

24 June 2025

Submission to the UN Fact Finding Mission for Sudan in relation to formal consultations regarding accountability measures for the Sudan

1. This submission is presented by the Global Survivors Fund (GSF). GSF was launched in October 2019 by Nobel Laureates Dr Denis Mukwege and Nadia Murad. GSF is the leading international organisation dedicated exclusively to enabling access to reparation for survivors of conflict-related sexual violence.
2. With operational experience in over 26 countries and across a wide range of legal and political contexts, GSF brings unparalleled technical expertise in designing and implementing survivor-centred interim reparative measures and reparation programmes.
3. GSF's programmatic work is structured around three interconnected pillars: GSF **ACTS** by demonstrating that the right to reparation for survivors of conflict-related sexual violence must be urgently addressed; in partnership with local civil society and survivor groups, GSF co-creates and supports localised, survivor-centred interim reparative measures. GSF **ADVOCATES** to ensure reparations are prioritised in international policy agendas, focusing on the urgency of reparation, financing, and children's right to reparation, while creating space for survivors to speak directly to power. GSF **GUIDES** by working together with State authorities and other actors to support the establishment of reparation programmes -, providing tailored technical support to governments and national institutions willing to develop and implement reparations.
4. In response to the request for input regarding avenues for pursuing accountability in the Sudan, GSF would like to highlight the centrality of reparation through some recommendations drawn from our work with partners and survivors in Sudan, our efforts to support Sudanese survivors of CRSV presently living in Chad, and our experience of pursuing and providing reparation and interim reparative measures as key elements of transitional justice despite of the ongoing conflict.
5. This submission focuses on the following five points:
 - Reparation is a priority to respond to survivors of conflict-related sexual violence;
 - There is an urgent need to seed the ecosystem of reparation through reparative measures;

- A unified registry of survivors of conflict-related sexual violence and other victims can and should be established;
- Reparation and interim reparative measures should be co-created;
- Reparative measures and reparation can and should be financed through seized assets.

A. Reparation at the core for Sudanese survivors of conflict-related sexual violence

6. Reparation for survivors of conflict-related sexual violence cannot continue to be an afterthought. For survivors, reparation means access to rehabilitation services that could enable their agency and life. It means being recognised as victims and not being blamed for what happened to them.
7. Reparation is also a key building block for other elements of transitional justice and accountability. Urgent and timely action on reparation can serve as a first step in a transitional justice process, and it can serve to restore trust in international or national actors seeking to involve survivors in justice initiatives.
8. It is also a crucial enabler of justice and accountability efforts. We will only create more conducive conditions for survivors to cooperate in accountability processes if, and when, we address their urgent harms and needs.
9. We strongly recommend that the FFMS continues to place the right to reparation at the forefront of its work, as it did on its report to the Human Rights Council in September 2024,¹ and highlights the importance of reparation for the victims that find themselves in the most vulnerable situations - such as survivors of conflict-related sexual violence.

B. Seeding the ecosystem of reparation through reparative measures

10. Sudanese survivors are living in one of the world's largest humanitarian crises. However, even in such a context, it is possible to act on reparation even if the full realisation of the right would take time.
11. The foundation for reparation needs to be set up as early as possible after the crimes are committed. In the case of Sudan, it is possible to support survivors with urgent reparative measures to address urgent harms right now. There is no need to wait for those responsible to comply with their international obligations, or for new peace talks to take place, or for other transitional justice measures to be established. During an ongoing conflict or humanitarian crisis,

¹ Findings of the investigations conducted by the Independent International Fact-Finding Mission for the Sudan into violations of international human rights law and international humanitarian law, and related crimes, committed in the Sudan in the context of the conflict that erupted in mid-April 2023, A/HRC/CRP.6, 23 October 2024, para. 337.

- a lot can already be done to ensure that a full reparation programme will be established down the line.
12. Such emergency reparative measures would build on existing humanitarian efforts but would be delivered in a more holistic manner. These measures would be provided through a human rights lens, grounded in the recognition of survivors as rights holders entitled to reparation - not as beneficiaries to charity.
 13. Reparative measures in a humanitarian context need to convey the message: "You have the right to reparation. Harm has been done to you. In the absence of formal reparation, you have the right to be supported. What should that look like to you?" This intervention and the framing of the intervention should be guided by the internationally recognised right to reparation - but considering Sudanese customs and culture.
 14. In a context where other justice measures are not immediately feasible, such urgent interim reparative measures provide a window of opportunity for international actors to mobilise support and build a foundation of trust with survivors, and also provide an avenue for survivors to develop a voice for future transitional justice processes.
 15. GSF has started piloting reparative interventions with survivors of conflict-related sexual violence in Chad for Sudanese survivors. Even in a desperate situation, we have been able to identify locally grounded organisations and survivor networks with whom we are developing urgent interim reparative measures, thereby seeding the ecosystem that makes reparation possible.
 16. We are bridging the actors, ensuring that referral pathways are stronger and survivor-centred. Through our work, we have seen a significant disconnect between survivors' local initiatives and the humanitarian assistance providers. Now, our work is ensuring that relevant actors bridge responses with local survivors' groups, and together make their collective response more survivor centred. GSF has partnered with 8 local initiatives in Adre and Aboutengue, in Chad, and is helping to bridge their work with that of humanitarian actors, like Médecins Sans Frontier, thereby enhancing the provision of health services. GSF has identified similar opportunities in South Sudan and within Sudan.
 17. Urgent interim reparative measures allow the delivery of essential services for survivors including physical and mental healthcare, education, and livelihood support in a manner that is intrinsically different and more holistic than existing responses. By bridging relevant actors, by testing different emergency reparative measures, and by improving service referral pathways, we are

beginning to lay the foundations for a future administrative reparation programme.

