

## ARTICLE 51

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## ARTICLE 51

### TEXT OF ARTICLE 51

Nothing in the present Charter shall impair the inherent right of individual or collective self-defence if an armed attack occurs against a Member of the United Nations, until the Security Council has taken measures necessary to maintain international peace and security. Measures taken by Members in the exercise of this right of self-defence shall be immediately reported to the Security Council and shall not in any way affect the authority and responsibility of the Security Council under the present Charter to take at any time such action as it deems necessary in order to maintain or restore international peace and security.

### INTRODUCTORY NOTE

1. Article 51 is connected with Article 2 (4), which provides that all Members shall refrain in their international relations from the threat or use of force against the territorial integrity or political independence of any State, or in any other manner inconsistent with the purposes of the United Nations. As in previous *Repertory* studies, the question of the bearing of Article 2 (4) on the right of self-defence as provided for in Article 51 is examined in this *Supplement* under Article 2 (4).<sup>1</sup>

2. During the period covered in this *Supplement*, the General Assembly adopted several resolutions which contained implicit references to Article 51. The Assembly and its committees engaged in some of these cases in long and relevant arguments regarding the interpretation and application of the Article. In one of these cases<sup>2</sup> the deliberations involved an extended constitutional discussion, but the material was not included in an Analytical Summary of Practice in this study since most of the noteworthy arguments leading to the adoption of the draft instrument by the Assembly were presented in detail in two other *Repertory* studies.<sup>3</sup>

3. There were also a few resolutions of the Security Council which had a bearing on the interpretation of Article 51, but they did not give rise to a constitutional discussion.

4. These instances, together with a considerable number of explicit references to Article 51 in the proceedings of the Security Council and of the General Assembly, are dealt with in the Summary of Practice.

<sup>1</sup> See this *Supplement*, under Article 2 (4).

<sup>2</sup> This is the case of the adoption of the Definition of Aggression by the General Assembly during its twenty-ninth session in 1974. See paras. 5-19 below.

<sup>3</sup> See this *Supplement*, under Articles 2 (4) and 13 (1)(a).

### SUMMARY OF PRACTICE

5. On 14 December 1974, at its 2319th plenary meeting, the General Assembly adopted resolution 3314 (XXIX) and, annexed to that resolution, the Definition of Aggression which, in its Article 6, reads as follows:<sup>4</sup>

“Nothing in this Definition shall be construed as in any way enlarging or diminishing the scope of the Charter, including its provisions concerning cases in which the use of force is lawful.”

6. From the deliberations of the Sixth Committee at the twenty-fifth through twenty-ninth sessions of the General Assembly<sup>5</sup> and of the Special Committee on the Question of Defining Aggression<sup>6</sup> at its 1970-1974 sessions it is clear that the language of Article 6 of the

Definition constitutes a clear implicit reference to Article 51.

7. The question of whether in the context of lawful uses of force an explicit reference should be made to cases deriving from the application of Article 51 was considered by the Special Committee in connexion with its deliberations on the three main proposals.<sup>7</sup> While there was general agreement that in so far as no con-

<sup>4</sup> For details regarding the procedures leading to the adoption of the Definition see this *Supplement* under Article 2 (4).

<sup>5</sup> G A (25), Annexes, a.i. 87, A/8171; G A (26), Annexes, a.i. 89, A/8525; G A (27), Annexes, a.i. 88, A/8929; G A (28), Annexes, a.i. 95, A/9411; G A (29), Annexes, a.i. 86, A/9890.

<sup>6</sup> G A (25), Suppl. No. 19 (A/8019); G A (26), Suppl. No. 19 (A/8419); G A (27), Suppl. No. 19 (A/8719); G A (28), Suppl. No. 19 (A/9019); G A (29), Suppl. No. 19 (A/9619).

