this resolution, so as to prevent such events from reoccurring.

3. The CMDBCPT, the law firm Justice for the People, the NGO Robert F. Kennedy Human Rights, the Center for Justice and International Law (*Centro para la Justicia y el Derecho Internacional*, CEJIL), the Reflection, Research, and Communication Team (*Centro para la Justicia y el Derecho Internacional*, ERIC), the International Committee of the National Lawyers Guild (*Comité Internacional del Gremio Nacional de Abogados*), and the International Human Rights Clinic of the University of Virginia (*Clínica de Derechos Humano*

¹ The following have been named as beneficiaries: (1) Juana Ramona Zúniga Martínez, (2) Gabriela Ofelia Sorto Cruz, (3) David Lemus, (4) J.M., (5) D.M. (6) Olayo Méndez, (7) Juana Esquivel, (8) A.C.(9) D.S., (10) Esly Emperatriz Banegas Ávila, (11) Rita Isabel Romero, (12) Aida Rodríguez, (13) Mario López, (14) Gregorio Vásquez, (15) Ernesto López, (16) Dinora Castro; (17) A.A., (18) José Abelino Cedillo, (19) Reynaldo Domínguez, (20) Eugenio Esquivel, (21) J.S.H., (22) O.H., (23) Juan Antonio López, (24) José Daniel Márquez, (25) Marco Tulio Ramos, (26) Kelvin Romero, (27) Porfirio Sorto; (28) Edy Alexander Tábora Gonzales, (29) Kenia Oliva, and (30) Carlos Jiménez.

² Inter-American Commission on Human Rights (IACHR), Resolution 55/2023, Precautionary Measures No. 137-23, Identified members of the Comité Municipal de Defensa de los Bienes Comunes y Públicos de Tocoa et al. regarding Honduras, October 5, 2023.

Internacional de los Derechos Humanos de la Universidad de Virginia) exert representation before the Commission.

4. During the time the precautionary measures have been in force, the Commission followed up on the situation by requesting information from both parties and has received a response on the following dates:

	Reports submitted by the State	Communications submitted by the representation	Information requested and forwarded by the Commission
2023	October 25 and December 4	October 25 and December 6	November 3
2024	February 19, May 20, September 25, October 25 and December 2	February 22, May 17, August 26, September 16, November 7, and December 19	January 19, March 21, June 24, July 17, August 26, September 17, September 26, November 8, December 9
2025	No information	January 21	No information

5. The Commission held two working meetings to follow up on the implementation of the precautionary measure: on July 11, 2024, at its 190th Period of Session, and on November 15, 2024, at its 191st Period of session.

6. On September 18, 2024, the Commission and its Special Rapporteurship on Economic, Social, Cultural and Environmental Rights (SRESCER) issued a press release condemning the murder of Mr. Juan López, who was an environmental defender, and beneficiary of the precautionary measures. Juan López was murdered on the night of September 14, 2024, after being shot in the municipality of Tocoa, department of Colón. The IACHR and REDESCA urged the State to investigate the facts promptly and diligently, considering his work as a possible motive for the crime, in accordance with inter-American standards.³

7. Between October 30 and November 1, 2024, the Commission conducted a working visit to Honduras, led by Commissioner Andrea Pochak, Rapporteur for the country, with the aim of establishing a dialogue with state authorities, beneficiaries, and their representation regarding the implementation of precautionary measures.⁴ On that occasion, the Commission traveled to Tocoa, in the Bajo Aguán region, where it met with beneficiaries and received first-hand information about their situation and toured the banks of the Guapinol River.⁵ The Commission received information about a significant presence of criminal groups in the region and the lack of diligent investigations into acts of violence over the years. In addition, they highlighted the challenges in the adequate and effective implementation of the measures provided by the National Mechanism of Protection.⁶

III. INFORMATION PROVIDED DURING THE TIME THESE PRECAUTIONARY MEASURES HAVE BEEN IN FORCE

A. Information provided by the representation after the measures were granted

i. Situation of the beneficiaries

8. The representation argued that, by late 2023, the situation had worsened due to discussions about the Ecotek company's energy project. Questions were raised regarding a call for an open town hall

³ IACHR, Press Release No. 219, [IACHR Condemns Assassination of Environmental Defender Juan López in Honduras](#), September 18, 2024.

⁴ IACHR, Press Release No. 285, [IACHR concludes working visit to Honduras](#), November 12, 2024.

⁵ IACHR, Press Release No. 285, [IACHR concludes working visit to Honduras](#), previously cited.

⁶ IACHR, Press Release No. 285, [IACHR concludes working visit to Honduras](#), previously cited.

meeting to approve the project by the mayor of Tocoa. This situation generated several controversies and legal actions.⁷

9. In January 2024, beneficiaries met with the Forest Conservation Institute (*Instituto de Conservación Forestal*), the National Congress Environment Committee (*Comisión de Medio Ambiente del Congreso Nacional*), and the Honduran Institute of Geology and Mines (*Instituto Hondureño de Geología y Minas*). The representation stated that, according to the Secretariat of Natural and Environmental Resources (*Secretaría de Recursos Naturales y Ambientales*, SERNA), there were irregularities in the company's actions. The representation also alleged the existence of a smear campaign against Leonel George,⁸ Reynaldo Domínguez,⁹ and Juan López,¹⁰ coordinated by individuals connected to the company Ecotek, and also mentioned a context of criminalization. Following Executive Decree 18-2024 to protect national parks from mining, the delegation indicated that there is no clarity on how it would be implemented to recover and restore the nuclear zone of the Carlos Escaleras Mejía Botaderos Mountain National Park. They stressed that the mining company continues to promote its project in the area.

10. The beneficiaries reported experiencing new incidents that placed them at risk between late 2023 and early 2024. Among them, they indicated the following:

- October 4, 2023: Juana Zúniga, Gabriela Sorto, and José Abelino Cedillo reported that eight armed men dressed in civilian clothing and traveling in a gray car were posing as agents of the Police Investigation Directorate to harass community residents and asked them for their addresses.
- October 9, 2023: Four hooded individuals arrived in the community of Guapinol to register residents at the soccer field.
- November 2023: After a beneficiary explained the Committee's concerns to people in the region during a religious celebration at the church, one person expressed disagreement with the beneficiary's remarks, who did not respond to avoid conflict. The following week, one of their cats and their hen were found tortured and killed at the entrance to their home, which was described as an act of intimidation.
- During 2024, at the facilities in the San Isidro neighborhood, when meetings of the executive members of the Coordinator of Popular Organizations of Aguán (*Coordinadora de Organizaciones Populares del Aguán*, COPA) were taking place, vehicles without license plates circulated repeatedly;
- February to April 2024: A patrol with hooded police officers entered the community of Guapinol, approximately two to three times a week;
- March and April 2024: Several unknown vehicles without license plates entered the community of Guapinol;
- April 18, 2024: As A.A. was traveling to a meeting in Tocoa, he was followed by a vehicle. On several occasions, unknown vehicles arrived late at night with men who would keep watch over his residence;
- April 2024: A vehicle followed José Daniel Márquez, and vehicles without license plates constantly drove by Juan López's residence.

