

# The Karabakh Wars and Violations of International Humanitarian Law

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## Abstract

This study provides a comprehensive legal analysis of the Nagorno-Karabakh conflict, with particular focus on documented violations of international humanitarian law (IHL) and international human rights law (IHRL) attributable primarily to Armenian forces across three critical phases of the conflict: the First Karabakh War (1988–1994), the Khojaly Massacre (1992), and the Second Karabakh War (2020). Drawing on established international legal frameworks—including the Geneva Conventions, the Convention on the Rights of the Child (CRC), and the Rome Statute of the International Criminal Court (ICC)—the study systematically identifies recurring patterns of forced displacement, indiscriminate attacks on civilians, deliberate destruction of cultural heritage, deployment of prohibited weapons, and recruitment of child soldiers. The research further evaluates the legal effectiveness of successive ceasefire and peace instruments, including the 1994 Bishkek Protocol, the November 2020 Trilateral Statement, the 2023 ceasefire agreement, and the 2024 peace accord, while foregrounding persistent obstacles to their implementation and enforcement. The findings underscore the imperative for stronger international accountability mechanisms, conflict-resolution processes that address root causes, and sustained humanitarian and reconstruction commitments. The study contributes to scholarship on protracted territorial disputes, international criminal accountability, and post-conflict justice, concluding with concrete policy recommendations directed at promoting durable peace and regional stability in the South Caucasus.

**Keywords:** Nagorno-Karabakh conflict; international humanitarian law; international human rights law; war crimes; Khojaly Massacre; ceasefire agreements; transitional justice

## Introduction

The Nagorno-Karabakh conflict between Armenia and Azerbaijan constitutes one of the most protracted and violent territorial disputes of the post-Soviet era, shaped by intertwined historical, ethnic, and geopolitical dynamics. The conflict has unfolded across several distinct phases of armed confrontation, most notably the First Karabakh War (1988–1994), the Khojaly Massacre (1992), and the Second Karabakh War (2020), each characterised by significant civilian casualties, mass population displacement, and widespread destruction of cultural and civic infrastructure ([Human Rights Watch, 1994](#); [UNHCR, 1995](#)).

This study examines violations of international humanitarian law committed by Armenian forces during these periods of heightened hostilities. Documented violations include indiscriminate attacks on civilian populations, mass forced displacement, and targeted assaults on protected cultural and religious sites ([MacFarlane & Minear, 1997](#); [Vandenberghe, 2022](#)). Particular analytical weight is accorded to the Khojaly Massacre of February 1992, during which hundreds of Azerbaijani civilians were killed in the course of a coordinated Armenian military operation ([Human Rights Watch, 1994](#)).

Beyond the identification and analysis of legal violations, the study assesses the legal architecture and

practical effectiveness of successive peace instruments—including the 1994 Bishkek Protocol, the Russia-brokered Trilateral Statement of November 2020, and the agreements of 2023 and 2024—in terms of their capacity to halt hostilities and lay the groundwork for post-conflict reconciliation (Shiriyev, 2016). It additionally examines the roles played by key regional and international actors, including Russia, Turkey, and the European Union, in shaping both the trajectory of the conflict and the prospects for its resolution.

Methodologically, this article situates the identified violations within applicable international legal frameworks, including the 1949 Geneva Conventions and their Additional Protocols, the Convention on the Rights of the Child (CRC), and the Rome Statute of the International Criminal Court (ICC). Through a systematic assessment of ceasefire mechanisms and a broader analysis of the legal consequences of Armenia's conduct, the study contributes to scholarship on armed conflict, accountability, and post-conflict justice. The analysis is structured around six thematic sections: (1) Armenia's conduct during the First Karabakh War; (2) the Khojaly Massacre and associated forced displacement; (3) IHL violations during the Second Karabakh War; (4) a cross-cutting legal analysis of violations across all phases; (5) a comparative legal and political assessment of ceasefire and peace agreements; and (6) conclusions, policy implications, and recommendations.