<sup>7</sup> The Special Committee had before it three draft proposals which were submitted during the 1969 session, namely: the draft proposal of the USSR (A/AC.134/L.12); the thirteen-Power draft proposal [by Colombia, Cyprus, Ecuador, Ghana, Guyana, Haiti, Iran, Madagascar, Mexico, Spain, Uganda, Uruguay and Yugoslavia] (A/AC.134/L.16 and Add.1 and 2); and the six-Power draft proposal [by Australia, Canada, Italy, Japan, the United Kingdom and the United States] (A/AC.134/L.17 and Add.1 and 2) contained in G A (25), Suppl. No. 19 (A/8019), Annex I. Paragraph 6 of the USSR draft proposal provided *inter alia* that nothing in the draft definition should prevent the use of armed force in accordance with the Charter of the United Nations including its use by dependent peoples in order to exercise their inherent right of self-determination in accordance with General Assembly resolution 1514 (XV). Paragraph 3 of the thirteen-Power draft proposal stipulated that the inherent right of individual or collective self-defence of a State can be exercised only in case of the occurrence of armed attack (armed aggression) by another State in

siderations of whatever nature could excuse the use of force by one State against another, with the exception of the right of individual or collective self-defence, the definition of aggression should include a provision recognizing that right as laid down in Article 51 of the Charter, there were differences of opinion as to the interpretation of that Article. In particular, there was lack of agreement as to the nature, scope and limitations of the right of individual or collective self-defence.<sup>8</sup>

8. It was maintained, on the one hand, that the effect of Article 51 was not to create the right of self-defence but to recognize its existence as an inherent right safeguarded in the Charter. It should not, however, be used as a pretext for enlarging the scope of what was recognized as the legal use of force, especially in Chapter VII of the Charter. The provisions of Article 51 could not be held to constitute an exception to the United Nations' monopoly of the right to use force. To consider the exercise of the right of self-defence recognized in Article 51 as an exception to the prohibition of the threat or use of force in Article 2, paragraph 4, would be to misinterpret the principle involved, which, being a rule of *jus cogens*, could not be subject to any exceptions whatsoever. Defensive action taken by States, individually or collectively, to repel an armed attack was an act of necessity which exempted from responsibility only those exercising their right of self-defence in the circumstances prescribed by the rules of international public order.

9. The view was expressed, on the other hand, that the Charter had modified the traditional conception of the inherent right of self-defence, so that that right could be invoked only in cases of armed aggression in accordance with the provisions of Article 51. That Article, it was held, constituted an exception to the Charter prohibition of the use of force.

10. The discussion on the relationship between Article 51 and the Charter prohibition of the use of force, more specifically of aggression, evolved around issues pertaining to the scope and the limitations of the right of self-defence, first, the problem of the point in time at which the right of self-defence arose; the question of whether that right could be exercised under other circumstances than an armed attack; and furthermore the question whether the use of force to repel an armed attack must be commensurate with the attack itself.

accordance with Article 51 of the Charter. Paragraph 6 of the same proposal stipulated further that nothing in paragraph 3 above shall be construed as entitling the State exercising a right of individual or collective self-defence, in accordance with Article 51 of the Charter, to take any measures not reasonably proportionate to the armed attack against it. Paragraph 7 of the thirteen-Power draft proposal stated that, when a State is a victim in its own territory of subversive and/or terrorist acts by irregular, volunteer or armed bands organized or supported by another State, it may take all reasonable and adequate steps to safeguard its existence and its institutions, without having recourse to the right of individual or collective self-defence against the other State under Article 51 of the Charter. The final paragraph (para. 10) of the draft proposal stated that none of the preceding paragraphs may be interpreted as limiting the scope of the Charter's provisions concerning the right of peoples to self-determination, sovereignty and territorial integrity. Paragraph III of the six-Power proposal stated that the use of force in the exercise of the inherent right of individual or collective self-defence, or pursuant to decisions of or authorization by competent United Nations organs or regional organizations consistent with the Charter of the United Nations, did not constitute aggression.

