

**INTER-AMERICAN COMMISSION ON HUMAN RIGHTS
RESOLUTION TO LIFT PRECAUTIONARY MEASURES 86/2025**

Precautionary Measure No. 68-17

Matter of Panambi regarding Paraguay

November 27, 2025

Original: Spanish

I. SUMMARY

1. The Inter-American Commission on Human Rights (IACHR) decides to lift these precautionary measures in favor of Panambi, in Paraguay. The precautionary measures were granted in light of the serious and urgent situation faced by the proposed beneficiary, whose life and personal integrity were at risk. The IACHR decided to lift the precautionary measures after considering that the State has reported on the adoption of measures aimed at implementing them, and that for over five years the representation has not reported on facts indicating that the beneficiary's risk persists. Consequently, since the requirements of Article 25 of the Rules of Procedure were not identified as having been met, the IACHR decided to lift the measures.

II. BACKGROUND INFORMATION

2. On March 2, 2017, the IACHR adopted precautionary measures in favor of the teenager Panambi,¹ in Paraguay. According to the request, the teenager was in a situation presenting a serious risk, given her health condition and the need for specialized medical treatment, in the context of a series of circumstances that were allegedly exacerbating her vulnerability.

3. Panambi lived as a "servant" ("*criada*")² in the home of a couple located in the city of Pedro Juan Caballero, department of Amambay. She had been working there since the age of 12, performing all domestic tasks. On January 13, 2017, she was rushed to the Regional Hospital of the City of Pedro Juan Caballero, Department of Amambay, allegedly because she was "forced to ingest caustic soda." According to news reports, the spouse allegedly caught her partner "sexually abusing the teenager." Subsequently, "both adults proceeded to subject the teenager to all kinds of physical and psychological torture, such as brutally cutting her hair and then forcing her to consume caustic soda."³

4. Upon analyzing the submissions of fact and law furnished by the parties, the Commission considered that the information presented showed *prima facie* that Panambi was in a serious and urgent situation, given that her life and personal integrity were at risk. Consequently, in accordance with Article 25 of the IACHR Rules of Procedure, the Commission requested that Paraguay: a) Adopt the necessary measures to preserve Panambi's life and personal integrity, in order to ensure that she has access to medical treatment appropriate to her situation and recommended by specialists; b) Ensure that Panambi's rights are duly represented and guaranteed in all decisions and procedures relating to health care, care for victims of sexual abuse, and other related processes; c) Take all necessary measures to ensure that the girl has all the technical and family support necessary to fully protect her rights; and d) Adopt a comprehensive care and protection plan for Panambi in the short, medium, and long term, once she has recovered from her current serious condition, taking into account the high level of vulnerability in which she finds herself.⁴

¹ The IACHR withheld the identity of the then-teenager, identifying her as "Panambi" at the request of the applicant.

² *Criadazgo* (servitude) is a term used in Paraguay to refer to domestic work performed by girls. Various international bodies, including the Committee on the Rights of the Child and the CEDAW Committee, have consistently expressed concern about the persistence of this practice, which can lead to situations of forced labor and exploitation. Inter-American Commission on Human Rights (IACHR), [Resolution 7/2017](#), Precautionary Measure No. 68-17, Matter of Panambi regarding Paraguay, March 2, 2017, para. 10.

³ IACHR, [Resolution 7/2017](#), Precautionary Measure No. 68-17, previously cited.

⁴ IACHR, [Resolution 7/2017](#), previously cited.

5. Representation is provided by the Latin American and Caribbean Committee for the Defense of Women's Rights (CLADEM).

III. INFORMATION PROVIDED DURING THE TIME THE PRECAUTIONARY MEASURES WERE IN FORCE

6. During the time the precautionary measure was in force, the Commission followed up through a working meeting⁵ and requests for information from both parties. Communications from the parties and from the IACHR have been recorded on the following dates:

	State reports	Communications from the representation	IACHR
2017	March 16, April 24	June 19, September 20	June 27, July 28
2018	-	July 7, July 17, July 19, July 23, September 24, November 27	September 11, October 15
2019	April 1, August 16, September 11	October 17, November 19	August 15, October 1, December 18
2020	No information	January 8	
2021	No information	No information	
2022	April 11, May 10	No information	January 12, September 22
2023	No information	No information	April 12
2024	August 27, September 6	No information	July 26, August 30, October 2

7. The State requested the lifting of these precautionary measures on April 24, 2017, reiterating this request on September 6, 2024. The Commission forwarded the State's requests to the representation on October 2, 2024, but received no response. The last communication from the representation was on January 8, 2020.