### **The First Karabakh War: A Critical Appraisal of Armenia's Role in Crimes Against Humanity**

The dissolution of the Soviet Union in 1991 precipitated a series of territorial disputes across the former Soviet space, among which the Nagorno-Karabakh conflict proved to be one of the most enduring. The region—internationally recognised as part of Azerbaijani territory—became the epicentre of armed confrontation between Armenia and Azerbaijan (de Waal, 2013). Under Soviet administration, Nagorno-Karabakh had been accorded autonomous status within the Azerbaijani Soviet Socialist Republic; as Soviet authority weakened in the late 1980s, calls for unification with Armenia intensified.

In 1988, the Nagorno-Karabakh Autonomous Oblast voted to secede from Azerbaijan and join Armenia, triggering violent intercommunal clashes and retaliatory attacks on both sides (Denber & Goldman, 1992). Following the collapse of the Soviet Union, these tensions escalated into full-scale armed conflict that persisted from 1988 to 1994. The war was characterised by intense military engagements, artillery bombardment, and siege operations, resulting in substantial civilian casualties, mass displacement, and the systematic destruction of towns and villages. Reports compiled by international human rights organisations documented widespread atrocities—including targeted killings, forced expulsion, and systematic ethnic cleansing—giving rise to serious allegations of crimes against humanity (Human Rights Watch, 1994).

This section critically appraises Armenia's role in these violations. It begins by establishing the applicable legal framework for crimes against humanity, proceeds to analyse documented incidents occurring during the conflict, and concludes with an assessment of the obstacles to accountability and the limitations of the international community's response.

#### ***The Legal Framework for Crimes Against Humanity***

Crimes against humanity occupy the highest tier of gravity within international criminal law. As defined in Article 7 of the Rome Statute of the International Criminal Court (1998), they encompass murder, torture, enforced deportation, persecution, rape, and other inhumane acts committed as part of a widespread or systematic attack directed against a civilian population (ICC, 1998; Robinson, 2014). They are distinguished from genocide, which requires specific intent to destroy a group, and from war crimes, which are confined to armed conflict; crimes against humanity may be perpetrated in times of both peace and war, and are defined by the scale and character of the attack rather than its nexus to hostilities (Cassese et al., 2020; Schabas, 2000).

The critical legal threshold lies in demonstrating that the acts were either widespread—affecting a large number of victims—or systematic—reflecting an organised policy or plan. Victims must be civilians not actively participating in hostilities, with particular protection afforded to vulnerable groups including children, women, and the elderly (Bassiouni, 2011; Schabas, 2011). Individual criminal responsibility extends to political leaders, military commanders, and others who plan, order, or facilitate such acts, a principle affirmed by the International Criminal Tribunal for the former Yugoslavia (ICTY) and the International Criminal Tribunal for Rwanda (ICTR).

#### ***Documented Incidents***

Several incidents during the First Nagorno-Karabakh War involved direct attacks on civilians and ethnic cleansing that carry the hallmarks of crimes against humanity.

The most extensively documented atrocity is the Khojaly Massacre of 26 February 1992. Armenian forces, supported by units of the 366th Independent Motor Rifle Regiment of the Commonwealth of Independent States (CIS), launched an assault on the Azerbaijani town of Khojaly. According to Human Rights Watch, at least 200 Azerbaijani civilians were killed; Azerbaijani sources place the death toll at 613, including significant numbers of women and children (Human Rights Watch, 1993; de Waal, 2003). Witness testimonies and survivor

accounts document the deliberate targeting of civilians, the mutilation of corpses, and the conduct of summary executions, indicating an organised and systematic attack. These characteristics satisfy the legal criteria for crimes against humanity (Mooradian & Druckman, 1999).

A less-publicised but similarly significant episode is the Maraga Massacre of 10 April 1992. Armenian forces are alleged to have attacked the village of Maraga, killing civilians and taking numerous inhabitants hostage (Travis, 2017). Survivors reported torture, public executions, and desecration of the dead. Despite receiving comparatively limited international attention, the available evidence indicates that these acts were systematic and deliberately targeted.

