

**INTER-AMERICAN COMMISSION ON HUMAN RIGHTS
RESOLUTION 89/2025**

Precautionary Measure No. 548-25

L. E. C. V., J. E. M. and D. F. P. M., members of CONPAZCOL, regarding Colombia¹

November 30, 2025

Original: Spanish

I. INTRODUCTION

1. On May 2, 2025, the Inter-American Commission on Human Rights (“the Inter-American Commission”, “the Commission” or “the IACHR”) received a request for precautionary measures filed by the José Alvear Restrepo Lawyers’ Collective - CAJAR (“the applicants”), urging the Commission to require that the State of Colombia (“the State” or “Colombia”) adopt the necessary measures to protect the rights to life and personal integrity of L. E. C. V., J. E. M. and D. F. P. M.² (“the proposed beneficiaries”). According to the request, the proposed beneficiaries are members of the board of the Association of Afro-descendant, Indigenous and Peasant Communities United for the Construction of Peace in Colombia (*Asociación de Comunidades Afrodescendientes, Indígenas y Campesinas Construyendo Paz en Colombia*, CONPAZCOL), and are at risk due to their work as human rights defenders. To date, the State has failed to provide effective and sufficient protection measures.

2. The Commission requested additional information from the applicants on August 15, 2025. The applicants submitted additional information on August 29, 2025. Pursuant to Article 25 (5) of the Rules of Procedure, the IACHR requested information from the State on September 10, 2025, and reiterated the request for information on September 29, 2025. The State submitted its report on October 24, 2025. The IACHR forwarded the State’s report to the applicants on November 11, 2025. The applicants submitted their response on November 19, 2025.

3. Upon analyzing the submissions of fact and law offered by the parties, the Commission considers that the information presented shows *prima facie* that the proposed beneficiaries are in a serious and urgent situation, given that their rights to life and personal integrity are at risk of irreparable harm. Consequently, the Commission requests that Colombia: a) take the necessary measures to protect the rights to life and integrity of the beneficiaries; b) implement the relevant measures so that the beneficiaries can carry out their work as human rights defenders without being subjected to threats, harassment, or other acts of violence in the exercise of their duties; c) consult and agree upon the measures to be adopted with the beneficiaries and their representatives; and d) report on the actions taken to investigate the alleged facts that gave rise to this resolution, so as to prevent such events from reoccurring.

III. SUMMARY OF FACTS AND ARGUMENTS

A. Information provided by the requesting party

4. The proposed beneficiaries are 16 members of the board of directors of the Association of Afro-descendant, Indigenous and Peasant Communities United for the Construction of Peace in Colombia (CONPAZCOL). This association is composed of human rights defenders from these communities, and includes the participation of peace signatories and the LGBTIQ+ population from rural and urban areas affected by the armed

¹ In accordance with Article 17(2) of the Rules of Procedure of the IACHR, Commissioner Carlos Bernal Pulido, a Colombian national, did not participate in the debate and deliberation of this matter.

² The applicants requested that, should the measure be approved, any document made public be anonymized so as not to disclose the identities of the proposed beneficiaries. The initial request was also filed on behalf of 13 other members of the board of directors of the Association of Afro-descendant, Indigenous and Peasant Communities United for the Construction of Peace in Colombia (CONPAZCOL). However, specific and updated information was presented in favor of three of its members: L. E. C. V., J. E. M. and D. F. P. M.

conflict. The applicants alleged that the members of their board of directors, who regularly travel throughout the territories where they operate and serve as the organization's public representatives, allegedly face serious risks due to their active role in implementing the 2016 Final Peace Agreement. The applicants added that, following the Agreement, they had experienced an escalation of violence, including harassment, threats, murders, forced displacement, and exile.

5. The association operates in various territories affected by armed conflict and control by illegal groups. Among the areas mentioned are Huila (Palestina and Pitalito); Putumayo (Puerto Asís); Cauca (Popayán and López de Micay); Meta (Mapiripán); Valle del Cauca (Trujillo and Buenaventura); Chocó (San José del Palmar and Nóvita); Antioquia (Apartadó and Dabeiba); Atlántico (Barranquilla and Luruaco); Cesar (Pueblo Bello); Santander; Tolima, and Bogotá. Between 2024 and 2025, the National Ombudsperson's Office issued numerous Early Warnings to alert to serious situations of risk in seven of the twelve departments where CONPAZCOL carries out its activities. The request also contextualizes this matter within the broader context of violence that human rights defenders face in Colombia, referring to multiple reports from national and international organizations. Moreover, it highlights that the Commission has granted precautionary measures in favor of communities and organizations that received support from CONPAZCOL.³

6. The applicants noted that, in 2017, two of the association's founders were murdered in Buenaventura while conducting work related to community risks, extortion, and disappearances in Buenaventura and Bajo Calima. In 2023, three other members of CONPAZCOL and their communities were killed in the areas of Buenaventura, Bajo Calima, and Puerto Asís. Among those killed was one of its former executives, P.G.P., and no significant progress has been made in identifying those responsible for his murder. The executive was attending the funeral of a leader of the Siona Indigenous people when a gunman shot him several times and killed him.