11. According to the representation, the protection measures that the National Protection Mechanism established on September 21, 2023 were limited in scope to seven of the beneficiaries, as they did not consider all members of the CMDBCPT to be beneficiaries of those measures. On May 23, 2024, at the request of the beneficiaries, a meeting of the Technical Committee of the Mechanism (*Comité Técnico del Mecanismo*) was held in Tocoa. On this occasion, the gathered information was presented at a meeting called by the beneficiaries on April 18. However, the State reported that it had to carry out its own risk assessment at a later date. An agreement was reached to implement urgent measures in their favor. On July 30, 2024, a new

⁷ In January 2024, an appeal for protection of constitutional rights (*amparo*) was filed against the irregular call for a new open council meeting.

⁸ Mr. Leonel George is a beneficiary of Precautionary Measures No. 50-14.

⁹ As a result of the threats and attacks received, Reynaldo Domínguez, his family unit, and more than 40 members of his inner circle had been forcibly displaced within the country.

¹⁰ Mr. Juan López is a beneficiary of Precautionary Measures No. 137-23 and was murdered on September 16, 2024.

session of the Technical Committee was held, during which a risk assessment based on interviews with 19 of the 30 beneficiaries was presented.

12. On September 16, 2024, the representation reported that the beneficiary Juan López was murdered at around 8:00 p.m. on September 14. He was leaving a religious service in the city of Tocoa while waiting for his wife when two men on a motorcycle shot him, and he died instantly. Before his death on September 10 and 11, Juan López, among others, had demanded the resignation of the municipal mayor due to bribery involving well-known drug traffickers. On September 16, 2024, members of civil society, beneficiaries, and representation appeared on the television program “Frente a Frente” to discuss the murder of Juan López. The representation noted the lack of progress in the implementation of the various measures. Following that television interview, the Minister of SERNA contacted beneficiary Kenia Oliva to clarify the government's position on the open council, while the Minister of Human Rights appeared on the same television program the following day to do the same. The beneficiaries viewed this as an attack on their credibility and an attempt to continue the campaign of stigmatization against human rights defenders.

13. The representation reported additional facts in the second half of 2024:

- August 2024: Unknown individuals reportedly broke cameras and lamps in the COPA office.
- Following the murder of Juan López, several beneficiaries reported being watched on several occasions, including acts of intimidation.
- September 26, 2024: During a protest demanding justice for Juan López, beneficiaries reported that several men had infiltrated the group.
- In September 2024, Esly Banegas, president of COPA, reported that a drone was flying over her residence and her husband received threats, warning him to “*be very careful.*”
- In September 2024, Edy Tabora was conducting business in La Ceiba after returning from Tocoa following the murder of Juan López, when his vehicle was followed by an unidentified pickup truck. On September 31, in Tocoa, two of the tires on his vehicles were intentionally punctured.
- In September 2024, rumors have resurfaced about a “blacklist” of people targeted for assassination, and they have been warned that “*if the company stops operating, there will be more murders.*”
- In September 2024, a beneficiary had to flee the area due to threats. In addition, it was noted that several beneficiaries are being forced to leave the area for long periods of time due to lack of security guarantees.
- On October 2, 2024, a tire was punctured on Kenia Oliva’s vehicle in Tegucigalpa;
- In December 2024, the CMDBCPT issued an alert about farming communities that are being attacked and dispossessed by heavily armed vigilantes linked to companies operating in Bajo Aguán. Consequently, a wave of attacks was generated against the Committee, the CUP, and the Agrarian Platform of Bajo Aguán;
- December 30, 2024: Three unknown men entered the grocery store owned by Juana Zúniga and José Abelino Cedillo, located on the same property as their residence. They asked if they sold beer, but ended up buying three cigarette cartons. The beneficiary then went to Tocoa with her daughters and noticed that the men were on the Tocoa bridge, which frightened her.
- January 16, 2025: An unknown pickup truck with no license plates was parked in front of Juana Zúniga and José Abelino Cedillo’s residence in Guapinol. It stayed there for several hours, watching the house.

14. Regarding the State response to the murder of Juan López, the representation mentioned that on September 18, 2024, they requested an urgent meeting with the Office of the Attorney General.¹¹ On September 27, 2024, the Minister of Human Rights met with the CMDBCPT and indicated that, at that time, there was no budget to implement the measures agreed upon in July 2024, and that a proposal for an emergency presidential decree had been sent to the Office of the President that would allow for direct procurement for security measures. However, they subsequently warned that the decree was not approved. The Minister also

¹¹ The delegation indicated that it had been agreed to: (i) hold a meeting with the Minister of Human Rights; (ii) review the appeal filed with the Supreme Court of Justice to verify the Committee’s demands to SERNA; (iii) review the company’s administrative files on environmental licensing.

stated that 90 security camera packages have been ordered for beneficiaries, which will be connected to the national 911 system. In this regard, beneficiaries stated they had to evaluate adopting this measure, as there was little trust in local authorities, including the police force.

15. In December 2024 and January 2025, the representation reported information regarding the adoption of protection measures established in July 2024 by the Protection System. They added that, although there has been some progress in repairing, remodeling, or building guard posts at the entrances to the community of Guapinol, these still do not have roofs or surveillance cameras. In addition, security cameras were installed in the community of Guapinol, however, the beneficiaries require their full implementation, as well as their installation in the communities of the San Pedro and Tocoa sectors.

ii. Status of investigations

16. The representation alleged that the Prosecutor's Office of Tocoa has conducted the investigation into the murders of Ali Dominguez, Oqueli Dominguez, and Jairo Bonilla with a lack of transparency; has failed to provide protection to protected witnesses; has failed to follow up on reports of environmental crimes; and has been responsible for the arbitrary detention of defenders. Following the arrest of one of the defendants as the perpetrator of the murder of Oqueli Domínguez on April 18, 2024, the defendant's initial hearing was held. The court issued a formal indictment for the crime of murder and dismissed the charge of illegal possession of weapons, while changing attempted murder to the crime of bodily harm against another person. Thus, the accused person was sent to pretrial detention in Trujillo. It was noted that the State had not provided any information on the status of the case, thereby leaving the beneficiaries in a situation of complete vulnerability, given that several of them live in the same neighborhood, "Fabio Ochoa," where the suspects are believed to reside. Although the perpetrators have been identified, the suspects in the murders of Ali Domínguez and Jairo Bonilla have not been apprehended.