More broadly, the conflict period witnessed mass forced displacement and ethnic cleansing: approximately 750,000 Azerbaijanis were expelled from Nagorno-Karabakh and surrounding occupied territories (Human Rights Watch, 1994). This displacement was accompanied by the destruction of civilian homes, cultural sites, and infrastructure, with the evident purpose of altering the demographic character of the contested territory (Gasanov, 2017). Given their scale and systematic nature, these acts fall squarely within the category of crimes against humanity under international law.

### ***Obstacles to Accountability***

Efforts to secure accountability for crimes committed during the First Karabakh War have faced significant legal, political, and geopolitical impediments, compounded by Armenia's persistent refusal to acknowledge its role in the commission of these acts.

First, Armenia has not accepted responsibility for the conduct of its forces, framing the conflict as a legitimate exercise of the right to self-determination and a defensive response to Azerbaijani aggression (Human Rights Watch, 1994). This narrative has impeded accountability discourse and enabled the treatment of perpetrators as national heroes rather than criminal defendants (Akçam, 2012).

Second, structural legal constraints have prevented formal prosecution. Neither Armenia nor Azerbaijan is a State Party to the Rome Statute; without a UN Security Council referral—effectively precluded by Russia's veto—ICC jurisdiction is unavailable (de Waal, 2013). Armenia has, moreover, declined to permit independent investigations into alleged war crimes.

Third, geopolitical alignments have insulated Armenia from international pressure. Russia's strategic interest in maintaining influence in the South Caucasus, and its provision of military support to Armenia, effectively constrained international legal and diplomatic action (Cornell, 2001). Armenia also capitalised on historical narratives and diaspora influence to cultivate international sympathy, thereby diluting calls for accountability.

Domestically in Armenia, political will for prosecution remains negligible. Senior officials and military officers implicated in war crimes have retained prominent positions or enjoyed effective immunity. The cultural veneration of war veterans as national defenders has entrenched a climate of impunity.

### ***The International Response: Challenges and Limitations***

The international community's response to the First Karabakh War and its humanitarian consequences was fragmented and largely ineffectual.

The United Nations Security Council adopted several resolutions calling for an end to hostilities and respect for territorial integrity but authorised no peacekeeping operation and initiated no judicial mechanism. Russia's veto authority and political alignment with Armenia proved decisive in blocking more assertive action (Cornell, 2001; Akhavan, 2001).

Major powers aligned along regional fault lines. Russia provided military support to Armenia; Turkey, as a close ally of Azerbaijan, condemned Armenian conduct but offered no concrete legal or humanitarian initiative; Iran attempted to maintain neutrality while avoiding direct confrontation of Armenian war crimes allegations (de Waal, 2003; Akhavan, 2001).

Non-governmental organisations, most notably Human Rights Watch, fulfilled a critical documentation function (Human Rights Watch, 1994). However, restricted access and the absence of political follow-through by major powers prevented these reports from feeding into accountability mechanisms.

The European Union and the OSCE Minsk Group engaged primarily in diplomatic mediation, focusing on conflict termination rather than accountability. Peace initiatives prioritised ceasefire arrangements and territorial negotiations over justice for civilian victims (Schabas, 2011). This approach critically undermined longer-term reconciliation and confidence-building efforts.

In sum, the First Karabakh War involved extensive violations of human rights and humanitarian law, with multiple incidents satisfying the legal criteria for crimes against humanity. Armenia neither acknowledged its role in these atrocities nor took steps towards accountability. The international community's constrained and politically conditioned response reinforced a culture of impunity that created the conditions for similar violations to recur during the Second Karabakh War.

### **The Khojaly Massacre and Forced Displacement: A Critical Analysis of Armenia's Role**

The Khojaly Massacre, perpetrated on the night of 25–26 February 1992, stands as one of the most devastating episodes in the history of the Nagorno-Karabakh conflict. Acting in coordination with forces of the self-declared Nagorno-Karabakh Republic (NKR), Armenian military units conducted a large-scale assault on the predominantly Azerbaijani town of Khojaly, resulting in the deaths of hundreds of civilians—including women, children, and the elderly (Human Rights Watch, 1994; de Waal, 2003). The attack was characterised by widespread inhumane acts: deliberate targeting of civilians seeking to flee, torture, and forced displacement (Akhavan, 2001). Survivors were abducted and held in conditions of severe deprivation, and the massacre came to symbolise the ethnic violence that pervaded the conflict.