7. It was stated that the murders were preceded by harassment and threats, particularly in the case of P.G.P. Despite this, it is alleged that the State failed to provide adequate protection measures. The threats and harassment against family members reportedly continued throughout 2024, and even resulted in at least one case of enforced displacement. In this regard, it was noted that, after assuming leadership of the Nasa Kwe'sx Kiwe Council, the children of P. G. P. have faced constant threats from armed actors, who have pressured and harassed them. M. C., leader of CONPAZCOL and partner of P. G. P., has reportedly been the victim of a systematic pattern of surveillance, harassment, and threats since December 6, 2023. Between October and December 2024, she reportedly received direct threats against her life with the intention of preventing her from cooperating with the Prosecutor's Office in the murder investigation, which forced her to relocate. P.G.P.'s family unit is reportedly part of the communities which receive help from the association.

8. In 2024, it was reported that a member of CONPAZCOL had been intercepted by an individual on a motorcycle, who threatened her by pointing a firearm at her head and chest. The individual then reportedly fired into the air and demanded her cell phone, which he finally snatched from her before fleeing the scene. On March 14, 2024, at around 11:00 a.m., another CONPAZCOL executive was reportedly detained at an illegal checkpoint set up by units of the armed group Columna Móvil "Jaime Martínez" of the Central General Staff (*Estado Mayor Central*, EMC), while on his way to participate in the first Historical Memory Meeting (*Encuentro de Memoria Histórica*) convened by the Río Naya Community Council, while traveling by public river transport from Buenaventura to the district capital of Puerto Merizalde. The applicants reported that on March 15, 2025, an elderly farmer and member of CONPAZCOL was killed in his residence during clashes between the National Army and the Clan del Golfo in Mutatá, Antioquia. The individual in charge of the military operation informed CONPAZCOL's legal representation that the corresponding investigations were being carried out, but there has allegedly been no progress.

³ Among the precautionary measures currently in force, the applicants referred to PM-152-14, Afro-Colombian families living in the so-called humanitarian space of "La Playita" neighborhood, Resolution No. 25/2014 (Available only in Spanish).

9. Of all the members of the board, particular attention was drawn to L. E. C. V., who works as a defender in Buenaventura; J. E. M. is a farming leader who works to defend the territory in the Atlántico Department; and D. F. P. M. who addresses human rights issues in the Bajo Calima area, and in Buenaventura. Among the events reported in 2025, the following were alleged:

- On February 4, 2025, at around 8:00 p.m., an individual allegedly threatened several people with a firearm while they were on a public street in the La Playita neighborhood of Buenaventura, including two members of CONPAZCOL, one of whom was **L. E. C. V.** The individual reportedly called the members by name and communicated explicit death threats against them. About 30 minutes after this incident, there was reportedly an armed confrontation. Several shots were fired in the area, and it resulted in a young man being injured. On July 24, 2025, after participating in an event organized by the High Council for Peace (*Alta Consejería para la Paz*) of the Office of the President of the Republic, the proposed beneficiary reportedly received two threatening phone calls from an individual who stated that he was the commander of an illegal armed group. This individual mentioned details such as the proposed beneficiary's ID number and home address, and requested that she collaborate with "the cause". When the beneficiary refused to collaborate, she was allegedly threatened with statements such as "don't play dumb, we have all your information" and "I'm going to kill you." These facts were reported and are allegedly being investigated by the Prosecutor's Office 54 of Valle del Cauca. A public statement of complaint is presented by CONPAZCOL regarding the facts. Lastly, the beneficiary reportedly continues to receive silent calls from various unknown numbers, which, in the context of the high level of conflict she faces, has caused her anxiety and fear.
- Since at least 2021, multiple incidents of harassment and surveillance targeting executive **J. E. M.** have been reported in the area around his residence near the village of Las Nubes in the city of Barranquilla. On January 28, 2025, hooded men were reportedly seen in the area. On February 2, 2025, four armed men were reportedly observed in the same area. On April 27, 2025, two other individuals were reportedly watching him. On May 2, 2025, a local resident was intercepted by two men on a motorcycle who told her, "You can go, you're not the person we're waiting for." The applicants infer that they were looking for the proposed beneficiary, who was allegedly living 500 meters from where the events took place. They mention that, in that area of Barranquilla and the Atlántico Department, the organization has repeatedly reported threats against social leaders and especially against this proposed beneficiary. In this sense, on March 30, 2025, another member of CONPAZCOL was the victim of a threat while he was in his residence in Barranquilla. In this regard, CONPAZCOL issued public statements denouncing the events and filed a complaint with the Office of the Attorney General (FGN). In addition to the foregoing, the proposed beneficiary is reportedly undergoing delicate medical treatment, including dialysis, which has significantly reduced his mobility and his ability to respond to potential situations that place him at risk.
- Between July 3 and August 27, 2025, **D. F. P. M.** reportedly received repeated threats via telephone. At the same time, unknown individuals reportedly appeared at his residence to warn him that he could not return to Bajo Calima (his place of origin and the area where he works with CONPAZCOL). They added that he should be careful because "they are planning to stage a robbery at his home in order to kill him." These incidents were in the process of being reported by the organization at the time of the request.

