



Liberation Tigers of Tamil Eelam

1. LTTE - Nature of the Organization

1. The Liberation Tigers of Tamil Eelam (LTTE) was founded in 1976 and is a secessionist terrorist organization that is internationally proscribed.¹ The LTTE was involved in a prolonged terrorist insurgency campaign and armed conflict against the Sri Lankan state for approximately 30 years until it was finally defeated by the armed forces of the government in May 2009. In that time it killed many people, destroyed crucial infrastructure and took de facto control over large areas of territory in the North and East of the state and subjected the population within to its unelected hegemony. It blocked the supply of goods and essential supplies to people of the North, by blocking the A-9 highway and forcing all transportation to be by sea convoy.
2. The LTTE enforced its aims by conducting widespread and systematic attacks against the Sri Lankan political leaders, civilians, religious groups, government officials, the state armed forces, the state police and even rival Tamil politicians. It used bombing campaigns including suicide bombers on the land, in the sea and in the air. It developed fully equipped armed forces by which to engage the government forces in combat. It coerced several generations of Tamils into its structure by fear and indoctrination, including children and youths, who were used as cadres to deliver its objectives. The terrorist activities of the LTTE were not confined to the island of Sri Lanka, but spread to foreign states where it carried out assassinations and assisted international terrorists by passing on its tactics and expertise. LTTE activities elsewhere in the world involved arms and drug trafficking as well as other other serious crimes.

2. LTTE Leadership

3. The LTTE was led throughout by Velupillai Prabhakaran who adopted for himself the exclusive role of being the leader of a hostile force against the Sri Lankan state. Prabhakaran ran the LTTE as a military force, with a political wing and all other agencies being subject to his control. Such was this control that any rivals were ruthlessly killed no matter how senior they were within the organization. The LTTE one-time deputy leader Gopalaswamy Mahendraraja aka “Mahattaya” was made President of the Peoples Front of the Liberation Tigers for the purposes of peace negotiations with the government of Sri Lanka in 1990. Distrust of Mahattaya’s intentions by Prabhakaran resulted in the execution of the Deputy and 257 of his LTTE

¹US Department of State List of Foreign Terrorist Organizations, Designation 8 October 1997; India Ministry of Home Affairs Notification No. SO 1272 (E) 14 May 2014; Council of the European Union Council Decision 2014/72/CFSP 10/2/2014; UK Prevention and Suppression of Terrorism SO NO.1261 of 28/3/2001.



supporters.² In 2004 when Prabhakaran was challenged by one of his military commanders, V. Muralitharan aka Col. Karuna, who had led his forces from the East in a split away from the main LTTE. As a result the Vanni based troops of Prabhakaran attacked their former fellow soldiers and within a month defeated Karuna's forces, that included 2,000 child soldiers.³

3. LTTE and Tamil Population Political Relationships

4. The LTTE targeted rival Tamil groups in Sri Lanka so that it became the self-proclaimed unopposed political voice of the Tamil population. No free choice was permitted to the Tamil population of Sri Lanka as to the type of representative it wanted for all rival political leaders were killed and their parties prevented from developing.⁴ An example is the assassination of Appapillai Amirthalingam the General Secretary of the Tamil United Liberation Front. He was a supporter of the LTTE and an early advocate of separatism, but his prominence resulted in his being killed. To achieve this a frequently used tactic of deception was used by the LTTE in that it was an apparent meeting to discuss peace, but resulted in his murder and those with him.⁵ Sri Sabaratnam is another example, as the leader of the Tamil Eelam Liberation Organisation he was hunted and riddled with machine gun bullets when caught by Satahasivam Krishnakumar ("Kittu") an iconic commander of the LTTE as a result of his extreme exploits.⁶

4. LTTE Assassinations of Prominent Politicians and Government Officials

5. The LTTE used the tactic of the assassination of prominent politicians and government officials whom they perceived had acted against their interests in order to invoke wide-scale fear and to prevent opposition to their objectives. These tactics invariably were through the use of suicide bombers and claimed the deaths of many bystanders. The Indian Prime Minister Rajiv Gandhi who was the architect of the Indo-Lanka Accord that had resulted in great losses to the LTTE, in 1991 was killed with 17 others by a female suicide bomber as revenge for his role in curtailing the activities of the organization.⁷ In May 1993, the Prime Minister of Sri Lanka, Ranasinghe Premadasa, who had negotiated the Indian Peace Keeping Forces withdrawal and had made great attempts to make peace with the LTTE, was killed along with 14 other people by a