Despite extensive testimony and documentation by human rights organisations, Armenia has never formally acknowledged its role. Nevertheless, compelling evidence establishes the direct involvement of Armenian military forces in the planning and execution of the assault—constituting a grave violation of international humanitarian law through the deliberate withholding of protection from civilians in active conflict (Cornell, 2001; Schabas, 2011).

#### ***Military and Tactical Dimensions***

The Khojaly Massacre was not an isolated act of violence but formed part of a broader strategic campaign to achieve territorial control and compel the displacement of Azerbaijani population centres. Research demonstrates the deliberate employment of tactics including the sealing of escape routes and the systematic targeting of civilian infrastructure, measures designed to induce terror and produce irreversible demographic change (Markarov, 2006; Gzoyan et al., 2023). The disproportionate use of force and systematic assault on civilian objectives underscores the planned and premeditated character of the operation (Kuburas, 2011).

#### ***Ethnic Cleansing and Political Motivations***

The attack has also been analysed within the conceptual framework of ethnic cleansing. Human Rights Watch (1994) and other researchers have advanced the argument that the massacre was designed to forcibly remove Azerbaijanis from Nagorno-Karabakh and alter its demographic composition (Balayev, 2013). The combination of mass killings, forced expulsion, and subsequent resettlement by ethnic Armenians points to a strategic objective that extended well beyond any military necessity.

#### ***Humanitarian Consequences and Failures of Evacuation***

Attempts to evacuate civilians were wholly inadequate; the surrounding of the town by Armenian forces meant that many were killed while attempting to flee. Virtually no humanitarian assistance was provided during or in the immediate aftermath of the attack (Human Rights Watch, 1994; Bagirov, 2023). The deliberate targeting of fleeing civilians and the absence of evacuation corridors constitute severe violations of international humanitarian law, including Article 3 common to the Geneva Conventions and Additional Protocol I.

#### ***Accountability and the Persistence of Impunity***

To date, no independent tribunal has investigated the massacre, and both Armenia and the NKR have categorically denied responsibility. Azerbaijan has persistently sought international legal recognition of the events as a war crime (Cornell, 2001; Schabas, 2011). This impunity has deepened communal divisions, reinforced the politicisation of the historical record, and delayed the delivery of justice to victims and their families (Gzoyan et al., 2023; de Waal, 2003).

In conclusion, the Khojaly Massacre was not a spontaneous outbreak of violence but a coordinated military and political operation involving grave violations of international law. Armenian forces, notwithstanding claims of providing safe passage, deliberately targeted civilians and obstructed their escape (Van Dijk, 2022; Tomek, 2023). The enforced displacement and inhumane treatment of survivors must be understood as integral components of a broader strategy of ethnic cleansing (Palandjian, 2022). The absence of independent investigation and prosecution represents a systemic failure of global justice mechanisms and continues to obstruct reconciliation efforts.

### **The Second Karabakh War: A Legal Analysis of International Humanitarian Law Violations**

The Second Karabakh War, initiated on 27 September 2020 following Armenian military provocations, concluded with Azerbaijan's successful counter-offensive and the re-establishment of its territorial integrity (Khachatryan & Voskanyan, 2021). Throughout the conflict, Armenian forces deliberately targeted civilian-populated cities situated far from the front line—including Ganja, Barda, and Tartar—using ballistic missiles and internationally prohibited cluster munitions. These acts constitute serious violations of international humanitarian law and international human rights law (Amnesty International, 2020; ICRC, 2021; Human Rights Watch, 2020). Credible reports further document the use of child soldiers by Armenian forces, in breach of the

United Nations Convention on the Rights of the Child and the Rome Statute (UNICEF, 2024; ICC, 2011).