17. It was stated that the deceased beneficiary Juan López, the beneficiary Reynaldo Domínguez, and Leonel George had previously filed complaints regarding defamation campaigns against the beneficiaries, with no progress reported. Regarding an action for protection filed to protect the right to citizen participation, a clean environment, and water for those affected by the mining company's megaproject surrounding the project in question, the Court of First Instance of Tocoa ruled against the plaintiffs. In its ruling, the Court decided that it was not competent to rule on environmental issues. The decision was sent to the Second Court of Appeals of La Ceiba. On April 29, 2024, the plaintiffs filed a criminal complaint against the judges of the Court of Appeals of La Ceiba and the Court of First Instance of Tocoa for malfeasance and abuse of authority in connection with their ruling.

18. Lastly, regarding the murder of Juan López, the Attorney General announced that it assembled a multidisciplinary team to investigate the crime. After learning of the plan to incorporate the Violent Deaths Investigation Unit of Bajo Aguán (*Unidad de Investigación de Muertes Violentas del Bajo Aguán*, UMVIBA), the beneficiaries made a public complaint and are awaiting for the Office of the Attorney General to confirm that UMVIBA will be excluded from the team. On October 6, 2024, the Public Prosecutor's Office filed charges against three individuals, one of whom was the perpetrator and two of whom were accomplices in the murder. On October 10, 2024, an initial hearing was held, in which the Court of First Instance for Organized Crime, Environmental Crimes, and Corruption of San Pedro Sula issued an indictment against the three defendants. They were held in preventive detention at the Marco Aurelio Soto prison, better known as "Tamara".

iii. Request for extension of the precautionary measures in favor of 13 identified persons

19. On November 7, 2024, the representation requested that protection be extended to 13 people, who are defenders from Guapinol or San Pedro and are demanding justice following the murder of beneficiary Juan López:

- a. *Telma Pena, Claudia López, and Julia López (widow and daughters of Juan López respectively)*: They live in a neighborhood where the alleged hitmen accused of murdering Oqueli Domínguez reside. In addition, according to the police investigation into the murder of Juan López, prior to the crime, he had been under surveillance at the home he shared with his family. On the day of his death, while his body

remained in the vehicle, a suspicious man approached Telma Pena and offered to help her by driving her to the location where the identification of the body was to be carried out. This person “called asking Telma to lend him her phone to make some calls and told her that they would stop by his house first to change his shirt, reassuring her that she should not be afraid.” She did not know this individual and has not seen him again to date. It was indicated that days later, the guest house where Claudia López lives was raided and robbed. After Juan López’s murder, the State granted them protection measures consisting of a police security made up of four police officers and an armored vehicle for a period of six months. Although these measures have been viewed positively, they remain concerned about possible reprisals against them, given that criminal proceedings are ongoing.

- b. *Melvin Darvin Espino López and Enma Iveth Gutiérrez Velásquez (Juan López’s brother and sister-in-law)*: Melvin Espino works in a market in Tocoa and has been vocal in the calls for justice, appearing in national and international media. In November 2024, an individual showed up at his workplace to intimidate him, telling him that “seeking justice for Juan was not the best thing for him and that he should not be playing around.” Enma Gutiérrez is a municipal office employee, which is why she also suffered harassment and intimidation by the mayor and his allies who are “pro-mining” employees at her workplace, due to her affiliation with human rights defense movements. She is currently on maternity leave, but is afraid to return to her job, especially after the murder. They have both stated that, in recent months, they have been victims of surveillance by suspicious men in unidentified cars, both at their workplace and at their residences.
- c. *Roxana Yamileth Romero Ruiz*: She is a defender of the San Isidro Labrador parish, member of the Samaritan Dimension, secretary of the interdiocesan coordination for the defense of Carlos Escaleras Mejía National Park, and member of the CMDBCPT since 2018. She is also part of the communications team that has coordinated public actions to demand justice. It was reported that she received friend requests on Facebook from military profiles. For several months, she noticed vehicles following her home and when she leaves to take her daughter to school early in the morning. In December 2024, on at least two occasions, unknown men on motorcycles following her. Furthermore, after the crime against Juan López, she observed several men outside her residence when she arrived from work.
- d. *Gloria Dubon*: She is an active member of the San Isidro de Labrador parish, where she coordinates the Environment Commission, and is a member of the CMDBCPT. She was at the scene where Juan López was murdered, as a result of which several journalists have identified her and published information about her. This has generated concern for her safety due to possible reprisals for having witnessed the murder. As a self-protection measure, Gloria Dubon was forced to confine herself to her residence and only leaves it for long periods of time to travel to other departments. Moreover, her husband has not returned to work since Juan López’s murder to avoid being out on the streets alone and unprotected. In November 2024, a person knocked on her door to sell shampoo to her husband at 7:00 a.m. When she observed them through a window, she saw that the person was talking to a stranger on a motorcycle. It was suspected that this individual went to their residence with the aim of confirming who lived there and their daily activities. By the end of 2024, on the rare occasions they left their residence, they were followed by unlicensed vehicles and noticed a mine employee parked nearby, photographing their house. It was reported that a friend who worked for a local media outlet had heard rumors about her and her husband and that “it would be better for them to leave the country if they wanted to avoid problems.” In addition, they had been told to “be very careful” and “to leave” the church they regularly attend. A woman who lives near one of the perpetrators who was detained for the crime told them that he is looking for information to take revenge. They do not currently have a protection measure in their favor.
- e. *Antonio Alvarado*: He oversees parish communications and is responsible for live broadcasts of the church’s messages on the Facebook Live page of the San Isidro Labrador parish in Tocoa. At about 10:00 p.m. on December 3, 2024, a suspicious motorcycle with an unknown man parked in front of his house and watched the area for several hours. It was reported that near his home there is a location

where several municipal employees gather and occasionally fire shots into the air in order to intimidate Antonio and other neighbors.