10. The applicants reported threats against the association on June 9, 2025, when graffiti with the initials "FARC-EP" and signs of burning were found at the premises of the "La Esperanza" community council in Buenaventura, one of the grassroots processes supported by the organization. They emphasized that these events took place despite a precautionary measure in force in the territory, issued by a judge specializing in land restitution. Images of the incident were attached.

11. In the areas where **L. E. C. V.** and **D. F. P. M.** operate, La Playita and Bajo Calima in Buenaventura, the applicants emphasized the heightened risk faced by human rights defenders. In Cauca and Valle del Cauca, specifically in Buenaventura and the Naya River region, the simultaneous presence of several armed groups—such as FARC dissidents, the ELN, the Clan del Golfo, and organized crime structures—has intensified violence and territorial control. Through Early Warning 039 of 2023,⁴ the National Ombudsperson's Office warned of the imminent risk of serious violations of fundamental rights, both in urban and rural areas. It was alleged that this situation has placed community, environmental, and indigenous leaders, as well as signatories to the Final Peace Agreement, in a highly vulnerable position. The National Ombudsperson's Office then adopted Early Warnings No. 001,⁵ 002,⁶ and 004⁷ of 2025, which warned about the imminent situation of risk for the civilian population generated by the actions, expansion and clashes of Organized Armed Groups (*Grupos Armados Organizados*, GAO) in the aforementioned departments.

12. In La Playita, where **L.E.C.V.** performed her work activities, there have been recent violent incidents, including the November 9, 2025 discovery of three people who had been murdered, which has created a widespread atmosphere of fear. In the "La Colonia" sector, located in Bajo Calima and where the proposed beneficiary **D. F. P. M.** is allegedly residing, explosions were reported, allegedly caused by the use of grenades in the midst of the civilian population. One of these devices exploded near a school, leaving at least one person injured. These events have intensified fear in the community and reaffirm the active presence of armed actors in the area.

13. The applicants noted that the State itself has acknowledged the risk that some of the members of the leadership face, and that they have been granted protective measures. However, they state that there have been obstacles in their implementation. In this regard, they argued that "gradually, the National Protection Unit (UNP) has been dismantling security measures" and that "the adopted measures do not correspond to the risks or needs of CONPAZCOL members."⁸ Regarding the three identified proposed beneficiaries, the following was reported:

- **L. E. C. V.** reportedly does not have protection measures in place, despite a request pending before the UNP. In this regard, the applicants attached a letter dated August 21, 2025, issued by the UNP, which outlined the procedure the proposed beneficiary must follow to request the granting of a protection detail. As of November 19, 2025, the situation reportedly remained unchanged, as the UNP has not yet issued a resolution.
- **J. E. M.** reportedly does not have protection measures implemented by the State.
- **D. F. P. M.** allegedly has a protection plan consisting of a security guard, a bulletproof vest, and a means of communication starting on February 28, 2024. The applicants submitted a copy of the UNP resolution where a risk assessment resulted in categorizing their risk as "extraordinary". However, the applicants allege that, although these measures continue to be implemented, they are neither

⁴ National Ombudsperson's Office of Colombia, Early Warning No. 039-2023, December 5, 2023, p. 5 (Available only in Spanish).