<sup>8</sup>For the differing views on these issues, see the discussions held in the Sixth Committee during the twenty-fifth through twenty-eighth sessions of the General Assembly. G A (25), 6th Com., 1202nd-1209th and 1211th-1214th mtgs.; G A (26), 6th Com., 1268th-1276th, 1281st and 1285th mtgs.; G A (27), 6th Com., 1346th-1352nd, 1366th and 1371st mtgs.; G A (28), 6th Com., 1471st-1484th, 1486th, 1489th and 1502nd-1505th mtgs. See also reports of the Special Committee on the Question of Defining Aggression for the years 1970-1974 cited in footnote 6 above.

Reference was made also to the use of force by peoples under colonial or alien rule and to the distinction between the exercise of the right of collective self-defence and regional enforcement action.

11. With regard to the question of timing, it was pointed out that the principle of priority was an essential element in any definition of aggression and was based directly on Article 51 of the Charter which established the right of self-defence in response to prior armed attack, the purpose of the principle being to condemn the practice of preventive or anticipatory or preemptive attack. Furthermore, it was contended that the principle of priority established a presumption of guilt on the party which "first" committed a particular act. The right of self-defence therefore existed only if force had actually been used, not just threatened. Furthermore, the right of self-defence had to be exercised immediately after the attack.

12. It was argued, however, that the principle of priority could not be unconditionally accepted. The right of self-defence was a right enjoyed by all States according to international law, independently of Article 51. It could therefore be invoked not only in cases of armed aggression but also in certain other cases to prevent such aggression.

13. The observation was made that the scope of Article 51 had never been fully established by the Security Council or the General Assembly. It was the responsibility of the Security Council under Article 59 to determine whether an act of aggression had occurred and which State had used armed force first. In this connexion, the view was expressed that the "aggression" had to be related to "force" as used in Article 2, paragraph 4 of the Charter. Insofar as the Charter made no reference to direct or indirect aggression, force could not be restricted to direct armed aggression; it also included all forms of so-called indirect aggression, such as the organization, support or direction of armed bands or irregular forces that infiltrated into another State, financial and other assistance to dissident elements, acts of terrorism or other subversive activities that have the effect of threatening or violating the sovereignty and the territorial integrity of a State. The so-called indirect use of force was no less unlawful than its direct use.

14. Others held, however, that insofar as direct aggression was the only form mentioned in Article 51 of the Charter, failure to distinguish between direct and indirect aggression might lead to unacceptable interpretations of Article 51 and hence to the justification of a preventive or anticipatory war. Certain cases of indirect aggression, it was noted, would constitute threat to the peace, breaches of the peace or acts of aggression as defined in Article 39 but would not give rise to the right of self-defence as defined in Article 51. No State should be able to charge indirect aggression and launch a "preventive war", under the guise of self-defence. If a State was a victim in its own territory of subversive acts, it could take all reasonable and adequate steps to safeguard its existence without invoking the right of self-defence under Article 51.

15. There were also differences of opinion on the question of the applicability of the concept of proportionality in the exercise of the right of self-defence. It was observed that the concept of proportionality had been accepted by international law in connexion with the right of self-defence long before the Charter was drawn up. The Charter affirmed that this right should be exercised only in response to armed aggression and should not provide a cover for an act of aggression or

reprisal. It was further argued that if the means of defence were sharply disproportionate to the means of attack, self-defence might degenerate into another form of aggression. It was also contended that proportionate measures of self-defence were justified against acts other than armed attack which violated the sovereignty and territorial integrity of a State.

16. It was suggested, on the other hand, that the principle of proportionality, a well-established concept of international law, should not apply to the use of force in self-defence. It was not directly mentioned in the Charter, as Article 51 placed no limitation upon the means employed in self-defence. The principle of proportionality would obscure the clear meaning of the Article. It was also emphasized that the right to self-defence under Article 51 could not be invoked to justify a preventive war even if the preventive strike was proportionate to the indirect aggression.

