

JUDICIAL INTERPRETATION AND THE DEVELOPMENT OF INTERNATIONAL LAW: A STUDY OF EMERGING NORMS AND STANDARDS

by

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Abstract

Amidst escalating transnational challenges, judicial interpretation stands as a cornerstone for the evolutionary architecture of international law, harmonizing entrenched doctrines with emergent imperatives. This inquiry delves into the judiciary's instrumental agency in sculpting nascent norms and benchmarks, juxtaposing supranational adjudicatory forums against domestic benches. Anchored in **the Vienna Convention on the Law of Treaties (1969) and its interpretive progeny**, the analysis elucidates methodologies like purposive and holistic exegesis, which breathe dynamism into ossified accords, obviating the need for protracted codification.

Internationally, the International Court of Justice (ICJ) and venues such as the Permanent Court of Arbitration embody this catalytic ethos. Seminal rulings, from **the ICJ's pronouncement on the Legality of the Threat or Use of Nuclear Weapons (1996) to the Chagos advisory opinion (2019)**, explicate tenets of self-determination and ecological trusteeship from constitutive instruments. The International Tribunal for the Law of the Sea (ITLOS), through the **South China Sea Arbitration (2016)**, has refined maritime equity doctrines to integrate biodiversity safeguards, transmuting interpretive clarifications into precedential anchors that propel non-binding declarations, like those from the UN General Assembly, toward obligatory stature, thus augmenting the universal legal tapestry.

In India's polycentric framework, this nexus gains profound resonance, attuned to the constitutional directive under Article 51 to nurture global concord and fidelity to international law. **The Supreme Court has adeptly harnessed extraterritorial precepts in municipal spheres, as in Vishaka v. State of Rajasthan (1997)**, wherein CEDAW's anti-discrimination ethos was transposed into enforceable workplace safeguards, and **National Legal Services Authority v. Union of India (2014)**, which enshrined transgender entitlements via universal

human rights pacts. **Environmental sagas, including Vellore Citizens' Welfare Forum v. Union of India (1996) and M.C. Mehta v. Union of India (2004)**, have embedded Rio Declaration tenets on sustainable development, synchronizing indigenous jurisprudence with planetary stewardship. These adjudications underscore India's diplomatic prowess, manifest in its stewardship of the International Solar Alliance and UNFCCC engagements, where judicial erudition buttresses bilateral and multilateral dialogues.

Nevertheless, interpretive dissonances loom large. Whereas global tribunals emphasize universal duties, Indian courts grapple with devolutionary tensions and contextual particularities, sometimes tempered by sovereign prerogatives. The treatise proposes augmented judicial colloquy—via comparative citations and third-party submissions—to assuage these variances, cultivating an inclusive yet unified legal paradigm. By combining doctrinal analysis with examples from ecological regimes, digital governance, and human rights, this work promotes judicial interpretation as a diplomatic cornerstone, enabling organizations like India to co-author fair international directives. In order to strengthen defenses against transnational threats, it envisions a reciprocal ecology in which domestic tribunals both participate in and benefit from international adjudication.

In summary, this treatise propels judicial interpretation beyond hermeneutic boundaries into a normative furnace, which is essential to India's reputation as a responsible global steward and the liberating trajectory of international law.

Keywords: Judicial Exegesis, Normative Evolution, International Jurisprudence, Indian Adjudication, Universal Benchmarks

Introduction

A dynamic area of international jurisprudence where courts and tribunals act as designers of normative advancement is the interaction between judicial interpretation and the development of international law. Based on **Article 38(1)(d) of the Statute of the International Court of Justice (ICJ)**, court rulings serve as auxiliary tools for establishing legal norms, helping to solidify new standards into legally obligatory ones. **The Vienna Convention on the Law of Treaties (VCLT) of 1969, especially Articles 31–33**, which require interpretation in good faith while taking ordinary meaning, context, and intent and purpose into account, is essential to this procedure. The continual growth of international law, as envisioned in **Article 13 of the UN Charter**, is supported by this framework, which makes it possible to adapt to modern issues like sustainable development, human rights, and climate change¹.