Under the 1949 Geneva Conventions and customary international humanitarian law, intentional attacks on civilians are classified as war crimes subject to prosecution under international law (Tamanini, 2012). Tribunal jurisprudence, including the ICTY's seminal judgment in *Prosecutor v. Tadić*, confirms the criminal character of such conduct. The international community, acting through mechanisms including the United Nations and the ICC, bears a responsibility to pursue the prosecution of Armenian political and military leaders implicated in these violations on the basis of the doctrine of command responsibility (Cassese, 2008).

### ***Violations of International Humanitarian Law during the Second Karabakh War***

The renewed outbreak of full-scale hostilities in September 2020 represented a watershed moment in the prolonged Armenia-Azerbaijan conflict. Four binding UN Security Council resolutions adopted in 1993—Resolutions 822, 853, 874, and 884—demanding the withdrawal of Armenian forces from occupied Azerbaijani territories had remained unimplemented for approximately three decades (UNSC, 1993a–d). Diplomatic efforts conducted through the OSCE Minsk Group produced no lasting settlement; Armenia persisted in its occupation and intensified provocations, most notably through the Tovuz incursion of July 2020 and sabotage operations along the line of contact (Aliyev, 2020; Vandenberghe, 2022).

On 27 September 2020, Armenian armed forces launched large-scale attacks on Azerbaijani military and civilian targets, prompting Azerbaijan to invoke its right of self-defence under Article 51 of the UN Charter (UN Charter, 1945). Following forty-four days of intensive combat, during which Azerbaijan liberated several districts, the conflict was brought to an end by the Trilateral Statement signed on 10 November 2020 (Office of the President of Azerbaijan, 2020).

### ***War Crimes Against Civilians***

Throughout the conflict, Armenian forces struck cities including Ganja, Barda, and Mingachevir—all situated at considerable distance from the front line—with ballistic missiles and internationally prohibited cluster munitions, causing extensive civilian casualties and injuries (Human Rights Watch, 2020; Amnesty International, 2020). The 1949 Geneva Conventions and the 1998 Rome Statute expressly define such conduct as war crimes, prohibiting indiscriminate attacks directed against civilian populations and objects (ICRC, 1949; ICC, 2011).

The attack on Ganja alone resulted in the deaths of 26 civilians. In Barda, a cluster munition strike killed 21 people and wounded more than 80 others. Although Armenia is not a party to the *Convention on Cluster Munitions* (2008), customary international humanitarian law—as codified in the ICRC's Customary IHL Study—prohibits the use of such weapons by all parties to an armed conflict (Henckaerts & Doswald-Beck, 2005). These attacks constitute grave breaches of international humanitarian law comparable to conduct prosecuted before the ICTY and ICTR in the aftermath of the Second World War (Cassese, 2003).

### ***Recruitment and Use of Child Soldiers***

Armenia further violated international norms through the use of child soldiers in military operations. Video evidence and contemporaneous reporting confirmed the deployment of minors in active combat (*Child Soldiers Global Report*, 2008). This conduct violates the Geneva Conventions and their Additional Protocols, the Convention on the Rights of the Child (UN, 1989), and its Optional Protocol on the Involvement of Children in Armed Conflict (UN, 2000), as well as ILO Convention No. 182 on the Worst Forms of Child Labour, ratified by Armenia in 2006.

The International Criminal Court definitively established the criminalisation of the recruitment and use of children under fifteen years of age in armed conflict in its landmark judgment in *Prosecutor v. Thomas Lubanga Dyilo* (ICC, 2012). The Special Court for Sierra Leone similarly convicted senior figures—including former President Charles Taylor—for the use of child soldiers, demonstrating that neither political status nor command hierarchy provides immunity from prosecution (*Special Court for Sierra Leone*, 2012).

In conclusion, Armenia's deliberate targeting of civilian settlements and its use of child soldiers during the Second Karabakh War constitute serious violations of international humanitarian law and human rights law. These acts are prohibited under the Geneva Conventions, the Rome Statute, and other foundational instruments of international law; they are subject to prosecution in accordance with the jurisprudential standards established by international criminal courts. The failure to ensure accountability not only perpetuates injustice for victims but erodes the normative foundations of international law and international peace.

