

# EXAMINING THE KERCH STRAIT BRIDGE ATTACKS BY THE PRISM OF INTERNATIONAL HUMANITARIAN LAW

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## ABSTRACT

*The Kerch Strait Bridge, also known as The Crimean Bridge, is an infrastructure that stretches between the Kerch Peninsula of Crimea and the Taman Peninsula of Krasnodar Krai in Russia. This infrastructure has been destroyed as a result of the ongoing conflict between The Russian Federation and Ukraine. This article aimed to analyze whether the attacks was in accordance with the principle of International Humanitarian Law (IHL). This article relies on normative legal research and statutory, case, and fact approaches to analyze this matter. The study designated that the attacks on the Kerch Strait Bridge followed the principles which is set in the International Humanitarian Law. Those said principles are the principle of distinction, the principle of military necessity, the principle of proportionality, and the principle of precautions. Thus, the attacks on Kerch Strait Bridge did not violate any provisions governed by the International Humanitarian Law.*

**Key Words:** Kerch Strait Bridge, International Humanitarian Law, Dual-Use Object, Attack.

## 1. Introduction

### 1.1 Research Background

The territory of Crimea was seized from the ascendant of Ukraine in 2014.<sup>1</sup> This marked a new era for The Russian Federation ('Russia') after the annexation was successful.<sup>2</sup> After Russia conquered Crimea and bring it under its authority, Russia planned to build a 12-mile-long bridge with road and rail across the Kerch Strait to connect mainland Russia and the occupied Crimean Peninsula.<sup>3</sup> In 2015, Russia awarded a construction company a multi-billion-dollar contract to build the bridge. The bridge's construction linking the Taman Peninsula and the Crimean Peninsula began in 2016<sup>4</sup> with a budget of about \$3.8 billion.<sup>5</sup> The road bridge was finished and opened for cars and public transport use in May 2018 and inaugurated by Putin driving an orange

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<sup>1</sup> Grant, Thomas. "Annexation of Crimea." *American Journal of International Law* 109, No. 1 (2015): 68-95.

<sup>2</sup> Sergej, Grigori. "The Russia-Ukraine War in The Study of Historical Law & Conflict of State Security Area." *International Journal of Law Reconstruction* 6, No. 2 (2022): 147-155.

<sup>3</sup> Kabanenko, Igor. "The Kerch Strait Bridge: A New Threat to Regional Stability." *Eurasia Daily Monitor* 14, No. 106 (2017).

<sup>4</sup> Olesia Gorbun, "The Status of the Kerch Strait," (Master Thesis, Mykolas Romeris University, 2018), 19. <https://vb.mruni.eu/object/elaba:29802770/>.

<sup>5</sup> Russia Briefing. "The Kerch Strait Bridge - Europe's Longest - Nears Completion" (2017). URL: <https://www.russia-briefing.com/news/kerch-strait-bridge-europes-longest-nears-completion.html/>. (Accessed on November 17<sup>th</sup> 2023).

kamaz truck. However, the railway bridge opened about a year later, in December 2019.<sup>6</sup> The bridge is essential to Russia as it is the only land link between Russia's mainland and the Crimean peninsula. Moreover, it serves as a main supply route to the people in the region, the Russian navy, and Russian forces stationed in the area.

In the recent situation, the tension between Russia and Ukraine has escalated further as Russia invaded Ukraine by launching a military operation on February 24<sup>th</sup>, 2022.<sup>7</sup> The invasion or so-called Special Military Operation<sup>8</sup> started when Russia sent missiles from land, air, and sea to attack some major cities in Ukraine.<sup>9</sup> The action was confirmed by The President of Russia, Vladimir Putin, in his speech.<sup>10</sup> Throughout the time of this conflict, there have been several attacks on the Kerch Strait Bridge.