⁵ National Ombudsperson's Office of Colombia, Delegate for Risk Prevention and Early Warning System, Early Warning No. 001-2025, January 21, 2025 (Available only in Spanish).

⁶ National Ombudsperson's Office of Colombia, Delegate for Risk Prevention and Early Warning System, Early Warning No. 002-2025, January 28, 2025.

⁷ National Ombudsperson's Office of Colombia, Delegate for Risk Prevention and Early Warning System, Early Warning No. 004-2025, February 17, 2025 (Available only in Spanish).

⁸ Information was provided on the following members of the board: M.E.M.R. reportedly has protection measures in place since October 8, 2024, according to the UNP resolution attached to the request. The proposed beneficiary has been assigned a protection detail that includes an armored vest and a communication device, and has undergone a risk assessment which yielded a result of "extraordinary risk". E. C. C. and R. G. C. also allegedly have protection measures provided by the UNP. In the case of R. G. C., the measures were allegedly established as of May 21, 2024, and a risk assessment with a result of "ordinary risk". It allegedly established a means of communication and a bulletproof vest, according to the attached resolution. As for E.C.C., the corresponding resolution and date of implementation and/or validity were not provided.

suitable nor effective given the territorial dynamics in which they carry out their work. The proposed beneficiary provides organizational support in rural and urban areas marked by the active presence of illegal armed actors, de facto territorial control, and recent violent operations against the civilian population. In this context, security details consisting only of passive self-protection elements, such as a vest and cell phone, and a security guard without their own means of transportation, is not sufficient to guarantee their safety or to allow the secure continuity of their work.

- Therefore, the applicants consider it essential to urgently and jointly strengthen the protection detail assigned to **D. F. P. M.**, and to incorporate measures that respond comprehensively and differentially to the identified risk. Among these, they believe that priority should be given to including collective measures for safe transport, suitable both for their work in rural areas that are difficult to access and for frequent travel arising from organizational work at the national level. These measures must have an ethnic and territorial focus, in accordance with the collective identity of the processes they accompany and the risk characteristics faced by Afro-descendant communities in Bajo Calima and other regions where CONPAZCOL carries out its work.

14. The applicants added that in the cases of the proposed beneficiaries **L. E. C. V.** and **D. F. P. M.**, they have received financial support from partner organizations to temporarily leave Buenaventura between August and November 2025, as a self-protection mechanism. In the case of **J. E. M.**, it is argued that, given his current state of health, he is in a situation of extreme vulnerability, as this limits his ability to move around, seek refuge, or take basic measures to protect himself from possible harassment or aggression.

15. The applicants acknowledged the preventive actions carried out by the Ministry of Defense and the National Police but considers them insufficient. They allege that, through the Ministry of Defense and the Public Force, the State acts only after an incident affecting the human rights of CONPAZCOL leadership has occurred, such as the threats against **L. E. C. V.** or the murder of P. G. P. They believe that the State's approach to serious human rights violations is reactive rather than preventive. It stated that the actions taken by the security forces are isolated and uncoordinated, and do not include a comprehensive plan in place to address the danger faced by CONPAZCOL and its members.

16. Lastly, the applicants expressed concern about the information presented by the Office of the Attorney General, given that the information provided came from only one of the 35 regional offices of the Prosecutor's Office, and specifically from one of those with the least influence on the patterns of victimization faced by the organization. They added that the information available is "superficial" and does not allow for an assessment of the measures taken to address the situation that places them at risk, as the Prosecutor's Office merely indicates which members of the CONPAZCOL board have filed complaints, but do not provide any updates on the status and progress of the investigations.

B. Response from the State

17. The State reiterated its commitment to the Commission to continue taking the necessary steps in the context of this request for precautionary measures and submitted reports prepared by the Ministry of National Defense and the Office of the Attorney General.

18. The Ministry of Defense provided information from the Valle del Cauca Police Department, which detailed that an incident was documented on February 4, 2025 in the municipality of Buenaventura during which an armed man threatened several people, including **L. E. C. V.** It was noted that minutes later, there was a firefight which left a young man injured and caused alarm in several communities. The Police responded with patrols, surveillance, and coordination with the Marine Corps.

19. The police departments of Chocó, Tolima, Meta, and Urabá stated that they had no evidence of CONPAZCOL's active presence or records of threats or requests for protection in their territories. The Antioquia Police Department stated that it is aware of the presence of the aforementioned organization in the municipalities of Apartadó and Dabeiba, although no incidents were detailed. The Huila Police Department reported that there have been no violent acts or requests for preventive measures in its jurisdiction, but it expresses its willingness to collaborate in the protection of social leaders.