## **Specific Violations of International Law: A Consolidated Assessment**

The Nagorno-Karabakh conflict has been marked by a consistent pattern of IHL and IHRL violations attributable to Armenian forces across the First Karabakh War (1988–1994), the Khojaly Massacre (1992), and the Second Karabakh War (2020). These violations generated mass civilian casualties, large-scale population

displacement, and irreversible destruction of cultural heritage (ICRC, 2021; OHCHR, 2021). This section consolidates the legal analysis of Armenia's specific treaty and customary law obligations and underscores the centrality of accountability to lasting peace and justice (ICC, 2011).

***The First Karabakh War (1988–1994)***

During the First Karabakh War, Armenian forces committed grave IHL violations, most consequentially the forced displacement of approximately 750,000 Azerbaijanis from Nagorno-Karabakh and the surrounding occupied territories, in violation of the fundamental IHL principle of civilian protection (UNHCR, 1995; ICRC, 2021). Indiscriminate artillery bombardment of civilian areas contravened the principles of distinction and proportionality that lie at the core of the law of armed conflict (ICRC, 2012). The systematic destruction of Azerbaijani cultural heritage sites constituted a further violation, specifically of the 1954 Hague Convention for the Protection of Cultural Property in the Event of Armed Conflict (UNESCO, 1954).

***The Khojaly Massacre (1992)***

The Khojaly Massacre represents the most severe concentration of IHL violations in the First Karabakh War. The assault of 25–26 February 1992 resulted in the deaths of at least 200 civilians, with Azerbaijani sources recording 613 fatalities (Human Rights Watch, 1993). The deliberate targeting of civilians constitutes a war crime and a potential crime against humanity under both the Geneva Conventions and customary international law. Forced displacement of survivors, hostage-taking, and the desecration of human remains are likewise prohibited under IHL (ICRC, 2021). The gravity of these violations underscores the urgent need for international accountability and for a reckoning with the human cost of the conflict.

***The Second Karabakh War (2020)***

Violations of IHL continued during the Second Karabakh War. Ballistic missile strikes and the deployment of prohibited cluster munitions against civilian-populated cities far from the front line—including Ganja, Barda, and Mingachevir—caused 94 civilian deaths and over 400 injuries, in direct contravention of the principles of distinction and proportionality (OHCHR, 2021; Amnesty International, 2020). The documented use of child soldiers violated the Optional Protocol to the CRC and Article 8 of the Rome Statute (UN, 2000; ICC, 2011). Evidence of torture and summary execution of Azerbaijani prisoners of war also emerged (ICRC, 2021), compounding the IHL violations of the conflict.

**Table 1.** Summary of Armenia's Documented Violations of International Law

Category of Violation	Specific Incident(s)	Applicable Legal Instrument(s)
Forced displacement and ethnic cleansing	Expulsion of c.750,000 Azerbaijanis (1988–1994)	IHL civilian protection principles; Art. 49, GC IV
Indiscriminate attacks on civilians	Artillery bombardment of cities in both wars	Principles of distinction and proportionality (AP I, Arts 48, 51)
Destruction of cultural heritage	Demolition of Azerbaijani cultural and religious sites	1954 Hague Convention (Art. 4); AP I, Art. 53
Mass killing of civilians (Khojaly)	Khojaly Massacre (Feb. 1992): 200–613 deaths	Geneva Conventions; Rome Statute, Arts. 7–8
Use of prohibited weapons	Cluster munition strikes on civilian areas (2020)	Customary IHL (ICRC Study, Rule 11); CCM (2008)
Recruitment and use of child soldiers	Deployment of minors in hostilities (2020)	CRC Optional Protocol, Art. 1; Rome Statute, Art. 8(2)(b)(xxvi)
Ill-treatment and killing of POWs	Torture and summary execution of Azerbaijani POWs	GC III, Arts. 13, 17; Rome Statute, Art. 8(2)(a)(ii)

**Ceasefire Agreements in the Karabakh Wars: Legal Analysis and Implications for Peace**

Ceasefire agreements have shaped the trajectory of the Karabakh conflict, yet inconsistent implementation and the absence of robust enforcement mechanisms have perpetuated cycles of instability and insecurity (Cornell, 2017; International Crisis Group, 2020). This section conducts a comparative legal analysis of four principal instruments: the 1994 Bishkek Protocol, the 2020 Trilateral Statement, the 2023 ceasefire agreement, and the 2024 Peace Accord. Each is examined in terms of its substantive provisions, structural limitations, and implications for regional peace.