The first attack happened at 6:07 a.m. local time on October 8<sup>th</sup>, 2022. A truck loaded with a bomb exploded in the middle of the road of the bridge. The explosion resulted a collapse of the road into the Kerch Strait. The railway bridge and a train crossing simultaneously as the truck were also affected by the blast, engulfing the train with a fierce fire. Russia investigated the attack and reported that the explosion resulted in the death of three people. At the time, Volodymyr Zelensky, as the president of Ukraine, did not claim nor admit that the government of Ukraine ordered the attack.<sup>11</sup> Nonetheless, in July 2023, Ukraine's deputy defense minister admitted the last-year attack as an effort to break the logistics of the Russians.<sup>12</sup>

In less than a year, another attack was launched by Ukraine on the Kerch Strait Bridge. Two maritime drones hit the bridge in separate explosions, damaging the roadway. The explosions happened before dawn, around 3 a.m. in July 2023. In this incident, a family, while crossing the bridge with a car, became the casualties of the attack. A couple were reportedly killed, and their daughter was injured.<sup>13</sup> In the following month, Ukraine attempted to attack the Kerch Strait Bridge again; however, Russia was able to detect, intercept, and shoot down the

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<sup>6</sup> OSW. "The Opening of the bridge from Russia to Crimea" (2018). URL: <https://www.osw.waw.pl/en/publikacje/analyses/2018-05-16/opening-bridge-russia-to-crimea>. (Accessed on November 17<sup>th</sup> 2023).

<sup>7</sup> Brunk, Ingrid and Hakimi, Monica. "Russia, Ukraine, and the Future World Order." *The American Journal of International Law* 116, No. 4 (2022): 687-697.

<sup>8</sup> Journal of Indo-Pacific Affairs. "Great-Power Competition and the Russian Invasion of Ukraine" (2022). URL: <https://www.airuniversity.af.edu/JIPA/Display/Article/3111129/great-power-competition-and-the-russian-invasion-of-ukraine/>. (Accessed on November 17<sup>th</sup> 2023).

<sup>9</sup> Nur, Muhammad and Soesilo, Galih Bagas. "Russian military operation in Ukraine: analysis from the perspective of International Law." *Borobudur Law Review* 4, No. 1 (2022): 54-65.

<sup>10</sup> Kremlin, President of Russia. "Address by the President of the Russian Federation" (2022). URL: <http://en.kremlin.ru/events/president/news/67843>. (Accessed on November 17<sup>th</sup> 2023).

<sup>11</sup> The Guardian. "Key bridge linking Crimea to Russia hit by huge explosion" (2022). URL: <https://www.theguardian.com/world/2022/oct/08/crimea-kerch-bridge-explosions-russia-ukraine>. (Accessed on November 20<sup>th</sup> 2023).

<sup>12</sup> Business Insider. "Ukraine marks 500 days of war by admitting it blew up Russia's bridge to Crimea" (2023). URL: <https://www.businessinsider.com/ukraine-admits-blowing-up-russias-bridge-to-crimea-2023-7>. (Accessed on November 20<sup>th</sup> 2023).

<sup>13</sup> CNN. "Ukraine claims responsibility for new attack on key Crimea bridge" (2023). URL: <https://edition.cnn.com/2023/07/16/europe/russia-crimea-bridge-intl-hnk/index.html>. (Accessed on November 20<sup>th</sup> 2023).

missiles and the drones that wanted to destroy the bridge.<sup>14</sup> There were no casualties nor damage to the bridge from this attempted attack.

Journal articles discussing the Kerch Strait Bridge attacks from the perspective of International Humanitarian law have not been discovered until this article is submitted. Accordingly, a discussion on this matter is needed. However, an article about attacks on civilian objects (dual-use object) existed. Salam Aessa Farhat and his two other co-authors have a publication with the title “Attacks Against Civilian Objects: An Analysis Under International Humanitarian Law” which discusses principles in International Humanitarian Law in carrying out an attack on an object.<sup>15</sup> Even though Salam’s article has similarities with this article in explaining the principles of International Humanitarian Law, the case discussed in both article remain different. Salam’s article examined the situation in Libya which some airports were attacked because of internal armed conflict. In this article, the discussed situation is about a bridge being attacked as a result of the ongoing international armed conflict. Thus, these two articles standing on different circumstances.

## 1.2 Research Questions

Based on the background of the problem explained above, the problem formulation that forms the basis of the discussion in this article is as follows:

1. Whether the status of the Kerch Strait Bridge is a military objective making it a lawful target of the attacks
2. Whether the attacks are in accordance with the principle of distinction, the principle of military necessity, the principle of proportionality, and the principle of precautions governed by the International Humanitarian Law

## 1.3 Research Purpose

This article aims to analyze the Kerch Strait Bridge attack from the outlook of International Humanitarian Law. This article will explained the status of the Kerch Strait Bridge, whether it is a civilian object or military objective. Furthermore, this article will provide an explanation of the proportionality, the taken precaution, and the necessity from the attacks launched by Ukraine.

