



PRIORITY ISSUE :

Protection of Journalists in Armed Conflict Zones

Advisory Note by the High Level Panel of Legal Experts on Media Freedom

7 May 2026

This Advisory Note:

- I. Briefly reviews the media freedom crisis in conflict zones;
- II. Sets out the binding international law applicable to the protection of journalists in armed conflict; and
- III. Offers recommendations for action moving forward.

1. The High Level Panel of Experts on Media Freedom issues this Advisory Note to express its grave concern over the surge in both violence against journalists and restrictions on the media in armed conflict zones across the globe. The unprecedented nature and proliferation of such attacks, including recently in Iran, Gaza, and Ukraine, as well as in Ethiopia, Yemen and Sudan, underscore the urgent need to take concrete action to protect journalists and media workers in accordance with well-settled international law.*
2. Attacks on journalists in conflict zones have far-reaching consequences that extend beyond the individuals targeted—they directly undermine the public’s right to access reliable, independent information, a cornerstone of both democratic society and international law. When journalists are killed, kidnapped, threatened with violence, arbitrarily denied access to conflict zones, or otherwise barred from reporting during armed conflict, it creates an information vacuum often filled by propaganda, disinformation, and misinformation. This not only distorts the public’s understanding of the conflict, but also can conceal human rights violations and war crimes, reducing the chances of accountability.
3. The Media Freedom Coalition (“MFC”) is uniquely placed to promote and protect media freedom within the United Nations and regional frameworks in the face of these pressing challenges.

I. EROSION OF MEDIA FREEDOM IN CONFLICT ZONES

4. **Attacks on Journalists.** The Committee to Protect Journalists (CPJ) has documented that 2025 was the deadliest year on record for journalists, with at least 129 journalists and media workers killed, with the vast majority—104 in total—occurring in countries experiencing armed conflict.¹ According to CPJ, nearly two-thirds of journalists killed in 2024 and 2025 died in Israeli attacks in Gaza. This aligns with a concerning upward trend: in 2024, UNESCO reported that at least 68 journalists and media workers were killed in the line of duty, in conflicts around the world.² In 2025, Reporters Without Borders (RSF) documented the killing of 67 journalists on the job or in connection with their work and that more than 150 journalists have been attacked while reporting on the Russia-Ukraine War, with at least 16 killed by Russian forces.³ The International Federation of Journalists likewise has documented the killing of 122 journalists, with 64 of these resulting from the war in Gaza.⁴ In Sudan, since the Sudanese Armed Forces and the Rapid Support Forces began open hostilities on 15 April 2023, at least 30 journalists have been killed and more than 500 press-

* For purposes of the present Advisory Note “journalist” refers to both war correspondents and civilian journalists as recognized under humanitarian law, as well as media workers and human rights defenders advocating for media freedom more generally. See International Committee of the Red Cross, International Humanitarian Law Database, Rule 34.



freedom violations were reported in 2024 alone.⁵ To date in 2026, eighteen journalists and media workers already have been killed.⁶

