

# THE VENICE COMMISSION AND THE PROTECTION OF HUMAN RIGHTS

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## 1. INTRODUCTION

All of the Venice Commission's efforts are directed towards promoting democracy and the rule of law, including human rights. Since its foundation in 1990 following the fall of the Berlin Wall, its opinions on constitutions and on constitutional and other laws in relation to each matter examined address the question whether international constitutional and human rights standards are respected. This question includes assessing whether State activity intrudes unduly upon the exercise of fundamental freedoms or interferes unduly with human rights.

It cannot be assumed that democracy, respect for human rights and the rule of law once achieved are here to stay. They must constantly and assiduously be protected, reinforced and developed so as to operate effectively in the prevailing circumstances. Threats to these values and principles are always present even in the most mature democracies and these threats must be guarded against and commented on when they arise. An appropriate constitutional structure guaranteeing democratic, pluralist ideals must be maintained, including an independent judiciary and bar. This structure must not be diminished by what may appear to be minor or by, what are at first sight, inconsequential alterations but which may in fact alter a delicate constitutional balance designed to deliver democratic institutions in a state which respects and guarantees the rule of law and human rights.

The specific field of action of the Venice Commission – 'the guarantees offered by law in the service of democracy' – is given expression in its formal title of the 'European Commission for Democracy through Law'. This is precisely defined by its three objectives of 'strengthening the understanding of the legal systems of the participating states, notably with a view to bringing these systems closer; promoting the rule of law and democracy; and examining the problems raised by the working of democratic institutions and their reinforcement and development'.

The Venice Commission pursues these objectives in giving legal advice to individual countries on laws that are important for the democratic functioning of institutions. The Commission advises whether, in its view, the legislative text meets the necessary democratic standards which respect human rights and the rule of law and advises how to improve it based on its experience. The Commission also prepares and adopts reports and studies on topics to do with the functioning of democracy – reports of significance include the *Report on the Rule of Law*,<sup>1</sup> the two-part *Report on the Independence of the Judicial System* (on Judges and on the Prosecution System)<sup>2</sup> and the *Study on Individual Access to Constitutional Justice*.<sup>3</sup>

An overview of the Venice Commission's activities can be found in its annual activity reports explaining how it has performed its prime function of providing constitutional assistance to States in the form of opinions, studies, reports, guidelines, conferences and seminars.

Whilst the Venice Commission draws on the expertise of its members in producing and adopting its opinions, it is also itself a learning organisation which facilitates learning by its members individually, and by those individuals and organisations, including state institutions, with which it engages. Many members of the Venice Commission have become senior members of the judiciary in their home states, or judges of the European Court of Human Rights, senior members of their countries' prosecution services or of the State's democratic apparatus. When they are appointed to these important positions they bring great breadth of knowledge not only of their home jurisdiction but also of the jurisdictions of other Council of Europe States. They take with them the common experience gained during their Commission membership through their work as *rapporteurs* on particular projects and through their attendance at plenary and sub-commission meetings. Here they engage closely with fellow members and with a wide variety of people representing democratic institutions and by reading the opinions and other Commission papers. This is one of the most important benefits delivered by the Venice Commission – travel, as they say, and legal travel in particular, broadens the mind.

<sup>1</sup> *Report on the Rule of Law*, adopted by the Venice Commission at its 86<sup>th</sup> plenary session, Venice, 25–26 March 2011, CDL-AD(2011)003rev [hereafter: *Report on the Rule of Law* 2011]. See the Venice Commission's website: <[www.venice.coe.int](http://www.venice.coe.int)>.

<sup>2</sup> *Report on the Independence of the Judicial System Part I: The Independence of Judges*, adopted by the Venice Commission at its 82<sup>nd</sup> Plenary Session, Venice, 12–13 March 2010, CDL-AD(2010)004 [hereafter: *Report on European Standards as regards the Independence of the Judicial System: Part I* 2010], and *Report on European Standards as regards the Independence of the Judicial System: Part II – the Prosecution Service*, adopted at its 85<sup>th</sup> plenary session, Venice, 17–18 December 2010, CDL-AD(2010)040.

<sup>3</sup> *Study on Individual Access to Constitutional Justice*, adopted by the Venice Commission at its 85<sup>th</sup> Plenary Session, Venice, 17–18 December 2010, CDL-AD(2010)039rev.