² See the killing of Mahendrarajah, alias Mahattaya on 28 December 1994

http://www.atimes.com/atimes/South_Asia/DI07Df01.html Dated September 7 2002

³ HRW Living in Fear: Child Soldiers and the Tamil Tigers in Sri Lanka, 11 November 2004

⁴ Annex A, List of Tamil Politicians Assassinated by the LTTE. Source: Sri Lankan Ministry of Defence, *Humanitarian Operation Factual Analysis: July 2006 – May 2009* (July 2011) at pp. 88 – 92. See also Annex M, Human Rights Abuses in the Vanni "Trapped and Mistreated" HRW 2008

⁵ <http://www.asiantribune.com/node/21684>

⁶ See the killing of Sri Sabaratnam http://www.atimes.com/atimes/South_Asia/DI14Df01.html Dated September 14 2002.

⁷ <http://indiatoday.intoday.in/story/rajiv-gandhi-assassin-diary-sivaran-exclusive-revelations-about-sivaran-plot-to-kill-rajiv-gandhi/1/346167.html>



suicide bomber riding a bicycle whilst at a May Day rally.⁸ The Indo-Lanka Accord also claimed Gamini Dissanayake the UNP leader as an LTTE victim. During the Presidential election campaign of 1994, Dissanayake was killed by an LTTE suicide bomber, in yet another act of revenge.⁹ In 1999 President Chandrika Kumuratunga survived a suicide bombing, although 36 people died in the blast aimed at her.¹⁰ Lakshman Kadirgamar who as Foreign Minister had persuaded foreign governments to list the LTTE as a proscribed terrorist organization in 2005 was killed by a sniper at his home.¹¹

6. The LTTE assassinated many Sri Lankan government officials¹² and academics¹³ in the region it sought to acquire to ensure that there was no opposition to its local control and in order to suppress the civilian population. The wide-scale violent activities of the LTTE to exert control over its own ethnic people were not those of a genuine liberation movement but an organization intent on hegemonic self-preservation.

5. LTTE Attacks on Villages and Ethnic Cleansing of Other Ethnic and Religious Groups

7. The LTTE attacked villages mainly with Sinhalese and Muslim populations to cause the removal of non-Tamils or even civilians not in support of their aims within the northern and eastern areas of Sri Lanka over which it wanted control.¹⁴ The number of villagers killed in the 25 years between 1984 and 2009 reveals a ruthless determination to achieve these aims as thousands lost their lives. One of the objectives was to destabilize the authority of the state and to obstruct effective governance.
8. The ethnic cleansing of the region to achieve a Tamil exclusive area was deliberately implemented by the LTTE as a policy of expansion from 1985 when Muslim owned land in the north was forcibly occupied.¹⁵ The LTTE entered villages, towns and the city of Jaffna, collected the Muslims together and read out notices in the mosques or other public places giving the population short notice to leave or risk attack.¹⁶ In Jaffna the Muslims were only allowed to take 500 rupees, possessions and property being commandeered by the LTTE cadres.¹⁷ In 1990 approximately 90,000 Muslims were

⁸ <http://www.globalsecurity.org/military/world/sri-lanka/premadasa.htm>

⁹ <http://indiatoday.intoday.in/story/gamini-dissanayake-assassination-brings-his-widow-into-electoral-fray-threatens-stability/1/294422.html>

¹⁰ <http://www.wsws.org/en/articles/1999/12/blst-d21.html>

¹¹ <http://www.mea.gov.lk/index.php/home/29-assassination-of-minister-lakshman-kadiragamar/39-foreign-minister-lakshman-kadirgamar-assassinated->

¹² See Annex B, List of Sri Lankan Government Officials Assassinated by the LTTE. Source: Sri Lankan Ministry of Defence, *Humanitarian Operation Factual Analysis: July 2006 – May 2009* (July 2011) at pp. 92 - 94.

¹³ See Annex C, List of Tamil Academics Assassinated by the LTTE. Source: Sri Lankan Ministry of Defence, *Humanitarian Operation Factual Analysis: July 2006 – May 2009* (July 2011) at pp. 95.

¹⁴ See Annex D, List of LTTE Attacks on Vulnerable Villages. Source: Sri Lankan Ministry of Defence, *Humanitarian Operation Factual Analysis: July 2006 – May 2009* (July 2011) at pp. 106 - 113.