A. Information provided by the State

8. On April 24, 2017, the State reported that on January 13, 2017, the beneficiary was admitted to the Regional Hospital in the city of Pedro Juan Caballero, department of Amambay, with signs of ingesting a corrosive substance. On January 14, 2017, she was rushed to the "Prof. Dr. Manuel Giagni" National Trauma Hospital, where she remained hospitalized until January 30 and then in intensive care until February 28, 2017. According to the State, after the beneficiary's condition improved, it was decided to transfer her on April 3, 2017, to the Acosta Ñu Hospital to continue with general comprehensive care measures appropriate for her age. The State added that the criminal proceedings were in the investigative stage and that the Public Prosecutor's Office had opened two cases against the alleged perpetrators: one for human trafficking for the purpose of labor exploitation (forced labor) and another for attempted murder, grievous bodily harm, and coercion. On January 14, 2017, an arrest warrant was issued for the accused, and in February 2017, an international arrest warrant was issued. On January 15, 2017, police custody was requested at the beneficiary's place of internment. On January 16, 2017, the Public Prosecutor's Office's Specialized Unit on Human Trafficking and Sexual Exploitation of Children and Adolescents carried out the proceedings to clarify the facts reported, granting the beneficiary provisional certification for the care of victims of human trafficking.

9. The State indicated that the beneficiary was receiving psychological care from professionals at the Trauma Hospital and the National Secretariat for Children and Adolescents. The Public Defender also requested the support of the Department of Psychology and Social Work of the Ministry of Public Defense. Through the Special Protection Directorate of the National Secretariat for Children and Adolescents, and with the assistance of the Ministry of Women, the beneficiary's grandmother and sister were transferred to shelters in Asunción to accompany the beneficiary's progress. The Public Defender noted that it was not possible to obtain information about the beneficiary's biological mother and father. After a thorough analysis of the beneficiary's family environment, the Directorate determined that "it did not have the biopsychosocial

⁵ The working meeting was held on October 2, 2018, during the 169th Period of Sessions of the IACHR.

conditions to provide a protective, safe, and supportive environment” for the beneficiary. The State planned to set up an inter-institutional and multidisciplinary working group to develop a special plan for the comprehensive care and protection of the beneficiary. The State concluded that the emergency had been resolved in a timely and appropriate manner and that there was no irreparable harm, and therefore requested the lifting of the precautionary measures at hand.

10. On April 1, 2019, the State reported that the medical team at Acosta Ñu Hospital was waiting for the beneficiary to reach the necessary body weight to undergo the surgery recommended by a medical board (esophageal replacement and exploratory laparotomy) and that, in the meantime, she continued to receive nutritional support through jejunostomy. It also reported that the beneficiary continued to receive psychological support at Acosta Ñu Hospital and at the Ñemity Educational Center (under the Ministry of Children), where she was being protected. The State also continued to take steps to maintain the beneficiary’s bond with her family. At that time, her sister was living with her at the Ñemity Educational Center. As for the beneficiary’s education, she was enrolled in that educational center, where she also participated in recreational activities and received various types of training.

11. On September 9, 2019, the State reported that on April 9 of that year, the beneficiary underwent successful surgery. It indicated that during her recovery, the beneficiary received ongoing support from the Ministry of Children and Adolescents until she was discharged from the hospital on April 25. At that time, she was transferred to the Ñemity Educational Center, where she received comprehensive care. Regarding the beneficiary’s family ties, the State specified that she received visits from her sisters and had telephone contact with her grandfather (who was unable to travel to Asunción for health reasons). In addition, the beneficiary continued to reside with her sister at the Ñemity Educational Center.