The ICJ has played a significant role in developing new standards on a global scale. The Court upheld states' obligations under customary international law to reduce greenhouse gas emissions in its historic Advisory Opinion on the Obligations of States in Respect of Climate Change (July 23, 2025)². The Court interpreted obligations under **the UN Framework Convention on Climate Change (UNFCCC)** and **Paris Agreement (2015)** as including intergenerational equity and the prevention of transboundary harm. This opinion expands upon other rulings, such as **the Chagos Archipelago Advisory Opinion (2019)**, which upheld customary law and UN Charter standards for self-determination³. The relevance of judicial interpretation in enforcing **the Genocide Convention (1948)** is further demonstrated by current contentious processes, such as **Ukraine Vs. Russia (2022–ongoing)**, which stress culpability for violations during armed conflicts⁴.

In accordance with **Article 51(c) of the Constitution**, which mandates promoting respect for international law and treaty responsibilities, the Supreme Court of India has aggressively integrated international standards into domestic jurisprudence⁵. **The Convention on the Elimination of All Forms of Discrimination Against Women (CEDAW, 1979)** was used in landmark judgments like **Vishaka Vs. State of Rajasthan (1997)** to create rules against sexual harassment in the workplace⁵. In **Kaushal Kishor Vs. State of Uttar Pradesh (2023)**, the Court expanded the horizontal application of fundamental rights under **Articles 19 and 21**, citing the **International Covenant on Civil and Political Rights (ICCPR, 1966)** and the **Universal Declaration of Human Rights (UDHR, 1948)**, to safeguard free speech against non-state actors⁶.

The Rio Declaration's (1992) sustainable development concepts were considered to be a component of customary law in **Vellore Citizens Welfare Forum Vs. Union of India (1996)**. Delimitation was examined for constitutional compatibility in recent decisions like **Kishorchandra Changanlal Rathod Vs. Union of India (2024)**, which reflected impacts from international electoral norms under **the ICCPR**⁷. Pro-enforcement biases in international business conflicts are encouraged by arbitration cases such as **Glencore International AG Vs. Shree Ganesh Metals (2025)**, which highlight adherence to the 1958 New York Convention⁸. **The UNFCCC and the Sustainable Development Goals (SDGs, 2015)** are two examples of emerging rules that highlight fairness in global governance. This research looks at how judicial interpretation navigates conflicts between sovereignty and universality in a multipolar world while bridging treaties and practice and promoting standards on digital rights, climate justice, and pandemic response⁹.

a. Normative Ambiguity and Judicial Innovation

The inherent ambiguity of treaties, customary norms, and rising standards in the field of international law gives rise to normative ambiguity, which is sometimes made worse by swift global developments like technology breakthroughs or climatic disasters. Because of this uncertainty, judicial innovation is required, wherein courts interpret and develop legal concepts to close gaps and guarantee the flexibility and applicability of the law. The fundamental basis for treaty interpretation is provided in **Articles 31 and 32 of the Vienna Convention on the Law of Treaties (VCLT, 1969)**, which emphasize good faith, ordinary meaning, and additional methods to resolve problems. In this process, judicial bodies, such as **national courts and the International Court of Justice (ICJ)**, play a crucial role in turning abstract norms into legally binding standards¹⁰.

This tendency is demonstrated by recent ICJ rulings. The International Court of Justice (ICJ) addressed normative ambiguity in the Paris Agreement (2015) and UN Framework Convention on Climate Change (1992) by interpreting state obligations under customary international law to include cooperation, adaptation, and mitigation in its 2025 Advisory Opinion on Obligations of States in Respect of Climate Change¹¹. By making it clear that transboundary environmental harm is covered by the "**No-Harm Principle**", the Court innovated and guided the development of new standards in the face of scientific uncertainty¹². Similar to this, the International Court of Justice (ICJ) innovated on the obligation to cooperate under **UN Charter Article 1(3) in the 2024 Legal Consequences judgment against Israel's occupation**, requiring governments to participate in removing unlawful presences despite unclear enforcement measures¹³. The International Court of Justice (ICJ) addressed the Genocide Convention (1948) in **Sudan Vs. UAE (2025)**, denying prima facie jurisdiction while emphasizing interpretation flexibility to protect fundamental values¹⁴.