## 2. FREEDOM OF ASSEMBLY

It is interesting to reflect on the Venice Commission's experience in advising on laws dealing with a specific core human rights issue. The Commission examines each law as a whole including individual elements of it. It also considers related laws and local conditions.

The Venice Commission has been asked on many occasions by the governments of Member States and by the Parliamentary Assembly of the Council of Europe to give its opinion on specific laws governing assembly<sup>4</sup> all of which have come from new democracies. As a result of its work on the topic the Commission has produced (and published) a compilation of extracts taken from opinions and reports and studies adopted by it on issues concerning freedom of assembly which gives an overview of the doctrine of the Commission in this field. It is intended to serve as a source of reference for drafters of constitutions and of legislation relating to freedom of peaceful assembly, for researchers who consult the website, as well as for the Venice Commission's members who are requested to prepare comments and opinions on such texts. The compilation will continue to be regularly updated with extracts of newly adopted opinions or reports and studies as they arise.<sup>5</sup> In addition the Commission has been involved in a consultative role with the OSCE/ODIHR Panel on Freedom of Assembly who prepared Guidelines on Freedom of Assembly (and which have been adopted by the Commission) which seek to set out a clear minimum baseline establishing a threshold that must be met by national authorities in their regulation of freedom of peaceful assembly.<sup>6</sup>

Freedom of peaceful assembly, for it is only peaceful assembly which is guaranteed by Article 11 of the European Convention on Human Rights (hereafter: the Convention), is inextricably associated with freedom of religion, freedom of expression and freedom of association all of which are expressly guaranteed by the Convention in Articles 9, 10 and 11 respectively.<sup>7</sup> These freedoms are fundamental to all properly functioning democratic societies and

<sup>4</sup> The Venice Commission has adopted opinions on assembly laws of the following States and these can be found on the Venice Commission website: Moldova, Armenia, Azerbaijan, Ukraine, Kyrgyz Republic, Bulgaria, Bosnia and Herzegovina, Georgia, Serbia, Belarus and the Russian Federation. Several opinions have been adopted in relation to many of these States.

<sup>5</sup> Compilation of Venice Commission opinions concerning Freedom of assembly, CDL(2012)014rev.

<sup>6</sup> *Venice Commission Guidelines on Freedom of Peaceful Assembly*, 2<sup>nd</sup> edition, prepared by the OSCE/ODIHR Panel on Freedom of Assembly and by the Venice Commission, adopted by the Venice Commission at its 83<sup>rd</sup> Plenary Session, Venice, 4 June 2010, CDL-AD(2010)020 OSCE/ODIHR.

<sup>7</sup> It can be said generally that the issues that arise in relation to laws concerning assembly also arise in relation to laws concerning religion, both of which types of law have fundamental implications for freedom of expression and association.

yet they can still come under severe threat from States in their efforts to regulate them and control those who seek to exercise them. Their exercise must not be restrictively interpreted as they are central to a proper operation of the political process which is a core democratic value.

Whilst exercise of these freedoms all permit of qualification by virtue the express terms of the European Convention the only permissible limitations are those set out in the second subparagraph of the article in question and which is an exhaustive list and not permitted to be extended. So, freedom of assembly is guaranteed in article 11 of the Convention as follows:

1. Everyone has the right to freedom of peaceful assembly [...].
2. No restrictions shall be placed on the exercise of these rights other than such as are prescribed by law and are necessary in a democratic society in the interests of national security or public safety, for the prevention of disorder or crime, for the protection of health or morals or for the protection of the rights and freedoms of others. This Article shall not prevent the imposition of lawful restrictions on the exercise of these rights by members of the armed forces, of the police or of the administration of the State.

The European Court of Human Rights neatly set out its view of the importance of the freedom of assembly as a constituent part of a democratic society in *Barankevich v. Russia*:

‘the right of peaceful assembly enshrined in Article 11 is a fundamental right in a democratic society and, like the right to freedom of thought, conscience and religion, one of the foundations of such a society [...]. As has been stated many times in the Court’s judgments, not only is democracy a fundamental feature of the European public order but the Convention was designed to promote and maintain the ideals and values of a democratic society. Democracy, the Court has stressed, is the only political model contemplated in the Convention and the only one compatible with it. By virtue of the wording of the second paragraph of Article 11 [...], the only necessity capable of justifying an interference with any of the rights enshrined in those Articles is one that may claim to spring from a “democratic society” [...]. The right to freedom of assembly covers both private meetings and meetings in public thoroughfares as well as static meetings and public processions; in addition, it can be exercised by individual participants of the assembly and by those organising it (...). States must refrain from applying arbitrary measures capable of interfering with the right to assemble peacefully. [...]’<sup>8</sup>