12. The State reported that on July 17, 2019, the beneficiary reached the age of majority (18 years) and expressed her desire to reside at the Home of the Congregation of the Sisters of the Good Shepherd in the city of Itauguá, 30 kilometers from Asunción. It added that this home had specific programs and plans for children, adolescents, and women, in coordination with the Ministry of Children and Adolescents. The beneficiary resided in that home and was in “excellent health” and received support from the Ministry of Women and the Specialized Unit on Human Trafficking and Sexual Exploitation of Children and Adolescents of the Public Ministry (considering that she was no longer subject to the jurisdiction of the Ministry of Children and Adolescents). The State affirmed that the beneficiary had access to the appropriate support throughout the pre- and post-operative process and that a pediatrician from the representation (CLADEM) participated without any impediment in the process.

13. On May 10, 2022, the State noted that, in the last follow-up with the beneficiary on September 24, 2019, conducted by the technical team of the Specialized Unit on Human Trafficking and Sexual Exploitation of Children and Adolescents of the Public Prosecutor’s Office, she replied “that she no longer wants to continue with the case and that she should not be bothered again.” It also reported that the beneficiary was residing at the Kuñatai Róga Home of the María Inmaculada Congregation in Asunción, where she would complete her studies and begin her reintegration into her family environment. According to the State, in December 2020, the beneficiary went to spend the holidays with her relatives in Pedro Juan Caballero, after which she did not return to the Kuñatai Róga Home, thus interrupting her educational process.

14. On September 6, 2024, the State reiterated the above and warned that since 2019 it has tried to contact the beneficiary through various state institutions, but without success. It recalled that on September 24, 2019, the beneficiary stated “that she no longer wants to continue with the case and that she should not be bothered again.” It presented updated information on the legal proceedings: on the one hand, it was decided to grant the definitive dismissal of the defendants in the case for attempted murder, grievous bodily harm, and coercion, indicating that, in a preliminary hearing, the beneficiary confirmed that she was not the victim of the criminal acts attributed to her. In the case of human trafficking for labor exploitation (forced labor), the oral

and public trial was held on October 20, 2023. After the opening of the trial, a motion to dismiss the indictment was filed, in response to which the trial court declared the indictment absolutely null and void on October 23, 2023. Consequently, the criminal action was dismissed and the defendants were acquitted. The prosecutor filed an appeal, which was declared inadmissible by the Criminal Chamber of the Supreme Court of Justice.

15. The State reported on the measures taken to ensure non-repetition: (i) the communication campaign “*Hay promesas peligrosas*” (“Dangerous Promises”) (2023), for the prevention and psychosocial care of children and adolescents who are victims of sexual exploitation and trafficking; (ii) the project “Prevention and improvement of care for victims of trafficking” (2024), training in schools and colleges on the prevention of trafficking and child labor; (iii) strengthening of PAIVTES, with the opening of the first state center for victims of trafficking (aged 12-17), offering comprehensive care and long-term stays; (iv) actions by the MTESS and CONAETI, national coordination to prevent and eradicate child labor and protect adolescent labor, with technical support from the ILO and UNICEF; (v) MTESS-*Global Infancia* agreement (2019), training to identify domestic servitude as a form of child labor; (vi) national strategies (Prevention and Eradication of Child Labor and Protection of Adolescent Labor 2019-2024 and Prevention and Eradication of Forced Labor 2021-2024); (vii) national commission to evaluate implementation of the strategy against forced labor; Inter-institutional coordination guide (2010), with protocols for intervention in cases of domestic servitude and internal trafficking; (viii) dissemination of and access to information, with printed materials to raise awareness and provide guidance on reporting and available services; and (ix) training for judicial magistrates on child labor, forced labor, and trafficking; and draft law against domestic servitude (2024).

16. Lastly, the State reiterated its request to have the precautionary measures lifted, noting that the grounds for granting them in favor of Panambi —based on the principle of the best interests of the child— no longer correspond to the current circumstances or the purpose of the measure. Therefore, it is not justified that the measure remain in force, given that it was granted while she was a teenager and in a vulnerable situation.