17. The view was presented that one of the instances in which the use of force was considered legitimate under the Charter was the struggle of peoples under colonial or foreign domination or military occupation to exercise their right to self-determination, sovereignty and territorial integrity. It was stated that oppressed peoples were victims of a permanent attack on their sovereignty and territory and had the right to free themselves from alien domination, to recover their independence and to regain their national territory by all means at their disposal, including the use of armed force. They would act in accordance with the inherent right of self-defence embodied in Article 51 and in conformity with the relevant General Assembly resolutions, in particular resolution 1514 (XV) containing the Declaration on the Granting of Independence to Colonial Countries and Peoples, resolution 3070 (XXVII) in which the Assembly reaffirmed "the legitimacy of the people's struggle for liberation from colonial and foreign domination and alien subjugation by all available means, including armed struggle", and resolution 3103 (XXVII) concerning the basic principles of the legal status of combatants struggling against colonial and alien domination and racist régime; the legitimacy of recourse to force under such circumstances was implicitly recognized also in the Declaration on Principles of International Law concerning Friendly Relations and Co-operation among States in accordance with the Charter of the United Nations.

18. It was recalled, on the other hand, that the Charter provisions for the pacific settlement of international disputes allowed no exception other than what was provided in Article 51 or decided on by the Security Council. While the right of peoples to self-determination, freedom and independence was derived from the Charter, the use of force in attaining these aims could not be condoned in principle. The Security Council, in considering each particular case, would bear in mind all relevant circumstances before determining whether a particular illegal activity should be denominated an act of aggression under Article 39. Furthermore, it was important to make sure that aid given to peoples struggling for self-determination should not provide to them a pretext for carrying out acts of aggression.

19. Finally, attention was drawn to the difference between collective self-defence and regional enforcement actions under Article 52 of the Charter: the right of collective self-defence against armed aggression could be exercised without the authorization of the Security Council, whereas the prior authorization of the Security Council was required in order to apply regional

enforcement action, the purpose of which was to maintain regional international peace and security.<sup>9</sup>

20. During the period under review, the General Assembly adopted one resolution with an explicit reference to Article 51. General Assembly resolution 2936 (XXVII), adopted on 29 November 1972, at the 2093rd plenary meeting, reaffirmed, "in accordance with Article 51 of the Charter, the inalienable right of States to self-defence against armed attack".<sup>10</sup>

21. In the course of the discussion preceding the adoption of that resolution, it was pointed out that the obligation to refrain from the use of force did not in any way imply the renunciation by States of their inherent right of individual and collective self-defence recognized in Article 51 of the Charter. Similarly, the renunciation of the use of force in international relations did not in any way infringe the right of peoples, including those of oppressed colonial countries, to carry on a struggle against aggression and for their freedom and independence, using all available means in that struggle.<sup>11</sup>

22. In some instances, it was merely observed that the right of individual and collective self-defence as recognized in Article 51 could not be reduced or modified by the principle of non-use of force. That right, it was maintained, which was limited to cases of repelling armed attack, was the other side of the coin of renunciation of force in international relations.<sup>12</sup>

23. Similar observations regarding the relationship between the principle of renunciation of the use of force and Article 51 were made at the thirty-first and thirty-second sessions of the General Assembly in connexion with the consideration of the item "Conclusion of a world treaty on the non-use of force in international relations"<sup>13</sup> in both the First Committee<sup>14</sup> and the Sixth Committee.<sup>15</sup>

24. At its thirty-second session, on 19 December 1977, the General Assembly decided, on the recommendation of the Sixth Committee, to establish a Special Commit-

<sup>9</sup>For the arguments summarized in paragraphs 8-19 the summary records of the meetings held by the Special Committee and the Sixth Committee during the twenty-fifth to twenty-ninth sessions of the General Assembly contain relevant material. The best survey over the course of discussion and the range of arguments is available in the reports of the Special Committee and the Sixth Committee issued during that period. The debates summarized in these reports offer a detailed overview of the various issues which the Committees were debating. Special mention should be made of the concluding statements summarized in the last report of the Special Committee (G A (29), Supplement No. 19 (A/9619), annex I), as they relate to Article 51 and the question of self-defence.

