

## Working Group Universal Periodic Review session 54<sup>th</sup> January-February 2027

### Submission for the Universal Periodic Review of Sudan



#### Human Rights Without Frontiers

Avenue d'Auderghem 61/16, 1040 Brussels

Phone/Fax: 32 2 3456145

Email: [international.secretariat.brussels@hrwf.net](mailto:international.secretariat.brussels@hrwf.net) – Website: <http://www.hrwf.net>



#### Coordination des Associations et des Particuliers pour la Liberté de Conscience

117, rue de Charenton 75012 Paris France

Phone +33 6 70 66 04 42

Email [contact@coordiap.com](mailto:contact@coordiap.com) Website :  
<https://freedomofconscience.eu/>

This draft stakeholder submission is prepared for Sudan's fourth-cycle Universal Periodic Review at the 54th session of the UPR Working Group (January-February 2027). [OHCHR](#) lists 17 July 2026 as the confirmed deadline for NGO, NHRI and other stakeholder submissions for that session.

### Key concerns

Since the outbreak of armed conflict in April 2023, Sudan has experienced grave violations<sup>1</sup> of international human rights law<sup>2</sup> and international humanitarian law<sup>3</sup>, including attacks on civilians, obstruction of humanitarian access, and allegations of use of prohibited weapons<sup>4</sup> by the Sudanese Armed Forces (SAF) and other parties to the conflict.

This submission focuses in particular on: (1) allegations that the SAF used chemical weapons and other prohibited means of warfare; (2) violations against civilians in El-Obeid, including restrictions on civilian movement<sup>5</sup> and the alleged use of civilians as

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<sup>1</sup> [How did chlorine imported to Sudan for water purification end up being used as a poison gas? - France 24](#)

<sup>2</sup> [Recommendations for the 52nd Session of the Universal Periodic Review - Global Centre for the Responsibility to Protect](#)

<sup>3</sup> [UPR And The Prevention Of Atrocity Crimes](#)

<sup>4</sup> [Sudan Army Said to Use Chlorine as Weapon | Arms Control Association](#)

<sup>5</sup> [El-Obeid, Sudan: SAF Holds Civilians Hostage As Rebels Surround Key City - Eurasia Review](#)

human shields; (3) the role of external support networks, including alleged transfers and operational assistance linked to Saudi Arabia and Egypt<sup>6</sup>, where such support may have contributed to serious human rights violations; and (4) Turkey's role in arming the Sudanese Armed Forces, in particular with drones (SAF).

#### Implementation Gap: From Pledges to Atrocities

The fourth UPR cycle is explicitly designed as an implementation cycle. For Sudan, this premise has collapsed. The gap between third-cycle commitments accepted in 2021–2022 and current conduct is not delayed implementation but deliberate reversal enabling the grave violations documented herein.

Sudan accepted recommendations to cease excessive force against civilians and abolish torture. These pledges are directly contradicted by aerial bombardment of populated areas using Turkish-supplied Bayraktar TB2 and Akıncı drones, identified by the UN High Commissioner as the leading cause of civilian death, and by allegations of weaponised chlorine use near the al-Jaili refinery documented in this submission — conduct engaging the very prohibition on ill-treatment that Sudan formally endorsed. Civilian protection commitments are equally contradicted by practices in El-Obeid consistent with the use of human shields by the Sudanese Armed Forces.

The absence of accountability for the 3 June 2019 massacre, which Sudan committed to address, signalled to current commanders that grave violations would attract no consequence. This impunity enabled recurrence of the same patterns. The erosion of international scrutiny, through obstruction of OHCHR, removed verification mechanisms that would have exposed chemical weapons use, drone warfare, and human shielding.

This submission therefore recommends that Sudan establish an independent mechanism with OPCW participation to investigate chemical weapons allegations within twelve months; disclose procurement records for arms and dual-use materials transferred since April 2023 within six months; facilitate independent monitoring of drone strikes with disaggregated reporting by supplier origin; immediately end the use of civilians as human shields in El-Obeid; and cooperate fully with the International Criminal Court, including surrender of indictees. An immediate moratorium on all arms transfers, pending UN Panel of Experts verification, should be implemented by Sudan and all supplier states.

The fourth cycle was conceived to close the gap between promise and practice. For Sudan, that gap has become the structural condition enabling the atrocities examined in this submission. The implementation deficit belongs at the centre of this review as explanatory framework and benchmark for any future pledges.