5. **Cyber Targeting.** This surge in violence has been accompanied by an increasing use of cyber targeting to attack journalists, which has worsened with the growing use of commercially available spyware, particularly in conflict zones where media freedom is already under threat.⁷
6. **Detentions during armed conflict.** As of February 2026, at least seven journalists have been jailed by the Iranian regime for their coverage of the mass civilian protests in the country.⁸ There are also reports that journalists covering the conflict in Iran have been detained and their reporting confiscated.⁹ At the same time, 15 Ukrainian journalists have been sentenced to prison terms in Russia on terrorism or espionage charges, and there are reports of inhumane treatment in detention.¹⁰ In Ethiopia, more than 200 journalists have been arrested and at least 53 driven abroad since the outbreak of the Tigray War in 2020.¹¹
7. **Access Restrictions.** Restrictions on access for journalists in areas of armed conflict have also increased, including restrictions imposed by internet shutdowns and other punitive crackdowns on media freedom.¹² The Iranian regime has imposed intermittent internet blackouts, including since January 2026. International press have been barred from entering Gaza, and reporters and citizens in Israel are subject to prohibitions on reporting or broadcasting material, on the basis that it might reveal sensitive information or pose a threat to the country's security interests.¹³ Al Jazeera, one of the few remaining sources of in-depth reporting from Gaza, has been banned repeatedly in both Israel and the Occupied Palestinian Territory, ostensibly on national security grounds.¹⁴ Despite calls from UN Secretary-General António Guterres and other international actors, access to Gaza by international journalists remains blocked.¹⁵ Five UN mandate holders called such bans a "dangerous precedent" that risks further impunity for human rights violations by restricting independent reporting.¹⁶ Russian forces have also targeted television and radio towers in air strikes, resulting in the shutdown of 329 Ukrainian news outlets.¹⁷ Ethiopian authorities imposed internet shutdowns, and there have been allegations that it was done deliberately to hinder reporting and conceal security-force abuses.¹⁸ Ethiopia has also imposed controls on independent media, citing national security concerns, and obstructed efforts to form independent journalist associations.¹⁹ Moreover, security forces carry out background checks on the political leanings of private media outlets,²⁰ and authorities reportedly stall the approval and renewal of necessary permits for publications perceived as opposing the ruling party.²¹ As a result, several independent outlets have been closed, and two foreign journalists working for *The Economist* and *The New York Times* were deported.²² The combatants in the Sudan have also imposed internet shutdowns: an extended nationwide shutdown of mobile and internet networks in 2024 crippled newsgathering and left outlets unable to verify battlefield casualties.²³ Numerous news organisations in Sudan have ceased operations, and the resulting media blackout has been characterised by widespread disinformation, constant pressure on independent media, and targeted harassment of journalists for their reporting.²⁴ There have been reports that print runs of media outlets has been confiscated repeatedly, including that of *Al Jazeera*, one of Sudan's last independent newspapers.²⁵
8. **Failure of Accountability.** Tragically, impunity remains the norm for attacks against journalists. UNESCO's 2024 annual report notes that 85% of all killings recorded by UNESCO since 2006 are considered unresolved.²⁶ The context of armed conflict makes accountability all the more difficult. CPJ reports that there has been no accountability for any of the journalists allegedly killed by Israeli forces in Gaza and Lebanon, and recent reports regarding Israel's strikes in Sanaa, Yemen record them as some of the deadliest attacks on journalists in 16 years.²⁷ In the Sudan, although the Government adopted a Transitional Justice Policy promising criminal prosecutions for serious human rights abuses, to date there are no public indictments under the mechanism related to crimes against journalists.²⁸



II. APPLICABLE LEGAL FRAMEWORK

9. States' obligations to protect journalists in conflict zones stem from well-settled international humanitarian and human rights law. Protections afforded to journalists under international humanitarian law ("IHL") derive from their status as civilians. Journalists working in conflict zones—including war correspondents or journalists who are otherwise embedded in military units—are considered civilians and must be protected accordingly, as long as they are not taking a direct part in hostilities.²⁹ As such, they "shall not be the object of attack" and parties to the conflict must take "all feasible precautions" to avoid any incidental injury or loss of life.³⁰ Without prejudice to their civilian status, accredited war correspondents accompanying the armed forces who are captured by opposing forces in an international armed conflict are entitled to prisoner of war status and all of the protections that status entails.³¹ The UN Security Council has addressed the targeting of journalists in Resolutions 1738 and 2222, condemning attacks against journalists and media facilities and demanding that all parties comply fully with their obligations under IHL, while also calling for impartial, independent and effective investigations of violations and stressing the need for accountability.³²
10. Protections afforded to journalists under international human rights law ("IHRL") apply concurrently with IHL obligations.³³ The UN Human Rights Council has emphasized that attacks on media workers violate the right to freedom of expression as protected under Article 19 of the International Covenant on Civil and Political Rights (ICCPR). The ICCPR, as well as various regional treaties and soft law instruments, reinforce States' obligations to protect freedom of expression as well as to investigate, prosecute, and remedy attacks on media professionals.³⁴ Human Rights Committee General Comment No. 34 clarifies that the right to freedom of expression is non-derogable—even during states of emergency—and that Article 19 is not subject to States' "margin of appreciation."³⁵ Any limitation on the right to freedom of expression, including all censorship, must satisfy the three-part test of legality, legitimate aim, and necessity/proportionality.³⁶ Generally speaking, concerns about journalists' safety alone cannot provide a basis on which to deny journalists access; any such restrictions must still satisfy this three-part test.³⁷
11. When impunity for violations of these well-settled legal obligations prevails, it erodes respect for international legal norms and emboldens future violators. As UNESCO has stated, "Impunity leads to more killings and is often a symptom of worsening conflict and the breakdown of law and judicial systems."³⁸