<sup>10</sup>G A resolution 2936 (XXVII), 5th preamb. para. The General Assembly also reaffirmed "its recognition of the legitimacy of the struggle of colonial peoples for their freedom by all appropriate means at their disposal" (*ibid.*, 7th preamb. para.).

<sup>11</sup>G A (27), Annexes, a.i. 25, A/8793, p. 3. *Ibid.*, Plen., 2078th mtg.: USSR, para. 37; 2079th mtg.: Poland, para. 25; 2081st mtg.: Romania, paras. 105-106; 2082nd mtg.: Somalia, para. 60; 2084th mtg.: Byelorussian SSR, para. 156; 2085th mtg.: Bulgaria, para. 126; Liberia, para. 98; USSR, para. 172; 2086th mtg.: Romania, para. 29; 2093rd mtg.: Afghanistan, para. 49; Mauritius, para. 58.

<sup>12</sup>G A (27), Plen., 2082nd mtg.: Lebanon, para. 79; Libya, para. 29; 2083rd mtg.: Brazil, para. 27; 2084th mtg.: Cyprus, para. 62; Jordan, paras. 81-82.

<sup>13</sup>The item was included in the agenda of the thirty-first session of the General Assembly in 1976 at the request of the USSR, which submitted a draft World Treaty on the Non-Use of Force in International Relations (G A (31), Annexes, a.i. 124, A/31/243, annex).

<sup>14</sup>For the views expressed on this item during the discussions held in the First Committee, see: G A (31), 1st Com., 11th-19th mtgs.; G A (32), 1st Com., 47th-49th mtgs., 51st-56th mtgs. See also the following reports of the Committee: G A (31), Annexes, a.i. 124, A/31/305; G A (32), Annexes, a.i. 37, A/32/449.

<sup>15</sup>For the deliberations of the Sixth Committee, see: G A (31), 6th Com., 50th-54th mtgs.; G A (32), 6th Com., 64th-67th, 69th and 70th mtgs. See also the reports of the Sixth Committee: G A (31), Annexes, a.i. 124, A/31/360; G A (32), Annexes, a.i. 37, A/32/466.

tee on Enhancing the Effectiveness of the Principle of Non-Use of Force in International Relations with the goal of drafting a world treaty on the non-use of force in international relations as well as the peaceful settlement of disputes or such other recommendations as the Committee deemed appropriate.<sup>16</sup>

25. The mandate of the Special Committee was renewed at the thirty-third session<sup>17</sup> as it had not been able to finish its work.

26. Article 51 was explicitly invoked *in passim* in the General Assembly<sup>18</sup> and its committees<sup>19</sup> in connexion with various other items under consideration.

27. During the period under review no resolution was adopted by the Security Council which contained an explicit reference to Article 51. One Security Council resolution<sup>20</sup> contained certain provisions which might be considered to have an implicit bearing on Article 51.

<sup>16</sup>G A resolution 32/150, paras. 1 and 2.

<sup>17</sup>By G A resolution 33/96 of 16 December 1978.