20. Previous preventive measures were reported for executives such as M.E.M.R., R.G.C., and **D.F.P.M.**, which are claimed not to be intended as protective measures. It was reported that self-protection measures such as courses, patrols, and educational campaigns were offered and implemented. However, the applicants emphasize that these measures do not constitute material protection, but rather tools to reduce vulnerabilities. Regarding **J. E. M.**, it was mentioned that he received institutional care from the Barranquilla Metropolitan Police, especially after changing residence due to health-related reasons. Preventive measures, patrols, interviews, and inter-agency coordination were detailed to ensure his safety.

21. The State added information about the investigation into the murder of P. G. P. in 2023. In addition, there were "previous situations that could be related to the violent act that cost him his life." In this regard, the investigation uncovered previous reports of threats dating back to 2016 and 2019. After his murder, they noted that protective measures were implemented in favor of his immediate family, including patrols, socialization of self-protection actions, and institutional monitoring.

22. The Tolima Branch Directorate of the Office of the Attorney General mentioned that, as for the branch, several proposed beneficiaries have no record of having made complaints. However, it warned that some have filed complaints or accusations, which was allegedly handled by other regional offices of the Office of the Attorney General, such as Cauca, Atlántico, Valle del Cauca, Bogotá, Caldas, Putumayo, and the Specialized Directorate against Human Rights Violations. Regarding the murder of P. G. P., it was revealed that the criminal investigation into this homicide is being led by Prosecutor's Office 16, attached to the Special Investigation Unit for the Dismantling of Criminal Organizations, in coordination with the Elite Corps of the National Police. Progress was detailed, with arrest warrants having been issued against several alleged perpetrators.

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

23. The precautionary measures mechanism is part of the Commission's function of overseeing compliance with the human rights obligations set forth in Article 41(b) of the American Convention on Human Rights, also included in Article 18(b) of the Statute of the IACHR. The precautionary measures mechanism is described in Article 25 of the Rules of Procedure of the Commission. In accordance with that Article, the Commission grants precautionary measures in serious and urgent situations in which these measures are necessary to avoid irreparable harm to people.

24. The Inter-American Commission and the Inter-American Court of Human Rights ("the Inter-American Court" or "I/A Court H.R.") have established repeatedly that precautionary and provisional measures have a dual nature, both protective and precautionary.⁹ Regarding the protective nature, these measures seek to avoid irreparable harm and protect the exercise of human rights.¹⁰ To do this, the IACHR shall assess the problem raised, the effectiveness of state actions to address the situation described, and how vulnerable the persons

⁹ Inter-American Court of Human Rights (I/A Court H.R.), [Matter of the Yare I and Yare II Capital Region Penitentiary Center](#), Provisional Measures regarding the Bolivarian Republic of Venezuela, Order of March 30, 2006, considerandum 5; [Case of Carpio Nicolle et al. v. Guatemala](#), Provisional Measures, Order of July 6, 2009, considerandum 16.

¹⁰ I/A Court H.R., [Matter of Capital El Rodeo I and El Rodeo II Judicial Confinement Center](#), Provisional Measures regarding Venezuela, Order of February 8, 2008, considerandum 8; [Case of Bámaca Velásquez](#), Provisional measures regarding Guatemala, Order of January 27, 2009, considerandum 45; [Matter of Fernández Ortega et al.](#), Provisional measures regarding Mexico, Order of April 30, 2009, considerandum 5; [Matter of Milagro Sala](#), Provisional measures regarding Argentina, Order of November 23, 2017, considerandum 5 (Available only in Spanish).

proposed as beneficiaries would be left in case the measures are not adopted.¹¹ Regarding their precautionary nature, these measures have the purpose of preserving legal situations while under the study of the IACHR. Their precautionary nature aims at safeguarding the rights at risk until the petition pending before the inter-American system is resolved. Their object and purpose are to ensure the integrity and effectiveness of an eventual decision on the merits and, thus, avoid any further infringement of the rights at issue, a situation that may adversely affect the useful effect (*effet utile*) of the final decision. In this regard, precautionary or provisional measures enable the State concerned to comply with the final decision and, if necessary, to implement the ordered reparations.¹² In the process of reaching a decision, according to 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.