- f. *Miguel Ángel Vásquez*: He is vicar of the San Isidro Labrador parish in Tocoa and advisor to the Samaritan dimension. During visits to communities in the San Pedro Sector, he reported incidents of surveillance against him.
- g. *José Nuncio Veliz Alfaro*: He is a human rights defender and founding member of the San Pedro Sector Environmental Committee, which is part of the CMDBCPT. He currently faces frequent harassment and intimidation because of his work and, more recently, because of his participation in protests and rallies demanding justice for Juan López, which has put him at high risk. He has a position of special vulnerability as he has a vehicle that he uses to transport other defenders to coordination meetings, as there is no public transportation in several areas. On September 25, 2024, his neighbor warned him that “the best thing you can do is withdraw from this collective because the displacement of people from the sector under Executive Decree 18-2024 will be charged to the Committee, and that the FSAR (*Fundación San Alonso Rodríguez*) truck that goes up to the Area will be burned... that Juan López had already been warned about this.” He does not have a protection measure in his favor.
- h. *Limbor Otoniel Velásquez Sarmient*: He is a delegate of *Palabra de Dios* at the San Oscar Arnulfo Romero Parish in Bonito Oriental and an employee of the San Alonso Rodríguez Foundation, which belongs to the CMDBCPT. Since 2018, he has supported the Committee with technical work on the environmental impact of the company Ecotek. As a result, he has been subjected to intimidation, threats, and harassment by personnel from the mining company operating in the area. In the July 2024 council, he was physically assaulted by an engineer employed by the company. During September 2024, Limbor Otoniel observed several suspicious vehicles parked for long periods of time outside his residence on several occasions, which frightened him. He does not have a protection measure in his favor.
- i. *Jose Juan Cedillo Martínez and Angel Augusto Centerero*: Both proposed beneficiaries are defenders and members of the Guapinol cooperative. Mr. Jose Cedillo is the father of the beneficiary José Abelino Cedillo. Mr. Angel Augusto Cantarero has accompanied and provided security to Guapinol beneficiaries in public actions in defense of Carlos Escaleras Mejía National Park. They received threats for their actions in opposition to the mining megaproject in the region. Jose Cedillo was suspended from his job and threatened with dismissal. Furthermore, following the murder of Juan López, they were told to “be careful” because the same thing that happened to Juan could happen to them for opposing the mining company.

B. Information provided by the State after the granting

i. Protection measures in favor of the beneficiaries

20. The State stated that the focus of the conflict in Guapinol, in the Bajo Aguán area, stems from the deepening of the extractive model as the main economic model for development. This leads to the criminalization and prosecution of defenders who defend land, territory, and natural resources against exploitation licenses granted to the mining company Inversiones Los Pinares, formerly known as Emco Mining Company, which has the “Ecotek” thermoelectric project in the region.

21. The Vice Minister of Protection was present at the open town hall meeting on December 9, 2024, in the department of Tocoa, convened by the Municipal Mayor’s Office, to ensure compliance with the popular decision regarding the installation of the Ecotek thermoelectric project and to take the necessary actions to reinforce security in the area. The purpose of the town hall meeting was to share the project with the communities. Human rights defenders attended the open meeting in large numbers, at which it was decided not to approve the project. When faced with a situation that could affect the company’s interests, some individuals decided to leave the council and disregard the decision of the community members, calling for a new open council meeting on January 31 with a select group of residents. The General Directorate of the Protection System mobilized to Tocoa to monitor the process, but upon arriving in the area, they were informed

that the town hall meeting would no longer take place. In this regard, an appeal for protection was filed against the call for a new open town hall meeting before the Court of First Instance of Tocoa, which upheld the suspension of the contested act.

22. The Protection System reported that on September 21, 2023, a Technical Committee of the National Protection Mechanism for Guapinol defenders was held, which included some of the beneficiaries of the precautionary measures. Based on the information provided by the beneficiaries, along with recent events in the area, it was considered that “it is logical to conclude that the risk situation has increased.” Thus, a serious risk level of 83.26% was confirmed and protective measures were established. These included maintaining police liaison with the group, police patrols in the community, infrastructure measures at beneficiary Juana Zúniga’s residence, and repairing security booths at the entrance to the community, among others.

23. On July 30, 2024, a new Technical Committee of the Protection System was held, which identified a serious risk level of 75.84% for beneficiaries and agreed on the following measures:

- Maintain collective police liaison in Tocoa, Colon, in favor of the beneficiaries;
- Implement infrastructure measures, such as the installation of razor wire, security cameras, security locks, solar panels, sensor lights, smart light bulbs, and metal gates, according to agreed specifications, at the beneficiaries’ residences;
- Maintain police patrols in the Guapinol community twice a week, and once a week in the communities of Vado Ancho, Las Mangas, Las Minas, Meangul, Tapiquil, and Mala Falda;
- Maintain timely police accompaniments for work activities, which must be requested 72 hours in advance;
- Repair, remodeling, or construction of guard houses and audible alarms at the two main entrances to the Guapinol community, and another in the Las Mangas community, Tocoa, Colón;
- It was recommended that the Prevention and Context Analysis Unit provide self-protection training to beneficiaries;
- It was recommended that beneficiaries be provided with identification cards;
- Send an official letter to the Central Office of the National Human Rights Commissioner so that, in accordance with its duties, it may follow up on investigations related to precautionary measures;
- Follow up on the request submitted to the Secretariat for Human Rights regarding the establishment of a “High-Level Commission for the implementation of Executive Decree 18-2024 on Carlos Escalera Mountain National Park”;
- Grant a protection stipend in the amount of 20,000 lempiras to assist with the work of personnel assigned to security checkpoints;
- Provide psychological support to beneficiaries;
- Grant a monthly stipend of 4,000 lempiras per sector (Tocoa Centro, Guapinol and San Pedro) for transportation and mobilization expenses;
- Send official letters: i) To the Board of Directors of the Association of Municipalities of Honduras, to keep them informed of the situation that occurred in the Municipal Corporation of Tocoa regarding the actions of the mayor, and to determine whether these actions are in accordance with the law; ii) To the mayor of Tocoa, Adán Funez, informing him that the members of the Committee are beneficiaries of precautionary measures granted by the Inter-American Commission on Human Rights (IACHR), urging respect for their work in defending human rights; iii) To the Secretariat of Strategic Planning, requesting a report that highlights the context of human rights defense in the municipality of Tocoa, to be disseminated through government-affiliated social media channels; iv) To the Secretariat of Infrastructure and Transportation, requesting a study aimed at improving road access to the 13 communities that make up the San Pedro sector; v) To the Secretariat of Social Development, requesting that, within the framework of its constitutional duties, it incorporate the beneficiaries into its social programs; vi) To the Special Prosecutor’s Office for the Protection of Human Rights Defenders, Journalists, Social Communicators, and Justice Officials (FEHPRDDHH), so that it may, ex officio, investigate the public complaints made by the Committee, related to smear campaigns on social media and local media outlets in Tocoa aligned with mining companies; vii) To the National Electric Power Company, for the review and repair of public lighting in the

Guapinol community, as well as for a technical study for a public lighting installation project for the communities of the San Pedro sector, Tocoa, Colón; viii) To the Honduran Telecommunications Company, requesting a technical study to improve communications in the aforementioned sectors.