<sup>18</sup>See, for example, in connexion with the general debate: G A (25), Plen., 1846th mtg.: Colombia, para. 30; 1859th mtg.: Sudan, para. 147; G A (27), Plen., 2062nd mtg.: Hungary, para. 46; G A (28), Plen., 2144th mtg.: Hungary, para. 3; G A (31), Plen., 12th mtg.: Greece, para. 254; and 15th mtg.: Ukrainian SSR, para. 23; G A (32), Plen., 33rd mtg.: Senegal, para. 39; G A (33), Plen., 19th mtg.: Senegal, para. 224; and 31st mtg.: Ethiopia, para. 163. In connexion with the celebration of the twenty-fifth anniversary of the United Nations, see: G A (25), Plen., 1862nd mtg.: Portugal, para. 208; 1868th mtg.: Hungary, para. 60. In connexion with the policies of *apartheid* of the Government of South Africa, see: G A (25), Plen., 1921st mtg.: Colombia, para. 34. In connexion with the situation in the Middle East, see: G A (27), Plen., 2092nd mtg.: Egypt, para. 53; 2103rd mtg.: Iraq, para. 172. In connexion with the question of Palestine, see: G A (30), Plen., 2392nd mtg.: Egypt, para. 82. In connexion with the financing of the United Nations Interim Force in Lebanon, see: A (S-8), 2nd mtg.: Pakistan, para. 425.

<sup>19</sup>See, for example, in connexion with the consideration of measures for the strengthening of international security: G A (25), 1st Com., 1733rd mtg.: El Salvador, para. 22. In connexion with the policies of *apartheid* of the Government of South Africa: G A (25), Spec. Pol. Com., 731st mtg.: Colombia, para. 20. In connexion with the consideration of principles of international law concerning friendly relations and co-operation among States in accordance with the Charter of the United Nations: G A (25), 6th Com., 1182nd mtg.: Portugal, para. 3. In connexion with the United Nations Relief and Works Agency for Palestine Refugees in the Near East: G A (27), Spec. Pol. Com., 833rd mtg.: Syria, paras. 2-9; G A (30), Spec. Pol. Com., 982nd mtg.: Japan, para. 11. In connexion with measures to prevent international terrorism: G A (27), 6th Com., 1387th mtg.: Uruguay, para. 20. In connexion with the implementation of the Declaration on the Strengthening of International Security: G A (28), 1st Com., 1975th mtg.: Afghanistan, para. 62; Jordan, para. 80; Mali, para. 98; G A (33), 1st Com., 67th mtg.: United States, pp. 58-60. In connexion with the question of Korea: G A (30), 1st Com., 2067th mtg.: Denmark, p. 66. In connexion with disarmament-related agenda items: G A (30), 1st Com., 2074th mtg.: Pakistan, p. 66; 2098th mtg.: France, p. 57; G A (30), Annexes, a.i. 35, A/10223, p. 10; G A (31), 1st Com., 44th mtg.: Japan, p. 22; 48th mtg.: Pakistan, p. 41; 49th mtg.: Japan, pp. 12-15; G A (33), 1st Com., 28th mtg.: Egypt, pp. 28-30; 43rd mtg.: Ecuador, p. 16; 51st mtg.: Pakistan, pp. 23, 32. In connexion with the report of the Special Committee on the Charter of the United Nations and on the strengthening of the role of the Organization: G A (33), 6th Com., 22nd mtg.: Ethiopia, para. 5; 23rd mtg.: Cyprus, para. 3; 26th mtg.: Yemen, para. 35.

<sup>20</sup>In connexion with the complaint of the Government of Botswana against the illegal régime in Southern Rhodesia concerning violations of its territorial integrity the Security Council adopted resolution 403 (1977) of 14 January 1977; its paragraph 5 contained implicit references to Articles 50 and 51. [The Security Council took cognizance of the "special economic hardship confronting Botswana as a result of the imperative need to divert funds from ongoing and planned development projects to hitherto unplanned and unbudgeted security measures necessitated by the urgent need effectively to defend itself against attacks and threats by the illegal régime in Southern Rhodesia."].

However, except for incidental remarks included among the explicit references cited below, no constitutional discussion occurred in the proceedings leading to its adoption.