III. HIGH LEVEL PANEL RECOMMENDATIONS

12. The current international crisis for journalists working in the context of armed conflict has reached epidemic proportions. To meet its mandate, the MFC must take a leading role in defending press freedom, protecting journalists, and promoting accountability for attacks against them in the context of armed conflict.
13. States should commit to uphold the international rule of law to take all necessary steps to protect journalists and media freedom in conflict zones and in particular:
 1. Publicly and specifically call upon parties to conflicts to **respect journalists' right to access and report information** and to take reasonable steps to **provide for their safety** while doing so;
 2. Immediately **cease acts of indiscriminate or deliberate killing** of journalists;
 3. **Protect physical access** to telecommunications and other means of reporting from conflict zones;
 4. **Facilitate the safe evacuation** of journalists who request it or for whom it is medically necessary;



5. **Provide and protect independent, unrestricted access to international and domestic journalists in conflict zones**, in accordance with IHL and the right to freedom of expression, including by restricting the use of internet shutdowns or other information blackouts;
 6. **Support international investigations** into the deliberate targeting of journalists in the context of armed conflict, including through the International Criminal Court and other mechanisms, and **further accountability for perpetrators in a transparent fashion**, including by publicly calling on ally states and other governments to combat pervasive impunity; and
 7. **Defend the independence of media outlets** and undertake to review and oppose legislation that criminalizes critical reporting, including where the ostensible national security grounds do not support such criminalization.
14. The right to report freely and safely is a pillar of democracy and a shield against attacks on civilians, the commission of war crimes, crimes against humanity, and the violation of international law. Journalists are not combatants and must be afforded the protections they enjoy under international law.

NOTES

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² UNESCO, ‘Journalists Killed in 2024: Heavy Death Toll in Conflict Zones for Second Year Running’ (12 December 2024) <www.unesco.org/en/articles/journalists-killed-2024-heavy-death-toll-conflict-zones-second-year-running> accessed 1 May 2026.

³ Reporters Without Borders, ‘RSF Round-up 2025’ (9 December 2025) <https://rsf.org/en/2025-deadly-year-journalists-where-hate-and-impunity-lead#_7-killed-22494> accessed 1 May 2026; Reporters without Borders, ‘Three years into Russian full-scale invasion of Ukraine, nearly 150 journalists attacked’ (18 February 2025) <<https://rsf.org/en/three-years-russian-full-scale-invasion-ukraine-nearly-150-journalists-attacked>> accessed 1 May 2026.

⁴ International Federation of Journalists, ‘122 Journalists and Media Workers Killed in 2024, says the IFJ’ (31 December 2024) <www.ifj.org/media-centre/news/detail/category/press-releases/article/122-journalists-and-media-workers-killed-in-2024-says-the-ifj> accessed 1 May 2026.

⁵ Ayin Network, ‘Sudan war turns journalism deadly amid killings, arrests, threats,’ 3 May 2025 (citing SJS data).

⁶ The Committee to Protect Journalists, ‘Journalists and Media Workers Killed in 2026’ <https://cpj.org/data/killed/2026/?status=Killed&type%5B%5D=Journalist&type%5B%5D=Media%20Worker&motiveConfirmed%5B%5D=Confirmed&motiveUnconfirmed%5B%5D=Unconfirmed&start_year=2026&end_year=2026&group_by=location> accessed 1 May 2026.

⁷ Interview: Phone of HRW Director Attacked Using Pegasus Spyware Lama Fakhri, Who Lives in Lebanon and Oversees Work on Conflict, Targeted by Government Attack (Human Rights Watch, 26 January 2022) <www.hrw.org/news/2022/01/26/interview-phone-hrw-director-attacked-using-pegasus-spyware> accessed 1 May 2026.