B. Information provided by the representatives

17. On July 9, 2018, the representatives recalled that the beneficiary was a girl of Panambi indigenous origin, then 16 years old, from the border town of Pedro Juan Caballero, a victim of “servitude” and a survivor of trafficking and violence, who had been institutionalized for one year and five months at that time. They warned that the State had adopted a series of measures to protect and provide assistance and care to the beneficiary. They emphasized that the complexity of the beneficiary’s health put her at risk due to her ingestion of caustic soda. They noted that the alleged perpetrators had not been apprehended and that effective measures to protect her life and integrity had not been adopted.

18. According to the representatives, in April 2017, in an “irregular intervention,” the court investigating the alleged crime of human trafficking of which the beneficiary was a victim, together with a judicial, prosecutorial, and police delegation, went to the Trauma Hospital to conduct a “testimonial hearing as a preliminary jurisdictional hearing.” The representatives questioned this judicial and prosecutorial action. They added that the media reported that the beneficiary had claimed to have “ingested caustic soda of her own free will.” They argued that “this irregular judicial and prosecutorial intervention reveals the lack of protection the girl was under at that time.”

19. At that time, the representatives stated that they did not know whether the State had guaranteed care for the beneficiary as a victim of sexual violence. Regarding the maintenance of the beneficiary’s family ties, the representative indicated that there had only been “sporadic” encounters with members of her family and that her younger sister was also institutionalized in a private home 60 kilometers from Asunción, which made it difficult for them to maintain a relationship. They noted that they were not aware of any plans for the beneficiary’s future. The representatives reported that the State had not ensured the

effective protection of the beneficiary, who had reportedly received threats and intimidating visits during her stay in the hospital.

20. On November 27, 2018, the representatives expressed concern that they had not been able to make progress on the agreements reached with the State at the working meeting held with the IACHR. The representatives had been informed that they could not visit Panambi without judicial authorization, despite being applicants for precautionary measures. On October 16, 2019, the representatives noted that they had been unable to arrange an interview with Panambi and her family, as she was no longer at the home where she had been living.

21. On January 8, 2020, the representatives added that, according to reports from state agents and officials at the *Hogar de las Hermanas del Buen Pastor* in the city of Itaiguá, the beneficiary had left the facility on August 7, 2019, without prior notice and leaving all her belongings behind. They stated that the State's response that the beneficiary had returned to the shelter after visiting her relatives in Pedro Juan Caballero was not true. One day after leaving the Home, the beneficiary had made a witness statement in the case investigating the attempted murder against her, and on August 13, 2019, she had made statements to the media, denying the involvement of the alleged perpetrators in the criminal acts under investigation.

22. The representation added that, although the State highlighted the medical procedures performed to restore the beneficiary's damaged organs, it did not refer to her final discharge and follow-up, or whether she continued to require special nutrition (after highly complex surgery and after not having been fed orally for almost two years). Regarding psychological care, they added that, in the interview held with the Minister of Children and Adolescents and officials from that Ministry on October 18, 2019, the authorities stated that they had had no contact with the beneficiary since she left the Home and that, having reached the age of 18, her follow-up was the responsibility of the Ministry of Women.

23. The representatives pointed out that, although the Minister and Ministry officials had recognized the risk to which the beneficiary was exposed, as well as the suspicion that she was being influenced by her possible traffickers, she had not been provided with support and protection. The representatives stated that the head and assistants of the Specialized Unit for the Fight against Human Trafficking and Sexual Exploitation of Children of the Prosecutor's Office visited the beneficiary at her grandmother's house. On that occasion, the beneficiary stated that she was well and wanted to settle in Pedro Juan Caballero. However, they were struck by the presence of a lawyer at the home. Days after the visit, this lawyer allegedly sponsored a brief filed by the beneficiary in which she denied any connection to the persons accused in the events under investigation. For this reason, they suspected that the beneficiary was being pressured, assisted, and influenced by lawyers linked to the persons accused in the court cases arising from the events that gave rise to these precautionary measures. The representatives recalled that these individuals were fugitives from justice and that drugs had been seized during a search of their home. The beneficiary's written statement, affirming that no criminal acts had taken place, had led the Specialized Unit for the Fight against Human Trafficking and Sexual Exploitation of Children to distance itself from the situation.