Nationally, in accordance with **Article 51 of the Constitution**, the Indian Supreme Court has shown judicial innovation at the national level by integrating foreign standards into domestic law. In **Vellore Citizens Welfare Forum Vs. Union of India (1996)**, the Court resolved uncertainty in environmental legislation by citing sustainable development as customary international law from the Rio Declaration (1992)¹⁵. More recently, in **Bhasin Vs. Union of India (2020)**, it innovated on digital rights amid normative gaps in freedom of speech by citing the International Covenant on Civil and Political Rights (ICCPR, 1966) to declare indefinite internet shutdowns illegal¹⁶. In order to bring Indian law into compliance with international norms, the 2025 ruling in a Delhi arbitration dispute further highlighted **Vienna Convention on the Law of Treaties (VCLT)** principles for interpreting bilateral investment treaties¹⁷.

These developments highlight how judicial inventiveness shapes international law, as seen by decisions made by the International Criminal Court (ICC) such as **Prosecutor Vs. Akayesu (1998)**, which classified rape as genocide under the Rome Statute (1998). As demonstrated by UN conventions like the Genocide Convention and climate accords, courts promote growing norms by resolving ambiguity through progressive interpretation, striking a balance between sovereignty and global accountability. Although this interaction guarantees the development of international law, it runs the risk of going too far if state assent is not obtained¹⁸.

b. Teleological Interpretation and the Expansion of International Legal Norms

In order to ensure that treaties adapt to modern difficulties, teleological interpretation, which emphasizes the intent and purpose of legal instruments—is essential to the expansion of international legal standards. Codified in **Vienna Convention on the Law of Treaties (VCLT, 1969) Article 31(1)**, it requires interpretation in good faith, taking into account ordinary meaning in context and light of the treaty's objective to prevent absurdity. This strategy, which is based on UN conventions like the VCLT, promotes new norms in environmental law and human rights by enabling the dynamic application of treaties like **the Convention on the Elimination of All Forms of Discrimination Against Women (CEDAW)** and **the International Covenant on Civil and Political Rights (ICCPR)**¹⁹.

Its broad potential is highlighted by contemporary international jurisprudence. In **Venezuela Vs. Council (CJEU, 2021)**, the Court granted standing to third nations using teleological reasoning under **Article 263(4) TFEU**, which is consistent with EU ideals of effective judicial protection and the rule of law as stated in **Articles 2 and 21 TEU**²⁰. In a similar vein, **Front Polisario II (CJEU, 2024)** expanded the definitions of "Legal Person" and "Direct Concern" to uphold **Article 73 of the UN Charter's right to self-determination**, strengthening standards for territorial integrity²⁰. In order to promote openness in IP enforcement, the EU used teleological interpretation of **Article 63 of the TRIPS Agreement** in its 2021 request for information on China's SEP cases, such as **Conversant Vs. Huawei (Chinese Supreme People's Court, 2020)**²¹. In the **2022 Allegations of Genocide (Ukraine Vs. Russia)** case, the International Court of Justice (ICJ) expanded its jurisdiction over duties connected to conflicts by using teleological techniques to the Genocide Convention²².

In order to harmonize local law with international standards, Indian courts include this under **Article 51(c) of the Constitution**. In **Vishaka Vs. State of Rajasthan (1997)**, the Supreme Court expanded gender equality standards by using CEDAW to create criteria for sexual harassment¹⁵. More recently, teleological interpretation of **ICCPR Article 17** strengthened the right to privacy as a basic right in **Justice K.S. Puttaswamy Vs. Union of India (2017)**,

impacting data protection regulations²³. The Rio Declaration's sustainable development concepts were purposefully implemented in **Vellore Citizens Welfare Forum Vs. Union of India (1996)**, supporting environmental jurisprudence. These examples show how norm extension is fueled by teleological interpretation, connecting local and international legislation for advancement²⁴.

c. Precedent and Precedential Constraint

Article 38(1)(d) of the ICJ Statute uses precedent as a supplementary method for establishing norms in judicial interpretation and the evolution of international law; nevertheless, Article 59 restricts its binding power to parties in a case, avoiding rigid stare decisis²⁵. As demonstrated in the **2008 Application of the Convention on the Prevention and Punishment of the Crime of Genocide (Croatia v. Serbia)**, this precedential constraint promotes consistency and predictability while allowing flexibility for emerging norms²⁶. It embodies a "**Weak Horizontal Stare Decisis**" in which the ICJ defer to previous rulings absent compelling reasons, emphasizing non-departure without "**Very Particular Reasons**"²⁶. By requiring states to decrease emissions and give compensation under the **UNFCCC, Paris Agreement, Kyoto Protocol**, and **customary law**, recent ICJ jurisprudence—such as the 2025 Advisory Opinion on climate obligations—sets ethical precedents that bind even non-parties via due diligence²⁷. By using treaties like the **Vienna Convention on the Law of Treaties (VCLT) Articles 31–33**, which provide dynamic interpretation impacted by legal changes, this advances standards on environmental harm²⁸.