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<sup>6</sup> [Evidence-of-Egypt | Rapid Support Forces](#)

## **Chemical weapons and prohibited means of warfare**

Credible reporting<sup>7</sup> and public findings have heightened concern that the SAF used chlorine or other chemical agents during military operations in 2024 and 2025. France 24's investigation<sup>8 9</sup>, supported by C4ADS<sup>10</sup>, documented evidence consistent with weaponised chlorine use near the al-Jaili refinery and traced at least part of the chlorine supply chain through an Indian exporter and onward transfers through Saudi-linked routes to Sudan. These allegations require urgent, independent investigation and engage Sudan's obligations<sup>11</sup> under international humanitarian law and the prohibition on chemical weapons<sup>12</sup>. Close links between the Sudanese Armed Forces' leader General Abdel Fattah al-Burhan and the Kingdom of Saudi Arabia's senior leadership, including Crown Prince Mohammed bin Salman Al Saud, should not be allowed to deter full investigation.

## **El-Obeid and protection of civilians**

Recent reporting indicates that civilians in El-Obeid have faced severe movement restrictions, exposure to military activity in populated areas, and other practices that may amount to the use of civilians as human shields by the SAF.<sup>13</sup> Such conduct would violate the obligation to distinguish between civilians and combatants and the prohibition<sup>14</sup> on using the civilian population to shield military objectives from attack.<sup>15</sup> Sudan should also ensure safe civilian evacuation, unhindered humanitarian access, and protection from forced recruitment and retaliatory abuse in El-Obeid and other contested urban areas.

## **External support and state responsibility**

Investigations into chlorine transfers have raised concerns that dual-use materials moving through Saudi territory or shipping networks may have been diverted to SAF-linked entities, underscoring the need for stronger export controls, transit oversight and human rights due diligence by third states.<sup>16</sup> Separately, allegations concerning Egyptian support<sup>17</sup> to the SAF, including use of territory, aircraft or munitions in operations affecting civilians, require transparent investigation and reinforce the duty of all states to avoid assisting violations of international humanitarian law. While the primary obligations under review in this submission are Sudan's, the UPR should

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<sup>7</sup> [Sudan Army Said to Use Chlorine as Weapon | Arms Control Association](#)

<sup>8</sup> [Videos show the Sudanese army's use of chlorine gas as a weapon - France 24](#)

<sup>9</sup> [Exclusive: The first proof of the use of chemical weapons in Sudan's civil war - The Observers - France 24](#)

<sup>10</sup> [C4ADS Supports France 24 Investigation into Alleged Chemical Weapons Use in Sudan - C4ADS](#)

<sup>11</sup> [Chemical Weapons Allegations in Sudan's Escalating Conflict](#)

<sup>12</sup> [How Chemical Weapons Allegations Could Change Sudan's War Stances and the World's Response](#)

<sup>13</sup> [El-Obeid, Sudan: SAF Holds Civilians Hostage As Rebels Surround Key City - Eurasia Review](#)

<sup>14</sup> [UPR and the Prevention of Atrocity Crimes](#)

<sup>15</sup> [United Nations Digital Library - Protection of the human rights of civilians in armed conflict](#)

<sup>16</sup> [How did chlorine imported to Sudan for water purification end up being used as a poison gas? - France 24](#)

<sup>17</sup> [Evidence-of-Egypt | Rapid Support Forces](#)

also encourage Sudan to cooperate with international inquiries into supply chains, external assistance and command responsibility for violations committed during the conflict<sup>18</sup>.

There is also concern<sup>19</sup> about Turkey's continued supply<sup>20</sup> of armed drones<sup>21</sup>, munitions and technical support to the Sudanese Armed Forces (SAF), despite the long-standing UN arms embargo on Sudan and mounting evidence of grave human rights violations in the current war. Turkish defence company Baykar has reportedly provided<sup>22</sup> Bayraktar TB2 and Akıncı drones<sup>23</sup>, loitering munitions such as the YIHA<sup>24</sup> system, warheads, command-and-control equipment and training teams to SAF-aligned units. These systems have been used in urban and densely populated areas such as Khartoum, El Fasher and parts of Kordofan, contributing to a sharp rise in civilian casualties<sup>25</sup> from air-launched weapons and to attacks on markets, displacement camps and critical infrastructure.

Sudan has been subject to UN Security Council arms-embargo measures since the Darfur crisis, and recent UN expert reporting and independent investigations suggest that Turkish transfers of drones and associated materiel to the SAF are inconsistent with these obligations. Allegations of covert delivery routes<sup>26</sup> and use of intermediaries raise serious questions about sanctions evasion and the erosion of international arms-transfer control norms by a NATO member state. The UN High Commissioner for Human Rights has identified armed drones as a leading cause of civilian death in the Sudan war, calling for robust measures to prevent the transfer of such systems to parties to the conflict.<sup>27</sup>

### Follow-up to the Third Cycle

The third-cycle review of Sudan was conducted on 9 February 2022 (A/HRC/50/16). The delegation presented legislative reforms and institutional commitments that would be systematically dismantled following the outbreak of armed conflict in April 2023. The implementation gap between pledges accepted and conduct documented in this submission constitutes the central finding of the present review.