25. In analyzing those requirements, the Commission reiterates that the facts supporting a request for precautionary measures need not be proven beyond doubt. The information provided should be assessed from a *prima facie standard of review to determine whether a serious and urgent situation exists*.¹³ Similarly, the Commission recalls that, by its own mandate, it is not in its purview to determine any individual liabilities for the facts alleged. Moreover, in this proceeding, it is not appropriate to rule on violations of rights enshrined in the American Convention or other applicable instruments.¹⁴ This is better suited to be addressed by the Petition and Case system. The following analysis refers exclusively to the requirements of Article 25 of its Rules of Procedure, which can be resolved without entering into determinations on the merits.¹⁵

26. Moreover, when assessing the alleged facts, the Commission takes into account the context in Colombia. In its Annual Reports for 2021, 2022, 2023, and 2024, the Commission reiterated its concern about the violence resulting from the armed conflict in the country and its particular impact on human rights defenders, social leaders, indigenous and Afro-descendant peoples, peasant communities, women, and children and adolescents.¹⁶ In its 2024 Annual Report, the IACHR warned that, despite efforts, high levels of violence persist in the country. As of November 2024, 26 Early Warnings had been issued for 24 departments, 123 municipalities, and 15 non-municipal areas regarding human rights violations linked to the actions of non-state armed groups and their links to drug trafficking, illegal mining, and deforestation.¹⁷ In this regard, between January and October

¹¹ I/A Court H.R., Matter of Milagro Sala, Provisional Measures regarding Argentina, Order of November 23, 2017, considerandum 5 (Available only in Spanish); Matter of Capital El Rodeo I and El Rodeo II Judicial Confinement Center, Provisional Measures regarding Venezuela, Order of February 8, 2008, considerandum 9; Matter of the Criminal Institute of Plácido de Sá Carvalho, Provisional Measures regarding Brazil, Order of February 13, 2017, considerandum 6 (Available only in Spanish).

¹² I/A Court H.R., Matter of Capital El Rodeo I and El Rodeo II Judicial Confinement Center, Provisional Measures regarding Venezuela, Order of February 8, 2008, considerandum 7; Matter of “El Nacional” and “Así es la Noticia” newspapers, Provisional Measures regarding Venezuela, Order of November 25, 2008, considerandum 23; Matter of Luis Uzcátegui, Provisional Measures regarding Venezuela, Order of January 27, 2009, considerandum 19 (Available only in Spanish).

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

¹⁴ 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.

¹⁵ In this regard, the Court has stated that “[it] cannot, in a provisional measure, consider the merits of any arguments pertaining to issues other than those which relate strictly to the extreme gravity and urgency and the necessity to avoid irreparable damage to persons.” I/A Court H.R., Matter of James et al. regarding Trinidad and Tobago, Provisional Measures, Order of August 29, 1998, considerandum 6 (Available only in Spanish); Case of the Barrios Family v. Venezuela, Provisional Measures, Order of April 22, 2021, considerandum 2 (Available only in Spanish).

¹⁶ IACHR, 2024 Annual Report, Ch. X. Colombia, OEA/Ser.L/V/II. Doc. 39 rev. 2, March 26, 2025, para. 256, p. 536.

¹⁷ IACHR, 2024 Annual Report, Ch. X. Colombia, previously cited, para. 263, p. 537.

2024, the Ombudsperson's Office recorded 147 murders of human rights defenders or leaders, with the departments of Arauca, Cauca, and Valle del Cauca having the highest number of cases.¹⁸ The Commission highlighted reports from civil society organizations concerning deficiencies in protection measures. These include material shortcomings in vehicles, protection vests, telephones, and panic buttons; restrictions on protection officers' mobility and fuel supply; lack of institutional presence in the territory; absence of qualified personnel; and measures based on a gender, ethnic-racial, and territorial approaches. These issues have hindered the effective implementation of protection measures.¹⁹

27. Furthermore, following its on-site visit to Colombia in April 2024, the Commission noted in its Preliminary Observations that the reconfiguration of the armed conflict has led to an alarming number of murders, threats, harassment, and stigmatization, particularly against human rights defenders and social and community leaders, signatories to the Peace Agreement, and journalists.²⁰

28. Consequently, the Commission understands that the circumstances that the proposed beneficiaries face, along with the country contextual and thematic monitoring carried out by the IACHR, are relevant in the analysis of the procedural requirements.