24. According to the State, the measure of granting collective police liaison was fulfilled, and the measure relating to the issuance of identification cards for beneficiaries of the precautionary measures was partially fulfilled, given that they had not been issued to all individuals. The other measures were allegedly managed through official communications sent by the Protection System to other institutions. The National Civil Police is reportedly implementing police liaison measures, police patrols in the community of Guapinol, the San Pedro sector, and downtown Tocoa, as well as providing occasional police security for beneficiaries. In addition, the Protection System stated that the case is being handled by the Implementation and Monitoring Unit, which is constantly monitoring the situation, and emphasized that “no security incidents were reported prior to the murder of beneficiary Juan López.”

25. On September 19, 2024, the Ministerial Office requested that the National Emergency System 911 provide 133 security cameras to be installed in the department of Colón, particularly in the beneficiaries’ residences. On September 19 and October 17, 2024, sessions of the National Protection Council were held, where the Secretariat for Human Rights, along with the Office of the United Nations High Commissioner for Human Rights, developed an action plan on the problem in the Bajo Aguán region. In the following months, meetings were held to follow up on the requests submitted by the beneficiaries.

ii. *Investigations of the reported facts*

26. The State referred to various files and complaints. Among them, the following were reported:

- Regarding the murders of Aly Magdaleno Domínguez Ramos and Jairo Bonilla Ayala, members of the CMDBCPT and the Guapinol community, on January 7, 2023, the case is currently being heard by the Regional Prosecutor’s Office of Bajo Aguán. Upon conclusion of the investigation, a formal indictment was filed on October 19, 2023, requesting the Tocoa Court of First Instance to issue arrest warrants against the defendants, which are pending execution by the police.
- Regarding the murder of Oscar Oquell Domínguez, the Regional Prosecutor’s Office of Bajo Aguán is bringing charges against one individual for murder, given that the other accused individual has since died. An initial hearing was held on April 18, 2024. The court issued a formal indictment against the defendant for the murder of Oscar Oquell Domínguez and injuries to Catalina Ramos Martínez. The Prosecutor’s Office filed an appeal pending resolution by the Court of Appeals of La Ceiba.
- Following the murder of beneficiary Juan López, the Regional Prosecutor’s Office of Bajo Aguán requested a detailed report from the National Police of the department of Colón on the implementation of the precautionary measures. The Public Prosecutor’s Office also formed a multidisciplinary team to investigate the crime.¹² Several steps have been taken in the investigation, including inspection of the crime scene, collection of evidence, witness statements regarding the incident, and requests for judicial authorization for expert reports, among others.
- Complaint regarding the fire at the treasury and land registry offices of the Municipal Council of Tocoa on July 5, 2024. The Police indicated that they had faced difficulties in communicating with the complainants.
- Report of threats against Carlos Leonel George George and others against the mining company Inversiones Los Pinares – Ecotek. On February 29, 2024, a request for investigation was sent, and the corresponding report is pending from the Police Investigation Directorate. The Special Prosecutor’s Office for the Protection of Human Rights Defenders, Journalists, Social Communicators, and Justice Operators stated that, with regard to the allegations of incitement to discrimination against Juan Antonio López and others, administrative closures were ordered due to a lack of evidence to prove the corresponding criminal offenses.
- The Environmental Prosecutor’s Office stated that, to date, there are three complaints filed in connection with crimes of illegal exploitation of natural resources, abuse of authority, environmental damage, and water pollution, which were filed jointly by Juan Antonio López against Inversiones Pinares S.A. In this regard, a tax request was

¹² Includes prosecutors from the Regional Prosecutor’s Office, agents from the Technical Criminal Investigation Agency with experience in crimes against defenders, a team from the Police Investigation Directorate with experience in deaths of vulnerable persons, a team from the Police Intelligence Directorate of the National Police, and a team from the Anti-Gang and Organized Crime Directorate of the National Police.

filed on September 23, 2024, and eight arrest warrants were executed. Four arrest warrants are reportedly pending.

iii. *Request for extension of the precautionary measures*

27. Following the death of Juan López on September 17, 2024, an official letter was sent from the Protection System to the Ministry of Security requesting that security measures for beneficiaries be enforced and reinforced. On the same date, urgent measures were implemented in favor of Ms. Telma Pena, widow of Juan López, consisting of two police escorts, a monthly stipend of 20,000 lempiras, and the decision to request the assignment of an armored vehicle to the beneficiary for a period of six months. The other proposed beneficiaries do not have protective measures in their favor, and their compliance with the requirements of the Protection Act must be assessed before they can be included as beneficiaries of the Protection System.

IV. ANALYSIS OF THE REQUIREMENTS OF SERIOUSNESS, URGENCY, AND IRREPARABLE HARM

28. The precautionary measures mechanism is part of the Commission's functions of overseeing compliance with the human rights obligations established in Article 106 of the Charter of the Organization of American States. These general oversight functions are established in Article 41(b) of the American Convention on Human Rights, as well as in Article 18(b) of the IACHR's Statute. The mechanism of precautionary measures is set forth in Article 25 of the Commission's Rules of Procedure. In accordance with this Article, the IACHR grants precautionary measures in urgent and serious situations in which these measures are necessary to avoid irreparable harm to persons or to the subject matter of a petition or case before the organs of the inter-American system.

29. The Inter-American Commission and the Inter-American Court of Human Rights ("the Inter-American Court" or "I/A Court H.R.") have repeatedly established that precautionary and provisional measures have a dual nature, both protective and precautionary.¹³ Regarding the protective nature, these measures seek to avoid irreparable harm and protect the exercise of human rights.¹⁴ To do this, the IACHR shall assess the problem raised, the effectiveness of state actions to address the situation described, and how vulnerable the persons proposed as beneficiaries would be, in case the measures were not adopted.¹⁵ Regarding their precautionary nature, these measures have the purpose of preserving a legal situation while under consideration by the organs of the inter-American system. Their precautionary nature aims at safeguarding the rights at risk until the petition pending before the inter-American system is resolved. Their object and purpose are to ensure the integrity and effectiveness of an eventual decision on the merits and, thus, avoid any further infringement of the rights at issue, a situation that may adversely affect the useful effect of the final decision. In this regard, precautionary or provisional measures enable the State concerned to comply with the final decision and, if necessary, to implement the ordered reparations.¹⁶ In the process of reaching a decision, and according to Article 25(2) of the Rules of Procedure, the Commission considers that:

¹³ I/A Court H.R., [Matter of the Yare I and Yare II Capital Region Penitentiary Center](#), Provisional Measures regarding the Bolivarian Republic of Venezuela, Order of March 30, 2006, considerandum 5; Case of Carpio Nicolle et al. v. Guatemala, Provisional Measures, Order of July 6, 2009, considerandum 16.