Ratification commitments accepted by Sudan included CEDAW, the Optional Protocol to the Convention against Torture, the Second Optional Protocol to the

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<sup>18</sup> [UPR and The Prevention of Atrocity Crimes](#)

<sup>19</sup> [Sudan: The SAF's Turkish Drones Aren't Having It All Their Own Way - Eurasia Review](#)

<sup>20</sup> [Turkey's Drone War In Sudan Demands Scrutiny - Eurasia Review](#)

<sup>21</sup> [Armed drones leading cause of civilian death in Sudan war: UN rights chief | UN News](#)

<sup>22</sup> [Kordofan drone strikes: Sudan's pivotal new front line as truce remains elusive - BBC](#)

<sup>23</sup> [UN Report Details Turkey's Drone Sales to Sudan's Armed Forces, Including Bayraktar TB2 and Akıncı Drones](#)

<sup>24</sup> [Following the failure of Akıncı... Türkiye increases its support for Islamist militias in Sudan with YIHA drones - Assayha Newspaper](#)

<sup>25</sup> [Armed drones leading cause of civilian death in Sudan war: UN rights chief | UN News](#)

<sup>26</sup> [A Turkish arms firm helped fuel Sudan's brutal civil war, records show - The Washington Post](#)

<sup>27</sup> [Armed drones leading cause of civilian death in Sudan war: UN rights chief | UN News](#)

ICCPR on abolition of the death penalty, and the Rome Statute of the International Criminal Court. At the time of review, CEDAW and the Rome Statute were pending ratification; the Optional Protocols were under consideration. No meaningful progress has been registered since 2022. The failure to ratify CEDAW is directly consequential to the sexual and gender-based violence documented in this submission, including the aerial bombardment of civilian areas with Turkish-supplied drones that has disproportionately affected women and girls, as examined in the section on Turkish drone transfers and civilian harm. The non-ratification of the Rome Statute has enabled continued obstruction of ICC investigations into current atrocities, including denial of access to procurement records for arms and dual-use materials, addressed in the section on external support and state responsibility.

Recommendation 137.121, accepted by Sudan, called for cessation of excessive force against peaceful protesters and repeal of emergency orders. The Sudanese delegation affirmed that the Public Prosecutor had issued directives regulating demonstrations and instructing law enforcement to prevent excessive force. These directives have proven entirely ineffectual. Since April 2023, the Sudanese Armed Forces have conducted systematic aerial bombardment of densely populated areas using Turkish-supplied Bayraktar TB2 and Akıncı drones, as well as loitering munitions. The United Nations High Commissioner for Human Rights has identified armed drones as the leading cause of civilian death in the Sudan war, as detailed in the section on Turkish drone transfers. The alleged use of weaponised chlorine near the al-Jaili refinery, traced through Saudi-linked supply chains, and the practices in El-Obeid involving severe movement restrictions and use of civilians as human shields, constitute escalation to methods of warfare prohibited under international humanitarian law, examined in the sections on chemical weapons allegations and on El-Obeid and protection of civilians.

Sudan accepted recommendation 137.139 to cooperate fully with the International Criminal Court and recommendation 137.132 to investigate enforced disappearances. The 2022 delegation highlighted the arrest of former President al-Bashir and a memorandum of understanding with the ICC Prosecutor. No indictee has been surrendered. The investigative commissions established in 2019 and 2021, including on the 3 June 2019 massacre, have produced no prosecutions or reparations. The same command structures implicated in 2019 atrocities remain in authority and are now implicated in the chemical weapons allegations, drone warfare, and human shielding documented herein. The failure to break this cycle of impunity has enabled its recurrence at expanded scale.

Sudan's acceptance of recommendations on civilian protection and accountability implied a duty to prevent diversion of weapons to unlawful uses. This duty has been comprehensively violated. Turkish defence company Baykar has supplied armed drones, munitions, and technical support to the Sudanese Armed Forces despite the UN arms embargo. Saudi-linked supply chains have allegedly facilitated diversion of chlorine to military use as a chemical weapon. Egyptian military support has been

documented in operations affecting civilians. Sudan has disclosed no procurement records, end-user certificates, or transfer documentation, as addressed in the sections on Turkish drones, Saudi chlorine diversion, and Egyptian support. The absence of a domestic legal framework to control arms transfers, a gap that third-cycle commitments failed to close, has enabled these violations to proceed unchecked.