¹⁵ <http://content.yudu.com/Library/A1vy1k/AJOURNEYTOHELLANDBAC/resources/29.htm>

¹⁶ Chavakacheri 15 October 1989; Mannar 28 October 1989; Jaffna 30 October 1990

¹⁷ <http://content.yudu.com/Library/A1vy1k/AJOURNEYTOHELLANDBAC/>



evicted en masse by the LTTE.¹⁸ The economic losses to these people were considerable and they were forced to resettle elsewhere in Sri Lanka and attempt to build new lives.¹⁹

6. LTTE Use of Suicide Bombers and the Global Influence of the Organisation

The attacks cited in this paper are not the full catalogue of all the deaths that took place during the 30 years of hostilities, but they demonstrate the extent of the lengths that the LTTE were prepared to go in order to achieve its objectives. A key tactic of the LTTE has been to kill by the use of suicide bombers. Between 1980-2000 the LTTE were responsible for almost double the amount of the suicide attacks of 9 other major terrorist organisations, including extreme Islamic groups.²⁰ The International Institute for Strategic Studies assessed that 168 suicide attacks took place during that period.²¹ These attacks continued after 2000 as the LTTE continued to target prominent politicians and military leaders.²² Sri Lanka's struggle to deal with this deadly strategy received ineffective international support until the September 11 2001 suicide terrorist air attacks by Al-Qaeda in the USA, whereupon the international community resolved to take greater steps to ensure global security. States then began more effective campaigns to prevent internal support for terrorist groups, including the LTTE, being engendered within their own societies. The strategies of the disparate terrorist groups around the world and their links are well known and the LTTE was a significant international resource to other terrorist groups, passing on expertise and skills.²³ The pattern of many of the suicide attacks was based upon supposedly innocent contact by the bomber with the victims using conditions of sympathy to get closer to the target victims as Annex F reveals.²⁴ During the final stages of the war as the SLAF closed in on the LTTE forces, cadres resorted to the tactic as part of the means of combat.²⁵ At least 1,229 people were killed and 3,601 seriously injured by LTTE suicide bombers during the 30 years of conflict.

7. LTTE Attacks on Civilian Targets

resources/29.htm

¹⁸ Centre for Policy Alternatives "Land and Property Rights of IDPs" (2003).

¹⁹ Refugees Studies Centre: Ending Internal Displacement: The Long Term IDPs in Sri Lanka, November 2010.

²⁰ Jennifer Sheehy-Skeffington: Social Psychological Motivations of Suicide Terrorism – A Community Perspective.

²¹ IISS Armed Conflict Database

²² See Annex I, List of LTTE Suicide Attacks; Source: Ministry of Defence, Democratic Socialist Republic of Sri Lanka, 'Humanitarian Factual Analysis July 2006 – May 2009', Annex B, Some of the Attacks Carried out by LTTE on Civilian Targets at pp. 96 - 105 and South Asia Terrorism Portal accessed at http://www.satp.org/satporgtp/countries/shrilanka/database/data_suicide_killings.htm

²³ See Annex J, LTTE Links With Other Terrorist Groups; Source: various media sources.

²⁴ 25 April 2006 - Female suicide bomber at Army Headquarters targeted Lt. General Fonseca; 4 February 2009 a 13 year old child suicide bomber; many LTTE female suicide bombers were used in operations

²⁵ 29/4/2009 Rektavaikkal; 15/5/2009 Vellamullivaikkal



The LTTE conducted widespread attacks against civilians in temples of religion, in cities, towns, villages and fields.²⁶ The attacks were organized to kill innocent victims indiscriminately by the means of shooting, bombing, mining and use of blades. The campaign of terror continued with great regularity throughout the conflict and resulted in the deaths of thousands. Some attacks were in the Northern region over which the LTTE sought control and many were in the capital Colombo. Attacks were also designed to cause greatest affront when they were at places of significant religious worship such as Sri Maha Bodiya, Anuradhapura where 120 Buddhists were slaughtered and 85 wounded during their devotions. The objectives of some attacks were politicians or senior military officers but many civilians were murdered at the same incidents.²⁷ These LTTE massacres caused great damage and harm to the Sri Lankan economy and made the prospects for foreign investors poor.