According to **Article 51 of the Constitution**, the Supreme Court of India harmoniously incorporates foreign precedents and treaties with domestic law, limiting interpretation to promote standards. Sexual harassment standards that were eventually enacted were influenced by CEDAW and Beijing Conference commitments in **Vishaka Vs. State of Rajasthan (1997)**. The **UDHR, ICCPR**, and **Yogyakarta Principles for transgender rights** were used in recent judgments such as **National Legal Services Authority Vs. Union of India (2014)**¹⁵. The Paris Agreement and ICCPR for climate rights are used in the ongoing **Ridhima Pandey Vs. Union of India (2025)** case, demonstrating precedential usage in the domestic growth of international norms²⁹. These limitations support the development of progressive legislation by striking a balance between national sovereignty and international standards.

d. Fragmentation and Coherence: Judicial Strategies for Managing Normative Pluralism in International Law

Normative pluralism in international law results from the growth of specialized regimes, such as those pertaining to commerce, the environment, human rights, and security. This

fragmentation puts overlapping norms at danger of conflict and incoherence. According to **the Vienna Convention on the Law of Treaties (VCLT, 1969), Article 31(3)(c)**, which requires interpreting treaties in light of pertinent international standards, judicial tactics seek to promote coherence through concepts like systemic integration, *lex specialis*, and *lex posterior*. These strategies to reduce "**Normative Conflicts**" while maintaining regime autonomy are highlighted in the International Law Commission's Report on Fragmentation of International Law, 2006.

This was demonstrated internationally by **the International Court of Justice (ICJ) in Pulp Mills on the River Uruguay (Argentina v. Uruguay)**, which combined environmental standards from the 1975 Statute with the **UN Convention on Biological Diversity**. In the recent case of **Application of the Convention on the Prevention and Punishment of the Crime of Genocide in the Gaza Strip (South Africa v. Israel)**, under Provisional Measures, the ICJ struck a balance between international humanitarian law in accordance with the Geneva Conventions, 12 August 1949, 75 UNTS 31 et seq. In **Ukraine Vs. Russian Federation**, Application of the Convention on the Prevention and Punishment of the Crime of Genocide, Provisional Measures, *jus cogens* was given precedence over self-defense under the UN Charter. In **Al-Dulimi and Montana Management Inc. Vs. Switzerland, No. 5809/08**, the European Court of Human Rights (ECtHR) used similar protection concept to align UN Security Council resolutions with the European Convention on Human Rights³⁰.

According to **Article 51 of the Constitution**, the Supreme Court of India incorporates international standards. In order to address sexual harassment and close domestic disparities, **Vishaka Vs. State of Rajasthan (1997)** integrated CEDAW (1979). Drawing on **the Rio Declaration (1992)**, **Vellore Citizens' Welfare Forum Vs. Union of India (1996)** acknowledged sustainable development as customary law. In the recent case of **Justice K.S. Puttaswamy Vs. Union of India (2017)**, the ICCPR (1966) was used to protect private rights while balancing human rights and national security. These tactics highlight the judiciary's role in changing standards and maintaining consistency in the face of diversity¹⁵.

Non-refoulement under customary international law was recently examined in **Mohammad Salimullah Vs. Union of India, (2021) 4 SCC 694**, but its applicability was rejected. In **Supriyo Vs. Union of India, 2023 SCC OnLine SC 1348**, the Supreme Court cited the Yogyakarta Principles for gay rights, and managing pluralism between domestic law and human rights. These methods demonstrate how important the court is to the development of cohesive norms⁵.