¹⁴ I/A Court H.R., [Matter of Capital El Rodeo I and El Rodeo II Judicial Confinement Center](#), Provisional Measures regarding Venezuela, Order of February 8, 2008, considerandum 8; [Case of Bámaca Velásquez](#), Provisional measures regarding Guatemala, Order of January 27, 2009, considerandum 45; [Matter of Fernández Ortega et al.](#), Provisional measures regarding Mexico, Order of April 30, 2009, considerandum 5; [Matter of Milagro Sala](#), Provisional measures regarding Argentina, Order of November 23, 2017, considerandum 5 (Available only in Spanish).

¹⁵ I/A Court H.R., [Matter of Milagro Sala](#), Provisional Measures regarding Argentina, Order of November 23, 2017, considerandum 5 (Available only in Spanish); [Matter of Capital El Rodeo I and El Rodeo II Judicial Confinement Center](#), Provisional Measures regarding Venezuela, Order of February 8, 2008, considerandum 9; [Matter of the Criminal Institute of Plácido de Sá Carvalho](#), Provisional Measures regarding Brazil, Order of February 13, 2017, considerandum 6 (Available only in Spanish).

¹⁶ I/A Court H.R., [Matter of Capital El Rodeo I and El Rodeo II Judicial Confinement Center](#), Provisional Measures regarding Venezuela, Order of February 8, 2008, considerandum 7; [Matter of "El Nacional" and "Así es la Noticia" newspapers](#), Provisional Measures

- a. “serious situation” refers to a grave impact that an action or omission can have on a protected right or on the eventual effect of a pending decision in a case or petition before the organs of the Inter-American system;
- b. “urgent situation” refers to risk or threat that is imminent and can materialize, thus requiring immediate preventive or protective action; and
- c. “irreparable harm” refers to injury to rights which, due to their nature, would not be susceptible to reparation, restoration or adequate compensation.

30. In analyzing those requirements, the Commission reiterates that the facts supporting a request for precautionary measures need not be proven beyond doubt; rather, the information provided should be assessed from a *prima facie standard of review to determine whether a serious and urgent situation exists*.¹⁷ Similarly, the Commission recalls that, by its own mandate, it is not called upon to determine any individual liabilities for the facts alleged. Moreover, in this proceeding, it is not appropriate to rule on violations of rights enshrined in the American Convention or other applicable instruments.¹⁸ This is better suited to be addressed by the Petition and Case System. The following analysis is based exclusively on the requirements set forth in Article 25 of the Rules of Procedure, which can be resolved without making any merits assessment.¹⁹

31. With regard to the foregoing, Article 25(7) of the Commission’s Rules of Procedure establishes that decisions granting, extending, modifying or lifting precautionary measures shall be adopted through reasoned resolutions. In addition, Article 25(9) establishes that “the Commission shall evaluate periodically, at its own initiative or at the request of either party, whether to keep, modify, or lift the precautionary measures in force.”

32. When analyzing compliance with the procedural requirements of a request for precautionary measures, Article 25 (6) of its Rules of Procedure establishes that the Commission shall take into account the context of the request. In this sense, the Commission proceeds to analyze the elements reported by the parties in the light of the context in which they are framed. The above is relevant, considering that this matter is related to defenders of the environment in the region of Bajo Aguán in Honduras.

33. With regard to the situation of human rights defenders in Honduras, in its 2024 Report on Honduras, the Commission noted that Honduras continues to be one of the most dangerous in the Americas for the defense of rights, particularly for those who defend the environment, land, and/or territory.²⁰ In the first half of 2023, at least 10 human rights defenders were killed in violent circumstances, some of whom had been granted state protection measures.²¹ The shortcomings of the National Protection System for human rights defenders, journalists, social communicators, and justice operators have contributed to the risks they face, as well as the persistence of high levels of impunity for crimes committed against them. In 2023, the IACHR subsequently condemned the murders of at least five defenders in Honduras between January and February 2023 and called the State to diligently and effectively investigate these events, as well as to protect those who

regarding Venezuela, Order of November 25, 2008, considerandum 23; [Matter of Luis Uzcátegui](#), Provisional Measures regarding Venezuela, Order of January 27, 2009, considerandum 19 (Available only in Spanish).

¹⁷ I/A Court H.R., [Matter of Members of the Miskitu Indigenous Peoples of the North Caribbean Coast regarding Nicaragua](#), Extension of Provisional Measures, Order of August 23, 2018, considerandum 13 (Available only in Spanish); [Matter of children and adolescents deprived of liberty in the “Complexo do Tatuapé” of the Fundação CASA](#), Provisional Measures regarding Brazil, Order of July 4, 2006, considerandum 23.

¹⁸ IACHR, [Resolution 2/2015](#), Precautionary Measure No. 455-13, Matter of Nestora Salgado regarding Mexico, January 28, 2015, para. 14; [Resolution 37/2021](#), Precautionary Measure No. 96-21, Gustavo Adolfo Mendoza Beteta and family regarding Nicaragua, April 30, 2021, para. 33.

¹⁹ In this regard, the Court has stated that “[it] cannot, in a provisional measure, consider the merits of any arguments pertaining to issues other than those which relate strictly to the extreme gravity and urgency and the necessity to avoid irreparable damage to persons.” I/A Court H.R., [Matter of James et al. regarding Trinidad and Tobago](#), Provisional Measures, Order of August 29, 1998, considerandum 6 (Available only in Spanish); [Case of the Barrios Family v. Venezuela](#), Provisional Measures, Order of April 22, 2021, considerandum 2 (Available only in Spanish).

²⁰ IACHR, [Report on the Human Rights Situation in Honduras](#), March 24, 2024, paras. 278 and 273 (Available only in Spanish).