29. In relation to the requirement of *seriousness*, the Commission considers that it has been met. The foregoing considering that the three individuals who have been identified as proposed beneficiaries carry out work as human rights defenders in their region, and as a result, have been subjected to multiple incidents that put them at risk so far in 2025. The Commission understands that these events have continued to occur over time with particular intensity, including:

- a. Harassment, surveillance, and continuous monitoring, with the presence of armed persons.
- b. Intimidation through the use of firearms in public spaces.
- c. Explicit death threats that include personal and location information of the beneficiaries (home addresses, workplaces, identification, and ID numbers).
- d. Repeated phone calls with threatening content and calls for extortion purposes.
- e. Armed clashes and explosions in nearby areas, occurring immediately after explicit threats were made.
- f. Threatening graffiti on property linked to beneficiaries and attempted arson at premises associated with the association to which they belong.
- g. Messages and warnings containing explicit language referring to violence, for example: "Don't play dumb, we have all your information"; "I'm going to kill you," among others.

30. The Commission observes that the continuity and severity of the events that affect the beneficiaries show the persistence of the risks and methods that non-state actors use to prevent them from carrying out their work in defense of human rights. Moreover, there are disturbing reports of at least five individuals who were members of or associated with CONPAZCOL being murdered between 2017 and 2025, some of which were preceded by similar threats and harassment, where the risk was later confirmed.

31. This contextual background is particularly relevant in this matter, especially considering the areas of activity of the proposed beneficiaries in the territories of Buenaventura and Barranquilla. At these locations, not only have specific incidents occurred, but extensive information has been documented regarding the existence of persecution and sustained violence in recent years against members of CONPAZCOL. In this context, the specific facts reveal a persistent and plausible risk of materialization, which aggravates the allegations and reinforces the need to adopt effective and adequate protective measures.

¹⁸ IACHR, 2024 Annual Report, Ch. X. Colombia, previously cited, para. 266, p. 537.

¹⁹ IACHR, 2024 Annual Report, Ch. X. Colombia, previously cited, para. 269, p. 538.

²⁰ IACHR, Preliminary Observations, On-site Visit to Colombia, April 15-19, 2024, page 3.

32. Upon requesting information from the State under the terms of Article 25 of the Rules of Procedure, the IACHR acknowledges its response and its commitment to the Commission to continue taking the necessary steps within the framework of the precautionary measures. It also takes into serious consideration the responses of certain state entities regarding their knowledge of the facts alleged by the applicants and certain preventive measures implemented in order to follow up on them.

33. The IACHR reports on the alleged lack of response by state entities to requests for protective measures or complaints about their ineffectiveness and dismantling. Although it was noted that the UNP has implemented security measures in favor of proposed beneficiary D. F. P. M., since February 28, 2024, the applicants have questioned their effectiveness and suitability. The State has not made any observations regarding this allegation, nor has it submitted any response that would allow it to be challenged. The above is relevant, given that new events that have placed the proposed beneficiaries at risk have been recently reported in relation to the proposed beneficiary, even under the current protection detail.

34. In this sense, it is observed from a *prima facie* standard that the current protection measures are not adequate to address situations which place D. F. P. M. at risk. In particular, it is alleged that the assigned protection detail lacks the necessary material resources. For example, it includes a bodyguard who lacks financial and logistical support, and cannot therefore guarantee continuous accompaniment or enable safe travel. The foregoing is particularly problematic given the work of the proposed beneficiary, which involves traveling between various areas of the country which have a marked presence of armed groups. It has also been noted that, in the absence of an effective detail, the proposed beneficiary himself has resorted to extreme self-protection measures, such as temporarily abandoning the territories in which he operates. This shows the need to strengthen the institutional response to mitigate risks he faces. Under these conditions, the measures currently in place are allegedly not appropriate or effective in responding to the identified threat level or in allowing the proposed beneficiary to continue performing his duties.

35. In the case of the proposed beneficiaries L. E. C. V. and J. E. M., they reportedly do not have any state protection detail in their favor, despite the complaints filed, the specific documented risks, as recorded in the State's own report, and the requests L.E.C.V submitted to the UNP. It should be noted that more than ten months have passed since the first event that placed them at risk, and to date no decision has been issued nor is there any estimated time frame for doing so. This situation raises concerns, as the passage of time without the necessary safeguards increases the likelihood that the reported risk will materialize to the detriment of the rights of the proposed beneficiaries.

36. In addition, the proposed beneficiaries have been forced to seek external financial support and take self-protection measures to protect their lives and personal integrity. These measures have resulted in their displacement from areas where they carry out their work or reside, as well as the disruption of their activities. The situation of J. E. M. is a matter of concern, as he is allegedly unable to protect himself due to current health and is therefore unable to mitigate the lack of response from the State.