## 2. Research Methods

In carrying out this research, the normative legal research method is used. Moreover, this research also uses some approaches, such as the statutory approach, the case approach, and the fact approach. The sources of this article revolve around international conventions, customary international law, and general principles of law as the primary sources; international judicial decisions, books, journals, and online websites are used as secondary sources.

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<sup>14</sup> The Moscow Times. “Ukraine Missiles Shot Down Over Crimea Bridge – Pro-Russia Official” (2023). URL: <https://www.themoscowtimes.com/2023/08/12/ukraine-missiles-shot-down-over-crimea-bridge-pro-russia-official-a82131>. (Accessed on November 20<sup>th</sup> 2023).

<sup>15</sup> Farhat, Salem and Nurdin, Rohaida and Basir, Salawati. “Attacks Against Civilian Objects: An Analysis Under International Humanitarian Law.” *Hasanuddin Law Review* 8, No. 1 (2022): 60-78.

### 3. Results and Discussion

#### 3.1 The Status of the Kerch Strait Bridge as a Lawful Target of the Attacks.

Civilian objects and military objectives are two completely different matters that have a significant role in every attack in a war. There are criteria for determining a military objective.<sup>16</sup> The criteria described in Rule 8 of the Customary International Humanitarian Law, as follows: “Military objectives are limited to those objects which by their nature, location, purpose or use make an effective contribution to military action and whose partial or total destruction, capture, or neutralization, in the circumstances ruling at the time, offers a definite military advantage.”<sup>17</sup> Making an effective contribution and gaining a definite military advantage after an attack are two criteria that need to be fulfilled in order to set whether an object is a military objective. On the contrary, objects who do not meet those criteria is a civilian object.<sup>18</sup> In every conflict, all parties shall always distinguish between civilian objects and military objectives, and that being so, shall direct their attacks only to military objectives.<sup>19</sup> This principle, namely the Principle of Distinction, governs that the lawful targets of the attack are limited to military objectives.

An object could serve both military and civilian purposes simultaneously during armed conflict, this is often referred to as dual-use object.<sup>20</sup> The International Humanitarian Law regulates this matter in Rule 10 of Customary International Humanitarian Law. It governs that a civilian object could lose protection if used in such a way that makes the object lose its civilian character.<sup>21</sup> In this case, the object is used for military purposes or military action.<sup>22</sup> However, if the parties doubt the character of an object, it should presumably be a civilian object.

In the situation being discussed regarding the Kerch Strait Bridge, we have to analyze first the status of the object before deciding whether the bridge is a lawful target of the attack. The bridge is helpful for civilians as it is used to cross the Kerch Strait. It is also a significant line for commodities destined for the people in Crimea and occupied Southern Ukraine. Moreover, in August 2022, the bridge was also being used to escape the Crimean Peninsula as the war came to the Peninsula after explosions in Saki Airfield. As many as 38.000 cars crossing the bridge into Russia in one day.<sup>23</sup>

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<sup>16</sup> Sassòli, Marco. “Military Objectives”. *MPEPIL* 334 (2015); Kolb, Robert. “Military Objectives in International Humanitarian Law.” *Leiden Journal of International Humanitarian Law* 28, No. 3 (2015): 691-700.

<sup>17</sup> Customary International Humanitarian Law, Rule 8. (“CIHL”)

<sup>18</sup> Additional Protocol I to the Geneva Conventions of 12 August 1949, Art. 52 (1). (“AP 1”)

<sup>19</sup> AP 1, Art. 48; CIHL, Rule 7.

<sup>20</sup> Shue, Henry and Wippman, David. “Limiting Attacks on Dual-Use Facilities Performing Indispensable Civilian Functions.” *Cornell International Law Journal* 35, No. 3 (2002): 559-573.

<sup>21</sup> Cohen, A, and Zlotogorski, D. *Proportionality in International Humanitarian Law* (New York, OUP, 2020), 157.

<sup>22</sup> CIHL, Rule 10.