28. In the course of deliberations in the Security Council, various issues occasioned pertinent arguments relating to the interpretation of the principle of self-defence which however did not culminate in constitutional discussion. Thus, in connexion with the situation in the Middle East,<sup>21</sup> it was pointed out that the permissibility of acts of self-defence must be established in terms of need and proportionality. It was also stressed that self-defence could not be invoked continually, but only for a single case of aggression at a time. Furthermore, punitive actions, it was noted, could not be called self-defence under Article 51. In connexion with the complaint by the Prime Minister of Mauritius,<sup>22</sup> the point was reiterated that self-defence could not be invoked to justify a premeditated act of aggression violating the sovereignty and territorial integrity of a Member State. The argument that the so-called principle of pre-emptive self-defence negates the very clear provisions of Article 51 was repeated in connexion with the complaint by Mozambique.<sup>23</sup> In connexion with the question of South Africa,<sup>24</sup> more specifically in connexion with the institution of the mandatory embargo on arms shipments, it was maintained that, while in strictly legal terms there could be no question of denying any country the right of self-defence in accordance with Article 51, the intention in the present instance was to protest against the stockpiling of weapons intended for purposes of internal repression.

29. Additional explicit references to Article 51 were made in the Security Council in connexion with the question of race conflict in South Africa,<sup>25</sup> the complaint by Senegal,<sup>26</sup> the complaint by Cuba,<sup>27</sup> the admission of new Members (Angola),<sup>28</sup> and the complaint by Botswana.<sup>29</sup> The Article was also invoked in several communications<sup>30</sup> received by the Security Council.

<sup>21</sup>For explicit references to Article 51, see S C (27), 1644th mtg.: Argentina, paras. 24-27; 1650th mtg.: Belgium, para. 51; S C (28), 1709th mtg.: Panama, para. 44; Peru, para. 64; 1725th mtg.: Israel, para. 33; President (USSR), para. 39; 1733rd mtg.: Israel, para. 75; 1739th mtg.: Peru, para. 8; 1745th mtg.: USSR, para. 159; S C (29), 1767th mtg.: Israel, paras. 64 and 65; 1768th mtg.: Iraq (President), para. 66; 1769th mtg.: Costa Rica, para. 22; S C (33), 2071st mtg.: Israel, para. 53; 2074th mtg.: Pakistan, para. 122.

<sup>22</sup>For explicit references to Article 51 in connexion with the "act of aggression" by Israel against the Republic of Uganda see S C (31), 1941st mtg.: Tanzania, para. 105; 1942nd mtg.: India, para. 146; Panama, para. 27; Romania, para. 39; 1943rd mtg.: Uganda, para. 112.

<sup>23</sup>S C (32), 2015th mtg.: Lesotho, para. 39; 2017th mtg.: Mauritius, paras. 70-71; 2018th mtg.: India, para. 78.

<sup>24</sup>S C (32), 2044th mtg.: France, para. 39; see also Suppl. for Oct.-Dec., 1977, S/12439.

<sup>25</sup>S C (25), 1547th mtg.: France, para. 48.

<sup>26</sup>S C (26), 1600th mtg.: Poland, para. 59; S C (26), Suppl. for July-Sept., 1971, S/10343.

<sup>27</sup>S C (28), 1742nd mtg.: Chile, para. 193.

<sup>28</sup>S C (31), 1932nd mtg.: Benin, paras. 215 and 216; German Democratic Republic, para. 112.

<sup>29</sup>S C (32), 2006th mtg.: Mauritius, para. 19. See also S C (32), Suppl. for Jan.-Mar., 1977, S/12275 and S/12307.

<sup>30</sup>See S C (30), Suppl. for April-June, 1975, S/11689 for a communication from the United States concerning an incident in the Gulf of Siam. See also *ibid.*, S/11680; *ibid.*, Suppl. for July-Sept., 1975, S/11775, S/11781, S/11819 and S/11820 for communications regarding bilateral relations between Member States.



**Chapter VIII**  
**REGIONAL ARRANGEMENTS**