The constitutions of all of the countries whose assembly laws were examined already contain express guarantees of freedom of assembly (as well as of freedom of expression and of religion and association). Furthermore, all incorporate

<sup>8</sup> ECtHR, *Barankevich v. Russia*, judgment of 26 July 2007, paras 24 and 25.



international treaties to which they are party (and this includes the Convention) into domestic law directly and in many cases provide in their constitutions that, in case of conflict between a provision of a treaty and a rule of domestic law, the rule in the international treaty will prevail.<sup>9</sup> Thus, the guarantees accorded to human rights in general and to the freedom of assembly in particular are formally very solidly entrenched at the highest normative level.

Despite this, it can be observed from the Venice Commission's opinions that there is a strong tendency in practice for the States that regulate freedom of assembly by a specific law and whose assembly laws were examined to seek to control its exercise (and that of associated freedoms) by making very detailed rules affecting every aspect of a proposed assembly from its initial notification to the authorities up until its dispersal. This legislative practice brings with it the danger that the State may indeed intrude unduly upon exercise of the fundamental freedoms in implementation of the law. The level of detailed rule-making which seeks to cover every eventuality brings excessive rigidity to a law that requires a flexible and, above all, a facilitative approach. The greater the number of specific rules to comply with, the greater the possibility of failing to do so, unwittingly or deliberately, thus potentially making the assembly unlawful. Putting organisational difficulties in the way of people who would wish legitimately to exercise their rights and freedoms will naturally dissuade some of them from making the effort to do so. People may simply be frightened of taking the risk of organising or attending an assembly that they would otherwise wish to organise or attend, particularly if a criminal conviction or involvement with the police might follow even for minor breaches of regulations.

These very detailed laws have implications for the rule of law as a concept which was examined in the Venice Commission's *Report on the Rule of Law*.<sup>10</sup> The Report observed<sup>11</sup> that the Soviet notion of strict execution of the laws was based on a very positivistic law-making approach and that 'this conception may still be enshrined in practice and prevent the development of a more comprehensive definition of the rule of law where law is more easily conceived as an instrument of power than as a value to be respected. In other words, especially in new democracies, the values of the rule of law still need "sedimentation", that is that they have to become part of day to day practice and, in the words of Valery Zorkin,<sup>12</sup> "legal awareness".'

The greatest problem is in practice that unnecessarily complex and detailed laws have the capacity to present the State itself and State authorities in their

<sup>9</sup> For example, see the Constitution of the Russian Federation Article 15(4), the Constitution of the Republic of Moldova Article 4(2) and the Constitution of Bosnia and Herzegovina Article II para. 2.

<sup>10</sup> *Report on the Rule of Law* 2011.

<sup>11</sup> At para. 33.

<sup>12</sup> V.D. ZORKIN, 'Rule of Law and Legal Awareness' in F. NEATE (ed.), *The Rule of Law: Perspectives from Around the Globe*, LexisNexis Butterworths, 2009, pp. 43–54.

enforcement of the law with the opportunity to act arbitrarily and without respect for the principle of proportionality in their regulation of assemblies which should, in principle, be permitted without significant regulation. Excessive regulation is anathema to the State's positive obligation to guarantee the effective exercise of the freedom of assembly. This positive obligation imposes on the State the duty to actively protect peaceful and lawful assemblies. The State is not entitled by its laws to prevent an assembly, and therefore the expression of views, without strong evidence that it will lead to violence. Excessive regulation is an attack on democracy itself.