<sup>23</sup> The New York Times. “Crimea’s Kerch Strait Bridge holds deep strategic, and symbolic, value.” (2022). URL: <https://www.nytimes.com/2022/10/08/world/europe/crimea-kerch-strait-bridge-explosion-explainer.html>. (Accessed on November 23<sup>rd</sup> 2023).

Apart from being symbolic and an emblem of Russia's power and identity, the bridge is also vital for Russia's military-strategic value. The bridge is an asset and a major supply route for food, fuel, and other products for the military stationed in the Crimean territory. Russia also has used the bridge to send military forces to support and sustain the operation in Southern Ukraine.

After the attack launched by Ukraine in 2022, Russia needed to repair the bridge, and it affected the transport in and out the Crimean Peninsula. The road part of the Kerch Strait Bridge was fully restored and re-opened on February 23<sup>rd</sup>, 2023, whereas the rail-bridge was fully re-opened in May 2023. In the 2023 attack, the bridge did not suffer as severe damage as last year's attack. However, the bridge was still closed for a day and opened the next day, albeit with only one lane.

The previous explanation shows that the Kerch Strait Bridge making an effective contribution to Russia as the parties in the ongoing conflict with Ukraine. The object benefited Russia in conducting operations against Ukraine. Furthermore, the attacks carried out by Ukraine gave them military advantages as Russia's military operations were disturbed and halted temporarily. Thus, it can be concluded that the Kerch Strait Bridge was a lawful target of the attacks as it is a military objective.

### 3.2 The International Humanitarian Law Principles' View of the Attacks.

In directing an attack, the principle of distinction is not the only principle that needs to be considered.<sup>24</sup> Although the bridge meets the requirements of a lawful target of the attacks, it also must comply with other IHL principles, *inter alia*:

#### a. The Principle of Military Necessity

The principle of military necessity could be defined as measures or efforts indispensable for securing the ends of war.<sup>25</sup> The principle also governs that the actions need to be taken only if it could accomplish a legitimate military purpose by weakening the military capacity of the hostile party in the armed conflict.<sup>26</sup> It legitimize a destroying offensive and offer a privilege military consideration at a cost of humanitarian value.<sup>27</sup>

The Kerch Strait Bridge, as previously explained, is being used to support the military operations of Russia in the territory of Ukraine. Russia used the bridge as a linking road from mainland Russia to the Crimean Peninsula. Russia sent its troops to the Crimean Peninsula to start their invasion of the Southern Ukraine. It is proven that Russia used the bridge as it

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<sup>24</sup> Hayashi, Nobuo. "Requirements of Military Necessity in International Humanitarian Law and International Criminal Law." *Boston University International Law Journal* 28, No.1 (2010): 39-140.

<sup>25</sup> Carnahan, Burrus. "Lincoln, Lieber and the Laws of War: The Origins and Limits of the Principle of Military Necessity." *American Journal of International Law* 92, No. 2 (1998): 213-231.

<sup>26</sup> Casebook ICRC. "Military Necessity." URL: [http://casebook.icrc.org/a\\_to\\_z/glossary/military-necessity](http://casebook.icrc.org/a_to_z/glossary/military-necessity). (Accessed on November 26<sup>th</sup> 2023).

<sup>27</sup> Forrest, Craig. "The Doctrine of Military Necessity and the Protection of Cultural Property During Armed Conflicts." *California Western International Law Journal* 37, No. 2 (2007): 177-219; Schmitt, Michael. "Military Necessity and Humanity in International Humanitarian Law: Preserving the Delicate Balance." *Virginia Journal of International Law* 50, No. 4 (2010): 795-839.

successfully gained control over the cities in Southern Ukraine, such as Kherson, the port city of Mariupol, and Kharkiv. In gaining control over Southern Ukraine, thousands of civilians have become casualties. Not only are the people affected by Russia's actions, but the environmental damage is on a large scale.