24. The representatives added that the beneficiary confirmed by telephone that she was living with her grandmother and grandfather in Pedro Juan Caballero. They emphasized that, given the context described, her continued presence in that locality posed a danger to her life and personal integrity, and that there were no visible state protection and security measures in place to ensure her protection and that of her family. Finally, the representatives reported that they had requested an interview with the beneficiary's younger sister from the Ministry of Children and Adolescents and the public defender, to which they had been told that judicial authorization was required. Although the written request was made, despite repeated efforts, it had not been received or processed due to a strike by the judiciary.

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

25. The mechanism of precautionary measures is part of the Commission's function 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 provided for in Article 41(b) of the American Convention on Human Rights, also reflected in Article 18(b) of the Statute of the IACHR, and the precautionary measures mechanism is described in Article 25 of the Commission's Rules of Procedure. In accordance with that article, the Commission grants precautionary measures in situations that are serious and urgent, and in which such measures are necessary to prevent irreparable harm to individuals.

26. The Inter-American Commission and the Inter-American Court of Human Rights ("the Inter-American Court" or "I/A Court H.R.") have repeatedly held that precautionary and provisional measures have a dual nature, one protective and the other precautionary.⁶ With regard to their protective nature, the measures seek to prevent irreparable harm and preserve the exercise of human rights.⁷ To this end, an assessment must be made of the problem raised, the effectiveness of state actions in response to the situation described, and the degree of vulnerability to which the persons on whose behalf the measures are requested would be exposed if the measures were not adopted.⁸ As for the precautionary nature, precautionary measures are intended to preserve a legal situation while it is being examined by the IACHR. The purpose and aim of precautionary measures is to preserve rights that may be at risk until the petition under consideration in the inter-American system is resolved. Their purpose and aim are to ensure the integrity and effectiveness of the final decision and, in this way, to prevent the alleged rights from being violated, a situation that could render the final decision ineffective or undermine its useful effect (*effet utile*). In this regard, precautionary or provisional measures thus enable the State in question to comply with the final decision and, if necessary, to implement the reparations ordered.⁹ With a view to reaching a decision, and in accordance with Article 25.2 of its Rules of Procedure, the Commission considers that:

- 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.

27. In analyzing the aforementioned requirements, the Commission reiterates that the facts giving rise to a request for precautionary measures do not need to be fully proven. The information provided, for the

⁶ Inter-American Court of Human Rights (I/A Court H.R.), [Case of the Capital Region Penitentiary Yare I and Yare II \(Yare Prison\)](#), 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.

⁷ I/A Court H.R., [Matter of the Capital Judicial Detention Center El Rodeo I and El Rodeo II](#), 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.

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

⁹ I/A Court H.R., [Matter of the El Rodeo I and El Rodeo II Capital Judicial Detention Center](#), Provisional Measures regarding Venezuela, Order of February 8, 2008, considerandum 7; [Matter of the Newspapers "El Nacional" and "Así es la Noticia"](#), Provisional Measures regarding Venezuela, Order of November 25, 2008, considerandum 23; [Matter of Luis Uzcátegui](#), Provisional Measures regarding Venezuela, Order of January 27, 2009, considerandum 19.

purpose of identifying a serious and urgent situation, must be assessed on a *prima facie* basis.¹⁰ The Commission also recalls that, by its own mandate, it is not responsible for determining individual responsibility for the acts denounced. Likewise, in the proceedings at hand, it should not rule on violations of rights enshrined in the American Convention or other applicable instruments,¹¹ which properly fall within the jurisdiction of the Petition and Case System. The following analysis refers exclusively to the requirements of Article 25 of the Rules of Procedure, which can be carried out without the need to make assessments on the merits.¹²

28. In analyzing this matter, the Commission notes that, during the more than eight years of proceedings, the State reported on various actions taken on behalf of the beneficiary with a view to implementing these precautionary measures:

- i. She received specialized medical care for her condition, including surgery (esophageal replacement and exploratory laparotomy).
- ii. She received psychological support at different times and from different institutions.
- iii. While she was a minor, she resided in a public educational center with one of her sisters, where she had access to recreational activities and training.
- iv. Steps were taken to maintain the beneficiary's relationship with her closest relatives (grandparents and sisters).
- v. Investigative work was carried out to find those responsible, as well as protective measures, including an arrest warrant for the accused, police custody at the place of internment, and proceedings to clarify the facts reported by the Specialized Unit on Human Trafficking and Sexual Exploitation of Children and Adolescents of the Public Prosecutor's Office.

29. After reaching the age of majority, the Commission notes that, in 2019, the beneficiary stated that she did not wish to continue with the case and that she did not want to be "bothered." Although her representatives expressed concern about the beneficiary's situation in their latest communications, the Commission has no additional information from her in the last five years. Consequently, there are no concrete and current elements to continue to maintain that the beneficiary is in a situation of vulnerability and imminent risk, as she was at the time this collegiate body decided to grant the precautionary measures in 2017. On the contrary, the Commission understands that the factual framework has changed significantly.

30. With regard to the questions raised by the representatives concerning the investigations into the crimes of human trafficking for labor exploitation (forced labor) and attempted murder, grievous bodily harm, and coercion, this Commission considers that they should be analyzed in the context of a possible petition or case, if the legal requirements for this are met. This is based on the current factual situation and the required exercise of compatibility with the American Convention and applicable standards.

31. In summary, considering the State's request for the lifting of the measures, as well as the information available and the assessments made in this resolution, and taking into account that exceptionality

¹⁰ I/A Court H.R., [Matter of the Residents of the Miskitu Indigenous Communities of the Northern Caribbean Coast Region regarding Nicaragua](#), Extension of Provisional Measures, Order of August 23, 2018, considerandum 13; [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.

¹¹ 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.

¹² In this regard, the Inter-American Court has stated that it "cannot, in a provisional measure, consider the merits of any argument other than those strictly related to the extreme gravity, urgency, and need to prevent irreparable harm to persons." See in this regard: I/A Court H.R., [Matter of James et al. v. Trinidad and Tobago](#), Provisional Measures, Order of August 29, 1998, considerandum 6; [Case of the Barrios Family v. Venezuela](#), Provisional Measures, Order of April 22, 2021, considerandum 2.

and temporality are characteristics of precautionary measures,¹³ this Commission considers that the measures should be lifted.

32. Likewise, the Commission positively assesses the non-repetition measures adopted by the State to ensure that situations such as that of the then-adolescent Panambi do not recur. As appropriate, this Commission will continue to follow up on this matter through its thematic monitoring mandate.

33. Finally, the Commission emphasizes that, regardless of the lifting of the present measures, in accordance with Article 1.1 of the American Convention, it is the obligation of the State of Paraguay to respect and guarantee the rights recognized therein.

V. DECISION

34. The Commission decides to lift the precautionary measures in favor of Panambi, in Paraguay.

35. The Commission recalls that the lifting of these measures does not prevent the representatives from submitting a new request for precautionary measures if they consider that there is a situation presenting a risk that meets the requirements established in Article 25 of the Rules of Procedure.

36. The Commission instructs the Executive Secretariat of the IACHR to notify this resolution to the State of Paraguay and the representatives.

37. Approved on November 27, 2025, by José Luis Caballero Ochoa, President; Andrea Pochak, First Vice-President; Edgar Stuardo Ralón Orellana, Second Vice-President; Roberta Clarke; Carlos Bernal Pulido; and Gloria Monique de Mees, members of the IACHR.

Luiz Marcelo Azevedo
Senior Officer
By authorization of the Executive Secretary

¹³ I/A Court H.R., Matter of Adrián Meléndez Quijano et al., Provisional Measures regarding El Salvador, Order of August 21, 2013, para. 22; Matter of Galdámez Álvarez et al., Provisional Measures regarding Honduras, Order of November 23, 2016, para. 24.