8. LTTE Attacks on Infrastructure

The LTTE chose economic targets to cause significant damage and harm to Sri Lanka at the local level and international level. The attacks involved damage to shipping, aircraft, railways, significant buildings and industry.²⁸ The maritime terrorism of the LTTE was particularly directed at merchant shipping and started the modern trend for piracy on the high seas that has become prevalent off the coasts of East and West Africa.²⁹

In July 2006 the LTTE shut down the Mavil Aru sluice gates depriving over 60,000 people in a rural area of access to drinking water and damaging 20,000 acres of paddy field cultivation.³⁰ As a result the SLAF launched “Operation Watershed” to take control of this important economic installation, which it was able to do so after 16 days of intense fighting. This defeat of the LTTE’s hold of the reservoir is recorded as being the first battle of the final Eelam War IV that continued until the final defeat in May 2009. In 2007 S.P. Thamichelvan the leader of the LTTE political wing in response to the loss of control of the Eastern province stated that the military and economic structures were targets of the organization.³¹

9. LTTE Military Structure

The LTTE developed an army, a naval force and eventually an air force. All forces were under the control of Velupillai Prabhakaran. During the ceasefire of 2002-2006 the LTTE took the opportunity to replenish and restore its military capacity, even taking advantage of the tsunami in 2004, to take boats and hardware from the storm damage

²⁶ See Annex E, List of LTTE Attacks on Civilian Targets. Source: Sri Lankan Ministry of Defence, *Humanitarian Operation Factual Analysis: July 2006 – May 2009* (July 2011) at pp. 96 - 105.

²⁷ 6 October 2008 killing of Maj. Gen. Perera (retired) at which 26 civilians also died and 84 were injured

²⁸ See Annex F, List of LTTE Attacks on Economic Targets. Source: Sri Lankan Ministry of Defence, *Humanitarian Operation Factual Analysis: July 2006 – May 2009* (July 2011) at pp. 114 - 116.

²⁹ See Annex L, LTTE Maritime Terrorism

³⁰ Assignment Peace in the Name of the Motherland by L.M.H. Mendis 2nd ed. P.601

³¹ Associated Press July 12 2007.



from which to construct machinery for the forces.³² The replenishment was made by funds supplied from the Tamil diaspora and through criminal activities conducted upon a worldwide scale. In July 2006 the LTTE had 25,000 cadres and by 2008 the numbers had increased to 30,000.³³

(a) Army

The LTTE was a well-equipped army using small arms, automatic rifles, mortars, artillery, anti-tank and rocket propelled missiles. The forces covered extensive parts of the terrain with mines to fortify their areas of control. They used armored vehicles and adapted machinery to be used for military purposes. The training and disciplinary structure was rigid and designed to ensure compliance to the point of personal sacrifice with combat objectives.

The LTTE was able to inflict heavy losses on the SLAF - prior to 2006, 19,282 SLAF personnel were killed and 82,104 were injured. In some battles the losses in a single action were extraordinarily high: at Mullaitivu in July 1996, 1,173 SLAF officers and soldiers were recorded as killed.³⁴

(b) Navy

The LTTE navy was named the Sea Tigers and was founded in 1984. The Sea Tigers had amongst its capability a number of suicide-bomber vessels and the main base were at Mullaitivu, the place of the last stand of the LTTE in May 2009. The Sea Tigers sank many Sri Lankan Naval ships with much loss of life: 8 major vessels; 20 fast attack craft; 28 inshore patrol craft.³⁵ Many merchant ships were also attacked in order to cause maximum disruption of trade routes during the 25 years of hostilities.³⁶

(c) Airforce

The Air Tigers (Vaanpuligal) was the name for the LTTE airforce. The LTTE is the only rebel organization in the world that had an air wing, without outside support. The existence of the wing was only revealed after attacks in 2007.³⁷ They used two-seater Czech Zlin Z-143's adapted to carry bombs.

(d) The Black Tigers

The Black Tigers were members of the LTTE forces trained for suicide missions. All members of the Black Tigers carried a cyanide capsule to be taken in the event of capture by the SLAF. More than 330 Black Tigers died in hostile operations on land

³² See Annex K Opening Section the Use of Ceasefire to Rearm and Replenish in 2001 (Procurements of Arms, Ammo and Equipments by LTTE) with particular reference to pages 33-76 on replenishment by the LTTE from 2001-2006

³³ See Sri Lankan Ministry of Defence, *Humanitarian Operation Factual Analysis: July 2006 – May 2009* (July 2011) at para 44.