In fact, the Commission has reflected on the general question of whether it is necessary and desirable to regulate the exercise of the freedom of assembly through a specific law at all, and if so, to what extent. In this regard it has noted that:

'The exercise of fundamental rights and freedoms is a constitutional matter par excellence and, as such, should be governed in principle primarily by the Constitution [...] and by the Convention. Fundamental rights should, insofar as possible, be allowed to be exercised without regulation, except where their exercise would pose a threat to public order and where necessity would demand state intervention. A legislative basis for any interference with fundamental rights such as the right of peaceful assembly is indeed required by the Convention. The relevant regulation, in other words, should focus on what is forbidden rather than on what is allowed: it should be clear that all that is not forbidden is permissible, and not vice-versa. Accordingly, in the Commission's opinion, it is not indispensable for a State to enact a specific law on public events and assemblies, as control of such events may be left to general policing and the rights in relation to them may be subject to the general administrative law. States may nonetheless decide to enact laws specifically regulating the freedom of assembly (and indeed several European States do have similar laws).'<sup>13</sup>

A point repeatedly made by the Venice Commission in its opinions<sup>14</sup> is that whilst there is a wide margin of appreciation for the Member States this does not mean that a restriction can be justified simply because of one of the purposes listed in the second sub-paragraph, that is 'in the interests of national security or public safety, for the prevention of disorder or crime, for the protection of health or morals or for the protection of the rights and freedoms of others' which possible restrictions are exhaustive and cannot be supplemented by other reasons

<sup>13</sup> *Opinion on the Law on Conducting Meetings, Assemblies, Rallies and Demonstrations of the Republic of Armenia*, adopted by the Venice Commission at its 60<sup>th</sup> Plenary Session, Venice 8–9 October 2004, CDL-AD(2004)039, paras 14–17.

<sup>14</sup> Most recently in its *Opinion on the Federal Law No. 54-Fz of 19 June 2004 on Assemblies, Meetings, Demonstrations, Marches and Picketing of the Russian Federation*, adopted by the Venice Commission at its 90<sup>th</sup> Plenary Session, Venice, 16–17 March 2012, CDL-AD(2012)007 [hereafter: *Opinion on the Federal Law No. 54-Fz of 19 June 2004 on Assemblies, Meetings, Demonstrations, Marches and Picketing of the Russian Federation 2012*], para. 24.



for restriction. In addition any restriction must in each case be ‘necessary in a democratic society’. According to the well-established jurisprudence of the European Court of Human Rights this means that the restriction of the freedom must correspond to a pressing social need, be proportionate (that is, there must be a rational connection between public policy objective and the means employed to achieve it and there must be a fair balance between the demands of the general community and the requirements of the protection of an individual’s fundamental rights) and the justification for the limitation must be relevant and sufficient. So for example, a restriction which purports to be for the purpose of protecting public safety or preventing crime cannot be justified solely on these bases but the restriction must also constitute a fair balance between the means and the aim sought to be achieved. States may not for example identify a minor threat to public safety which could be prevented by ordinary policing and use this to justify prohibition of an assembly – the freedoms must be protected and allowed to be exercised. The reciprocal of the possibility of restriction by the State is therefore that the State may be required to intervene to secure conditions permitting the exercise of the freedom of assembly and this may require positive measures to be taken to enable lawful demonstrations to proceed peacefully. Laws regulating assemblies must not in any circumstances create unjustifiable restrictions in relation to holding peaceful assemblies. Rather, the State must act in a manner calculated to allow the exercise of the freedom. This involves applying the principle of proportionality.<sup>15</sup>

A glance at the Compilation will show the interested reader that the same issues repeatedly present themselves in the assembly laws examined. A number of examples serve to demonstrate this.

## 2.1. ADVANCE NOTIFICATION

All laws examined required that the authorities be notified in advance by the organisers of the intention to hold an assembly. However, the Venice Commission has commented that, in reality, what some of the laws required was a request for permission or an authorisation<sup>16</sup> but that a peaceful demonstration not interfering with public order should not automatically be subject to such a procedure. The ‘notification’ procedures prescribed by the laws were often rigid and difficult whilst at the same time leaving administrative authorities with a very wide discretion on how to apply the law. The Venice Commission observed that this does not reflect the positive obligation of the State to ensure and facilitate the

<sup>15</sup> *Joint Opinion on the Draft Law on Peaceful Assemblies in Ukraine by the Venice Commission and OSCE/ODIHR* [hereafter: *Joint Opinion* 2011], adopted by the Venice Commission at its 68<sup>th</sup> Plenary Session, Venice, 13–14 October 2006, CDL-AD(2006)033, para. 10.