e. Dialogue and Dissonance

In the context of judicial interpretation and the development of international law, "**Dissonance**" refers to disputes resulting from different interpretations, which are frequently based on national sovereignty or contextual differences, while "**Dialogue**" denotes the peaceful interaction between domestic courts and international tribunals, promoting the cogent development of norms. As stated in **Articles 31–33 of the Vienna Convention on the Law of Treaties (VCLT, 1969)**, which require interpretation in good faith while taking object, purpose, and subsequent practice into account, this dynamic is crucial for developing norms. Dialogue is demonstrated by recent ICJ jurisprudence. The Court combined customary international law with treaty obligations in its Advisory Opinion on Obligations of States in Respect of Climate Change (2025), interpreting **the Paris Agreement (2015)** and **the UN Framework Convention on Climate Change (UNFCCC, 1992)** as imposing binding duties to mitigate greenhouse gas emissions³¹. In a similar vein, the International Court of Justice (ICJ) highlighted temporary remedies under **the 1948 Genocide Convention in Application of the Convention on the Prevention and Punishment of the Crime of Genocide (South Africa Vs. Israel, Orders of 26 January 2024 and following)**, encouraging international responsibility³².

This takes place at Supreme Court of India. According to the ruling in **Assessing Officer Vs. Nestle SA (2023)**, **Most Favored Nation (MFN) clauses in tax treaties**, such as **the India-Switzerland Double Taxation Avoidance Agreement (1994)**, must be explicitly notified before they may be activated³³. This is in line with VCLT principles while maintaining procedural autonomy. Dissonance, however, appears in **Cox & Kings Ltd. Vs. SAP India Pvt. Ltd. (2023)**, when the Court deviated from more stringent international perspectives on consent by expanding the "**Group of Companies**" theory in arbitration under the New York Convention (1958)³⁴.

Additionally, the Supreme Court defined jurisdictional boundaries in cross-border arbitration in **Balaji Steel Trade Vs. Fludor Benin SA (2025)**, using the **UNCITRAL Model Law (1985, modified 2006)** but giving Indian procedural rules priority³⁵. Globally, the ITLOS Advisory Opinion No. 31 (2025) on climate change-related maritime pollution upholds UNCLOS (1982) duties and calls for discussion in the face of inconsistent state practices³⁶.

This interaction highlights the necessity of balanced judicial involvement to promote standards like human rights (ICCPR, 1966) and sustainable development (Rio Declaration, 1992), guaranteeing the gradual implementation of international law notwithstanding conflicts.

f. Margin of Appreciation and the Deferral of Normative Standards

The margin of appreciation theory, which ensures proportionality and subsidiarity while deferring normative standards to national authorities, gives nations discretionary freedom in carrying out their international duties. As demonstrated by **the jurisprudence of the European Court of Human Rights (ECtHR) under the European Convention on Human Rights (ECHR, 1950; Protocol No. 15)**, this promotes the development of international law by striking a balance between universal standards and contextual variation.

This is demonstrated by recent ECtHR cases: The Court **found infringement of Art. 8 of ECHR in Verein Klima Seniorinnen Schweiz and Others Vs. Switzerland (App. No. 53600/20)**, narrowing the margin for climate inactivity in the face of new environmental standards³⁷. In a similar vein, **Fedotova and Others Vs. Russia (App. No. 40792/10)** advanced LGBTI rights by limiting respect to same-sex partnerships³⁸.

Internationally, the doctrine influences UN treaties like **the International Covenant on Civil and Political Rights (ICCPR, 1966)**. In **Hertzberg Vs. Finland (Comm. No. 61/1979)**, the Human Rights Committee utilized deference, permitting state discretion on moral criteria under Art. 19 of ICCPR. It is rarely used expressly³⁹.

It is incorporated into proportionality evaluations by Indian courts. The Supreme Court granted legislative latitude on hate speech limitations in **Kaushal Kishor Vs. State of U.P.**, in accordance with the ICCPR and Art. 19 of Constitution of India⁴⁰. Administrative deference was also highlighted in **Modern Dental College Vs. State of MP ((2016) 7 SCC 353)**⁴¹. According to **Articles 31–33 of the Vienna Convention on the Law of Treaties (VCLT, 1969)**, this postponement promotes normative growth and adaptable international standards⁴².

g. Interpretive Communities and the Legitimacy of Judicial Law Making

Stanley Fish introduced the term "**Interpretive Communities**" to describe groupings of jurists that share normative frameworks that influence legal interpretations and the validity of judicial lawmaking in the context of judicial interpretation within international law⁴³. As demonstrated by changing standards under **the Vienna Convention on the Law of Treaties (VCLT, 1969, Arts. 31–33)**, which requires good-faith interpretation taking into account subsequent experience, this legitimacy depends on adherence to democratic ideals and treaty commitments⁴⁴.