²¹ IACHR, [Situation of Human Rights in Honduras](#), previously cited, para. 9 (Available only in Spanish).

defend human rights in the country. According to public information, the IACHR identified that the five murdered defenders were engaged in activities in defense of land, territory and/or the environment.²²

34. During its *on-site* visit to the country in 2023, the IACHR received testimonies about the murders of defenders in the Bajo Aguán region that have not been investigated.²³ The IACHR also learned about the challenges that undermine the functioning and effective response capacity of the National Protection System for Human Rights Defenders, Journalists, Social Communicators, and Justice Operators, which had already been noted since 2022.²⁴

35. Between October 31 and November 1, 2024, the Commission conducted a working visit to Honduras for dialogue and follow-up on precautionary measures, including Precautionary Measures 137-23, in the Bajo Aguán region.²⁵ In Tocoa, the IACHR received information regarding persistent threats, harassment, surveillance, and violence against them. In addition, the beneficiaries warned about the significant presence of criminal groups in the region and the criminalization of defenders for their work. They also highlighted the challenges in the adequate and effective implementation of the measures provided for by the National Protection Mechanism and the lack of thorough investigations into violence in the region. For their part, environmental defenders also warned that armed groups continue to be present in the National Park and that there is still a large circulation of weapons in the area. They are therefore calling for the implementation of the environmental and disarmament policies approved in Executive Decree 18-2024 for the conservation of the Carlos Escaleras Mejía Montaña de Botaderos National Park and Executive Decree 117-2012, regarding the prohibition of the carrying of weapons by civilians in the department of Colón. The IACHR took note of the State's initiatives to strengthen this mechanism and considered it essential that it have sufficient financial resources to carry out the security plans that have been established. In addition, the IACHR found impunity in most of the incidents that occurred in the last 10 years and encouraged the strengthening of institutions in Bajo Aguán.²⁶

36. Based on the foregoing context, the IACHR will first analyze keeping these precautionary measures in force and, subsequently, the request to extend them to the proposed beneficiaries, in accordance with the procedural requirements set forth in Article 25 of its Rules of Procedure.

- ***Situation of the beneficiaries***

37. In light of all the available information, the Commission assesses that the elements that place the beneficiaries at risk that led to the granting of the precautionary measures remains unchanged to date. The beneficiaries continue to be subjected to threats, surveillance, monitoring, intimidation, and acts of violence in the course of their work defending the environment in Honduras. The Commission understands that the State also considers that the beneficiaries continue to face a risk. In 2023, it assessed that the risk had increased, and in 2024 that they were at "serious risk" which required the implementation of protective measures in their favor.

38. The available information shows that the representation has attributed the events to, for example, armed, hooded, or unknown individuals, along with the presence of unlicensed vehicles at the beneficiaries' residences. In addition, the Commission observes that the identified risk materialized in the murder of one of the beneficiaries, Juan López, in September 2024, who had reportedly been under surveillance at his residence. That same month, the delegation reported that rumors had resurfaced about a "blacklist" of people who were to be murdered. Several beneficiaries left the area for some time due to safety concerns. The Commission considers that the beneficiaries are reportedly facing a very similar pattern of surveillance to that experienced by the beneficiary prior to his murder. This situation is particularly concerning given that the

²² IACHR, [IACHR condemns murders of human rights defenders in Honduras](#), Press Release no. 022/23, February 14, 2023.

²³ IACHR, [Report on the Human Rights Situation in Honduras](#), March 24, 2024, paras. 297 and 310 (Available only in Spanish).

²⁴ IACHR, [Situation of Human Rights in Honduras](#), previously cited, para. 304 and 305 (Available only in Spanish).

²⁵ IACHR, Press Release No. 285, [IACHR concludes working visit to Honduras](#), November 12, 2024.

²⁶ IACHR, Press Release No. 285, [IACHR concludes working visit to Honduras](#), November 12, 2024.

precautionary measures have been in place since 2023 and that the State has implemented protective measures in their favor.

39. The precautionary measures were granted due to the situation faced by the beneficiaries in defending the environment in the context of mining projects. During its working visit to Honduras to follow up on Precautionary Measures 137-23 in the Bajo Aguán region, the Commission observed the persistence of risk factors and the strong presence of armed groups in the area. The Commission also found that most of the incidents that have occurred in recent years, such as violence, threats, and even murders of human rights defenders, have gone unpunished,²⁷ which is consistent with the information received in this proceeding. In this regard, the Commission warns that the lack of an effective response by state authorities to such acts generates impunity and, consequently, an environment conducive to the continuation of the risk that the beneficiaries face.

40. The Commission acknowledges the actions taken by the State to ensure the functioning of its internal institutions responsible for protecting human rights defenders, as well as the progress made in the investigation into the murder of Juan López. In this regard, it should be recalled that in its 2024 Report on the Situation of Human Rights in Honduras, the IACHR called on the State to strengthen the National Protection System for Human Rights Defenders, Journalists, Social Communicators, and Justice Operators, as well as to investigate the deaths in Bajo Aguán related to the agrarian conflict.²⁸ The available information leads to the conclusion that the State must strengthen the effective implementation of protective measures and ensure their effectiveness, and guarantee that investigations move forward and responsibilities are determined, in order to prevent such events from reoccurring.

41. Considering that the identified situation that places them at risk remains in place, the Commission deems it appropriate to maintain the precautionary measures in favor of all beneficiaries identified in Resolution 55/2023 of October 5, 2023, with the exception of Juan López, regarding who it has decided to lift the measures due to his death. Notwithstanding this decision, the Commission condemns the murder of the environmental defender and calls on the State to investigate the facts promptly and diligently, taking into account his work in defense of human rights as a possible motive for the crime, in accordance with inter-American standards.

- ***Situation of the 13 proposed beneficiaries after the murder of defender Juan López in September 2024***

42. The Commission notes that there is a “factual connection” with the events that gave rise to the initial adoption of precautionary measures. The Commission identifies the beneficiaries, as well as the proposed beneficiaries, as human rights defenders, relatives of the deceased beneficiary Juan López, witnesses to the murder, members of the Committee, or members of the Guapinol Community or the Tocoa Sector. In addition, the proposed beneficiaries share common factors with the beneficiaries, both in their mission to seek justice following the defender’s murder in September 2024 and in their work defending the environment in the area. Consequently, the Commission proceeds to the analysis of its situation under the terms of Article 25 of its Rules of Procedure.

43. With regard to the requirement of *seriousness*, the Commission confirms that the proposed beneficiaries, along with those who have already been named as beneficiaries, have been subjected to acts of threat, intimidation, harassment, surveillance, and violence in recent months. Among the incidents reported are death threats and threats to leave the area, as well as frequent surveillance and monitoring, which are believed to be linked to their environmental advocacy work or to demands for justice following the murder of human rights defender Juan López.