³⁴ See Annex G, List of SLAF Deaths Caused by Attacks on Major SLAF Bases. Source: Sri Lankan Ministry of Defence, *Humanitarian Operation Factual Analysis: July 2006 – May 2009* (July 2011) at pp. 146 - 148.

³⁵ See Sri Lankan Ministry of Defence, *Humanitarian Operation Factual Analysis: July 2006 – May 2009* (July 2011) at para 58.

³⁶ See Sri Lankan Ministry of Defence, *Humanitarian Operation Factual Analysis: July 2006 – May 2009* (July 2011) at para 59.

³⁷ 29 April 2007 Kolonnawa oil storage depot and Muturajawella gas storage depot bombed by LTTE aircraft



and sea during the conflict.³⁸ The maritime Black Tigers used small speedboats laden with explosives and rammed into Sri Lanka Navy vessels.³⁹ Suicide divers were also used to swim into the SL naval base at Kankasanturai in the Jaffna peninsula and Trincomalee harbor and blow up vessels.⁴⁰ The Black Tigers are believed to have been the most effective unit of its kind in the world and killed many members of the SLAF and Sri Lankan civilian population. Cadres joined the Black Tigers as a result of LTTE indoctrination of the value of this method of attack for the cause. Children and youths were groomed by the LTTE leadership to join the Black Tigers and took part in suicide operations.⁴¹

(e) Child Soldiers

The LTTE used child soldiers in combat operations throughout the conflict in Sri Lanka.⁴² In 1987 the recruitment of children intensified as the LTTE fought the Indian Peace-Keeping Forces, with approximately 2,000 used in the ranks. Most children were brainwashed into joining the LTTE forces and some were forcibly recruited. Originally the LTTE operated a so-called “Baby Brigade”, but by 1987 had integrated the children into all units. A particular brigade was known as the “Leopard” and was constituted of children from orphanages, known for their particularly fierce fighting and loyalty to Prabhakaran.⁴³ In the battle of Elephant Pass in 1991, waves of children were sent in by the LTTE commanders to fight the SLAF and they counted for most of the 550 LTTE deaths.⁴⁴ The policy of recruitment by the LTTE of child soldiers led to the loss of life of many children of both sexes. During the ceasefire of 2002-2006 notwithstanding the LTTE commitment to the Action Plan for Children Affected by War, that was intended to reduce numbers, the recruitment in fact doubled the number of child soldiers.

10. LTTE Continued Strategy

Even after its military defeat the LTTE has not abandoned the concept of “Eelam” and has initiated new efforts to form a revived force.⁴⁵ Former officers and agents of the LTTE have emerged in recent times with new groups: Transnational Government of

³⁸ See Annex I, List of LTTE Suicide Attacks; Source: Ministry of Defence, Democratic Socialist Republic of Sri Lanka, ‘Humanitarian Factual Analysis July 2006 – May 2009’, Annex B, Some of the Attacks Carried out by LTTE on Civilian Targets at pp. 96 - 105 and South Asia Terrorism Portal accessed at http://www.satp.org/satporgtp/countries/shrilanka/database/data_suicide_killings.htm

³⁹ See Annex H, Major Attacks Launched by LTTE on Sri Lankan Navy. Source: Sri Lankan Ministry of Defence, *Humanitarian Operation Factual Analysis: July 2006 – May 2009* (July 2011) at pp. 149 - 153. 10 May 2008 Trincomalee Harbour M/V Invincible sunk by a suicide diver.

⁴⁰ See Annex H, Major Attacks Launched by LTTE on Sri Lankan Navy. Source: Sri Lankan Ministry of Defence, *Humanitarian Operation Factual Analysis: July 2006 – May 2009* (July 2011) at pp. 149 - 153.