A similar situation happened in the Prlić case in the International Criminal Tribunal for the former Yugoslavia (ICTY). A reconstruction connecting two parts of the city and crossing the Neretva River stands in the city of Mostar in Bosnia and Herzegovina. The Old Bridge of Mostar is a property that was used by both civilians and military troops. The court found that the bridge was necessary for the military troops to send food, material, and armed forces. It was also necessary to the daily life of civilians. However, the hostile party destroyed the bridge based on the aforementioned reasons. As the bridge was destroyed, both civilian and conflicting parties couldn't use it. The attack absolutely affected the civilians as it put them in virtually total isolation. The situation resulted in a severe setback of the humanitarian crisis and had a profound impact on their psychological. Nevertheless, the Appeal Chamber justified the destruction by military necessity.<sup>28</sup>

In the current situation of Russia-Ukraine conflict, the destruction of the Kerch Strait Bridge is one of an effort to cease Russia's operation in Ukraine. The damage and the casualties from Russia's invasion are undesirable and massive. The attack on the Kerch Strait Bridge was expected to disrupt or even stop the action of Russia. In fact, the attack of Ukraine proved to weaken Russia's operation as the bridge temporarily closed. This hampered the distribution of goods and troops to the occupied Ukraine territory and even temporarily suspended them. The attack on Kerch Strait Bridge corresponded with the Principle of Military Necessity accordingly.

#### b. The Principle of Proportionality

Launching an attack which may be expected to cause incidental loss of civilian life, injury to civilians, damage to civilian objects, or a combination thereof, which would be excessive in relation to the concrete and direct military advantage anticipated, is prohibited. This principle could be found in a number of instruments.<sup>29</sup> The principle of proportionality is used to look at the 'delicate balance' between military necessity and humanitarian consideration.<sup>30</sup>

The attack on the Kerch Strait Bridge sadly took a toll. Reportedly, around five people died and one injured in both episodes. However, destroying the bridge gave Ukraine a military advantage as Russian supply route to support its illegal operations was disrupted. Moreover, the damage to the bridge does not qualify as collateral damage as the bridge itself has served military purposes and lost its civilian character and protection. The attack also certainly impacted civilians as the transport of supplies and travel could be disrupted. Those factors generally could be taken into account if the effects of the attack are severe such as starvation, isolation, and disease which is not likely to happen in this case. Therefore, the attacks on the Kerch Strait Bridge appeared proportionate.

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<sup>28</sup> Prosecutor v. Prlić et al., Case No. IT-04-74, Appeals Chamber, 29 November 2017, p. 253.

<sup>29</sup> AP 1, Art. 51(5)(b); CIHL, Rule 14.

<sup>30</sup> Shaw, Malcolm. *International Law Ninth Edition* (Cambridge, CUP, 2021), 2518; Henderson, Ian and Reece, Kate. "Proportionality under International Humanitarian Law: "Reasonable Military Commander" Standard and Reverberating Effects." *Vanderbilt Journal of Transnational Law* 51, No. 3 (2018): 835-855.

### c. The Principle of Precautions

This principle applies to all parties to the conflict; they must take all feasible precautions to minimize or spare civilian harm.<sup>31</sup> The term feasible in this rule denote that precautionary measures only extend to those that are practicable during the relevant time.<sup>32</sup> The first attack of the bridge was conducted around six in the morning and the following year's attack was conducted before dawn, around three in the morning. In this frequency of time, civilians are most likely not crossing the bridge; making the chance of a significant number of casualties unlikely. This view is supported by the fact that the civilian casualties is a small number. However, considering the time of an attack, it is still unknown whether it is viewed as an effort to take precautions in the International Humanitarian Law, as no specific rule governs this matter. Although it remains unknown, it appears that there was no alternative means or ways to attack the bridge that would give a final result with a fewer or even no casualties. Moreover, the fourth Geneva Convention governs that "The presence of a protected person may not be used to render certain points or areas immune from military operations."<sup>33</sup> Consequently, the Kerch Strait Bridge is a legitimate target of the attack and precautionary measures have been taken in the relevant time before carrying out the attack.

## 4. Conclusion

In conclusion, the attack carried out by Ukraine on the Kerch Strait Bridge is in accordance with the principles of International Humanitarian Law. The International Humanitarian Law governs several principles that must be followed by conflicting parties in launching an attack. The principle of distinction, the principle of military necessity, the principle of proportionality, and the principle of precautions are the principles that should be taken into consideration in an attack. The Kerch Strait Bridge has become a military objective as it lost its status and protection as a civilian object, making the bridge a legitimate target of an attack. The attack was also a manifestation of Ukraine's effort to stop the ongoing war as the bridge become a helpful object to Russia's Special Military Operation. In executing the attacks, precautionary measures have been taken, resulting in a small number of casualties making the attacks proportionate as well.

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