The third-cycle commitments were framed as immediate, actionable measures to consolidate democratic governance and human rights protection. The outbreak of conflict in April 2023 has revealed the hollowness of institutions that accepted recommendations without embedding them in enforceable frameworks. The violations documented in this submission, chemical weapons allegations, Turkish drone warfare, Egyptian and Saudi support networks, and human shielding in El-Obeid, are the direct product of an implementation gap that transformed pledges into permissive conditions for atrocity. The fourth cycle must treat this gap as the central finding requiring remedial action.

## **Recommended actions**

This submission notes that (i) while the recommendations which follow address governments that are recognised by the UN, those concerning Sudan are directed towards a de facto authority, the Sovereign Transitional Council, which has no mandate from the Sudanese people, and that (ii) a durable, equitable solution to this national and regional crisis will only be achieved through inclusive, civilian-led, internationally supervised negotiations in which there are no preconditions for participation.

### **To Sudan:**

Recommendation 1: Establish an independent mechanism, with the participation of the Organisation for the Prohibition of Chemical Weapons, to investigate all credible allegations of chemical weapons use by all parties to the conflict, and publish its findings within twelve months.

Recommendation 2: Cooperate fully with the Organisation for the Prohibition of Chemical Weapons and relevant United Nations mechanisms regarding alleged use, transfer and diversion of prohibited or dual-use chemical agents, including by facilitating unfettered access to all sites of alleged use.

Recommendation 3: Incorporate into domestic legislation explicit criminal prohibitions on the use, transfer and stockpiling of chemical weapons, and establish military command accountability for violations thereof.

Recommendation 4: Immediately end all practices amounting to the use of civilians as human shields, including in El-Obeid and other contested urban areas, and remove all military objectives from densely populated civilian areas.

Recommendation 5: Guarantee safe passage for civilians seeking to leave conflict-affected urban areas, and ensure rapid, unimpeded humanitarian access to all areas under its control or influence.

Recommendation 6: Investigate all allegations of forced recruitment, arbitrary restrictions on civilian movement, and attacks on civilians in El-Obeid and other conflict-affected areas, and ensure that perpetrators are held accountable through independent judicial proceedings.

Recommendation 7: Cooperate with international efforts to trace arms, munitions and dual-use materials, and disclose all relevant procurement and transfer records, including end-user certificates and third-country trans-shipment documentation.

Recommendation 8: Ensure that all military cooperation, transit arrangements and procurement practices comply with international human rights law and international humanitarian law, including the United Nations arms embargo.

Recommendation 9: Accept and facilitate independent monitoring of all aerial strikes and civilian harm, including by allowing access to United Nations human rights mechanisms and independent investigators, and ensure that monitoring reports are published without restriction.

Recommendation 10: Strengthen domestic controls on the import, storage and end-use of dual-use chemicals, including chlorine, to prevent diversion to military purposes, and ensure full compliance with the Chemical Weapons Convention and relevant Security Council resolutions.

Recommendation 11: Investigate all allegations of diversion of imported dual-use chemicals to military purposes, publicly report findings, and take corrective measures to prevent recurrence, including through strengthened border and customs controls.

Recommendation 12: Establish a transparent national registry of all arms, ammunition and dual-use materials imported or procured, and ensure that all such materials are subject to end-use monitoring and accountability mechanisms.

Recommendation 13: Disclose all records of military aircraft, munitions and equipment imported or received, including origin, transfer routes and end-user documentation, and ensure that all such equipment is used in compliance with international humanitarian law.

Recommendation 14: Ensure that all military operations conducted from or transiting through Sudan's territory are conducted in full compliance with international humanitarian law, including the principles of distinction, proportionality and precaution.

Recommendation 15: Investigate all allegations of attacks on civilians using imported military equipment, and ensure accountability for officials or entities involved in the unlawful use of such equipment.

Recommendation 16: Suspend the use of all imported armed drones, munitions and related military equipment in populated areas pending independent investigation into their use against civilians, and ensure that all such equipment is subject to strict command accountability.

Recommendation 17: Cooperate fully with United Nations mechanisms and human rights bodies investigating the deployment of armed drones and other imported military equipment in Sudan, including by facilitating access to operational records and command structures.

Recommendation 18: Strengthen domestic controls on the use of imported military equipment in conflict zones, and adopt due-diligence procedures to ensure that such equipment is not used in the commission of war crimes or other serious violations of international humanitarian law.

Recommendation 19: Ensure that all military procurement and operational practices are aligned with the United Nations arms embargo and support an arms-embargo-compliant peace process, including by ceasing all military operations that obstruct humanitarian access.

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