⁴¹ HRW Living in Fear: Child Soldiers and the Tamil Tigers in Sri Lanka, 11 November 2004

⁴² Annex M: LTTE Human Rights Abuses in the Vanni “Trapped and Mistreated” HRW 2008; HRW Living in Fear: Child Soldiers and the Tamil Tigers in Sri Lanka, 11 November 2004

⁴³ Among their actions is the gunning down of 200 elite government troops on December 4, 1997, in Kanakarankulam, Wannai

⁴⁴ Rohan Gunaratna, “LTTE Child Combatants,” *Jane’s Intelligence Review*, July 1998

⁴⁵ India Ministry of Home Affairs Notification No. SO 1272 (E) 14 May 2014



Tamil Eelam; Tamil Peoples Assembly; Tamil National Council; LTTE ex-Combatants Group; and the Global Tamil Forum.⁴⁶ The LTTE network still uses the large Tamil diaspora in North America, South Africa, Europe and Asia, to issue propaganda, procure weapons, funds and other needed supplies.⁴⁷ False charities continue to be used as a means from which to divert funds for unlawful activities.⁴⁸ The LTTE has now transferred activities to the state of India.

11. Conclusion

The LTTE was primarily a ruthless and determined fighting force that used all means available to attempt to secure victory. These means included the use of armed forces, civilians, suicide bombers, women and children in the armed struggle. There was no core political philosophy beyond that of wanting separatism and the LTTE was utterly opposed to any rival groups that sought to lead the Tamil people or rival the Commander Prabhakaran. The four wars that were fought against the Sri Lankan Governments were with one objective alone: the partition of the island to enable a separate Tamil state. Any non-Tamils in the areas controlled by them were at real risk of harm and not tolerated to be part of their society. Any rival Tamil political groups were also not tolerated and the people denied the option of choosing different representatives.

The LTTE was never seriously intent upon giving up its armed struggle against the Sri Lankan state and as the breaches of the ceasefires show, used such periods to rearm, replenish, retrain and resume the conflict. The Sri Lankan nation could not have been expected to continue to accept this continued pattern of resistance to its rightful exercise of sovereignty and responsibility to protect its people. The activities of the LTTE resulted in great harm to the economy and prospects of Sri Lanka as well as great loss of life to Tamils and the other inhabitants of the island. States elsewhere in the world would not have been as tolerant and patient with the continuous conflict of such an organization and would not have permitted the interference by other states with its sovereignty.⁴⁹ In September 1987 President Rajiv Gandhi of India gave an order through the High Commissioner that Velupillai Prabhakaran should be shot at a truce meeting with the IPKF, which the Indian forces commander disobeyed.⁵⁰

In order to challenge the destructive forces of the LTTE operating within its territories, in 2006 the Sri Lankan government launched the humanitarian mission to restore normal conditions of life within its sovereign state. Opportunities were given to the LTTE to surrender, but it would not do so. Instead, it operated a military

⁴⁶ Sri Lanka Ministry of Defence and Urban Development June 2012, Re-Emergence of LTTE International Network and Potential Threat

⁴⁷ US Department of State, Diplomacy in Action, Foreign Terrorist Organisations, Country Reports on Terrorism 2013; Sri Lanka Ministry of Defence and Urban Development June 2012, Re-Emergence of LTTE International Network and Potential Threat

⁴⁸ US Department of State, Diplomacy in Action, Foreign Terrorist Organisations, Country Reports on Terrorism 2013

⁴⁹ Indian Peacekeeping Forces were present from 1987-1990 and became embroiled in conflict with the LTTE resulting in great loss of life. 1,155 IPKF soldiers were killed in combat with the LTTE.

⁵⁰ Intervention in Sri Lanka: The IPKF Experience Retold by Major General Harkirat Singh (Retd)



campaign from within the civilian population it had herded around it. The civilian population was prevented from escaping from the hold of the LTTE if it wanted to leave, although some Tamil civilians were content to stay notwithstanding the battle conditions between the opposing forces.⁵¹

In such circumstances, the SLAF were entitled to use necessary and reasonable force to defeat the hostile forces of the LTTE at the point it was able to press for victory.⁵² At the time of the military operation the international community were informed of developments and were supportive of the SLAF. Conflicts in recent times involving other states that have not been justified in international law, have caused more deaths, greater numbers of casualties and far greater damage to infrastructure and the conditions of life of the civilian population.⁵³

Signed 
Steven Kay QC
25 September 2014

⁵¹ See Sri Lankan Ministry of Defence, *Humanitarian Operation Factual Analysis: July 2006 – May 2009* (July 2011) at para 166.

⁵² For clear justification see Sri Lankan Ministry of Defence, *Humanitarian Operation Factual Analysis: July 2006 – May 2009* (July 2011).

⁵³ NATO campaign against Serbia to take control of Kosovo 1999; US and Allies campaign against Iraq from 2002; NATO and Allies campaign against Afghanistan from 2001