<sup>16</sup> *Joint Opinion* 2011, para. 10.

exercise of freedom of peaceful assembly and of expression. The laws also failed to envisage adequate mechanisms and procedures to ensure that the freedoms were practically enjoyed and not subject to undue bureaucratic regulation.<sup>17</sup> In the laws examined prohibition might result from some or all of the following: lack of required documentation; another mass public event in the same location at the same time; the possibility of danger to people including confrontation with opposing demonstrations in the vicinity; prohibitions by other law; disruption of traffic; unlawful goals or objections,<sup>18</sup> the lack of an organiser.

The notification requirement necessarily interferes with the entitlement to demonstrate spontaneously, that is, peacefully and immediately in response to an unanticipated triggering event, which is guaranteed. Nonetheless it is clear that such assemblies must be permitted as they are an essential part of the freedom of assembly and expression and should be facilitated. The Venice Commission has advised that legislation must allow for an exemption to the strict notification requirements so as to permit spontaneous assemblies.

Remarkably, the Venice Commission has in several opinions had to advise that organisers have to be entitled supplement information submitted in order to fix flaws in notifications at any time up to the commencement of the assembly.<sup>19</sup> The absence of such a provision in effect gives the authorities the scope for arbitrarily deciding on the validity of notifications and therefore for refusing them arbitrarily.

## 2.2. LOCATION

It is the privilege of the organiser and demonstrators to decide where to hold the assembly which will generally be within sight and sound of its target object. Therefore, in principle all public spaces should be available for assembly and legislating for blanket restrictions on specified locations is problematic. Such restrictions have commonly been placed in the vicinities of government institutions and courts thus blocking off from the demonstrators what are often the most desirable areas for politically motivated assemblies. In apparent efforts to facilitate assemblies, officially designated areas for holding assemblies to the exclusion of all other locations impermissibly interferes with the freedom to choose the site most suitable.

The Venice Commission has repeatedly had to advise that assemblies are as much a legitimate use of public space as commercial activity and the movement

<sup>17</sup> *Joint Opinion* 2011, para. 38.

<sup>18</sup> *Opinion on the Law on Conducting Meetings, Assemblies, Rallies and Demonstrations of the Republic of Armenia* 2006, para. 33.

<sup>19</sup> *Joint Opinion on the Order of Organising and Conducting Peaceful Events of Ukraine by the Venice Commission and OSCE/ODIHR*, adopted by the Venice Commission at its 81st Plenary Session, Venice, 11–12 December 2009, CDL-AD(2009)052.



of vehicular and pedestrian traffic and that this must be acknowledged when considering the necessity of any restrictions. Interference with circulation of traffic will almost inevitably occur where an assembly is of any significant size and this must be accommodated. Restrictions are only permitted where an assembly will actually disrupt unduly and a mere possibility of an assembly causing inconvenience does not justify its prohibition. Indeed, inconvenience to designated institutions or to the public, including interference with traffic should not be as such a sufficient basis for prohibition.

### 2.3. BLANKET RESTRICTIONS

Generally, restrictions require to be examined and the interests to be taken into account weighed in each specific case so that individual solutions can be provided which satisfy the requirements of proportionality. Legislative provisions, which ban all assemblies at specific times or in particular locations, require greater justification than restrictions on individual assemblies. Choice of location and time are therefore key aspects of freedom of assembly.

Requiring that a large number of requirements be complied with failing which an assembly will be prohibited does not respect the principle of proportionality. The authorities must not adopt an all or nothing approach where this is not necessary and, in particular must not create restrictions beyond those permitted by Article 11(2) of the Convention. However, this has regularly been the case in the legislation examined.

In one of the laws examined<sup>20</sup> individuals who worked for internal affairs agencies were prohibited from participating in peaceful assemblies. This provision was considered *prima facie* too broad as it lent itself to the interpretation that for instance, police officers were barred from participation in an assembly even when they were off-duty. If the purpose of the prohibition was to prevent improper and/or undercover surveillance of the assembly by law-enforcement officials, such a purpose should have been expressly stated. Otherwise, there was no reason to exclude such individuals from taking part in public assemblies in their personal capacities when such participation was not connected with the fulfilment of their professional duties.