### ***The 1994 Bishkek Protocol***

The Bishkek Protocol succeeded in halting large-scale fighting in the First Karabakh War but failed to establish a durable peace. Its principal provisions included an immediate ceasefire, prisoner-of-war exchanges, partial troop withdrawals, and the creation of a negotiating framework under the auspices of the OSCE. The Protocol's structural weaknesses, however, were considerable: it lacked binding legal force; it made no provision for an international peacekeeping or monitoring presence; and it left fundamentally unresolved the question of Armenian military control over occupied Azerbaijani territories beyond Nagorno-Karabakh itself. The result was a 'frozen conflict' characterised by the continuation of military build-up, protracted displacement, and the entrenchment of Russian influence in the region (de Waal, 2003; Bláhová, 2019). The Bishkek Protocol's failure to address the root causes of the conflict—or to establish a pathway to a comprehensive settlement—thus became evident in subsequent years.

### ***The 2020 Trilateral Statement (Ceasefire Agreement)***

The Trilateral Statement of 10 November 2020, brokered by Russia following Azerbaijan's military victory in the Second Karabakh War, fundamentally altered the conflict's dynamics and the regional geopolitical landscape. Its key provisions included the immediate cessation of hostilities, the withdrawal of Armenian forces from several districts surrounding Nagorno-Karabakh, the deployment of approximately 2,000 Russian peacekeepers in a monitoring capacity, the exchange of prisoners and the remains of the fallen, and the establishment of a joint Russian-Turkish monitoring centre. The agreement was celebrated in Azerbaijan as a historic victory; in Armenia, it precipitated a political crisis and widespread domestic discontent (Davtyan, 2024; Jović-Lazić, 2021). While it resolved immediate territorial questions, the statement left open the long-term status of Nagorno-Karabakh and set the stage for subsequent negotiations.

### ***The 2023 Ceasefire Agreement***

The 2023 ceasefire agreement followed Azerbaijan's rapid military operation, which resulted in the effective dissolution of the self-proclaimed 'Republic of Artsakh'. Its central provisions mandated the disbandment of all ethnic Armenian armed formations in Nagorno-Karabakh, the immediate withdrawal of remaining Armenian military units, and the surrender of weapons and equipment to Azerbaijani authorities (Krzysztań, 2024). The agreement effectively ended Armenian military presence in Nagorno-Karabakh and paved the way for the reintegration of the territory under Azerbaijani sovereignty, accompanied by the large-scale departure of the ethnic Armenian population to Armenia.

### ***The 2024 Peace Accord***

The 2024 Peace Accord represents the most comprehensive attempt to date to formalise peace between Armenia and Azerbaijan following decades of intermittent conflict. Its key provisions include mechanisms for the exchange of prisoners and the remains of the fallen, the establishment of a joint boundary delimitation commission, the staged withdrawal of Russian border guards from strategically significant areas, and the creation of monitoring mechanisms to ensure compliance. The accord offers meaningful opportunities for regional stabilisation, expanded economic cooperation, and a reduction of Russia's historically dominant influence in the South Caucasus.

However, significant obstacles persist. These include Armenia's resistance to the constitutional amendments necessary to extinguish any residual claims to Azerbaijani territory, unresolved humanitarian concerns relating to displaced persons and detainees, and ongoing disagreements regarding the future roles of external actors and peacekeeping forces. These challenges reflect the enduring complexity of achieving a comprehensive and durable settlement and underscore the continued need for diplomatic effort and mutual concessions (Ordukhanyan et al., 2025). The ultimate success of the 2024 Peace Accord will depend on the effective management of these outstanding political and humanitarian concerns and the parties' commitment to binding and enforceable obligations.