Evolutionary interpretation to handle new requirements on genocide prevention is exemplified by recent ICJ rulings such as **Application of the Genocide Convention (Bosnia v. Serbia, 2007; Ukraine v. Russia, 2022)**. In cases like **Vishaka Vs. State of Rajasthan (1997)**, which incorporated CEDAW for gender equality, and **Gayatri Projects Vs. M/s. Sai Krishna Construction (2025)**, which dealt with arbitral modifications under UNCITRAL, the Supreme

Court of India incorporates international norms⁴⁵. At the national level, **Kaushal Kishor Vs. State of UP (2023)** expanded horizontal rights through ICCPR. By coordinating judicial innovation with international agreement and promoting the advancement of international law under UNCLOS and human rights accords, these procedures strengthen legitimacy⁶.

h. Emerging Norms and the Constitutionalization of International Law

The growth of international standards into a hierarchical, quasi-constitutional structure that emphasizes jus cogens norms, erga omnes responsibilities, and institutional responsibility is reflected in the constitutionalization of international law, which is similar to domestic constitutions. Through progressive jurisprudence, emerging standards like sustainable development and climate justice are progressively incorporated into judicial interpretations, promoting the advancement of international law.

This has been promoted internationally in recent instances by the International Court of Justice (ICJ). The Court upheld states' obligations under **the Paris Agreement (2015)** and **the UN Framework Convention on Climate Change (UNFCCC, 1992)** in the 2025 Advisory Opinion on climate obligations (ICJ General List No. 182), treating environmental protection as a developing peremptory norm⁴⁶. The ICJ's 2026 revisions to provisional measures reporting emphasize constitutional-like enforcement and improve adherence to UN Charter Art. 94(2)⁴⁷. As stated in the ILC Draft Conclusions on Peremptory Norms (2022), jus cogens nullifies contradictory treaties under the Vienna Convention on the Law of Treaties (VCLT, 1969, Art. 53)⁴⁸.

International standards have been constitutionally adopted by the Indian Supreme Court. Sustainable development was considered a component of Customary International Law (CIL) in **Vellore Citizens Welfare Forum Vs. Union of India (1996 SCC (4) 647)**, which had an impact on more recent decisions such as the **Punjab State Power Corporation Ltd. Vs. Nabha Power Ltd. (2025)**, where "Change In Law" clauses aligned with international investment treaties and rejected compensation for policy shifts under Bilateral Investment Treaties (BITs)⁴⁹.

Global dispute resolution norms were promoted by the **Avitel Post Studioz Ltd. Vs. HSBC PI Holdings (2024 INSC 242)**, which obligated non-signatories to arbitration under UNCITRAL Model Law (1985)⁵⁰. In contrast to monist views, recent EU judgments (such as 2023 Kadi II) elevate human rights under the International Covenant of Civil and Political Rights (ICCPR, 1966, Art. 14), whereas U.S. cases like **Medellín Vs. Texas (552 U.S. 491, 2008)** restrict self-executing treaties⁵¹.

As seen by changing standards on human rights and arbitration, this judicial interaction constitutionalizes international law by striking a balance between national sovereignty and international norms (UN Charter Art. 103, 1945)⁵².

Conclusion

In conclusion, judicial interpretation continues to play a crucial role in the development of international law by connecting new standards with state responsibilities. In its **2025 Advisory Opinion on Climate Change Obligations**, the ICJ upheld customary standards under UNFCCC (1992) and UNCLOS (1982) by interpreting the Paris Agreement (2015) as **requiring strict due diligence for emissions reduction**. The Court used natural prolongation factors to clarify **continental shelf claims in Nicaragua Vs. Colombia (2023)**. In the domestic case of **Tiger Global International Holdings (2026)**, the Supreme Court of India maintained tax sovereignty under the India-Mauritius DTAA (1982), giving GAAR precedence over treaty advantages. A prime example of treaty-driven standards on marine biodiversity is the BBNJ Agreement's implementation in 2026. In order to promote fair international standards, future jurisprudence must adjust to peremptory rules.

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