### 2.4. GUARANTEEING HUMAN RIGHTS

The Venice Commission has noted that the State's positive duty to protect peaceful assembly requires that the police actively facilitate the assembly and

<sup>20</sup> Joint Opinion on the Draft Law on Peaceful Assemblies of the Kyrgyz Republic by the Venice Commission and OSCE/ODIHR, adopted by the Venice Commission at its 85<sup>th</sup> Plenary Session, Venice, 17–18 December 2010, CDL-AD(2010)050.

protect those participating in it.<sup>21</sup> However, this will not happen without training of law enforcement officials in the human rights standards relevant to freedom of assembly and related freedoms, and in particular their duty to facilitate the enjoyment of the right even where conditions deteriorate and intervention is necessary. The overall quality of the policing operation and their level of understanding of and respect for human rights is a key to developing a culture of respect between demonstrators and police.<sup>22</sup>

## 2.5. REVIEW AND APPEAL

In the last resort, it is the role of the judiciary to interpret and apply the law and to guarantee that the right to peaceful assembly should not be interpreted restrictively and that any restrictions should be construed narrowly and rights must be 'practical and effective' not 'theoretical or illusory'. The Venice Commission has advised that a court decision on the legality of a ban or restriction on an assembly should be made available before the planned date of the assembly so as to ensure that the rights of those seeking to demonstrate are protected in a practical way and the assembly can proceed as planned if the review is successful. The Commission advised on several laws where this was not possible, making access to the court an inadequate remedy.<sup>23</sup>

A strong independent judiciary is a key element in the delivery in practice by democratic states of fundamental human rights and freedoms guaranteed by the Convention<sup>24</sup> and Article 6 of the Convention guarantees the right to an independent and impartial judge. The rule of law<sup>25</sup> as one of the three pillars of the Council of Europe requires everyone to be treated by decision-makers in accordance with the law which must protect human rights and not be arbitrarily applied. It is essential that those affected by laws have the opportunity to challenge decisions before independent and impartial courts for their lawfulness

<sup>21</sup> *Interim Joint Opinion on the Draft Law on Assemblies of the Republic of Armenia by the Venice Commission and OSCE/ODIHR*, adopted by the Venice Commission at its 85<sup>th</sup> Plenary Session, Venice, 17–18 December 2010, CDL-AD(2010)049, para. 65.

<sup>22</sup> *Joint Opinion on the Law on Peaceful Assemblies of Ukraine by the Venice Commission and OSCE/ODIHR*, adopted by the Venice Commission at its 84<sup>th</sup> Plenary Session, Venice, 15–16 October 2010, CDL-AD(2010)033, para. 41.

<sup>23</sup> *Opinion on the Federal Law No. 54-Fz of 19 June 2004 on Assemblies, Meetings, Demonstrations, Marches and Picketing of the Russian Federation* 2012, para. 52; *Opinion on the Law on Freedom of Assembly in Azerbaijan*, adopted by the Venice Commission at its 68<sup>th</sup> Plenary Session, Venice, 13–14 October 2006, CDL-AD(2006)034.

<sup>24</sup> *Report on European Standards as regards the Independence of the Judicial System: Part II* 2010.

<sup>25</sup> See CDL(1991)031. As early as 1991, a report of a CSCE Seminar of experts on the rule of law and independent courts in the context of democratic institutions noted its essential requirements including the absolute necessity that such law must be that of a democratic society and emphasised its association with the separation of powers and in particular that the judicial power be independent of the other two state function, legislative and executive.



where they are accorded fair procedures.<sup>26</sup> An independent bar with the strength to challenge legislation and executive decisions made pursuant to it so as to ensure that laws are interpreted and applied in a manner designed to enforce human rights<sup>27</sup> is necessary to achieve this and to support the judiciary. Judicial control offers the best guarantees of independence, impartiality and a proper procedure in reviewing the decisions of the executive authorities.<sup>28</sup>

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<sup>26</sup> *Report on the Rule of Law 2011.*

<sup>27</sup> See in general *Joint Opinion on the Draft Law on the Bar and Practice of Law of Ukraine by the Venice Commission and the Directorate of Justice and Human Dignity within the Directorate General of Human Rights and Rule of Law of the Council of Europe*, adopted by the Venice Commission at its 88<sup>th</sup> Plenary Session, Venice, 14–15 October 2011, CDL-AD(2011)039.

<sup>28</sup> *Opinion on the Federal Law No. 54-Fz of 19 June 2004 on Assemblies, Meetings, Demonstrations, Marches and Picketing of the Russian Federation 2012*, para. 26.

# FUNDAMENTAL RIGHTS AND PRINCIPLES

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