18. The FFMS should recommend that humanitarian actors continue to take action to ensure that the foundation for reparation can be built now, amidst ongoing conflict, and recommend for their services to be provided in a more reparative manner and in close coordination with survivors' initiatives and networks of support.

C. Creating a unified registry of victims

19. Violence, including conflict-related sexual violence, has shaped the lives of Sudanese people for decades. When atrocities unfolded in Darfur twenty years ago, documentation efforts were made, but the focus was not on victims and the harms they suffered. As we look ahead and learn from the past, we must act swiftly to document victims and the harm done to them, laying the groundwork for future reparation.
20. GSF strongly recommends for the FFMS to mobilise the Human Rights Council and other relevant actors to call for the establishment of a unified victims' registry. Different actors have already been documenting and registering violations, damages, etc., but we need to unify these numerous registries into a single registry that allows the registration of survivors for the purpose of reparation. A strong example of this approach can be found in Colombia, where the Victims and Land Restitution Law built upon existing registries and documentation efforts related to internal displacement and other violations. These efforts enabled the creation of a unified register encompassing both individual and collective victims, including survivors of conflict-related sexual violence and children born of war.
21. In addition, new registrations can begin during the delivery of urgent reparative measures, as survivors of conflict-related sexual violence and other victims come forward through safe spaces and survivor-centred referral networks. This means that when a formal reparation programme is eventually established as part of transitional justice efforts, a functioning registry - and practical experience with eligibility criteria and their application - will already be in place.
22. A unified registry for reparation would provide *recognition* to victims: a fundamental form of reparation.

23. Technology today is vastly different from twenty years ago. With the right measures in place, victims and survivors could be registered in a safe, secure and confidential manner, with survivors always owning their own data.
24. Transitioning from interim reparative measures to a more holistic and comprehensive phase - one that benefits not only survivors of conflict-related sexual violence but also other victims - will require the establishment of a dedicated reparation mechanism and a fund to finance it. We recommend that the FFMS explore the most appropriate institutional set-up for this purpose, including the creation of a unified victims' registry, through inclusive consultations with victims, survivors, and other relevant stakeholders.

D. Reparations should be co-created

25. Co-creation of reparation measures, including interim reparative measures, should be a key guiding principle for the design and implementation process. GSF's experience of working with survivors individually and collectively to design and implement interim reparative measures demonstrates that co-creation is both feasible and has immense value in ensuring the success and impact of such measures.
26. The experiences and demands of survivors of conflict-related sexual violence are not only essential to understanding the harm caused, but also to shaping meaningful and effective transitional justice processes, including reparation. For any reparations programme to be legitimate, inclusive, and just, it must be informed by those who have endured the consequences of violations firsthand.
27. Participation is not a symbolic gesture - it is a right. Under international human rights law and transitional justice standards, victims have the right to participate in the design, implementation, and monitoring of reparations. This is affirmed in the [UN Basic Principles and Guidelines on the Right to a Remedy and Reparation](#), which emphasises that victims should be consulted and involved in decisions that affect their rights and futures.
28. When survivors and families are excluded, reparations risk becoming detached from their lived realities. Such programmes may fail to address the most urgent needs, may reinforce patterns of marginalisation, or may even cause new harm. On the other hand, when survivors are meaningfully engaged, reparations can become a transformative process. They can restore dignity, promote accountability, and rebuild trust between society and the state.
29. Survivor perspectives of their needs in relation to various transitional justice processes need to be a primary concern for designing appropriate interventions.
30. GSF recommends for the FFMS to continue bringing the voices of survivors and victims' forward, and to promote consultations of victims and of survivors of

conflict-related sexual violence so that they can help shape the institutional set up of reparation, including the potential unified registry. They can provide invaluable feedback on how to make such processes effective, and survivor- and victim-centred. They will also ensure that any system put in place responds to context and local customs and culture.

E. Reparative measures and reparation can and should be financed through seized assets

31. A key challenge for realising a national reparation programme is often the lack of (or competition for) funding after a destructive conflict. In Sudan, there are opportunities to ensure that revenues for reparations are secured through tracing, seizing and repurposing assets associated with conflict actors and corrupt activities.
32. Sudan has a long history of state assets being siphoned by elites for personal gain. It is difficult to find verified monetary values, but Omar al-Bashir is estimated to have looted up to \$9 billion during his presidency, and today, Hemeti's RSF-linked commercial empire, including gold mining, logistics, and foreign-registered trading companies, is estimated to be worth over \$7 billion, with much of it shielded through offshore networks and front companies.
33. There is clearly an entrenched pattern of kleptocracy in Sudan, which is fuelling ongoing conflict, and as such, there is an urgent need to trace, freeze, and ultimately repurpose these assets for the most vulnerable victims and survivors of human rights violations. While the US, UK, EU, and Canada have imposed asset freezes on RSF leaders, Bashir-era figures, and affiliated companies, and the UN has recently sanctioned RSF generals for atrocities, sanctions remain fragmented, and there is very little transparency on the jurisdictions in which the money sits. We need coordinated global action not just to freeze assets, but to ensure they are repurposed and can serve as a form of justice and accountability for survivors.
34. For survivors of conflict-related sexual violence to be provided with interim reparative measures or even with reparation using these assets would contribute to a sense of justice. Efforts to pursue and repurpose these assets also need to be guided by survivor's voices.
35. The UN has a vital role to play on repurposing of assets for Sudanese victims and survivors. The FFMS could play a pivotal role positioning the topic and mobilizing relevant UN actors to call for the repurposing of assets and for greater international cooperation in this area.