44. With regard to the protective measures that have been adopted, the Commission understands that the only individuals with protective measures in their favor were Juan López’s widow, Telma Pena, and his daughters Claudia and Julia López, given that after the defender’s murder, Telma Pena was assigned police

²⁷ IACHR, Press Release No. 285, [IACHR concludes working visit to Honduras](#), November 12, 2024.

²⁸ IACHR, [Honduras Report: Situation of Human Rights](#), OAS/Ser.L, previously cited, pp. 337 and 338.

security consisting of four police officers, as well as an armored vehicle for a period of six months. It is undetermined whether this arrangement is still in place. Although the Commission acknowledges the implementation of these measures, it is possible to infer that the risk of reprisals against them for their demands for justice remains. On another note, the State reported that the remaining proposed beneficiaries do not have protection measures in their favor and that an analysis was required in accordance with internal regulations.

45. The Commission highlights that when an authority becomes aware of a situation that threatens a person's life, it is up to that authority "to identify or determine whether the person being threatened or harassed requires protection measures or to refer the matter to the competent authority for that purpose", who must "offer the person at risk pertinent information on the measures available" and "must not be limited to requiring the victim to apply."²⁹ The Commission has stressed the importance of national mechanisms for the protection of human rights defenders, given that they can encourage timely and specialized intervention, taking into account all the contextual and specific aspects when analyzing the risk of a human rights defender.³⁰ Consequently, given the ties between the proposed beneficiaries and the recent murder of beneficiary Juan López and their actions in defense of the environment, the Commission urges the State to swiftly carry out the corresponding assessment with the aim of determining the appropriate measures for the protection of their lives and personal integrity, taking into account the information provided by the proposed beneficiaries.

46. The Commission appreciates the Public Prosecutor's Office's creation of a multidisciplinary team to investigate the murder of human rights defender Juan López and the progress made in the investigation in recent months, given the importance of a prompt investigation to identify the perpetrators and instigators of the crime. The Commission recalls the importance of conducting the relevant investigations with due diligence to prevent recurrence and avoid creating a situation of impunity, which would place the proposed beneficiaries in a position of greater vulnerability.

47. In light of the above assessments, the Commission considers that the 13 individuals proposed as beneficiaries are *prima facie* in a situation of serious and urgent risk to their rights to life and personal integrity.

48. Regarding the *urgency* requirement, the Commission verifies that, despite the granting of the precautionary measures in 2023, the risk that the beneficiaries face has continued to date and has intensified with the murder of environmental defender Juan López in September 2024, as well as threats and intimidation of proposed beneficiaries. In this regard, the Commission has already observed that the murders of human rights defenders have a crucial impact on families and communities due to the leadership roles they fulfill.³¹ Consequently, as long as these individuals continue their environmental defense activities and their demands for justice, the risk they face is likely to worsen over time. Taking into account the available information on the State's response, the Commission considers that immediate measures to safeguard his life and personal integrity are urgently required.

49. Regarding the requirement of *irreparable harm*, the Commission considers that it has been met, insofar as the potential impact on the rights to life, personal integrity, by their very nature, constitutes the maximum situation of irreparability.

50. Consequently, the Commission decides to extend these precautionary measures in favor of Telma Pena, Claudia López, Julia López, Melvin Darvin Espino López, Enma Iveth Gutiérrez Velásquez, Roxana Yamileth Romero Ruiz, Gloria Dubon, Antonio Alvarado, Miguel Ángel Vásquez, José Nuncio Veliz Alfaro, Limbor Otoniel Velásquez Sarmiento, Jose Juan Cedillo Martínez, and Angel Augusto Centerero.

V. DECISION

²⁹ I/A Court H.R., *Case of Luna López v. Honduras*, Merits, Reparations, and Costs, Judgment of October 10, 2013, para. 127.

³⁰ IACHR, *Second Report on the Situation of Human Rights Defenders in the Americas*, OEA/Ser.L/V/II. 66, December 31, 2011, para. 484.

³¹ IACHR, *Northern Central America: Situation of Environmental Defenders*, OAS/Ser.L/V/II, December 16, 2022.

48. In view of the legal and factual arguments put forward by both parties, the Commission has decided the following:

- a) Keep the precautionary measures granted in favor of Juana Ramona Zúniga Martínez, Gabriela Ofelia Sorto Cruz, David Lemus, J.M., D.M., Olayo Méndez, Juana Esquivel, A.C., D.S., Esly Emperatriz Banegas Ávila, Rita Isabel Romero, Aida Rodríguez, Mario López, Gregorio Vásquez, Ernesto López, Dinora Castro, A.A., José Abelino Cedillo, Reynaldo Domínguez, Eugenio Esquivel, J.S.H., O.H, José Daniel Márquez, Marco Tulio Ramos, Kelvin Romero, Porfirio Sorto, Edy Alexander Tábor Gonzales, Kenia Oliva, and Carlos Jiménez;
- b) Extend the precautionary measures granted in favor of Telma Pena, Claudia López, Julia López, Melvin Darvin Espino López, Enma Iveth Gutiérrez Velásquez, Roxana Yamileth Romero Ruiz, Gloria Dubon, Antonio Alvarado, Miguel Ángel Vásquez, José Nuncio Veliz Alfaro, Limbor Otoniel Velásquez Sarmiento, Jose Juan Cedillo Martínez, and Angel Augusto Centerero;
- c) Lift the precautionary measures granted to Juan Antonio López;
- d) Strengthen the implementation of measures to protect beneficiaries and assess the situations that place them at risk, as soon as possible, with a view to adopting appropriate and effective measures to protect their lives and personal integrity;
- e) Strengthen the presence of state institutions in the area within the framework of environmental and disarmament policies as part of the measures to be implemented to mitigate the risk to beneficiaries; and
- f) Investigate with due diligence the alleged acts of risk and thus prevent impunity and the repetition of such acts, in particular the murder of human rights defender Juan Antonio López.

49. The Commission requests that the parties submit the requested information to the Commission within 60 days from the date of this resolution.

50. The Commission instructs its Executive Secretariat to notify this resolution to the State of Honduras and to the representation.

51. Approved on May 1, 2025, by José Luis Caballero Ochoa, President; Andrea Pochak, First Vice-President; Arif Bulkan, Second Vice-President; Edgar Stuardo Ralón Orellana; Roberta Clarke; Carlos Bernal Pulido; and Gloria Monique de Mees, members of the IACHR.

Tania Reneaum Panszi
Executive Secretary