37. The Commission notes that it is not called upon, at this time, to detail the concrete measures that should be implemented to protect the proposed beneficiaries. Notwithstanding, in order to contribute to the establishment of the most suitable measures, it considers it necessary to adopt protective measures in their favor. The foregoing in light of the reported incidents and the persistence of events that have placed them at risk over time in the context of their work as human rights defenders, which will enable them to carry out their work in safe conditions. This assessment is essential since, according to the information available, the measures taken so far have not effectively mitigated the ongoing risks they face. Therefore, the Commission warns that, given the nature of the alleged events over time, the State must conduct a comprehensive assessment of the situations that continue to place the proposed beneficiaries at risk in order to identify the causes of the risk.

38. In relation to the investigations, the Commission observes that the facts have been reported to the Office of the Attorney General. However, the applicants have alleged that there has been no progress in identifying those responsible for the reported acts. The lack of concrete results in investigations limits the ability to mitigate risk and perpetuates a context of vulnerability.²¹ This information is relevant when assessing the safety of the proposed beneficiaries and the likelihood that the threats, surveillance, harassment, and reported incidents will recur.

39. Taking into account the foregoing, the Commission finds that, from the applicable *prima facie* standard, it is sufficiently verified that the rights to life and personal integrity of the three proposed beneficiaries are at serious risk.

40. With regard to the requirement of *urgency*, the Commission considers that this has been met, given that the proposed beneficiaries have been subjected to threats, surveillance, harassment, and acts of armed violence against them, which have not ceased over time. The Commission observes that the proposed beneficiaries are still not receiving effective and sufficient protection measures to ensure their safety in the context of their work as defenders. Therefore, given the imminent materialization of the risk and the absence of protection measures effectively implemented, it is necessary to adopt immediate measures to safeguard their rights to life and personal integrity.

41. Regarding the requirement of *irreparable harm*, the Commission concludes it met, given that the potential impact on the rights to life and personal integrity constitutes the maximum situation of irreparability.

42. Lastly, the Commission observes that the protection of the rights of 13 other CONPAZCOL board members duly identified in the file has also been requested. However, upon analyzing the available information, the Commission does not have sufficient evidence at this time to show that the requirements of Article 25 of its Rules of Procedure have been met. The foregoing, on the understanding that the specific facts of risk, which are recent and persistent, have focused solely on three of its members: L. E. C. V., J. E. M., and D. F. P. M. Without prejudice to the above assessment, the Commission recalls that the State of Colombia must guarantee their rights under the terms of Article 1.1 of the American Convention on Human Rights. These obligations remain in force regardless of the decision regarding the situation of the other members of the CONPAZCOL board.

V. BENEFICIARIES

43. The Commission declares as the beneficiaries of the precautionary measures L. E. C. V., J. E. M. and D. F. P. M., who are duly identified in this proceeding.

VI. DECISION

44. The IACHR considers that this matter meets *prima facie* the requirements of seriousness, urgency, and irreparable harm set forth in Article 25 of its Rules of Procedure. Consequently, it requests that Colombia:

- a) take the necessary measures to protect the rights to life and integrity of the beneficiaries;
- b) implement the relevant measures so that the beneficiaries can carry out their work as human rights defenders without being subjected to threats, harassment, or other acts of violence in the exercise of their duties;

²¹ IACHR, Resolution No. 49/2025, Precautionary Measures No. 262-24, Dumar Eliecer Blanco Ruiz regarding Colombia, July 21, 2025, para. 35.

- c) consult and agree upon the measures to be adopted with the beneficiaries and their representatives; and
- d) report on the actions taken to investigate the alleged facts that gave rise to this resolution, so as to prevent such events from reoccurring.

45. The Commission requests that the State of Colombia report, within 15 days from the date of notification of this resolution, on the adoption of the precautionary measures requested and to update that information periodically.

46. The Commission emphasizes that, pursuant to Article 25(8) of its Rules of Procedure, the granting of precautionary measures and their adoption by the State do not constitute a prejudgment regarding the possible violation of the rights protected in the American Convention and other applicable instruments.

47. The Commission instructs its Executive Secretariat to notify this resolution to the State of Colombia and the applicants.

48. Approved on November 30, 2025, by José Luis Caballero Ochoa, President; Andrea Pochak, First Vice-President; Edgar Stuardo Ralón Orellana, Second Vice-President; Roberta Clarke; and Gloria Monique de Mees, members of the IACHR.

Luiz Marcelo Azevedo
Senior Officer
By authorization of the Executive Secretary