In sum, the evolution of ceasefire instruments in the Karabakh context traces a trajectory from fragile ceasefires to more structurally elaborated peace-building efforts. Sustainable peace nonetheless remains contingent upon genuine political will on both sides, sustained international oversight, and a comprehensive resolution of territorial, humanitarian, and constitutional disputes. As implementation of the 2024 Peace Accord proceeds, the resolution of outstanding grievances and the securing of binding long-term commitments will be critical to its success.

## **Conclusion**

The Nagorno-Karabakh conflict has generated significant and lasting consequences for regional stability and the integrity of the international legal order. This study has systematically documented Armenia's violations of international humanitarian law and human rights law during the First Karabakh War, the Khojaly Massacre,

and the Second Karabakh War—including forced displacement, indiscriminate attacks on civilians, cultural destruction, and the use of prohibited weapons. It has also provided a detailed analysis of the international legal frameworks breached—including the Geneva Conventions, the Convention on the Rights of the Child, and the Rome Statute—and of the applicable standards of accountability under international criminal law.

The examination of the 1994 Bishkek Protocol, the 2020 Trilateral Statement, the 2023 ceasefire, and the 2024 Peace Accord reveals persistent obstacles to implementation and compliance, and highlights the imperative for stronger monitoring and enforcement mechanisms as a precondition for durable peace. The analysis further underscores the complex roles played by external actors and the necessity of addressing root causes—including territorial grievances and historical injustices—as the foundation for a sustainable settlement.

Lasting peace requires robust legal accountability, genuine reconciliation, and a comprehensive conflict-resolution approach grounded in respect for human rights and international law. The failure to address past violations perpetuates cycles of mistrust and insecurity; meaningful accountability is thus not merely a matter of justice for victims but a prerequisite for breaking those cycles and building a stable future for the South Caucasus region.

### ***Policy Implications and Limitations***

This research calls on the international community to strengthen accountability mechanisms to ensure compliance with IHL and IHRL. Supporting independent investigations, facilitating dialogue, and promoting adherence to legal norms are indispensable steps towards justice and durable peace. Addressing the root causes of the conflict—including historical grievances and territorial disputes—is critical for any sustainable resolution. Continued international cooperation is essential to upholding legal norms and achieving a comprehensive peace agreement.

The study acknowledges certain limitations. Reliance on secondary sources may constrain analytical depth, as first-hand accounts and primary documentation of specific incidents remain difficult to access. The complex geopolitical context, involving multiple actors with competing interests, complicates the legal assessment of specific violations and the evaluation of ceasefire compliance. Furthermore, the dynamic evolution of international law and the shifting geopolitical environment may require the periodic updating of conclusions and recommendations. Political and practical impediments to accountability continue to slow institutional processes, limiting the immediate applicability of certain findings.

### ***Recommendations***

In light of Armenia's documented violations of international law during the Karabakh conflict, the following recommendations merit priority attention:

First, the international community should support independent and impartial investigations and establish international legal mechanisms to prosecute those responsible for war crimes—thereby reinforcing Armenia's obligations under the Geneva Conventions and relevant UN Security Council resolutions.

Second, compliance with ceasefire and peace agreements should be strengthened through enhanced monitoring mechanisms, appropriately mandated peacekeeping deployments, and the effective use of sanctions and incentives to ensure performance.

Third, humanitarian assistance and reconstruction programmes are essential to support displaced populations and promote conditions conducive to regional stability, and should be adequately resourced.

Fourth, sustained diplomatic engagement and trust-building measures should be actively promoted to facilitate dialogue between Armenia and Azerbaijan.

Fifth, historical reconciliation processes should be supported and equitable frameworks developed for addressing territorial disputes, ensuring that resolution is pursued in a manner consistent with international law and respectful of the rights of all affected communities.

Sixth, the inclusion and empowerment of civil society actors and local stakeholders in peace-building processes is essential to securing inclusive and sustainable outcomes.

Finally, specific violations—including the deliberate targeting of civilians, the use of prohibited weapons, and the recruitment of child soldiers—must be publicly condemned in unambiguous terms, and those responsible must be prosecuted under international law. The international community's firm commitment to justice and accountability is indispensable to breaking the cycle of violence and establishing the foundations for lasting peace in the South Caucasus.

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