⁸ Reporters Without Borders, ‘Crackdown in Iran: Surge in arrests of journalists covering protests’ (18 February 2026) <<https://rsf.org/en/crackdown-iran-surge-arrests-journalists-covering-protests>> accessed 1 May 2026.

⁹ Reporters Without Borders, ‘War in Iran: journalism in crisis as access to information restricted and reporters work amid bombs’ (3 March 2026) <<https://rsf.org/en/war-iran-journalism-crisis-access-information-restricted-and-reporters-work-amid-bombs>> accessed 1 May 2026; Reporters Without Borders, ‘Media blackout in Iran’ (21 January 2026) <<https://rsf.org/en/media-blackout-iran-least-one-media-outlet-suspended-silence-country-s-other-independent-newsrooms>> accessed 1 May 2026; Human Rights Watch, ‘Iran: Internet Shutdown Violates Rights, Escalates Risks to Civilians’ (6 March 2026) <www.hrw.org/news/2026/03/06/iran-internet-shutdown-violates-rights-escalates-risks-to-civilians> accessed 1 May 2026.

¹⁰ Reporters without Borders, ‘26 empty chairs in Kyiv for the Ukrainian journalists detained by Russia: RSF calls for their immediate release’ (17 November 2025) <<https://rsf.org/en/26-empty-chairs-kyiv-ukrainian-journalists-detained-russia-rsf-calls-their-immediate-release>> accessed 1 May 2026.



- ¹¹ The Guardian, 'Mass arrests and beatings: how Ethiopia went from celebrating journalists to jailing them' (5 May 2025) <www.theguardian.com/global-development/ng-interactive/2025/may/05/mass-arrests-and-beatings-how-ethiopia-went-from-celebrating-journalists-to-jailing-them> accessed 1 May 2026.
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- ¹⁸ Internet Society Pulse, 'Internet shutdown in Amhara region, Ethiopia – August 2023' (updated 14 Jul 2024).
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- ²¹ *Id.*
- ²² The Guardian (n 19).
- ²³ The Committee to Protect Journalists, 'CPJ alarmed by extended communications blackout in Sudan' (5 February 2024) <<https://cpj.org/2024/02/cpj-alarmed-by-extended-communications-blackout-in-sudan/>> accessed 1 May 2026.
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- ²⁹ Protocol Additional to the Geneva Conventions of 12 August 1949, 1125 U.N.T.S. 3 (8 June 1977) [hereinafter “API”], Art. 51, Art. 79 (as applied to international armed conflicts); Protocol Additional to the Geneva Conventions of 12 August 1949, 1125 U.N.T.S. 609 (8 June 1977) [hereinafter “APII”], Art. 13 (as applied to non-international armed conflicts). The customary international law principle of distinction between combatants and civilians, who cannot be targeted, is also relevant. *See* International Committee of the Red Cross (ICRC), Customary Rules, Rule 1 (2005).
- ³⁰ API, Arts. 51 (2) and (5), 57-58.
- ³¹ Geneva Convention (III) relative to the Treatment of Prisoners of War of 12 August 1949, Art. 4(4).
- ³² *See* UNSC Resolution 1738 (2006); UNSC Resolution 2222 (2015).
- ³³ *See, e.g.*, Legal Consequences of the Construction of a Wall in the Occupied Palestinian Territory, ICJ Advisory Opinion, 9 July 2004, paras 106-107.
- ³⁴ *See, e.g.*, Article 10 ECHR (Europe), Article 13 ACHR (Americas), and Article 9 ACHPR (Africa); HRC Resolution A/HRC/RES/33/2, 2016.
- ³⁵ HRC General Comment No. 34, paras 5, 36.
- ³⁶ ICCPR, Art. 19(3); HRC General Comment No. 34, paras 22-37.
- ³⁷ HRC General Comment No. 34, para 45 (“It is normally incompatible with [ICCPR Art. 19] paragraph 3 . . . to restrict freedom of movement of journalists and human rights investigators within the State party (including to conflict-affected locations. . .).”). *See generally* HRC General Comment No. 34, paras 21-45.
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